United States Department of Agriculture
Forest Service

Shoshone Land Management Plan Revision

Final Environmental Impact Statement

Volume II

Appendix A. Content Analysis Report

Shoshone National Forest, Park, Fremont, Sublette, Teton, and Hot Springs Counties, Wyoming

January 2014

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Shoshone National Forest Land Management Plan Revision
Final Environmental Impact Statement
Park, Fremont, Sublette, Teton, and Hot Springs Counties, Wyoming

Lead Agency:	**USDA Forest Service**
Cooperating Agencies:	**State of Wyoming** **Fremont County Commission** **Hot Springs County Commission** **Park County Commission** **Big Horn County Commission** **Cody Conservation District** **Dubois-Crowheart Conservation District** **Hot Springs Conservation District** **Lower Wind River Natural Resource District** **Meeteetse Conservation District** **Popo Agie Conservation District** **Teton Conservation District**
Responsible Official:	**DANIEL JIRÓN, REGIONAL FORESTER** **Rocky Mountain Region** **740 Simms Street** **Lakewood, Colorado 80401**
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Abstract: This final environmental impact statement (FEIS) documents analysis of seven alternatives developed for programmatic management of the 2.4 million acres administered by the Shoshone National Forest. The Forest Service has identified alternative G as the preferred alternative.

The announcement of the release of the final plan and this final environmental impact statement will be published in the Federal Register. This will be followed by a 60-day objection period. To qualify for

"standing," objections must be linked to a prior substantive comment submitted during opportunities for comment on the proposed decision. Objections will be resolved and/or responded to within 90 days following the 60-day objection period. The Record of Decision for the revised Forest Plan will not be issued until the reviewing officer has responded to the objections.

Appendix A. Content Analysis Report

Introduction

The notice of availability of the Shoshone Land Management Plan Revision DEIS was published in the *Federal Register* on August 3, 2012 (77 FR 46433). The notice of availability began the official 90-day comment period, which ended on November 1, 2012. We received approximately 23,480 responses from individuals, organizations, agencies, and businesses by email or U.S. Post Office. The responses included approximately 22,400 form letter submissions and 1,080 unique extensive and detailed comment letters.

We prepared responses to the public comments, which in some cases resulted in changes to the EIS. Concerns were not determined by majority opinion but rather by the substance of the comments. The content analysis process ensured that every comment was read, analyzed, and considered.

Comment letters that contained references to specific literature citations were reviewed, analyzed, addressed, and the responses to each literature citation are included in the project record.

The lists below include the Table 1 lists the Federal, State and local agencies, elected officials, Tribes, organizations, groups, businesses and individuals that submitted unique comment letters. Some individuals or groups submitted more than one unique letter. Originators of form letter submissions are noted and the content of form letters was considered. Comment letters from individuals that were not signed, or where the commenter's last name was not provided, were considered; however, those incomplete names are not included in this listing.

The following Federal, State and local agencies, elected officials, Tribes, organizations, groups and businesses submitted unique comments:

Abcycles, Bryce Carroll
American Council of Snowmobile Associations, Christine Jourdain
American Rivers, Michael Fiebig
American Whitewater, Kevin Colburn
Backcountry Hunters and Anglers, Holly Endersby
Big Wild Adventures, Marilyn Olsen
Biodiversity Conservation Alliance, Erik Molvar
Californians for Western Wilderness, Michael Painter
Cody Country Chamber of Commerce, Darby Michael
Continental Divide Trail Society, James Wolf
Defenders Of Wildlife, Mike Leahy
Department Of Environmental Quality, John Wagner
Dowco Valve Company, Rob Copenhaver
Elk Creek Ranch, Tina Moore
Fitzgerald's Bicycles, Scott Fitzgerald
Forest Service Employees for Environmental Ethics, Jennifer Fairbrother
Fremont County ATV Association, John Johnson
Greater Yellowstone Coalition, Charles Drimal
Greater Yellowstone Coalition, Thomas Rogers
Guardians of the Range, Kathleen Jachowski
Hot Springs County Planner, Bruce Bowman
Intermountain Forest Association, Tom Troxel
International Mountain Bicycling Association, Jeremy Fancher
Lander Llama Company, Scott Woodruff
Meeteetse Conservation District, Clara Yetter
Meeteetse Museums, Jim Allen

Meeteetse Recreation District, John Fernandez
National Outdoor Leadership School, Aaron Bannon
National Resources Defense Council, Christine Wilcox
North America Pack goat Association, Andrew Irvine
North American Pack goat Association, Charles Jennings
Northwest Wyoming Off Highway Vehicle Alliance, Dana Sander
Northwest Wyoming OHV Alliance, Dennis Nagy
Office of the Governor, Matthew Mead
Outdoor Alliance, Adam Cramer
Park County Historic Preservation Commission, Matt Hall
Powder River Basin-Resource Council, John Fenton
Public Lands Advocacy, Claire Moseley
Roger Sport Center, Dustin and Jenni Rosencranse
Ry Timber, Inc, Edward Regan
Shoshone and Arapaho Tribes Joint Business Council, Earlene Three Irons
Shoshone Back Country Horsemen,
Shoshone Cooperating Agency Coalition,
Sierra Club, WY Chapter, Connie Wilbert
Sierra Club/Shasta Group, Bruce Waggoner
South Dakota Snowmobile Association, Mary Anne Grabow
State Historic Preservation Office, Mary Hopkins
Sunlight Landowner's Association, Marshall Dominick
Teton Mountain Bike Alliance, Mike Lien
The Nature Conservancy, Holly Copeland And Paul Hunker
The Teacher Store
The Wilderness Society, Dan Mccurdy
The Wilderness Society, Vera Smith
The Wilderness Society
Theodore Roosevelt Conservation Partnership,
Trout Unlimited, Cathy Purves
United States Dept of Interior, Robert Stewart
United States Environmental Protection Agency Region 8, Amy Platt
Utah Snowmobile Association, Curtis Kennedy
Western Watersheds Project, Jonathan Ratner
Wild Sheep Foundation, Kevin Hurley
Wind River Front, Tim Hudson
Winter Wildlands Alliance, Forrest Mccarthy
Wyoming Department of Agriculture, Jessica Crowder
Wyoming Department of State Parks and Cultural Resources-State Trails Program, Ron McKinney
Wyoming Game and Fish Department, John Emmerich
Wyoming Legislative Service Office, Matt Obrecht
Wyoming Native Plant Society, Amy Taylor
Wyoming Outdoor Council, Lisa Mcgee
Wyoming Pathways, Tim Young
Wyoming State Forestry Division, Jay Hein
Wyoming State Snowmobile Association, Jeff Moberg
Wyoming Wild Sheep Foundation, Kevin Hurley
Wyoming Wilderness Association, Sara Domek
Wyoming Wildlife Federation, Joy Bannon

The following individuals submitted unique comments on the DEIS:

Les and Sharon Aasheim
Lenice Abbott
Kenneth Able
Dave Abrams
Rick Ackerman
Rick and Sherry Adair
Clay Adams
Frankie Adams
David Agnello
Bonita Albrecht
Matt Alford
Bret and Deanna Allard
Katie Allen
Larry Amundson
Marta Amundson
Jennifer Anders
Richard Anderson
Tom Anderson
Jorge Andromidas
Bill and Joan Arndt
Cindy Arnette
Linda Arnold
Joy Aso
Joe Austin
Anne Austin
Henry Austin
David Bacon
J Bailey
D Baily
Gene Ball
G Barnard
J. Adrian Barnes
Karla Barrell
Jennifer Barrett
Brian Barrett
Laurel Barrett
Ray Barry
Wendy Barteaux
David and Cindy Bartle
Lin Bashford
Diane Bastian
Chris Bates
Harold Bauer
Shanny and Thommy Baughman
Richard Bearzotti
Jessica Beaucin
Terry Beaver
Nick Bedel
Sandy Bell
Mike Bellah
Cam Belter
Wade Bemmels
Kaci Benefield
Susan Benepe
Elaine Bengston
Karen Bennett
Linda Benson
Linda Benson
Ted Beringer
Mark Bertels
Tony Bibeau
Greg Bigler
Paul Bindert
Alexander Bing
Jason Binner
Frank and Karla Bird
Oscar Bird
Donna Bishop
John Bjorkman
Robert Black
Richard Blain
G.D. Blaine
Andrew Blair
Marvin Blakesley
Marvin Blakesley
L Bland
Eric Blankemeier
Elizabeth Blassingham
Auzie Blevins
Mike Blymer
Judi Blymyer
Perry Bongiani
Philip Bongiorno
Lorraine Bonney
Bryce Born
Joni Bosh
Michael Bostick
Tammy Bowers
Joe Boydston
Cynthia Boyhan
Korby Bracken
Joseph Brady
Connie Brakebill
Erin Brandmier
Robert Branscomb
Misti Braun
Kalman Brauner
Jeanne Brenneman
John Brink
Steven Brock
Dave Bromley
T.A. Brooks
Porter Broughton
Barbara Brown
Janet Brown
Kristen Brown
Mary Brutger
James Bryant
Saidi Buher
Brooke Bullinger
Paul and Ann Bumsted
Dave Burke
Perry Burkhart
Matt and Family Burkhart
Virginia Burris
Mary Burton
Joann Butkis
William Butler
Cenie Cafarelli
Lorie Cahn
Deborah Cain
Cheryl Caldwell
Mark Calhoun
Daniel Calhoun
Jackie Canterbury
Pat and Byron Carnahan
Bryce Carroll
Donald Casavant
Steve Caughey
William Champion
Christina Chapman
Diane Chapman
Kathleen Cheatham
Alice Chesly
Saul Chessin
Frances Chilcohe
Martha Christensen
Dee Christensen
Sharon Christensen
Matt Chuch
Jackson Clarendon
Fritz and Jan Clark
Virginia and Darrell Clark

Ryane Clark
Margo Clark
Nancy Clark
Jack Clinton
Mike Close
Michael Cluff
Mary Lou Cohen
Dave Colavito
Nick Colgn
Carl Colonna
Gina Colovich
Susan Colvin
Jennifer Connell
Frank Connelly
Dennis Conniff
Sue Consolo-Murphy
James Cook
Perry Cook
Carlyn Cook
Brian Cook
Holly Copeland
Scott Copeland
Karly Copeland
Rob Copenhaver
Eugenie Copp
Dale Corkill
Stephen Cornell
Donald Cornish
R.H. Corrothers
Jeffrey Counts
David Courtis
Kewdahl Cox
Keith Cozzens
Ryan Crabb
Eva and Peter Crane
Adam Crenshaw
Joe Crutcher
Elaine Dacken
Pam and Eric Dahl
Nate Dahlin
William Daily
Matt Daly
Christopher Daly
Carl Dammann
Richard Dandurand
Kent Daniels
Alan Daniels
Kent Daniels
Anita Daquila
Hannah Darcy-Weisser
Huella Darling
Dale and Teresa David
Robert Davis
Kristen and Tad Davis
Brenda Davis
Alice Deangelis
Zane Debuse
Roger Dehaan
Jane Demayo
Lou Anna Denison
Carol Deno
Mark Deorsay
Helen and Paul Desmarais
Irene Devin
Marybeth Devlin
Johanna Devries
Lewis Diehl
Dennis Dietl
Christopher Dingman
Katrina Dingman
Corey Dinsdale
Wendy Dixon
Nick Dobric
Thomas Dolese
Mark Domek
Callie Domek
John and Lynn Dominick
Jane Dominick
David Dominick
Marshal Dominick
Joyce Donahoe
Gerald Donahue
Steven Donham
Robert Donner
Bradley Douglass
Virginia Dubeis
Ken Dunn
Carol Edwards
Allen Edwards
Amity Eisele
Hilary Eisen
Richard Elkins
H Jo Ellis
Judith Embry
Lamar Empey
Fran Essex
Jody Evans
Russell Ewoldt
Dirk Faegre
Kim Fander
Jay Farfalla
Margie Farias
Bill Farley
Bruce Fauskee
Bruce Fauskee
Barbara Felton
Jon Ferrian
Maybi Filpourih
Vicki Finley
Joanne Fisher
Katrina Fisher
Ric Fisher
John Flannigan
Bob Fleming
Herbert Flower
Bonnie Foley
Keysha Fontaine
Melodie Foos
Gregg Foote
Julie Ford
Russ Foren
David Forssaint
Robert Forster
Genette Foster
Ryan Fourlen
Bayard Fox
Alan Frank
Gretchen Freda
Beau Fredlund
Jason Freeze
Catherine Frischmann
Laurence Fritz
Clay Fulcher
Matt Funk
Vince Furst
Sherrill Futrell
Mary Gadski
John Gallagher
Jackson Gallegos
Barry Gammell
Jessica Garcia-Torres
Martin Garhart
Lydia Garvey
Joann Gaynor
Dorothy Geisler
Monse Geller
Rich Gerow

Marla Gerstue-Wooll
Jonel Geske
Pat Ghidden
Lori Gibson
Ed Giguere
Carolyn Gillette
Rick and Josephine Gilpatrick
Rick and Josephine Gilpatrick
Nicholas Gistaro
Steve Glenn
Jennifer Goe
J. Taylor Goforth
Marcus Goodbody
Serena Gordon
Shelby Gores
Sarah Gorin
Lisa Gosnell
Bud Grace
James Graeter
James Graeter
Fay Graning
Connie Grant-Howell
Dorothy Green
Diana Green
Mark Griffin
Gregory Griffith
Shirley Grimes
Nick Gruneich
Judd Grunzke
Joe Gutkoski
Philip Gyr
Nick H
Dolores Hakes
Tacy Halen
Maurice Hall
Robert Hamborg
Shad Hamilton
Janet Hannel
Erin Hannelly
Deborah Hans
Robert Hanselman
Dennis Hardin
Merlin Hare
Matt Harmon
Brian Harrington
Ronald Harris
Nathan Harris
Shaleas Harrison
Ruthanne Harstad
Donald Hartley
Sydney Hartsuch
Ann Harvey
Ann Harvey
Scotthaskamp
Nick Haskin
Nan Hassey
Karen Hayes
Mary Hays
Bruce Hayse
Pat Headley
Linda Healow
Virginia Hedbrand
Steve and Tina Hefel
Bonnie Heidel
Mitch Helling
Phil Helman
Melissa Helman
Hilary Heminway
Jaclyn Henry
Bernadette Henzi
Thrall Hershberger
Donald Heyneman
Mark and Ardie Hickerson
Laney Hicks
Edwim Higbie
Dan Hilger
Marion Hillard
Edward Hiller
Lois Hiller
Don Hillman
Bern Hinckley
Cory Hinsz
Robert Hitchcock
Robert Hitchcock
Philip Hocker
Carlyle Hodges
Mark Hogan
Elaine and G.W. Hogan
Katie Hogarty
Jay Hojer
Brad Holland
Scott Holloman
Aaron Holton
Sidney Hoopes
Lowell Horan
Jack Houliston
Liz Howell
Clayton Howes
Barbara Hudson
Tim Hudson
Martin Huebner
Don Hundley
Gail Hunt
Sete Hunt
Phil Hutchison
Mollie Iler
Dick Inberg
Judy Inberg
K Inman
Joan Intrator
James Jackson
Sego Jackson
Jeanne Jacobs
Eric Jacobs
Jerry Jayne
Ralph Jenkins
Lisa Jenkins
Judith and Michael Jenkins
Charlie Jennings
Charlie Jennings
Jim
Cindie Jobe
Marcia Johns
Deborah Johnson
John Johnson
Thomas Johnson
Alex Johnson
Thomas Johnston
Robert Johnston
Jim Johnston
Pamela Johnston
Jim Jones
George Jones
Beth Jones
Don Jones
Tj Jones
Lorin Jones
Logan Jones
Valente Jordan
Tommy Jorgensen
George Judson
Rob and Cathy Juno
Peggy Kaestle
Denise Kalakay
Dennis Kaleta

Bruce Kamminga
Randy Kane
David, Elizibeth, Sarah,
Rachel, Joshua, Jacob
Kauffman
Randall Kaufmann
Bonnie Kautz
Tom Keating
Bill Kehler
Bart Kehler
Robert Keiser
Mary Keller
Pamela Kelley
Mike Kelly
Richard Kenyon
Joy Keown
Edward Kershner
Thomas Kiefer
Nancy King
Clifford Kirk
Robert Kizik
Luther and Shirley Kleckner
Charles Klingsporn
Dennis Knight
Bill Knutson
Bart Koehler
Bart Koehler
Patricia and Kenneth Kolm
Betty Kooner
Robert Koppe
Thomas Korytowski
Dorothy Koster
Ira Kowall
Ronald Krafjack
Lisi Krall
Sarah Krall
William Kranse
Joseph Krawiec
William Krogman
Curtis Kruer
Katrina Krupicka Dingman
Elizabeth Krusko
Michael Kulakofsky
Karen Kunz
Juan Laden
Randy Laird
Sussan Lamb
Paul and Carol Lamberger
Donna Lanciotti
Bill and Jill Lander
Mike Langhenry
Josh Larsen
Tony Larson
Jerome Lascola
Grant Law
Jim Laybourn
Sean Leach
Linda Leblang
Mary Ellen Lee
John and Janet Lee
Bryon Lee
Thomas Lee
Jack Lee
Randy Lehman
Jeff Leininger
Patrick Leonard
Richard Leonard
Catherine Leonardi
Jeanne Leske
Arthur Levit
Barry Lewis
Thomas Lewis
Larry Lewis
Larry L'heureux
Ken Lichtendahl
Jason Lillegraven
Karen Linarez
David and Pam Lindahl
Vicki Lindner
Ed Livingston
Matthew Llyod
R Locker
Andy Lockhart
Elizabeth Lockwood
Robert Loftfield
Marilyn Logan
Carolyn Lopez
Doug Lowham
Justin Loyka
Larry Luckinbill
James Luebbers
Tim Lund
Ann Lund
Tyler Lund
Mary Jane Luther
Dorcas Macclintock
Don Macfarlane
Jon and Ginnie Madsen
Fred Maguire
David Maness
Bill Manke
Jon and Marcia Maroon
Jordan Marrou
Rob Marshall
Arnold Martelli
Amy Martens
David Martin
Steve and Jen Martin
Roy Martin
John Martin
Alan Martin
S Martin
Linden Martineau
Carlos Martinez Del Rio
Martha Martinez Del Rio
Mike Maurer
Jim Maves
John Maxwell
Elaine Mcandrews
Karen Mcbee
Carla Mccall
Jacqueline Mccauley
George Mcclelland
Traci Mcclintic
J G Mccue
Nancy Mcdonald
Jazmyn Mcdonald
John Mcdonald
Charles Mcdowell
Sherry Mcfall
John Mcgee
Thomas Mcguire
Colin Mcleod
Lilian Mcmath
Mimi Mcmillen
Sally Mechels
Diane Mehling
Joellen Meier
Craig Meiter
Edwin Mellander
Kathryn Mellander
Char-Lena Meloney
Hugo Melvoin
Armando Menocal
Jessie Crow Merme
J Merrick
Laura Merrill

Gregg Messel
Andy Metzler
Brad Metzler
Patrick Mezzuno
Smith Michele
Wynn Miller
Bert Miller
Jeremy Miller
Tabitha Miller
Neil and Jennifer Miller
Cate Miller
John Millhone
Leigh Mintz
Dee Mirich
Jess and Lisa Mitchell
Vanne Mocilac
Joan Montagne
Robert Moon
Carol Moore
Dave Moore
Chris Moran
Steve Mordt
Robert More
George Mores
Mike Mores
Vic Mosbrucker
Gary Moss
S. David Moss
Michael Mougel
Craig Muderlak
Peter Muldon
Wayne Muller
Zak Munro
Zak Munro
Donna Murphy
Warren Murphy
Ester Murray
Ester Murray
Martha Muth
Randal Mutter
Julia Nania
Anthony Natale
Chuck Neal
Dan and Mary Neher
Lee Nellis
Michael Nerby
Craig Nerone
Randall Neumann
Tom Neumayr
Dot Newton
Dale and Margaret Nichols
Fred Nicol
Glenn Nielson
Leslie Nistico
Itrey Nolarned
Noname
Noname
Keith Norleen
Laura Norman
Florence Norstrom
David Novak
Jeremy Obrien
John and Christine Obyrne
Micaela Occonnor
Bob Ohler
Danny Ohler
Paul Onken
M. E. Oppenheim
Steve Oppermann
Andrea Orabona
Diane Orme
David and Sharon Orphey
John Osgood
Tracy Oullette
Kim Overfield
Barbara Owens
Scott Pace
Spencer Paddock
Ryan Palmer
John Pansewicz
Garth Parish
Sherrie and Daryl Parker
Carol Parkor
Daniel Parshall
Matthew Parsons
R.D. Pascoe
Debra Patla
Susan Patla
J. Nichols Patrick
Joyce Patrick
Wade Patrick
Leslie Pattern
Chister Pauls
Jim Paulsen
Michael Pearlman
Ali Pearson
Dorothy Pearson
Mark Pearson
Katherine Pellow
Karl Pernich
Toddy Perryman
Wayne Person
Leslie Petersen
Nikki Peterson
Chris Peterson
Elaine Phelps
Jeff and Jill Phillips
Julien Phillips
Roger Phillips
Orion Pipersky
Nancy Pitblado
Scott Ploger
Patricia Poletti
Elizabeth Poletti
Doug Pollema
Christina Powers
Kevin Pownell
Don Pownell
Jim Pratt
Penny Preston
James Proctor
Alison Prost
George and Angelina Pryich
Jean Public
Ed Pyle
Justin Quandt
John Raby
Dana Ramos
Julie Rapp
Dallas Rasmussen
Richard Raushenbush
Garth Reber
Family Redford
David Reeves
Dorothy Reichardt
Joseph Reichert
Barry Reiswig
Bill Resor
Linda Reynolds
Gail and John Richardson
Joanne Richter
Catherine Rideler
Hap Ridgway
E. Chester Ridgway
Hap Ridgway
J.R. Riggins
Christian Rinker

Nate Robbins
Shauna Roberts
Shauna Roberts
Robert Robinson
Jeanne Robinson
Shannon Rochelle
Katie Rodgers
Reenie Roe
Evan Roman
Mark Romer
Robin Roscher
Stephen Rose
Robert Rosenberg
Dustin Rosencranse
Jacquelene and Steven Rouff
Mary Rovell
Charles Rowe
Bob Rowen
Victor Rowen
Casie Rowland
Derick Ruchti
Barbara Rugtzke
Charles Rumsey
Mary Rumsey
Charles Rumsey
Charles Rumsey
Richard Rusnak
Richard Rusnak
Tyler Rybicki
Ben Salisbury
Phil Salonek
Al Sammons
Arne Sandberg
Dana Sander
Pam Sanders
Irine Saphra
Greg Sauer
David Saurman
George Sauter
Anne and Jim Schifferle
Kathy and Willie Schilling
Erich Schimps
Michael Schirmer
Kuni Schmerzear
Ryan Schmidt
Lee Schmidt
Rudy Schmiedt
Laura Schneider
Betty Schraer
Dave Schreiber
Andrew Schrum
Kathryn Schultz
Daniel Schurg
Paul Schutt
Duane Schweigert
Zachary Scott
Roger Sebesta
Les Seely
Victoria Seever
Charlene Sehorn
Aaron Seifert
Family Severns
Jason Severns
Sean Sheehan
Sherry Shelley
Matthey Shelley
Judy Shepard
Tom Shephard
Donna Sherwood
Vance Sherwood
Daniel Shively
Fred Shoemaker
Karen Shoemaker
Heather Shop
Sandy Shuptrine
Micah Shuster
Natalie Shuttleworth
David and Uly Silkey
Tony Simek
Terry Simpson
Alan Simpson
Holly Sinclair
Benjamin Sinclair
Katherine Sinclaire
Chad Siroky
Linda Sisco
Lenore Sivuuch
Jerry Skelton
Geoff Skews
Andrew Sleeper
Barb Slovisky
Jerry Smith
Carol and Dave Smith
Patricia Smith
Bryce Smith
Cj Smith
Keith Smith
Jack Smith
Tom Solin
John Spahr
Steven Spencer
Douglas Sphar
Richard Spotts
Carolyn St. James
Patricia Stahler
Jeff Stangler
Duane Stanley
Melissa Stanley
Peter Steele
Larry Steffensmeir
Mark Steinmueller
V. A. Stimac
Louis Stoddard
Jean-Pierre Stoermer
John Stoltenberg
Kristi Stouffer
Jesse Stover
Kathleen Stover
Jason Stowe
Mark Strobel
Sarah Sturges
Arlene Sturm
Rene Suda
Karen Suisse
David Suisse
Roberta Sullivan
Madeline Sutherland-Meier
Dan Swift
Frank Symington
Les and Pat Szewzk
Martha Tate
Jim Taylor
Barbara Taylor
Erica Tenbroek
Neil Thagard
Sydney Thielke
Rebecca Thomas
Darren Thomas
Rebecca Thomas
Renate Thomee
Todd Thompsen
Barbara Thompson
Derek Thompson
Bruce Thompson
Rock and Donna Thums
Nanette Till
Buck Tilton

Joan Timchak
Ellen Tiygstad
Lawrence Todd
Lee Tofelmeyer
Lane Tomme
Kathy Topkins
Leslie Towle
Nancy Traer
Joseph Treanor
Kathleen Treanor
Laurence Treanor
Michael Trewartha
Elizabeth Tronstein
Martha Tunjunit
Thomas Turek
Thomas Turnino
Keith Twombly
Juliet Unfried
James Unger
Ethan Valenstein
Benjamin and Jennifer Valentine
Bob and Sandy Van Deest
Clinton Van Siclen
Michael Van Stone
Dewey Vanderhoff
Marjorie Vanochten
Jeff Vanuga
Joseph Veghts
Robert Vermillion
Barbara Vietti
Sally Vogel
John Vogel
Kathy Vukasovich
Paul Vukmanc
Richard Vullogpio
John Wadsworth
Hygi Waetermans
Mary J Wagner
Kip Wagner
Rebecca Walchli
Jj Walden
Ted Waldron
Noah Waldron
Rebecca Wall
Frank Ward
Jacob Ward
G.A. Warren
Lynne Warts
Warren Watkins
Margaret Webster
Richard Wecker
Richard Wecker
Todd Weeks
Andy Weenig
Thomas Weil
Virginia Weiler
Rc Weimann
Joyce Welbon
Jennifer Wellman
Darren Wells
O. Alan Weltyien
James Wenninger
Terri Wentworth-Davis
Jennifer and Kent Werlin
Sallie Wesaw
Katherine West
Walter Wethenell
Jeff Wethod
Ali Wheeler
Hal Wheeler
Bill Whetstone
Lornie White
Donna Whitham
Brian Whitlock
Kevin Whitmore
Stifler Wiezbenslie
Kim Wilbert
Jost Wilhide
Gail Wilke
Patricia Wilkens
Patricia Wilkens
Bill Willers
Fred Williams
Sharelynn Williams
Tom Williams
Allison Willoughby
Richard Wilson
David Wilson
Sundre Winslow
Elizabeth Winston
Thomas Wise
Debra Wolf
Chad Wolf
Lillian Wolter
Hunter Wood
Jeff Woodard
Kari Wouk
George Wuertherner
B Wyberg
John and Lavinia Ycas
Steve Yenko
Frank Young
Ken Younger
Linda Yow
Zare
James Zeasley
Tina Zenzola
Thomas Zieber
Tom Zimmer
Cristin Zimmer
Thomas Zimmer
James Zubik
L Zwick

Content Analysis Process

All of the comment letters were analyzed using a process called content analysis. The Forest Service followed a systematic process of carefully reading, coding and summarizing all viewpoints and concerns that were submitted. The interdisciplinary team members read the comment letters. Of the approximately 1,080 comment letters that contained unique and substantially different comments, over 6,300 comments were coded, analyzed, and grouped by subject or topic. The most helpful comments were those that were unique, substantially different, and specifically related to the analysis disclosed in the DEIS. When an individual raised multiple concerns within the same letter, each unique comment was coded separately by subject or topic. Table 1 displays the coding structure breakdown of the subject or topic applicable for the comments received on the DEIS.

Table 1: Coding structure used for comments on the DEIS

Category Code	Category Description
100	Proposed Action General
101	Forest-wide Goals and objectives – general
102	Forest-wide Standards and guidelines – general
103	Insufficient Science
104	Beyond the Scope
105	Best Science
150	Management Area 1.1 Wilderness - General
151	Management Area 1.1 Wilderness - Desired Condition
155	Management Area 1.1 Wilderness - Guidelines
156	Management Area 1.1 Wilderness - Standards for the Pristine Wilderness Setting
157	Management Area 1.1 Wilderness - Plan Management Approach
158	Management Area 1.1 Wilderness - More of this Management Area
159	Management Area 1.1 Wilderness - Less of this Management Area
190	Management Area 1.3 – Back country recreation year-round non-motorized - General
191	Management Area 1.3 – Back country recreation year-round non-motorized - Desired Condition
194	Management Area 1.3 – Back country recreation year-round non-motorized - Standards
197	Management Area 1.3 – Back country recreation year-round non-motorized - Management Approach

Category Code	Category Description
198	Management Area 1.3 Back country recreation year-round non-motorized- More of this Management area
199	Management Area 1.3 Back country recreation year-round non-motorized - Less of this Management area
210	Management Area 1.5A – Clarks Fork of the Yellowstone Wild River - General
218	Management Area 1.5A – Clarks Fork of the Yellowstone Wild River- More of this area
230	Management Area 1.6A – High Lakes Wilderness Study Area - General
232	Management Area 1.6A – High Lakes Wilderness Study Area - Goals
250	Management Area 1.6B - Dunoir Special Management Unit - General
270	Management Area 2.2A – Line Creek Plateau Research Natural Area- General
275	Management Area 2.2A – Line Creek Plateau Research Natural Area - Guidelines
290	Management Area 2.3 – Proposed Research Natural Areas - General
294	Management Area 2.3 – Proposed Research Natural Areas - Plan - Standards
310	Management Area 3.1A – Swamp Lake Botanical Area - General
330	Management Area 3.1B – Proposed Little Popo Agie Geological Area - General
335	Management Area 3.1B – Proposed Little Popo Agie Geological Area - Guidelines
350	Management Area 3.1C – Proposed Sawtooth Peatbed Geological Area - General

Category Code	Category Description
370	Management Area 3.3A– Back Country Recreation Year-Round Motorized - General
371	Management Area 3.3A– Back Country Recreation Year-Round Motorized - Desired condition
372	Management Area 3.3A– Back Country Recreation Year-Round Motorized - Goals
377	Management Area 3.3A– Back Country Recreation Year-Round Motorized - Management Approach
378	Management Area 3.3A– Back Country Recreation Year-Round Motorized - More of this area
379	Management Area 3.3A– Back Country Recreation Year-Round Motorized - Less of this area
390	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized -General
392	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized - Goals
394	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized -Standards
397	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized - Management
398	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized - More
399	Management Area 3.3B– Back Country Recreation Summer Non-Motorized With Winter Motorized - Less
410	Management Area 3.3C-Back Country Recreation Summer Motorized with Winter Non-Motorized -General
417	Mgt Area 3.3C– Back Country Recreation Summer Motorized with Winter Non-Motorized -Mgt Approach
418	Mgt Area 3.3C– Back Country Recreation Summer Motorized with Winter Non-Motorized -More of area
419	Mgt Area 3.3C– Back Country Recreation Summer Motorized with Winter Non-Motorized -Less of area

Category Code	Category Description
430	Management Area 3.5– Back Country Recreation and Forest Restoration - General
431	Management Area 3.5– Back Country Recreation and Forest Restoration - Desired Conditions
434	Management Area 3.5– Back Country Recreation and Forest Restoration - Standards
437	Management Area 3.5– Back Country Recreation and Forest Restoration - Mgt Approach
438	Management Area 3.5– Back Country Recreation and Forest Restoration - More of this area
439	Management Area 3.5– Back Country Recreation and Forest Restoration - Less of this area
450	Management Area 3.6A – Continental Divide National Scenic Trail - General
451	Management Area 3.6A – Continental Divide National Scenic Trail - Desired Condition
452	Management Area 3.6A – Continental Divide National Scenic Trail - Goals
453	Management Area 3.6A – Continental Divide National Scenic Trail - Objectives
454	Management Area 3.6A – Continental Divide National Scenic Trail - Standards
455	Management Area 3.6A – Continental Divide National Scenic Trail- Guidelines
457	Management Area 3.6A – Continental Divide National Scenic Trail - Mgt Approach
460	Management Area 3.6A – Continental Divide National Scenic Trail - Monitoring
470	Management Area 3.6B – Nez Perce (Nee-Me-Poo) National Historic Trail - General
490	Management Area 4.2 – Scenic Byways, Scenic Areas, Vistas, and Travel Corridors General
510	Management Area 4.3 – Back Country Access Corridor - General
517	Management Area 4.3 – Back Country Access Corridor - Mgt approach
530	Management Area 4.5A – Proposed Kirwin Historical Area - General

Category Code	Category Description
538	Management Area 4.5A – Proposed Kirwin Historical Area More of area
550	Management Area 5.1 – Managed Forests and Rangelands - General
551	Management Area 5.1 – Managed Forests and Rangelands - Desired condition
558	Management Area 5.1 – Managed Forests and Rangelands - more of this mgt. area
559	Management Area 5.1 – Managed Forests and Rangelands - more of this mgt. area
570	Management Area 5.2 – Public Water Supply – Water Quality Emphasis - General
590	Management Area 5.4 – Managed Big Game Crucial Winter Range - General
591	Management Area 5.4 – Managed Big Game Crucial Winter Range- desired condition
592	Management Area 5.4 – Managed Big Game Crucial Winter Range- Goals
594	Management Area 5.4 – Managed Big Game Crucial Winter Range - Standards
595	Management Area 5.4 – Managed Big Game Crucial Winter Range - Guidelines
597	Management Area 5.4 – Managed Big Game Crucial Winter Range - management approach
598	Management Area 5.4 – Managed Big Game Crucial Winter Range- more of this mgt. area
599	Management Area 5.4 – Managed Big Game Crucial Winter Range- less of this mgt. area
610	Management Area 8.1 – Developed Recreation Areas - General
611	Management Area 8.1 – Developed Recreation Areas - Desired Condition
630	Management Area 8.2 – Ski-Based Resorts - General
650	Management Area 8.6 – Administrative Sites - General
670	Misc. - Attachments
671	Misc. - Incorporate by reference other comments
672	Misc. - Information Requests
673	Misc. - Miscellaneous Comments
674	Misc. - Non-substantive Comments
675	Monitoring - General

Category Code	Category Description
676	Monitoring - Annual monitoring and evaluation report
677	Monitoring - Components of the monitoring strategy
680	Monitoring and Evaluation
700	DEIS Chap 1 - Purpose and need
701	DEIS Chap 1 - Proposed action - general
702	DEIS Chap 1 - Decision Framework - 1982 Planning rule
704	DEIS Chap 1 - Public involvement – general
710	DEIS Chap 1 - Revision Topics – general
711	DEIS Chap 1 - Recreation uses and opportunities
713	DEIS Chap 1 - Vegetation management
716	DEIS Chap 1 - Commercial livestock grazing
730	Other - general
732	Other - Climate change scorecard - general
733	Other - Multiple Use
750	DEIS Chap 2 - Alternatives Considered - General
751	DEIS Chap 2 - Alternative A
752	DEIS Chap 2 - Alternative B
753	DEIS Chap 2 - Alternative C
754	DEIS Chap 2 - Alternative D
755	DEIS Chap 2 - Alternative E
763	DEIS Chap 2 - Exclude human presence in crucial big game winter range
764	DEIS Chap 2 - Add additional special interest areas
765	DEIS Chap 2 - Undesignated Wilderness areas, RNA, SIA
767	DEIS Chap 2 - Pro-recreation
768	DEIS Chap 2 - Changes to travel management
770	DEIS Chap 2 - No oil and gas surface occupancy forest-wide
780	DEIS Chap 2 - New Alternatives
800	DEIS Chapter 3 - affected environment and environmental effects – general
801	DEIS Chapter 3 - Resource protection measures
802	DEIS Chapter 3 Environmental consequences
803	DEIS Chapter 3 Cumulative effects summary table - general

Category Code	Category Description
804	DEIS Chapter 3 Climate change – general
810	Water and Soil - Resource – general
812	Water and Soil - Methodology
813	Water and Soil - Affected environment
814	Water and Soil - Desired condition
815	Water and Soil Direct and indirect effects include general effects
817	Water and Soil Climate change
818	Water and Soil Incomplete and unavailable information
819	Water and Soil Monitoring
831	Water and Soil Desired Condition
832	Water and Soil Goals
833	Water and Soil Objectives
835	Water and Soil Guidelines
836	Water and Soil Management Approach
850	Riparian/Wetlands Resource general
852	Riparian/Wetlands Methodology
853	Riparian/Wetlands Affected Environment
876	Riparian/Wetlands Management Approach
900	Air Quality Resource – general
901	Air Quality Legal and administrative framework
907	Air Quality - Climate change
923	Air Quality - Objectives
950	Vegetation - Resource – general
953	Vegetation - Affected environment (AE)
954	Vegetation - AE -Rangeland
955	Vegetation - AE –Cover types
957	Vegetation - AE - Unique habitats
958	Vegetation -Desired condition
959	Vegetation - Direct and indirect effects
962	Vegetation - DE - Vegetation Structure Components
965	Vegetation - Climate change
966	Vegetation - Incomplete and unavailable information
967	Vegetation - Monitoring
981	Vegetation - Desired Condition
982	Vegetation - Goals
983	Vegetation - Objectives

Category Code	Category Description
984	Vegetation - Standards
985	Vegetation - Guidelines
986	Vegetation - Management Approach
1000	Species Diversity - General
1001	Species Diversity - Terrestrial wildlife
1002	Species Diversity - Legal and administrative framework
1003	Species Diversity - Methodology
1004	Species Diversity - Wildlife Corridors
1010	Threatened endangered proposed candidate species - TES - General
1020	Threatened endangered proposed candidate species - Gray wolf
1030	Threatened endangered proposed candidate species - Canada Lynx
1040	Threatened endangered proposed candidate species - Grizzly bear
1050	Forest Mammals - American marten
1070	Forest Mammals - Northern American Wolverine
1090	Forest Birds - Boreal Owl
1100	Forest Birds - Northern Goshawk
1120	Grassland/Sage Mammals - Rocky Mountain bighorn sheep
1125	Grassland/Sage Mammals Disease
1130	Grassland/Sagebrush Birds - Brewer's sparrow and Sage sparrow
1160	Grassland/Sagebrush Birds - Greater sage-grouse affected
1190	Grassland/Sagebrush Birds - Short-eared owl
1270	Riparian Amphibians - Boreal western toad
1290	Riparian Amphibians - Northern leopard frog
1300	Caves and mines mammals - Fringed myotis
1340	Management Indicator Species (MIS) - Ruffed Grouse
1360	Management Indicator Species (MIS) - Red-breasted nuthatch
1390	Species of local concern - Rocky Mountain elk
1400	Species of local concern - Mule deer
1410	Species of local concern - Moose
1450	Aquatic, Riparian and Fisheries Resources - General

Category Code	Category Description
1452	Aquatic, Riparian and Fisheries Resources - Methodology
1453	Aquatic, Riparian and Fisheries Resources - Affected environment
1454	Aquatic, Riparian and Fisheries Resources - Desired condition
1455	Aquatic, Riparian and Fisheries Resources - Direct and indirect effects
1459	Aquatic, Riparian and Fisheries Resources- Monitoring
1476	Aquatic, Riparian and Fisheries Resources - Management Approach
1500	Rare Plants - Resource – general
1600	Fire and Fuels Management - Resource general
1602	Fire and Fuels Management - Methodology
1604	Fire and Fuels Management - Desired condition
1605	Fire and Fuels Management - Direct and indirect effects
1606	Fire and Fuels Management - Cumulative effects
1607	Fire and Fuels Management - Climate change
1608	Fire and Fuels Management - Incomplete and unavailable information
1626	Fire and Fuels Management - Management Approach
1650	Insects and Disease - Resource General
1652	Insects and Disease - Methodology
1654	Insects and Disease - Desired condition
1656	Insects and Disease - Cumulative effects
1670	Insects and Disease - Background
1677	Insects and Disease - Management Approach
1700	Invasive Species - Resource general
1701	Invasive Species - Legal and administrative framework
1706	Invasive Species - Cumulative effects
1709	Invasive Species - Monitoring
1750	Commercial Livestock Grazing - Resource – general
1751	Commercial Livestock Grazing - Legal and administrative framework
1752	Commercial Livestock Grazing - Methodology

Category Code	Category Description
1753	Commercial Livestock Grazing - Affected environment
1754	Commercial Livestock Grazing - Desired condition
1755	Commercial Livestock Grazing - Direct and indirect effects
1756	Commercial Livestock Grazing - Cumulative effects
1757	Commercial Livestock Grazing - Climate Change
1758	Commercial Livestock Grazing - Incomplete and unavailable information
1759	Commercial Livestock Grazing - Monitoring
1770	Commercial Livestock Grazing - Background
1771	Commercial Livestock Grazing – Desired Condition
1774	Commercial Livestock Grazing - Standards
1776	Commercial Livestock Grazing - Management Approach
1800	Forest Products - Resource General
1802	Forest Products - Methodology
1804	Forest Products - Desired Condition
1820	Forest Products - Background
1821	Forest Products - Desired Condition
1822	Forest Products - Goals
1824	Forest Products
1825	Forest Products - Guidelines
1826	Forest Products - Management Approach
1850	Special Forest Products - Resource General
1872	Special Forest Products - Management Approach
1900	Land (Special Uses) - Resource General
1924	Land (Special Uses) - Standards
1950	Minerals - Resource – general
1951	Minerals - Legal and administrative framework
1952	Minerals - Desired condition
1954	Minerals -
1955	Minerals - Direct and indirect effects
1958	Minerals - Incomplete and unavailable information
1960	Minerals - Monitoring

Category Code	Category Description
1961	Minerals - Oil and Gas Leasing
1982	Minerals - Goals
1983	Minerals - Objectives
1986	Minerals - Management Approach
2000	Roads and Trails - Resource – general
2001	Roads and Trails - Legal and administrative framework
2004	Roads and Trails - Desired condition
2005	Roads and Trails - Direct and indirect effects include general effects
2006	Roads and Trails - Cumulative effects
2021	Roads and Trails - Desired Condition
2022	Roads and Trails - Goals
2023	Roads and Trails - Objectives
2024	Roads and Trails - Standards
2025	Roads and Trails - Guidelines
2050	Recreation - Resource – general
2051	Recreation - Legal and administrative framework
2052	Recreation - Methodology
2053	Recreation - Affected environment
2054	Recreation - Desired condition
2055	Recreation - Direct and indirect effects
2058	Recreation - Incomplete and unavailable information
2059	Recreation - Monitoring
2060	Recreation - OHV
2061	Recreation - Snowmobile
2062	Recreation - Bicycle
2063	Recreation - Noise Pollution
2064	Recreation - Trails
2081	Recreation - Desired Condition
2082	Recreation - Goals
2083	Recreation - Objectives
2084	Recreation - Standards
2085	Recreation - Guidelines
2086	Recreation - Management Approach
2100	Designated Wilderness and Recommended Wilderness - Resource – general
2105	Designated Wilderness and Recommended Wilderness - Direct and indirect effects

Category Code	Category Description
2107	Designated Wilderness and Recommended Wilderness - Climate Change
2125	Designated Wilderness and Recommended Wilderness - Guidelines
2126	Designated Wilderness and Recommended Wilderness - Management Approach
2150	Designated and Eligible Wild and Scenic Rivers - Resource – general
2152	Designated and Eligible Wild and Scenic Rivers - Methodology
2175	Designated and Eligible Wild and Scenic Rivers - Guidelines
2200	Inventoried roadless areas - Resource – general
2202	Inventoried roadless areas - Resource – Methodology
2204	Inventoried roadless areas - Desired condition
2209	Inventoried roadless areas - Monitoring
2250	Research Natural Areas – general
2255	Research Natural Areas – Direct and indirect effects include general effects
2271	Research Natural Areas – Desired Condition
2277	Research Natural Areas - Management Approach
2300	Special Interest Areas
2350	Scenery Resources – general
2373	Scenery Resources - Objectives
2374	Scenery Resources - Standards
2375	Scenery Resources- Guidelines
2400	Heritage Resources – general
2421	Heritage Resources - Desired Condition
2423	Heritage Resources - Objectives
2424	Heritage Resources - Standards
2425	Heritage Resources - Guidelines
2427	Heritage Resources - Public Involvement - general
2450	Social and Economic - Resource – general
2452	Social and Economic - Methodology
2453	Social and Economic - Affected environment
2454	Social and Economic - Desired condition
2455	Social and Economic - Direct and indirect effects include general effects

Category Code	Category Description
2456	Social and Economic - Cumulative effects
2458	Social and Economic - Incomplete and unavailable information
2459	Social and Economic - Monitoring
2477	Social and Economic - Public Involvement - general
2501	Other Required Disclosures - Environmental Justice
2503	Other Required Disclosures -Potential Conflicts with Goals and Objectives of Other Agencies
2600	Appendix A – Public Involvement
2800	Appendix C Evaluated Areas for Potential Wilderness
2806	Appendix C Evaluated Areas for Potential Wilderness Trout Creek 02044

Category Code	Category Description
2813	Appendix C Evaluated Areas for Potential Wilderness Franc's Peak 02051
2814	Appendix C Evaluated Areas for Potential Wilderness Wood River 02052
2819	Appendix C Evaluated Areas for Potential Wilderness Dunoir 02058
2829	Appendix C Evaluated Areas for Potential Wilderness Togwotee Pass 02903
2833	Appendix C Evaluated Areas for Potential Wilderness High Lakes 02915
2900	Appendix D Wild and Scenic River Eligibility Evaluation – general
3000	Appendix E - Maps General
3100	Commercial Livestock Allotment Capable and Suitable Acres and AUMS - general

Once the unique and substantially different comments were coded, concerns raised by different commenters on the same subject and with the same intent and issue were grouped and summarized into public concern statements that capture the essence of those like concerns. We developed over 900 public concern statements from the comments received.

In this way, multiple comments may be addressed by one response. In some cases, more nuanced or complex concerns may be answered through multiple responses to multiple concern statements, or they may have a single response dedicated to just that specific comment. It is important to keep in mind that even though the public concern statements attempt to capture the full range of public issues and concerns, they should be reviewed with the understanding that there is no limitation on who submits comments. Therefore, the comments received do not necessarily represent the sentiments of the public as a whole. Every comment has the same value, whether expressed by many, or by one respondent. Analyzing comments is not a vote-counting process. The Forest Service response to the public comments, which in some cases resulted in changes to the DEIS, was not determined by majority opinion but rather by the substance of the comments. The content analysis process ensured that every comment was read, analyzed, and considered.

Following are the public concern statements pertaining to the Draft Environmental Impact Statement prepared for the Shoshone Land Management Plan Revision. The statements are a summary of similar grouped submitted comments. The full letters are available in the project file at the Shoshone National Forest Office in Cody, Wyoming.

The public concern statements are organized by subject (table 1). If you look for the subject that most closely aligns with your comments, it might be easier for you to find the public concern statement that captures your comment. In some cases, your concerns may be addressed as part of several different, but related public concern statements. The public concern statements and the Forest Service response follow.

Public Concern Statements and Forest Service Response

Subject: 100 - Proposed Action General

Public Concern #1

The Forest Service should keep management approaches for fish and wildlife, recreation, habitat preservation, and energy development consistent with neighboring public lands and agencies using strict conservation measures to preserve the forest's pristine environment for future generations by limiting new road construction and not allowing surface occupancy for gas and oil development.

Response

The revised Forest Plan identifies the need and desire to cooperate with agencies and adjacent landowners. Many comments identified issues with the preferred alternative not matching management on adjoining BLM and State lands, particularly for oil and gas management. Those comments are being addressed between draft and final. The modified preferred alternative will include changes to make management more consistent as appropriate.

Public Concern #2

The Forest Service should address Endangered Species Act Issues through the Section 7 consultation process. The following should be addressed in the final Plan: (1) The Forest should create additional wilderness areas. (2) Protection of lower elevation zones. (3) Better measures to protect wildlife and natural resources. (4) Better back-country management. (5) Recognize management needs for future generations. (6) On page 12, Vision, paragraph 5, modify sentence one as follows: "Forested ecosystems ... while providing habitat for viable populations ... species." Sentence two should be modified as follows: "Sensitive species are stable ... toward recovery. "(6) Define management actions and management activities. (7) Should other state and federal planning and management efforts cumulatively affecting the region including the BLM's Big Horn Basin Resource Management Plan. (7) On page 230, change the citation for conservation agreement to Montana Fish Wildlife and Parks 2010.

Response

We will consult with Fish and Wildlife Service on the final decision.

Alternatives C and D provide more wilderness and less development in back country areas. The decision maker will consider the public comments requesting less management in these areas in addition to other public comments in making the final decision.

The vision statement provides the overarching picture of the plan. Its current wording provides that picture. The language about increasing sensitive species is a key concept. Where possible, we want sensitive species to reach to a point where they are no longer sensitive.

We will add definitions for management actions and management activities in the glossary. Other State and Federal agency plans are considered in the EIS analysis. That analysis is not directly addressed in the revised Forest Plan, because the plan addresses management for National Forest System lands. The plan does discuss other plans in the Preface.

We will verify the citation for the Yellowstone cutthroat trout conservation agreement.

Public Concern #14

The Forest Service should consider consistent management across the ecosystem and work with Yellowstone National Park, BLM, State Lands to manage the area the same especially along the Absaroka-Beartooth Front with BLM and Wyoming Game and Fish Dept.

Response

See Public Concern (PC) #1

Public Concern #22

The Forest Service should consider focusing on multiple use and not wilderness which will allow for more options for forest management.

Response

Multiple use is part of the mission of the Forest Service. The alternatives analyzed have a wide range of both recommended wilderness allocation and allocation to other multiple uses. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 101 - Forest-wide Goals and Objectives – General

Public Concern #3

The Forest Service should make the best efforts to maintain the wild legacy and heritage of the Shoshone, preserving the wild and scenic environment and rich and diverse wildlife for future generations through conservation of resources and research protection programs. The Forest should make conservation and wildness a focus with a reduction in motorized use areas, which will help preserve the quite solitude of the back-country experience.

Response

The recreation opportunity spectrum setting is an indicator of the development level and character of a landscape. Back country landscapes are predominately in the primitive and semi-primitive end of the spectrum. We analyzed differences in the percentages of acres in these two settings. These ranged from a low of 66 percent in alternative F to a high of 87 percent in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #4

The Forest Service should ensure the forest follows the direction of the National Forest Management Act and Multiple-Use Sustained-Yield Act to provide and plan for multiple-use of the forest which include a level of commerce including timber harvesting and management of outdoor recreation and range resources, in addition to the management of wildlife and resource conservation.

Response

We prepared the forest plan under the guidance of the National Forest Management Act and Multiple-Use Sustained-Yield Act. The plan provides guidance for a range of uses including timber products, recreation, and livestock grazing among others. The plan also contains direction to protect soil and water, in addition to wildlife and other resources.

Public Concern #5

The Forest Service should consider the following in the Draft Land Management Plan (DLMP): (1) Public water supply and big game crucial range are currently not placed in a Management Area that does not protect these resources as discussed in the Management Area direction and should be protected. (2) The plan should recognize the importance of not allowing fires to burn natural resources. (3) A more appropriately balanced desired condition should state: "Front country areas provide a wide range of recreation opportunities for motorized and non- motorized recreation in a natural setting." (4) Forest planers should prioritize an emphasis on recreation planning and management that protects economic interests of the community. (5)The Plan should increase some of its Forest-wide direction language as it is currently lacking in specifics in the discussions of how activities will be conducted and monitored, sensitive species and management indicator species, water and soil, minerals, roads and trails, and the ensuing potential impacts these activities have on fish and wildlife, air quality, and water quality. (6) The Plan should ensure that adequate Objectives and Standards are consistent throughout the Land Management Plan. (7) On page 53 of the DLMP the guideline recommendations to oil and gas and wind energy development should be referenced in other sections of the document addressing wildlife and energy development, not just sensitive species. (8) On page 93 of the DLMP, Scenery, guidelines the final LMP needs to describe whether wind energy of winder turbines were considered within the scenery section. (9) On pages 40-42, Chapter 1, Forest-wide direction, additional quantifiable Objectives tied to other species should be included and Standards should be more species specific and quantifiable. (10) On pages 48-49, Chapter 1, Forest-wide direction, the plan should ensure that all Standards have quantifiable language and Standard 6 should provide an example or definition of "authorized use" as stated in "Do not allow recreational pack goat use in core native bighorn sheep ranges, except for authorized use." (11) Under Goals, page 90: Goal 1 add "…..while not compromising the integrity of important wildlife habitats" to the end of the sentence. (12) Under Standards, page 90, add a second quantifiable Standard addressing the maintenance of habitat integrity through the use of HE/HS analyses and thresholds. Under Management Approach, page 91 add, "…… which do not compromise the integrity of wildlife habitat" to the end of the following sentence, "Forest recreation management focuses on community and visitor interests, new as well as traditional recreational activities, and year round enjoyment of outdoor recreation on the Shoshone." (13) Page 191, the Goal is stated as a statement of fact, not a goal with any accompanying Objectives and should be corrected. (14) An updated Forest Inventory and Analysis should be completed since the last one completed was in 1999. (15) On page 13, Need for Change, the Forest should address the impacts of "changes" to wildlife and wildlife habitat. (16) The final LMP should be more specific in nature and provide a more comprehensive and consistent use of Standards and Guidelines. (17) The final LMP should contain less detail and micro- management and produce a generalized guide that addresses public comments and recommendations. (18) DLMP, Chapter 1 – Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #8, p. 43, wording should be changed to "Inside the Primary Conservation Area, the agency will always work with livestock grazing permittees to resolve conflicts and/or change management on cattle allotments or portions of cattle allotments with recurring grizzly bear conflicts. If conflicts cannot be resolved, livestock management will follow the Conservation Strategy" to add clarity to the statement that protect the interests of public land ranchers. (19) More attention should be given to the documented trends and their impacts towards the future needs of the forest in the final Plan.

Response

- Management Area 5.2 is assigned to the municipal watershed for the City of Lander. The management area emphasizes the protection of water quality including special direction for the management of fire. The City of Lander requested that the area be assigned to a management area that allowed the full array of multiple-use activities. Though management area direction allows activities such as timber harvest and motorized recreation, they will be conducted in a way that protects water quality.

Management Area 5.4 is assigned to manage big game crucial winter range. Though management area direction allows activities such as timber harvest and motorized recreation, they will be conducted in a way that provides for sufficient forage to maintain big game herd objectives. We have clarified the wording of the livestock grazing standard.

- Fire is a natural component of the forest ecosystem. The plan includes direction that allows fire to play a natural role on the forest. In the cases of unique or valuable resources, there are areas where the plan favors other resources over fire. Examples include infrastructure, suitable timber lands, and the sawtooth peatbeds.
- We agree, the suggested language would improve the desired condition. We added a variation of the suggested language.
- The forest plan supports a wide range of recreation opportunities, all of which provide support to local economies.

(5, 6, 9, 13, 16) The plan includes direction for protecting all resources including water and wildlife. The plan describes out comes and does not specify how that outcome should be achieved. The decision on how something is achieved is made during project planning. Not all direction that protects wildlife is found in the wildlife section. For example, direction for protecting aquatic habitats is captured by the water standard that requires use of the Watershed Practices Handbook and direction in the vegetation section protects key habitat components for wildlife. Each of the plan components of Desired Condition, Goals, Objectives, Standards, and Guidelines are used to provide different types of plan direction. There is no requirement that each component needs to occur for each resource area. Rather the requirement is that the combined components across all the resources provide the direction that is needed.

(7) The guidance on page 53 is specific to wildlife and is referenced in the correct place. There is no need to list the guidance in multiple places. The plan direction is implemented in its entirety not resource by resource.

(8) The large facilities reference in the scenery section would include wind turbines, as well as other infrastructure that is not listed.

(10) Authorized use is use for which a valid permit is issued.

(11, 12) Such qualifiers and additional direction could be added for all direction throughout the plan. The plan is implemented in its entirety. Direction on protecting wildlife is elsewhere in the plan.

(14) Forest inventory analysis (FIA) is done on a schedule that is independent of Forest Plan Revision schedules. There is no opportunity to complete a new FIA inventory at this time. The mapped vegetation inventory for the forest has been updated and is used throughout the analysis.

(15) The changes in wildlife habitat are encompassed by the vegetation management need for change topic.

(17) We agree this is the basis of the revised plan. Thank you for the comment.

(18) We agree that the plan should clearly tie to the Conservation Strategy Language. The plan contains additional direction that is tied to the Biological Opinion for Livestock Grazing on the Forest. We will work between draft and final to improve the clarity on where the direction is from in this section.

(19) The EIS does address trends, particularly in how it examines the changes that have occurred in the life of the existing plan. The plan is for the next 10 to 15 years; the current analysis of changes should be adequate for deciding how to manage the plan during that time period.

Public Concern #6

The Forest Service should consider all suggestions, recommendations, and comments equally towards forest management and not be swayed by any specific special interest group.

Response

The decision maker will consider the full range of public comments and will outline the rationale for the decision in the Record of Decision.

Public Concern #7

The Forest Service should make the following change to the DEIS, page 81: the "Effects from Mineral and Energy Development" portion is vague and doesn't include phosphate mining or wind energy development.

Response

The discussion is commensurate with the level of activity that is occurring on the Shoshone. There is little historic mining on the Shoshone and none is currently ongoing or anticipated. There is also no current or anticipated wind energy development.

Public Concern #279

The Forest Service should provide the specifics necessary for proper management for the goals, objectives, and standards of guidelines beginning on page 25 of the draft plan. The plan should correctly implement the management emphasis of the various DFCs, currently different species are treated the same in terms of conflicts in DFCs that have a wildlife emphasis as opposed to those with a resource extraction emphasis.

Response

The plan describes outcomes and does not specify how an outcome should be achieved. Site-specific analyses will address activities proposed to meet or move toward desired conditions. The management approach sections clarify how plan direction may be applied (e.g., for water and soil see pages 26 to 27). The decision on how something is achieved is made during project planning.

Management of wildlife species, such as grizzly bear, is provided in the Forest-wide direction.

Subject: 102 - Forest-wide Standards and Guidelines – General

Public Concern #8

The Forest Service should rehabilitate all disturbances from allowed developments, follow Standards 5 and 6 for sensitive species, and ensure that guidelines are followed as directed in FSM 2621.2 or FSM 2672.

Response

The forest plan contains direction to mitigate disturbances to soil and water resources from management activities. The biological evaluation and biological assessment address sensitive speces and threatened and endangered species as directed by Forest Service Manual. The analysis from those documents is incorporated in the EIS. Plant collection permits are handled from the regional office according to manual direction and are not specifically addressed in the forest plan.

Public Concern #9

The Forest Service should consider the following changes to the Draft Management Plan (DLMP): (1) on page 55, an additional Standard should be included stating, "Stating effective surveys will be utilized to track or index management indicator species in order to adequately assess the impacts of forest management activities. (2)Clarify the statement "The revision will follow transition language of the current planning regulations published in the Federal Register on April 9, 2012 (36 CFR 219.17(b)(3)), which allow use of the provisions of a previous version of the regulations published in 1982…Only the parts of the 1982 version about preparation or revision of forest plans is applicable" to make sure it is compliant with National Forest Management Act.

Response

1. Monitoring requirements for the plan are contained in chapter 3 of the Plan, not in the standards and guidelines section.
2. The current planning regulations finalized in 2012 have transition procedures that allow use of the prior planning regulation, including its transition procedures. (36 CFR 219.18(b)(3)) In turn, that prior planning regulation, finalized in 2000, had transition procedures that permitted the use of the 1982 version of the regulations for completing plan procedures. (36 CFR 219.35(b) 2000 version) However, other portions of the 1982 version (regional planning, project planning) were eliminated by the 2000 version (see appendix B to 36 CFR 219.35 2000 version). So only the portions of the 1982 version that address forest plan revisions or amendments are still in effect through the transition procedures of the current regulations.

The commenter is correct all the substantive provisions, requirements, and protections of the 1982 version of the regulations must be included, but only those related to doing a forest plan revision, and not regional planning or project planning.

Public Concern #10

The Forest Service should include the following in each Alternative to ensure that there is adequate balance between economic factors and wildlife habitat protection: (1) Better big game habitat information that includes specific protection measures. (2) Reclamation guidelines defined and updated. (3) Recreation be considered as a strong use, both in terms of economic and social impacts as other diverse uses on the Forest.

Response

By design, the alternatives provide varying balances of resources by responding to the issues differently. Alternatives C and D provide greater protection for big game winter range than alternatives E and F. They also emphasize non-motorized recreation more. While Alternatives E and F have a greater emphasis on motorized recreation. All alternatives contain watershed conservation practices that protect soil and water resources.

Subject: 103 - Insufficient Science

Public Concern #11

The Forest Service should not consider blanket statements such as "a managed is good and an unmanaged forest is bad" as they are unscientific as well as the idea of continued old growth elimination as current data has shown that old growth stands are a rare and valuable resource.

Response

Managed and unmanaged are not inherently good or bad when describing effects. For some management areas, forest plan direction is trying to produce desired conditions that do not occur naturally. On those

lands, the only way to meet desired conditions is to manage the forest. An example would be the desire to reduce fuel loadings adjacent to infrastructure to reduce the risk from fire. The forest plan contains direction to maintain mature forests across the landscape. The large amount of unmanaged land on the Shoshone has many acres of mature forest.

Subject: 104 - Beyond the Scope

Public Concern #12

The Forest Service should consider keeping hunting and fishing privileges as they are except for trophy and out of state hunting/fishing.

Response

Hunting and fishing regulations are determined by the Wyoming Game and Fish Commission and are outside the scope of this project.

Public Concern #16

The Forest Service should consider deferring wildlife management as long as state works to keep animals protected but must assert its authority to protect animals when other agencies will not along with have Game and Fish justify wildlife closures, remapping the Canadian lynx habitat with the re-tooled habitat model developed by the USFWS and reconsidered the forest being occupied, and, modifying the forest's wolf management plan.

Response

Hunting (including gray wolves) and fishing regulations are determined by the Wyoming Game and Fish Commission and are outside the scope of this project.

Lynx habitat was modeled in 2000, following direction in the Lynx Conservation Assessment and Strategy, and is displayed in the biological assessment.

Public Concern #17

The Forest Service should consider prioritizing local contractors for forest work and let the local public decide how to run the forest and not tourist input.

Response

The decision on what contractors use to implement plan direction is not decided in the revised Forest Plan. Procurement direction and law govern contractor selection which is beyond the scope of the revised Forest Plan analysis. The Shoshone is established for all people in the nation and not exclusively for local publics. All comments are considered in developing management direction. Local publics generally provide very useful comments, because they tend to be more site-specific.

Subject: 105 - Best Science

Public Concern #18

The Forest Service should consider using best and most current science for sustaining fish and wildlife as well as energy. This should include using most updated monitoring and mitigation measures, using the most current published science, create a science review team, possibly use third party review, and incorporate process that allows all new information science to be used as it comes out.

Response

We used current science in developing forest plan direction. Many commenters identified additional science for us to consider. We reviewed submitted literature and incorporated it where appropriate into plan development and the analysis.

Subject: 150 - Management Area 1.1 Wilderness - General

Public Concern #19

The Forest Service should consider allowing physical geocaches throughout the entire Shoshone National Forest. Geocaching is increasing in popularity and common standards are that the geocaches cannot be placed closer than .25 miles apart, except in multi-cache areas, where they will not be within .1 mile of each other. Power trails are only allowed in areas that already have defined trails and roadways.

Response

Physical geocaching is allowed under a special use permit to occur in all areas outside of designated wilderness. It has been determined that in designated wilderness, a physical geocache is a structure that is not needed for the administration of wilderness, and thus, will not be authorized.

Public Concern #20

The Forest Service should consider discussing and revising their Ten-Year Wilderness Stewardship Challenge that pertains to wilderness management. In this revision, specific management targets should be highlighted, along with how the Forest Service plans on achieving those goals. It is important for the Forest Service to ensure that the scores are consistent with what is actually happening in the area.

Response

The Wilderness Ten-Year Challenge is a national initiative that culminates in 2014, and as such, is not appropriate for inclusion in a forest plan. Wilderness management targets are addressed in the plan through the identified desired conditions, goals, objectives, and standards and guidelines for Management Area 1.1.

Public Concern #21

The Forest Service should strive to maintain the Shoshone's wild character through a critical examination of the proposed group size limits and strategies they use to meet their educational missing such as 'Leave No Trace' camping practices. Limiting group sizes in the wilderness will significantly impact NOLS [National Outdoor Leadership School] operation and the students' experiences.

Response

No group size limits are proposed in the revised Forest Plan. A limit on group size is one of many possible management tools listed in the management approach section for Management Area 1.1.

Any change to current group size limits would be analyzed site-specifically and are beyond the plan revision process.

Subject: 151 - Management Area 1.1 Wilderness - Desired Condition

Public Concern #23

The Forest Plan should clearly state their educational mission with outfitters, guides, and their clients, and use a rating matric to evaluate and prioritize major issues threatening the integrity of the Shoshone's wilderness areas. This should include face-to-face training that is fully refreshed every year. The

following sentence should be added to the Desired Conditions, "Education and recreation are recognized as fundamental purposes of Wilderness as identified in the Wilderness Act of 1964 (Section 4(b))."

Response

Major issues and educational needs facing designated wilderness areas are addressed in site-specific education plans and Information Needs Assessments that are produced for each wilderness area and are not a section within forest plans. Education and recreational activities are covered in the desired conditions through the statement "Forest management strategies support recreational and educational activities when in alignment with the preservation of wilderness character."

Subject: 155 - Management Area 1.1 Wilderness - Guidelines

Public Concern #24

The Forest Service should consider eliminating the Recreation Opportunity Spectrum from their analysis as Section 504 of the Wyoming Wilderness Act of 1984 prohibits buffer zones surrounding wilderness areas. Rather, the Forest Service should be proactive in managing motorized trespassing into wilderness areas through winter trail maps, improved signage, and enforcement. A guideline should be added requiring (not suggestion) signs be planned in problematic areas. Current problematic areas on the Shoshone National Forest are around (1) Absaroka-Beartooth; (2) North Absaroka; (3) Teton; (4) Washakie; and (5) Fitzpatrick Wilderness areas.

Response

The revised Forest Plan and the EIS do not create buffers or perimeters around existing wilderness. Activities outside of designated or recommended wilderness are governed by the management area designation of that area. Effects to wilderness are measured by how any particular project or planning effort modifies the wilderness character of a wilderness area.

The requirement for disclosing environmental effects to designated wilderness stems from the National Environmental Policy Act (NEPA) of 1969. A 1-mile zone adjacent to wilderness was analyzed for its recreation opportunity spectrum setting to compare the effects to wilderness of the different alternatives. This effect measurement indicator will be reassessed and a new one may be used between draft and final.

A guideline is already in place addressing wilderness boundary signing at problem areas. Management Area 1.1 land adjustment guideline states that "wilderness boundary posting should be maintained at recurring wilderness trespass locations and along motorized routes immediately adjacent to the wilderness."

Subject: 156 - Management Area 1.1 Wilderness - Standards for the Pristine Wilderness Setting

Public Concern #25

The Forest Service should manage the Fitzpatrick Wilderness as "pristine" rather than "primitive" because the official monitoring protocols suggest that the wilderness conditions in the Southern Fitzpatrick Wilderness are violating the wilderness non-degradation policy set forth in the area's assigned wilderness setting of "pristine." Wilderness management area description maps should be included in the plan revision.

Response

The desired condition and mapping for both primitive and pristine wilderness settings in the Fitzpatrick Wilderness Area are based on our desired management direction for that acre of wilderness. Standards

and guidelines are in place in Management Area 1.1 of the plan that addresses maintenance of wilderness character in both primitive and pristine settings. Management action if a standard or guideline is exceeded is a site-specific action and is beyond the scope of the plan revision.

Subject: 157 - Management Area 1.1 Wilderness - Plan Management Approach

Public Concern #26

The Forest Service should ensure that until Congress officially designates an area as wilderness, all existing recreational uses continue to be allowed for the Recommended Wilderness areas, unless they threaten the wilderness character. Furthermore, non-wilderness activities that can be seen or heard from zones that buffer any wilderness area should be allowed to exist according to Section 504 of The Wyoming Wilderness Act.

Response

Some existing recreational uses within any recommended wilderness would be affected if an area was recommended. Motorized uses for both summer and winter would be prohibited in recommend wilderness areas and mechanized would be restricted to system roads and trails. The revised Forest Plan and the EIS do not create buffers or perimeters around existing wilderness. Nor do they suggest precluding non-wilderness activities in areas immediately adjacent to wilderness simply because the area is immediately adjacent to wilderness.

Subject: 158 - Management Area 1.1 Wilderness - More of this Management Area

Public Concern #27

The Forest Service should consider designating all of the recommended wilderness areas for official wilderness status. Areas that are recommended for wilderness should not be dropped from recommendation in most cases, but preserved for their pristine qualities that got them the recommended status. There is significant national and public support for designating all qualifying areas for wilderness designations and increasing the number of special interest areas.

Response

Thirty-four areas on the Shoshone were evaluated for potential wilderness. Various alternatives were analyzed, including a range of recommended wilderness from 628,800 acres in alternative C to 194,500 acres in alternative D and 0 acres in alternatives B, E, F and G. Potential areas not recommended for wilderness were allocated to other management prescriptions. Alternative F allocates the most acreage of potential wilderness to management prescriptions that allow activities that may impact the potential for wilderness, followed by alternatives E and A that allocate the second highest, and alternatives B, D and G, which allocate the third highest. An alternative was considered that included recommending all areas evaluated for wilderness. The wilderness evaluation included in appendix C was reviewed and updated between draft and final EIS to clarify the needs analysis. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #28

The Forest Service should consider designating all of the past and present recommended wilderness areas and maintaining all wildernesses to preserve them for future generations. No oil/gas development, no surface occupancy, no timber production, year-round non-motorized recreation, and no new roads or

trails will all aid in preserving the areas wildlife including within climate change, vegetation communities, big game winter ranges, seclusion, and watershed.

Response

See PC #27.

Subject: 159 - Management Area 1.1 Wilderness - Less of this Management Area

Public Concern #29

The Forest Service should not designate any additional wilderness areas. SCAC, MCD, WSSA, and the oil and gas industries all oppose any wilderness additions. A blanket policy of immediately removing all vehicle use would create a "de-facto wilderness" area without Congressional approval. With 80% of the Shoshone National Forest open to only non- motorized uses, the other 20% should be left open to motorized vehicles to include Jeeps, ATV's, and other forms of mechanized travel. This leaves a small, disproportionate amount open for multiple use and limits options for active forest management.

Response

Thirty-four areas on the Shoshone were evaluated for potential wilderness. Various alternatives were analyzed, including a range of recommended wilderness from 628,800 acres in alternative C to 194,500 acres in alternative D and 0 acres in alternatives B, E, F and G. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #30

The Forest Service should not make any new wilderness designations as they will constrain the livelihoods of the surrounding communities. Wilderness designations exclude the young, old, disabled, and anyone else who is incapable of travelling on foot or is not financially, physically, of poor health, or without horses, to have an equal opportunity to enjoy the forest.

Response

See PC #29.

Subject: 190 - Management Area 1.3 – Back country recreation year-round non-motorized - General

Public Concern #31

The Forest Service should consider making much of the forest M.A. 1.3 year round non- motorized including Clay Butte, Gilbert Creek, Sunlight Basin; Gravel Bar, Beem Gulch, Huff Gulch, and Sheridan Pass. This should be done to stop illegal off trail abuse, protect wildlife and wilderness, and maintain the area for hikers, climbers, equestrians, and other leave-no- trace and low impact uses for future generations.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C, and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #32

The Forest Service should consider making the following changes to M.A. 1.3: 1- change the area of Deacon Meadows and Ramshorn Basin from management area 1.3 to 3.3A to maintain consistency with 1986 forest plan and currently allows semi-primitive motorized use; 2- Cross- country travel by over-snow vehicles should continue to be allowed in 1.3 management areas unless there are parcel-specific justifications to warrant specific closures.

Response

Management area boundaries were reviewed between draft and final, and were corrected or adjusted where appropriate. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 191 - Management Area 1.3 – Back country recreation year-round non-motorized – Desired conditions

Public Concern #33

The Forest Service should consider maintaining existing year-round non-motorized management areas

Response

See PC #31.

Subject: 194 - Management Area 1.3 – Back country recreation year-round non-motorized - Standards

Public Concern #34

The Forest Service should consider having language that refers to trail management standards as provided by the National Trail Classification System, FSM 2350, and FSH 2309.18 as identified in the Federal Register/Vol. 71, No. 127/Monday, July 3, 2006.

Response

FSM 2350 and FSH 2309.18 will be added under the other guidance section for roads and trails.

Public Concern #35

The Forest Service should support standard 1 and guideline 1 on page 138.

Response

Standard 1 and guideline 1 are included in all action alternatives.

Subject: 197 - Management Area 1.3 – Back country recreation year-round non-motorized – Management approach

Public Concern #36

The Forest Service should consider changing the following items away from M.A. 1.3: 1-Phelps Mountain Management Area to 3.5 to allow for 13 miles of historic motorized trails; 2-Kirwin and Timber Creek Trail to 3.5 since they are historical motorized trails; 3- Historical Trails 602, 603, 605, 626, and 627 with 100 foot buffer to 3.5 or 3.3C to keep them available for any future changes to Grizzly Bear PCA requirement; 4- Jack Creek, Phelps Mountain Area, Deer Creek Trailhead and Kirwin Area to 3.5 to

create a OHV linked trail system; 5- areas not currently in inventoried roadless areas should be changed from 1.3.

Response

See PC #32.

Public Concern #37

The Forest Service should consider making the following changes: 1-adding Little Popo Agie Canyon area to M.A. 1.3 since it is a popular destination for non-motorized use,2-no temporary should be built in any overlapping inventoried roadless areas for any reason; 3-no surface occupancy should be added to all non-motorized areas.

Response

1. See PC #32.
2. Roads construction in inventoried roadless follows the Roadless Area Conservation Rule. Roads construction and reconstruction are prohibited except in some very limited situations.
3. Table 113 lists surface occupancy suitability by alternative. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 198 - Management Area 1.3 Back country recreation year-round non-motorized – More of this

Public Concern #38

The Forest Service should consider increasing M.A. 1.3 including all 684,800 acres of roadless areas, two areas along the steep terrain of the Beartooth Mountain Front, Trout Creek, Wood River, Franc's Peak and Deep lake roadless areas, Dick Creek Lakes area, Two Ocean Peak, Wiggins Fork/Double Cabin road east to the reservation boundary, the south of Moon Lake jeep trail to Fitzpatrick Wilderness Area, West and South of Shoshone Lake to Popo Agie Wilderness Area, Little Popo Agie Canyon area, Beem Gulch, and Gravelbar drainages in Sunlight Basin, Bald Ridge, Pat O'Hare Mountain, Sheridan Pass, and Togwotee Pass. This should be done to increase solitude, protect wildlife, wilderness, watershed, and fisheries, scenic, protect archaeological sites, and help economy of those that rely on non-motorized recreation, and illegal ATV use and ATV damage.

Response

Various alternatives for the MA 1.3 allocation were analyzed from a maximum of 455,554 acres in alternative A to a minimum of 106,890 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 199 - Management Area 1.3 Back country recreation year-round non-motorized – Less of this

Public Concern #39

The Forest Service should consider having less area closed to motorized recreation including Two Ocean Mountain, Togwotee Pass, Brooks Lake, Ramshorn Basin, and Deacon Meadows. This should be done since motorized recreation is a big part of what the public uses on the forest and help economy of those in motorized recreation business.

Response

See PC #31.

Subject: 210 - Management Area 1.5A – Clarks Fork of the Yellowstone Wild River - General

Public Concern #40

The Forest Service should continue with this management area as outlined in Alternative D, and should mention in this area of the plan that the lower segment of Clarks Fork River already has wild and scenic river designation.

Response

All action alternatives (B, C, D, E, F, and newly developed G) protect the designated 20.5-mile section of the Clarks Fork; the first sentence of the management area theme notes that "In 1990, the Clarks Fork Wild and Scenic River Designation Act designated the 20.5-mile segment of the Clarks Fork of the Yellowstone River to be included in the National Wild and Scenic Rivers System." Under alternative C, portions of the 20.5-mile National Wild and Scenic River-Desingated segment would be portected under MA 1.2.

Subject: 218 - Management Area 1.5A – Clarks Fork of the Yellowstone Wild River- More of this

Public Concern #41

The Forest Service should consider increasing management in this area by prohibiting livestock grazing within 50 feet of the river, and managing this area as a biological corridor between core protected areas, Beartooth Plateau and the Absaroka/Yellowstone regions.

Response

The plan includes standards and guidelines that protect the outstandingly remarkable values for which it was designated including a guideline that grazing operating plans include measures to protect these values. Management standards and guidelines do not preclude this management area from serving as a biological corridor. Corridor connectivity is mentioned on page 29 under vegetative management and also in goal #3 on page 55 under management indicator.

Subject: 230 - Management Area 1.6A – High Lakes Wilderness Study Area - General

Public Concern #42

The Forest Service should consider not designating High Lakes Wilderness Study Area as wilderness and should continue to allow snowmobiling in this area. The area on Beartooth Plateau provides valuable off trail snowmobiling experiences that should be continued.

Response

Only alternative C recommends the High Lakes Wilderness Study Area as wilderness. The balance of the alternatives include MA 1.6A direction that allows semi-primitive motorized use in the winter. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #43

The Forest Service should consider designating High Lakes a Wilderness Study Area in the final Forest Plan. This area is home to Beartooth Plateau, many alpine lakes, is within the grizzly bear primary conservation area, includes area in the Lynx Analysis Area 1, and is home of the Beartooth wolfpack. This area should prohibit motorized recreation, and should have no surface occupancy for oil and gas development.

Response

High Lakes is a Wilderness Study Area. In compliance with the enabling legislation, summer motorized use is prohibited and winter motorized is allowed to the extent and degree that occurred when the area was designated. No surface occupancy for oil and gas is authorized in this management area.

Public Concern #44

The Forest Service should consider completing the statute required mapping of the High Lakes Wilderness Study Area to include the geographical map boundaries and legal description of this area.

Response

Direction has been included in the plan that will lead to the creation of the legal description.

Public Concern #45

The Forest Service should consider clarifying actual dates when summer versus winter recreation can occur in the Shoshone National Forest as various management areas seem to contradict each other. In addition, snowmobiling should be closed in this area after the Beartooth Highway is opened for motorized wheel traffic as it is dangerous to have the snowmobilers present with the skiers and snowboarders.

Response

1. Summer versus winter recreation dates are a site-specific decision made in travel management and may change from area to area based on resource concerns.
2. Closure of the Beartooth Plateau to snowmobiles once the road is open for wheeled traffic is a site-specific travel management decision outside the scope of the revised Forest Plan.

Subject: 232 - Management Area 1.6A – High Lakes Wilderness Study Area - Goals

Public Concern #46

The Forest Service should consider describing how it is meeting the federal statute from the Wyoming Wilderness Act in 1984 which stated that snowmobile use could continue in "the same manner and degree as was occurring prior to the enactment of the Wyoming Wilderness Act of 1984." The Forest Service has not monitored snowmobiling rates, and snowmobile use has increased dramatically and gone unregulated during this time.

Response

The plan includes direction to monitor snowmobile use in High Lakes Wilderness Study Area to determine the current manner and degree of use that is occurring in the area. This information will be used in a separate environmental analysis that will be conducted as part of travel management to determine what site-specific changes need to be made to address the language in the Wyoming Wilderness Act (1984).

Subject: 250 - Management Area 1.6B - Dunoir Special Management Unit - General

Public Concern #47

The Forest service should consider designating this area as wilderness as described in Alternative D and include the bordering roadless areas (Dunoir, East, West, and South). The pristine wilderness found in this area should be kept intact and timber harvest, road creation, oil/gas development, mountain biking, and motorized recreation should all be prohibited. As a significant amount of dispersed snowmobiling is currently occurring, and a designation of wilderness would change boundaries, improved and increased signage and forest user education should be implemented. However, snowmobile access to Trail H (access to Austin Peak) should remain open, but with clear trail markers. This area is a critical habitat for the grizzly bear, elk, wolves and lynx. This area also contains one heritage site that is an important historical paleontological resource.

Response

Alternative D does not recommend this area for wilderness. Alternative C recommends Dunoir, East, West, and South for wilderness designation. In compliance with the enabling legislation, winter motorized will no longer be allowed in the designated area. The deciding officer will consider the various options for this management area along with other comments during the decision process.

Public Concern #48

The Forest Service should consider not designating this area as wilderness. This area was set aside in the 1972 and 1984 plans and was dropped from wilderness designation by Congress both times. This area should be kept open for multiple uses, including bicycles, and should be managed as a back country non-motorized area.

Response

Alternatives C and D recommend this area for wilderness designation. The balance of the alternatives do not include this area for wilderness designation. The deciding officer will consider the various options for this management area along with other comments during the decision process.

Public Concern #49

The Forest Service should consider completing the statute required mapping of the Dunoir Special Management Unit to include the geographical map boundaries and legal description of this area.

Response

For the preferred alternative, an objective related to the mapping of the Dunoir Special Management Unit has been included in the revised Forest Plan.

Public Concern #50

The Forest Service should consider developing the Dunoir Special Management Area. This area would be non-motorized and would help in protecting the natural beauty of the area. Increased and improved signage is needed to educate forest users about boundaries and recreation opportunities.

Response

All action alternatives provide for non-motorized recreational access. Increased and improved signage is beyond the scope of the revised Forest Plan.

Subject: 270 - Management Area 2.2A – Line Creek Plateau Research Natural Area - General

Public Concern #51

The Forest Service should consider recommending this area as a Research Natural Area and possible wilderness designation. This area includes habitats not present in other areas of the Shoshone National Forest and should be closed to oil and gas leases.

Response

Line Creek Research Natural Area (RNA) is an existing RNA and current designation is maintained in all proposed alternatives. RNAs are not managed as wilderness, but under management prescription 2.2a. No surface occupancy for development of oil and gas is allowed.

Subject: 275 - Management Area 2.2A – Line Creek Plateau Research Natural Area - Guidelines

Public Concern #52

The Forest Service should reword this guideline to state that stocking will continue to be allowed in streams and lakes, so that it is consistent with the management approach found on page 54.

Response

Fish-stocking guidelines in the Line Creek RNA are outlined in the 2000 Line Creek RNA Environmental Assessment and decision memo. Fish stocking will be allowed only in lakes stocked prior to RNA designation.

Public Concern #53

The Forest Service should consider clarifying Guideline #14 in this section. The Desired Conditions state that the area will allow non-motorized recreation in the summer, and motorized and non-motorized in the winter. However, the guideline only discusses semi- primitive non-motorized. The final plan should reflect that motorized recreation opportunities are permitted during the winter as to continue to allow snowmobile use in this area.

Response

The direction in Guideline #14 only refers to wheeled motorized recreation on designated routes. Winter motorized activity on snow is not addressed in the context of recreation opportunity spectrum. That direction is covered in the suitability section of the plan. Over-snow winter motorized use is allowed in this area.

Subject: 290 - Management Area 2.3 – Proposed Research Natural Areas - General

Public Concern #54

The Forest Service should consider designating the eight Research Natural Areas that were identified. Bald Ridge and Pat O'Hara areas should also be included for their biodiversity, ecological and archeological areas, and wildlife and sensitive species populations that has been identified in the Wyoming Natural Diversity Database. These areas should not be open to motorized recreation of any kind and not managed as back country recreation.

Response

The proposed RNAs are represented in the range of alternatives. Alternatives C, D, and G include the Bald Ridge and Pat O'Hara areas. The decision maker will take your comments and the comments of others into consideration.

Public Concern #55

The Forest Service should clarify how many Research Natural Areas are being proposed. The theme states that six areas are being proposed, but the setting states that there are eight being proposed.

Response

The setting noted there were eight potential RNAs. Alternatives propose varying numbers of RNAs. Alternative B proposed six RNAs. Eight RNAs are proposed in alternatives C, D, and G. Edits will be made to the summary of the analysis of the management situation in the forest plan.

Public Concern #56

The Forest Service should not designate Beartooth Butte as a Research Natural Area if the area would then be closed to off-trail snowmobiling. Clarification is needed between Guideline 5 which states that semi-primitive non-motorized with over-snow motorized is allowed to occur where already occurring. Page 504 on SEIS states over-snow motorized recreation can occur only on designated trails, page 506 states that existing trails will stay open but motorized use would be prohibited in Beartooth Butte, and page 540 states that motorized use is prohibited in RNAs that are outside of wilderness designation. The Beartooth Butte area that is outside of the wilderness designation should be classified as back country winter motorized or as a travel corridor.

Response

Winter motorized issues in the proposed Beartooth Butte RNA will be addressed by the decision maker. Alternative G includes a modified boundary of the Beartooth Butte area for consideration.

Public Concern #57

The Forest Service should manage Beartooth Pass as a summer, non-motorized recreation area that prohibits snowmobiles in order to make the area safer for skiing.

Response

Various alternatives were analyzed concerning winter motorized use allocations. These ranged from a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 294 - Management Area 2.3 – Proposed Research Natural Areas - Plan - Standards

Public Concern #896

The Forest Service should include road and trail related standards to prohibit new roads, trails and facilities within MA 2.3.

Response

The suitable uses table in chapter 2 of the revised Forest Plan indicates that motorized roads and trails are not allowed in MA 2.3.

Subject: 310 - Management Area 3.1A – Swamp Lake Botanical Area - General

Public Concern #58

The Forest Service should be aware that a fence was put up last year along the northern boundary of this area, and it implies that it is private land. Gates should be established along this fence line to encourage access to this area.

Response

Thank you for bringing this fencing concern to our attention. This site-specific issue is outside the scope of the scope of the revised Forest Plan analysis.

Public Concern #59

The Forest Service should consider designating the Swamp Lake Botanical Area as a Special Interest Area in order to continue its research and science missions.

Response

Swamp Lake Special Interest Area is considered in the range of alternatives presented in the revised Forest Plan.

Subject: 330 - Management Area 3.1B – Proposed Little Popo Agie Geological Area - General

Public Concern #61

The Forest Service should consider designating the Little Popo Agie as a Special Interest Area because of its importance to the plant and animal communities.

Response

The Little Popo Agie Special Interest Area is considered for designation in alternatives B, C, D, and G, as discussed in the range of alternatives presented in the EIS.

Subject: 335 - Management Area 3.1B – Proposed Little Popo Agie Geological Area - Guidelines

Public Concern #62

The Forest Service should change the wording under Guideline 8 from "semi-primitive" to "semi-primitive motorized."

Response

The wording for Guideline 8 has been clarified in the final documents.

Subject: 350 - Management Area 3.1C – Proposed Sawtooth Peatbed Geological Area - General

Public Concern #63

The Forest Service should consider designating the Sawtooth Peatbed Geological Area as a Special Interest Area in order to continue its research and science missions, and should incorporate guidelines that state this area is not available for mineral leasing and a stipulation for no surface occupancy.

Response

The Sawtooth Peatbeds Geological Area is considered for designation in alternatives B, D, and G, as discussed in the range of alternatives presented in the EIS. Standards for management of area 3.1C include that the area is not suitable for surface development of oil and gas resources. The guideline for recreation in alternative G was modified to manage for an adopted recreation opportunity spectrum class of non-motorized.

Public Concern #64

The Forest Service should consider revising the following items in regards to the Sawtooth Peatbed Geological Area. (1) When discussing the RNA, change wilderness to non-motorized designated areas so the recreation opportunities will not change. (2) Reduce the 577 acres to 377 acres, and designate the 200 acres from the North ridge and East ridge down to the Morrison Jeep Trail as back country access corridor.

Response

We developed a new boundary for consideration in alternative G. The decision maker will take your comments and those of others into consideration.

Subject: 370 - Management Area 3.3A – Back Country Recreation Year-Round Motorized - General

Public Concern #65

The Forest Service should not expand motorized use areas from the current levels, especially in the North Fork and South Fork areas as it appears to violate the Shoshone National Forest's commitment to strive for sustainable consumption strategies. The current limited vehicle use on Bald Ridge should be eliminated.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #66

The Forest Service should make the following changes to the Land Management Plan: (1) The goals listed on page 164 should be expanded to include changes in commercial and educational group sizes and stress flexibility based on size, purpose, and impact upon resource. (2) Under Standards add "…existing System road reconstruction…" to Standard 2, page 164 to clarify that if a non-system road exists in this management area that is within the 1 mile guideline, it could be reconstructed as long as it was restored upon completion of the project. (3) Clarify the difference in acres allocated to the management area that were changed from 185,936 to 64,243, and if the 121,693 acre difference remain in motorized use. (4) Under Recreation, Guideline 2, the statement "some trails may be restricted to non- motorized use" should be removed since 3.3A should be for true motorized use areas.

Response

Group sizes for educational and commercial use are not within the scope of plan revision; they are handled site-specifically during the process of issuing a special use permit. Unclassified user-created routes that the commenter is calling non-system roads could be available for use as temporary roads, and

as such, would then be subject to the guideline on temporary roads. Therefore, no additional guideline is needed on non-system roads. While there is a difference in management area 3.3A acres between alternatives A and B, the total acres available for motorized use does not change significantly between alternatives A and B. Management area 3.3A in the setting provides for both motorized and non-motorized recreation opportunities. Thus, the recreation guideline that "some trails may be restricted to non-motorized use" as motorized and non-motorized uses may be separated to provide a safe experience and it is an appropriate guideline that will be retained.

Public Concern #67

The Forest Service should not close any additional lands to year-round motorized recreation as currently only a small portion of the forest is open to year-round motorized use.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process. See also response to PC #270 regarding travel management planning.

Subject: 371 - Management Area 3.3A – Back Country Recreation Year-Round Motorized – Desired condition

Public Concern #68

The Forest Service should make a change under Desired Conditions to state that motorized recreation should be given a clear and distinct preference over non-motorized uses in all 3.3A managed areas since Management Area 3.3A should provide a true backcountry motorized experience for its users.

Response

The wording was originally part of a section that applied to the entire forest. It was removed from this management area and moved to the Forest-wide management approach under roads and trails.

Subject: 372 - Management Area 3.3A – Back Country Recreation Year-Round Motorized - Goals

Public Concern #69

While the Goals stated for Management Area 3.3 are clear and appropriate, the Forest Service should clarify how designating separate non-motorized areas in a year-round motorized area will fit in with these goals as currently they are contradictory and do not meet the desired conditions of the management area.

Response

The desired condition as written articulates our management intent. The preference for motorized use is indicated in the first goal for the management area which is to "Provide year-round motorized recreation opportunities."

Subject: 377 - Management Area 3.3A – Back Country Recreation Year-Round Motorized – Management approach

Public Concern #70

The Forest Service should make the following changes to the Management Plan: (1) Management Areas 3.3A Back Country Recreation Year-Round Motorized-Theme on page 163, include the following changes: "back country motorized recreation areas are managed to provide recreation opportunities on trails in a natural appearing landscape while emphasizing the use of vegetation management activities to enhance vegetation diversity." (2) There is a specific area of concern by the WWWA of MA 3.3A in the Ramshorn Lakes/Amoretti Park area, south and east of Dickinson Park area and in the Christina Lake area for prescriptions as outlined in Alternative B.

Response

(1) We feel that the addition of the statement "while emphasizing the use of vegetation management activities to enhance vegetation diversity" to the theme of the management area would change the intent. Vegetation management direction is adequately addressed under the setting description and guideline #1.

(2) See PC #32 regarding MA 3.3A mapping.

Public Concern #71

The Forest Service should not allow snowmobiling in any big game winter range areas in Management Area 3.3A to protect wintering wildlife. The Forest should ensure that there is no road construction within Management Area 3.3A as specified in the Land Management Plan, especially in areas that overlap with inventoried roadless areas.

Response

(1) Snowmobiling in 3.3A and other management areas was worked out in partnership with the Wyoming Game and Fish Department based on crucial winter range coverages.

- Standard #2 for MA 3.3A states that "Road construction or reconstruction will only be authorized to honor existing rights." Road construction in inventoried roadless follows the Roadless Area Conservation Rule. Road construction and reconstruction is prohibited except in some very limited situations.

Subject: 378 - Management Area 3.3A – Back Country Recreation Year-Round Motorized – More of this

Public Concern #72

The Forest Service should increase or maintain current year-round motorized areas, not decrease the amount of acres as currently 80% of the forest is designated Wilderness or other roadless areas and avoid crowding and increased resource damage by cramming motorized use into smaller areas and provide access to the forest for those who are unable to due to physical condition. Designated trail routes through existing wildlife ranges should remain with the creation of trails if new winter ranges are created. Togwotee Pass and Brooks Lake should be kept open for winter motorized use.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of

103,000 acres in alternative C. Existing trails through winter range remain in all alternatives.The deciding officer will consider the various options along with other comments during the decision process.

Subject: 379 - Management Area 3.3A – Back Country Recreation Year-Round Motorized – Less of this

Public Concern #73

The Forest Service should decrease the amount of the forest currently opened to year-round motorized recreational use, create no new motorized trails, limit motorized vehicle use, and keep the following areas non-motorized: Little Pop Agie Canyon area, Wiggins Fork, Double Cabin area, Sunlight, Dead Indian, Elk Creek, Beem Gulch, Huff Gulch, Gravelbar, Company Creek, Trail Creek, Lodgepole Creek, Crandall area, and Ed Young Basin to reduce noise, illegally created trails, and protect wildlife and pristine environments.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. Projected motorized trail miles vary also by alternative from 32 miles in alternatives A and C to a high of 92 miles in alternative F. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #74

The Forest Service should consider changing the area north of the Christina Lake Road and back to the wilderness boundary and the area south of the Moon Lake Jeep Trail including the north aspect and west ridge of Union Peak to MA 1.3 or MA 3.3B to restrict motorized vehicles, as it is an excellent summer moose habitat and ensure that non-motorized recreation is not disturbed by motorized traffic.

Response

See response PC #32 regarding boundary adjustments.

Subject: 390 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized - General

Public Concern #75

The Forest Service should consider increasing the areas to management area 3.3B as much as possible for summer non-motorized and increased demand for winter motorized.

Response

Various alternatives and acreages of management area 3.3B were analyzed from a high of 86,413 acres in alternative B to a low of 3,157 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 392 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized - Goals

Public Concern #77

The Forest Service should consider adding a goal to reduce unauthorized motorized travel.

Response

Reducing unauthorized motorized travel is a broader issue than just associated with Management Area 3.3B. As such, it is addressed on a Forest-wide basis in the roads and trails section through a goal of "Resource impacts from use of unauthorized motorized routes are eliminated, along with the unauthorized route." See also response to PC #270 regarding travel management planning.

Subject: 394 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized - Standards

Public Concern #78

The Forest Service should consider adding existing System road reconstruction… to Standard 2 (page 166) to clarify that if a non-system road exists in this management area it could be reconstructed as long as it was restored upon completion of the project.

Response

Non-system roads could be available for use as temporary roads, and as such, would then be subject to the guideline on temporary roads. Thus, no additional guideline is needed for non-system roads.

Subject: 397 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized – Management approach

Public Concern #79

The Forest Service should consider the following: 1- not allowing winter motorized use in big game winter range that is within M.A. 3.3B since big game crucial winter ranges are sensitive and crucial to the survival of these species and [2] not allow any road construction in any inventoried roadless areas that overlap with M.A. 3.3B.

Response

(1) See response to PC #71 item 1. (2) See response to PC #37 item 2.

Subject: 398 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized – More of this

Public Concern #80

The Forest Service should consider having much area open to winter motorized use and not closing any areas to take away varying recreational options.

Response

Various alternatives were analyzed concerning motorized winter use allocations. These ranged from a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. Existing trails through winter range remain in all alternatives. See also response to PC #270 regarding travel management planning. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #81

The Forest Service should consider adding the following to M.A. 3.3B: 1- area immediately north and east of Morrison Road; 2- East Fork of the Wind River area east of Dubois.

Response

See response to PC #32.

Subject: 399 - Management Area 3.3B – Back Country Recreation Summer Non-Motorized with Winter Motorized – Less of this

Public Concern #82

The Forest Service should consider not having winter motorized travel especially Two Ocean Mountain and Sublette Pass for the benefit of cross country skiers and snow-shoe users.

Response

In the various alternatives two options for the Two Ocean area were analyzed. Alternatives A, B, E, and F would kept this area open to all uses, and alternatives C and D would close the area to winter motorized use. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 410 - Management Area 3.3C - Back Country Recreation Summer Motorized with Winter Non-Motorized - General

Public Concern #84

The Forest Service should address the following concerns in regards to skier and snowmobile user interactions within the Two Ocean, Togwotee Pass and other multiuse areas: (1) Potential for physical conflicts between the two user groups. (2) High marking puts a stress on the snowpack along steep slopes, which can create avalanche hazards for skiers. (3) Snowmobile tracks harden and are snowed over creating safety hazards for skiers. (4) There is too much traffic in these corridors during weekends, which increase the likelihood of collisions between skiers and snowmobiles.

Response

See response to PC #82.

Public Concern #85

The Forest Service should make the following changes to the Land Management Plan: (1) Add "…existing System road reconstruction…" to Standard 2 to clarify that a non-system road could be reconstructed as long as it was restored upon project completion. (2) Provide a map of the winter motorized recreation area within the Dunoir.

Response

Non-system roads could be available for use as temporary roads and as such would then be subject to the guideline on temporary roads thus no additional guideline is needed on non- system roads. All of the Dunoir management area is proposed to be closed to winter motorized use to be consistent with the enabling legislation. No further map is needed as a management area map is included in the document.

Public Concern #86

The Forest Service should not designate the areas west of Sinks Canyon to Shoshone Lake and to north of Cyclone Pass as Winter Non-Motorized since it would create an area which has historically been used by backcountry snowmobilers and is not easily accessible my non- motorized users and make much of the area inaccessible to the public.

Response

See response to PC #80.

Public Concern #87

The Forest Service should not close the Two Ocean Mountain area to snowmobiles as proposed in Alternatives C and D and leave it open to multiple winter recreation uses.

Response

See response to PC #82.

Subject: 417 - Management Area 3.3C – Back Country Recreation Summer Motorized with Winter Non-Motorized – Management approach

Public Concern #88

The Forest Service should make the following changes to the Land Management Plan: (1) On page 167, under Management Area 3.3C –Back country recreation summer motorized with winter non-motorized – Theme include the following changes: "Back country recreation areas are managed to provide back country recreation opportunities in a natural appearing landscape while emphasizing the use of vegetation management activities to enhance vegetation diversity." (2) Changing Historic Trails 602, 603, 605, 626, and 627 from MA 1.3 to MA 3.3C or MA3.5 to ensure that motorized travel options will be available for the future.

Response

We feel that the addition of the statement "while emphasizing the use of vegetation management activities to enhance vegetation diversity" to the theme of the management area would change the intent. Vegetation management direction is adequately addressed under the setting description and guideline #1.

Within the Grizzly Bear Primary Conservation Area (PCA), generally, management areas 3.A, 3.3C, 3.5A, and 3.5C are not used. The revised Forest Plan does not encourage expansion of motorized use within the PCA, because of the existing secure habitat direction.

Public Concern #89

The Forest Should clarify how road management is to be planned when inventoried roadless areas overlap with backcountry year-round non-motorized, backcountry year-round motorized, backcountry summer non-motorized, and backcountry summer motorized. The Forest should clarify the following in MA 3.3C: (1) Page 4, Map 6: MA 3.3C and 3.5 prescriptions in the Carter Mountain Area. (2) Page 7, Map 6: MA 3.3C in the East Fork Area. (3) Page 8, Map 6: MA 3.3C in the Shoshone Lake/Cyclone Pass/Pete's Lake area.

Response

The desired conditions and management approach in both inventoried roadless areas and Management Area 3.3C articulate how road management is planned. Under the inventoried roadless section it states that desired conditions for inventoried roadless is guided by the desired conditions of the underlying management area. Under the management approach for inventoried roadless it states "The management approach for inventoried roadless is generally guided by the management area to which the individual roadless area is allocated. Management direction is sometimes more restrictive than the direction in the Roadless Area Conservation Rule. In other cases, the specific direction is less restrictive. In those cases, the roadless rule direction is followed. For MA 3.3C (1-3) see response to PC #32. See also response to PC #270 regarding travel management planning.

Subject: 418 - Management Area 3.3C – Back Country Recreation Summer Motorized with Winter Non-Motorized – More of this

Public Concern #90

The Forest Service should establish more quality terrain, winter non-motorized areas, especially Togwotee Pass, Two Ocean Peak, Brooks Peak area, Breccia Peaks, and Beartooth Pass as it provides easy access for non-motorized use and the current multiuse of the areas make it difficult for skiers to have a peaceful recreational experience as well as pose a potential safety hazard. The Woody Creek Trail just south of Cooke City should also be managed as winter non-motorized for safety reasons.

Response

Various alternatives for winter non-motorized use (MA 3.3C) were analyzed from a low of 4,563 acres in alternative F to a maximum of 98,030 acres in alternative E. The deciding officer will consider the various options along with other comments during the decision process. See also response to PC #82.

Subject: 419 - Management Area 3.3C – Back Country Recreation Summer Motorized with Winter Non-Motorized – Less of this

Public Concern #91

The Forest Service should consider keeping open all areas that are currently open to winter motorized use including snowmobiling. This should include all roadless areas, Togwotee Pass, Brooks Lake, High Lakes Study Area, Two Ocean Mountain, Beartooths, Brecciae Cliffs, Sublet Pass, Jade Lakes, Austin Peak, Bonneville Meadows, Jules Bowl, Area west of Sinks Canyon: Shoshone Lake and to north of Cyclone Pass. Perhaps switch area designations to 3.3B.

Response

See response to PC #80.

Public Concern #92

The Forest Service should consider not expanding any ATV and snowmobile areas including unofficial expansion and focus more on patrolling to keep the unofficial expansion from occurring since there are enough motorized trails. The Forest Service should perhaps consider perhaps switching to 3.3B in alternatives C and D and keep areas open to just non-motorized use.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. Projected motorized trail miles vary also by alternative from 32 miles in alternatives A and C to a high of 92 miles in alternative F. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 430 - Management Area 3.5 – Back Country Recreation and Forest Restoration - General

Public Concern #93

The Forest Service should clarify why Beem Gulch, Huff Gulch and Sulfur Lake are included in Management Area 3.5. Currently Huff Gulch and Sulfur Lake have access only through private property and Beem Gulch is steep, heavily forested and not suitable for motorized use.

Response

These areas were allocated to management area 3.5, because they are within inventoried roadless that has previously been managed. The desired condition in the plan is to manage the vegetation in these areas consistent with the Roadless Rule. The modified preferred alternative will include direction that clearly states how motorized public recreation will be managed in management area 3.5.

Public Concern #94

The Forest Service should add to the description of MA 3.5 that motorized trail construction, maintenance, and use is allowed of existing routes even in roadless areas. The Forest should also verify that motorized vehicle use conforms to the Comprehensive Plan and not allow any additional motorized routes and focus solely on vegetative treatment to prevent any impact to wildlife or the environment.

Response

The suitable uses discussion for recreation opportunities, roads, and trails in the beginning of chapter 2 of the revised Forest Plan indicates the motorized trails are permitted n MA 3.5 and that they can be maintained. Additional road construction in inventoried roadless is generally not allowed under the Roadless Rule, so there will be no further road construction in MA 3.5. The key component of the desired condition for MA 3.5 is to manage the vegetation in these areas consistent with the Roadless Rule.

Public Concern #95

The Forest Service should make the following changes to the Land Management Plan: (1) Under Desired Conditions include the following additional language in the 2nd sentence of the first paragraph (underlined): Snowmobiling is not allowed in big game winter range areas except in areas of existing snowmobile routes and play areas. (2) Under Desired Conditions include the following additional language in the fourth paragraph (underlined): Improvements to enhance recreation opportunities may include parking areas and informational, interpretive, motorized trail construction, motorized trail development, motorized trail maintenance, and directional signs, but improvements are minimal. (3) Update Standard 2 to state that there is an exception for over-the-snow vehicles.

Response

Management area 3.5 is being subdivided into motorized and non-motorized areas to clarify what areas allow motorized activity and what areas do not allow motorized areas. The associated plan direction will be clarified.

Public Concern #897

The Forest Service should change the theme of MA 3.5 to emphasis a desire to restore impaired forest elements and processes so that natural processes from herein out dominate. Additional goals should be added to promote aquatic connectivity, diminish fragmentation by obliterating unneeded roads and tracks, remove invasive species and enable natural processes including those at the landscape scale such as fire, floods, and predation.

Response

The decision maker will consider the public comments requesting additional management goals. Management area 3.5 is being subdivided into motorized and non-motorized areas so that it is clear what areas allow motorized activity and what areas do not allow motorized areas. The associated plan direction will be clarified.

See also responses to PCs #95 and #96.

Subject: 431 - Management Area 3.5 – Back Country Recreation and Forest Restoration – Desired condition

Public Concern #96

The Forest Service should consider making the following changes to 3.5 Desired Conditions: 1- increasing the acreage of Management Area 3.5 to be consistent with the need for additional ecosystem restoration, 2-add in red "Improvements to enhance recreation opportunities may include parking areas and informational, interpretive, motorized trail construction, motorized trail development, motorized trail maintenance, and directional signs, but improvements are minimal."

Response

The decision maker will consider the public comments requesting additional acres of management area 3.5 in addition to other public comments in making the final decision. Restoration activities can also be conducted in back country management areas 3.3A, 3.3B, and 3.3C. See PC #95.

Subject: 434 - Management Area 3.5 – Back Country Recreation and Forest Restoration - Standards

Public Concern #97

The Forest Service should consider making the following changes to 3.5 Standards: 1- define motorized trail info in red; 2- Prohibit new System road construction or existing road reconstruction unless needed to honor existing rights; 3- Allows new system motorized trail construction, development, and existing trail reconstruction.

Response

See response to PC #95. The suitable uses section and the inventoried roadless section include the direction on roads for inventoried roadless areas, which includes the portions that are management area 3.5.

Subject: 437 - Management Area 3.5 – Back Country Recreation and Forest Restoration – Management approach

Public Concern #98

The Forest Service should consider splitting 3.5 into two groups, 3.5a for vegetation treatment and 3.5b for motorized use since they are two very different concepts and to better benefit users and wildlife.

Response

The modified preferred plan will include direction that clearly shows where motorized activity is allowed in MA 3.5 and where it is not.

Public Concern #99

The Forest Service should consider making all of Rattlesnake Mountain and Carter Mountain M.A. 3.5 to allow for snowmobile use in winter, additionally change trails Jack Creek, Deer Creek, Trail Creek, Timber Creek, Phelps Mountain, trails 602, 603, 605, 626, and 627 in sunlight basin and Kirwin areas due to historical nature and to make a good network for ATV use.

Response

Alternatives A and F open both these areas to motorized recreation. The decision maker will consider the public comments requesting more of these acres in addition to other public comments in making the final decision.

Public Concern #100

The Forest Service should consider need for lower short-term visual conditions in order to increase ecosystem resiliency and forest health.

Response

The plan contains a guideline in the scenery section that allows for temporary reductions in scenery to meet plan goals and objectives.

Public Concern #101

The Forest Service should consider to specifically stating how MA 3.5 active management projects would be conducted especially in the following areas: Sunlight Crandall area, Carter Mountain area, Franc's Peak and Wood River IRAs, Ramshorn Lakes/Amoretti Park area, Wolf Creek Trailhead, Bonneville Pass, East Fork Area, and the Shoshone Lake/Cyclone Pass/Pete's Lake area.

Response

See responses to PCs #98 and #94

Subject: 438 - Management Area 3.5 – Back Country Recreation and Forest Restoration – More of this

Public Concern #102

The Forest Service should considering increasing the acres of Management Area 3.5 in Alterative B, which would result in more acres in the semi-primitive, motorized ROS Class.

Response

Alternatives E and F both have more acres of semi-primitive motorized recreation opportunity spectrum (ROS) acres. The decision maker will consider the public comments requesting more of these acres in addition to other public comments in making the final decision.

Subject: 439 - Management Area 3.5 – Back Country Recreation and Forest Restoration – Less of this

Public Concern #103

The Forest Service should consider changing Gravelbar from 3.5 to 1.3 since ATV's can already get close enough for vegetation treatment from Sunlight Creek and keep the Gravelbar area from getting impacts to wildlife and solitude.

Response

Alternatives C and D allocate the Gravelbar area to MA 1.3. The decision maker will consider that allocation along with allocations requested by other public comments in making the final decision.

Public Concern #104

The Forest Service should consider deleting M.A. 3.5 since forest should not open up backcountry to motorized recreation use.

Response

Alternative C provided an alternative that prohibited motorized activity in back country areas (inventoried roadless areas). The decision maker will consider this option along with other public comments that want motorized opportunity in roadless areas in making a final decision.

Subject: 450 - Management Area 3.6A – Continental Divide National Scenic Trail - General

Public Concern #76

The Forest Service should consider the following: 1- North of Brooks Lake motorized winter use must conform to paragraph IV.B.6b (6) of the Comprehensive Plan; 2- Brooks Lake through U.S. 26/287 corridor motorized vehicle use must conform to paragraph IV.B.6b of the Comprehensive Plan; 3- Sheridan Pass to Leeds Creek motorized winter use must conform to paragraph IV.B.6b of the Comprehensive Plan; 4- Brooks Lake to U.S. 26/287 Corridor neither motorized nor mechanical (bicycle) use should be authorized at any time; 5- Pelham Lake to Sheridan Pass motorized winter use must conform to paragraph IV.B.6b(6) of the Comprehensive Plan;.

Response

Winter motorized use and bicycle use on the Continental Divide National Scenic Trail (CDNST) is consistent with the 2009 Comprehensive Management Plan. Snowmobile use is allowed on the CDNST where it is consistent with the applicable land management plan; is allowed in accordance with 36 CFR Part 212, Subpart C, on National Forest System lands or is allowed on public lands; and the use will not substantially interfere with the nature and purposes of the CDNST. Bicycle use is also allowed on the CDNST (16 U.S.C. 1246c) if the use is consistent with the applicable land and resource management plan and will not substantially interfere with the nature and purposes of the CDNST. The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. Both limited winter snowmobile use and mechanical (bicycle) use do not interfere with this nature and purpose.

Public Concern #105

The Forest Service should make the following changes to the Forest Plan and DEIS: (1) On page 120 of the Plan under Management Area acres, identify the acres associated with MA 3.6A and 3.6B (2) On page 475 of the DEIS, Executive Order 13195 is not listed, add Executive Order 13195.95. (3) On page 476 of the DEIS, list the Continental Divide National Scenic Trail (CDNST) Comprehensive Plan as an Other Authority (FSM 2353.01d). (4) The Forest needs to follow the direction in the 2009 CDNST Comprehensive Plan Chapter III and FSM 2353.42 and 2353.44(b) Part 1 to provide for the management and development of the CDNST. (5) On Page 480 of the DEIS, FSM 2353.44 references need to be completed. (6) On Page 496 of the DEIS, effects need to be disclosed for other potential CDNST MA corridors. (7) The proposed CDNST MA 3.6 MA directions do not provide for the nature and purposes of the CDNST and needs to be modified. (8) On page 506 of the DEIS, a Supplemental Plan and DEIS may be need to be completed in order to address cumulative effects based on MA 3.6A direction. (9) The Forest should address the needs for volunteer work on the CDNST in the Forest Plan. (10) Forest Service should address the discrepancy displayed in Table 23 on page 126 and the standard and guidelines for the management area and should consider removing "may be restricted in big game crucial winter range because over-the-snow vehicles are an exception in crucial winter range" (11) The Forest Service should address the last paragraph of the affected environment section for the CDNST (page 480) and consider changing it to "The management area emphasis for the CDNST corridor will determine the appropriate scenery objective and recreation opportunity spectrum class. Therefore alternatives will be analyzed using the Scenery Management and Recreation Opportunity Spectrum systems". (12) The Forest Service

should consider addressing the CDNST on Page 558 under scenery resources similar to the discussion provided for scenic byways because scenery is not adequately addressed.

Response

(1) A map of the CDNST and Nez Perce corridors will be included in the plan.

(2) Executive order 13195 which furthers the purposes of the National Trails System Act of 1968, as amended (16 U.S.C. 1241–1251), the Transportation Equity Act for the 21st Century (Public Law 105-178), and other pertinent statutes, to achieve the common goal of better establishing and operating America's national system of trails will be added to the DEIS.

(3) The CDNST Comprehensive Plan will be added to the recreation regulation and policies section of DEIS.

(4) The management area direction, standards, and guidelines in the plan comply with both the 2009 CDNST Comprehensive Management Plan and FSM 2353.42 and 2353.44(b) Part 1.

(5) FSM 2353.44 does not need to be added as the overarching FSM 2300 is referenced which includes 2353.44.

(6) Analysis of the potential re-routes of the CDNST is a site-specific analysis that is not appropriate for this revised forest plan analysis. If these potential re-routes move forward a site-specific analysis will be done to analyze the effects of the new corridor.

(7) The MA 3.6A plan direction through appropriate standards and guidelines, desired condition, and the management approach does provide for the nature and purposes of the CDNST which is to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.

(8) The cumulative effects for the CDNST are addressed in the DEIS recreation section. If any potential re-routes are moved forward, then they will be analyzed site-specifically at that time, and if needed, the plan would then be amended to incorporate MA 3.6A direction to a new corridor.

(9) The need for volunteers on the CDNST is outside of the scope of the revised Forest Plan analysis. The Forest will continue to work with partnerships and volunteer opportuntiies as they arise.

(10) See response to PC #130.

(11) The last section of the affected environment is appropriately worded as “The management area emphasis of each of the alternatives may have effects to the Scenery Management System as well as the Recreation Opportunity Spectrum class that may affect the CDNST.”

(12) The desired condition for scenery is addressed for the CDNST by identifying that the desired Scenic Integrity Objective (SIO) is high to very high depending on the trail segment. The alternatives were then analyzed based on the acres of MA 3.6A within the corridor that met a high to very high SIO. These ranged from alternative C which had the most acres in high and very high at 50 percent to alternative E which had the least acres in high and very high at 24 percent.

Public Concern #106

The Forest Service should create a Continental Divide National Scenic Trail corridor from Sheridan Pass to Brooks Lake and coordinate with the Bridger-Teton National Forest for potential effects towards forest management as portions of the route may be located on the Bridger-Teton. The Management Area should be located close to the following points: Sheridan Pass, Lava Mountain, Two Ocean Mountain, Togwotee Pass, and Brooks Lake with the boundary following the topographic features to the extent possible while being at least one- half mile wide on each side of the CDNST travel route. The Forest Service should consider managing the corridor under goals and standards set out in MA 3.6 prescription. The Forest Service should consider revising the plan to describe the management area and should map the area and provide trail prescriptions such as trail class and managed uses.

Response

The revised Forest Plan establishes a corridor within 0.50 mile of the centerline of the existing trail location. This corridor is set aside and described as MA 3.6A.

Public Concern #107

The Forest Service should manage the Continental Divide National Scenic Trail (CDNST) in accordance to the National Trails System Act and the CDNST Comprehensive plan and the prescriptions for National Scenic and Historic Trails are appropriately found Page 118 Management Area Category 3.

Response

The management area direction, standards, and guidelines in the plan comply with both the 2009 CDNST Comprehensive Management Plan and the National Trails System Act.

Public Concern #108

The Forest Service should adhere to Standard 4 under Recreation and to ensure that sections of the Continental Divide National Scenic Trail do not follow improvements to motorized trails.

Response

Standard #4 states that "Existing snowmobile use is allowed. New sections of the Trail will not be located coincidently with snowmobile trails."

Public Concern #109

The Forest Service should consider revising Map 41 to address the discrepancy of not being identified as MA 3.6 on any of the alternative maps included on the DEIS and because the alternative maps should include all of the locations drawn on Map 41.

Response

A map will be added that shows where there the 3.6A management direction will apply.

Public Concern #110

The Forest Service should consider adopting management strategies that encourage non- motorized winter recreation in the CDNST to include Togwotee Pass.

Response

The management direction in MA 3.6A that allows existing snowmobile use to continue on the CDNST will continue. The decision maker will consider the public comments in making the final decision.

Public Concern #124

*The Forest Service should review all provisi*ons for roads and trails to ensure consistency with Forest Service Manual (FSM) 2353.44b and the Co*mprehensive Plan (IV.B.5.c). Motor vehicles by the general public should also be prohibited on the Continental Divide National Scenic Trail in every ROS category unless an exception applies.*

Response

See responses to PC #111 and #118 item (7)

Public Concern #267

The Forest Service should make a change on Page 47 of the DEIS that erroneously identifies that prescribing a non-motorized Continental Divide National Scenic Trail (CDNST) corridor as being outside

the scope of the DEIS. The Forest should follow the 2009 CDNST Comprehensive Plan Chapter III and Forest Service Manual 2353.42 and 2353.44(b) for establishing a Management Area for the CDNST.

Response

As noted on EIS pages 47 through 48, existing motorized segments will require site-specific analysis before any changes are made. Changes to the CDNST are considered site-specific projects and will be addressed in project planning. See also response to PC #76 regarding management of the Continental Divide National Scenic Trail.

Subject: 451 - Management Area 3.6A – Continental Divide National Scenic Trail - Desired Condition

Public Concern #111

The Forest Service should make the following changes to the plan: (1) Further examination of the "compatible" non-motorized recreational opportunities along the Continental Divide National Scenic Trail (CDNST), especially areas of the trail that are open for bicycles and motorized vehicles. (2) On page 128 of the DEIS, the direction for roads and trails suitable uses should be modified to the direction found in FSM 2353.44b parts 10 and 11. (3) The Shoshone Plan needs to follow the 2009 CDNST Comprehensive Plan Chapter III and FSM 2353.42 and 2353.44(b) part 1 instead of the 1998 EA.

Response

(1) The plan allows both bicycle and motorized use where consistent with the Comprehensive Management Plan and where these uses do not interfere with the nature and purposes of the CDNST. A decision to restrict these uses if they become inconsistent would be a site-specific analysis.

(2) The plan is consistent with both the Comprehensive Management Plan and FSM 2353.44b parts 10 and 11. Motorized use by the general public is generally prohibited unless that use is consistent with the applicable land management plan and is designated in accordance with 36 CFR part 212, Subpart B and the vehicle class and use we allowed on that segment of the CDNST was constructed as a road prior to November 10, 1978. Bicycle use is also allowed where consistent with the Comprehensive Management Plan and where these uses do not interfere with the nature and purposes of the CDNST.

(3) The plan is consistent with the CDNST Comprehensive Management Plan and FSM 2353.44b as indicated in responses to PCs #105 through #110.

Public Concern #112

The Forest Service should provide high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the Continental Divide National Scenic Trail (CDNST) corridor with a minimum width of 0.05 mile on either side of the CDNST. Management should be consistent with primitive or semi-primitive non- motorized Recreation Opportunity Spectrum class. Low intensity vegetation management should be utilized to maintain long term goals and stewardship objectives of the CDNST corridor.

Response

The desired condition of MA 3.6A CDNST is the same as requested and does include a corridor 0.50 mile from centerline of the trail. Guideline #2 indicates managing for the ROS class of the management area in which the trail occurs. Standard #5 requires, where possible, that new or relocated sections be in an ROS class of primitive or semi-primitive non-motorized. Vegetation management is covered under guideline #1 which allows cutting or removal of trees under circumstances to reduce fuel loads and fire risk, curtailing insect attack, salvaging dead trees to enhance scenic views, or maintaining wildlife habitat diversity.

Subject: 452 - Management Area 3.6A – Continental Divide National Scenic Trail - Goals

Public Concern #113

The Forest Service should make the following changes to the Forest Plan: (1) Objectives for the CDNST in the Goals for Management Area 3.6A (p 173) should read As revised, it should read: "Provide high-quality scenic, primitive hiking, and horseback riding opportunities and conserve natural, historic, and cultural resources along the Trail corridor," to acknowledge the historical and cultural resources that should be considered in unit planning. (2) Remove the last five words of the Proposed Goal 2 for Management Area 3.6, "relocate the Trail off motorized routes as time and resources allow," since the entirety of the trail will eventually be off of roads for its entire length, so the goal of the Trail being off motorized route is clear. (3) On page 17, Continental Divide National Scenic Trail the following quote should be added, "The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor," as directed in the Comprehensive Plan and FSM 2353.42. (4) On page 174, Recreation Goal 2 should provide for the nature and purposes of the CDNST by implementing the direction in the 2009 CSNST Comprehensive Plan Chapter III and FSM 2353.42 and 2353.44(b) part 1.

Response

(1) And to conserve natural, historic, and cultural resources will be added to Goal #1.

(2) We will delete "as time and resources allow" from Goal #2.

(3) Statement was changed to match MA 3.6A Goal #1.

(4) Standard #5 (second one under recreation) states "Where possible, new or relocated sections of the Trail will be located within areas mapped with an ROS setting of primitive or semi-primitive non-motorized." This is in line with section IV.B.1b.1 of the 2009 Comprehensive Plan.

Public Concern #114

The Forest Service should allow volunteer crews the opportunity to complete and maintain work needed on the Continental Divide National Scenic Trail.

Response

See response to PC #105 item 9.

Subject: 453 - Management Area 3.6A – Continental Divide National Scenic Trail - Objectives

Public Concern #115

The Forest Service should make corrections to the Scenic Integrity Objectives as needed on Tables 140 and 141 since they are not consistent with the narrative on page 495. On Page 173, The Forest Service should consider revising the objectives to very high to moderate without being tied to ROS classifications because the Recreation Opportunity Spectrum areas do not seem to be a part of the management area allocations.

Response

We will correct errors in this section between text and info in tables 140 and 141. The tie of the SIO to the ROS is not necessary and was dropped. The range for the SIO was changed from very high to high to be consistent with the national direction for the CDNST.

Public Concern #116

The Forest Service should complete the Continental Divide National Scenic Trail travel route through the MA.

Response

A trail route currently exists through the MA and was established in 1998. Any site-specific reroutes of specific sections would be analyzed in separate future efforts.

Subject: 454 - Management Area 3.6A – Continental Divide National Scenic Trail - Standards

Public Concern #117

The Forest Service should make the following changes in the Forest Plan: (1) On page 173, Standards need to be established that support the goals of the Continental Divide National Scenic Trail (CDNST). (2) On page 173, the Recreation Standards should address the direction in FSM 2353.44(b)(1) as they are currently inconsistent with the Comprehensive Plan and Policy. (3) If the standard for snowmobile use conforms to FSM 2353.44b, then the restriction regarding colocation of the Trail with snowmobiles can be deleted.

Response

(1) Six standards and four guidelines have been established for the CDNST that support the goals of the CDNST. The recreation standards and guidelines do address direction in FSM 2353.44(b)(1) and are not inconsistent with the Comprehensive Plan or Policy.

- While the standard for snowmobile use conforms to FSM 2353.44b it is our desire that the two uses be separated to prevent future conflicts hence the direction not to collocate future trails locations with snowmobile trails.

Public Concern #118

The Continental Divide National Scenic Trail (CDNST) is a Concern Level 1 Travelway and needs to be managed as follows: (1) Ensuring that all management activities meet the Scenic Integrity Objective of High or Very High. (2) Recreation Manage for the ROS Class of Primitive and Semi-Primitive Non-Motorized, except motor vehicle use is allowed if such use is in accordance with the CDNST Comprehensive Plan direction (Chapter IV.6). (3) Permits for Special Uses Activities will not be authorized unless the activity contributes to the nature and purposes of the CDNST. (4) Reconstruction and maintenance of the CDNST travel route will be designated Trail Class 3, pack and saddle stock with no new system road construction or reconstruction unless there is a valid existing right. (5) There should be no surface occupancy for mineral leases, no permit issuance for the removal of mineral materials, and there should be a consideration for withdrawals for areas with locatable mineral findings. (6) The Forest Service should not move the Continental Divide National Scenic Trail off of existing motorized routes as addressed in Standard 6 unless the new location offers equivalent or superior scenic, historic, natural, or cultural values. Standard 6 should be re-written as "If motorized use that has been allowed becomes incompatible with management of the Trail, the conflict will be resolved after consideration of alternatives in a site-specific planning process." (7) The provision in Table 26 that would allow new primitive roads in a semi-primitive motorized portion of MA 3.6 should be removed as it conflicts with Section 7 of the NTSA prohibiting the use of motorized vehicles on post-1978 roads by the general public. (8) Enhance the CDNST environment, fish and wildlife habitat improvements are allowed along with vegetation management activities that should enhance the scenic quality, meet trail construction and maintenance needs, and manage fuels through timber harvest, prescribed burning, and wildland fire activities. (9) The management area is classified as unsuitable for timber production and hauling or

skidding along the CDNST route is prohibited along with the creation of landings or temporary roads. (10) Wildland fire management should consist of suppression strategies that minimize impact on CDNST values with no heavy equipment line construction on the CDNST allowed with restorative measures prescribed after fire suppression or fire use projects are completed. (11) The CDNST should be well identified with standard signs and markers and located and maintain developed campsites and privies where there is a need for overnight use and facilities are needed to protect Forest resources and ecological health. (12) The degree of contrast for management actions must range from none to weak in the foreground and from none to moderate in the middleground and background.

Response

(1) Direction in the revised Forest Plan for the scenic integrity objective (SIO) is to manage for high to very high in primitive to semi primitive ROS classes and moderate to high in roaded natural ROS classes. The decision maker will consider adjusting in an alternative for the final decision.

(2) Direction in the revised Forest Plan is to manage for the ROS the trail route that currently falls in with a standard included that requires new or relocated trail sections to be in primitive or semi-primitive.

(3) Special uses will be permitted unless they conflict with the nature and purpose of the trail, but will not have to contribute to the nature and purpose.

(4) The goal of this management area is to provide high-quality hiking and horseback opportunities. Reconstruction or maintenance of a CDNST travel route will not change the designated existing trail class. Road construction or reconstruction is controlled by the most restrictive direction of either the MA 3.6A or if more restrictive, the management area that the 3.6A corridor crosses.

(5) A standard will be added addressing surface occupancy in MA 3.6A.

(6) Relocated portions of the CDNST would have to make sure they met the nature and purpose. Relocation of the trail would require a site-specific analysis of the effects to the CDNST.

(7) The Comprehensive Plan direction cited limits motorized use of the CDNST to pre-1978 roads, but allows roads in semi-primitive to cross the CDNST at intervals of no more than 0.5 mile, which is the standard included in the revised Forest Plan.

(8) We agree with this statement.

(9) Hauling and skidding are not a forest plan-level decision, but identifying lands suitable and unsuitable for timber production is. Any vegetation management proposal would go through site-specific analysis where hauling and skidding along the route would be addressed.

(10) A guideline will be added to address fire management activities along the CDNST.

(11) Signing direction is present in guideline #3 under recreation.

(12) Visual quality specifics are not addressed in forest planning, but are part of the specific SIO (high, very high, etc.) which is part of the plan direction.

Public Concern #119

The Forest Service should adhere to Standard 4 under Recreation and to ensure that sections of the Continental Divide National Scenic Trail do not follow improvements to motorized trails

Response

Discussion in the management approach addresses the issue of the location of CDNST and motorized routes.

Public Concern #120

The Forest Service should have the DRMP's standards for competitive events, non-motorized outfitter and guide activities, and over-snow winter activities be re-written to say: "Allow [activities] only if they do not interfere with the nature and purposes of the Trail."

Response

Suggestion was considered. We will retain our current wording as we think it better reflects our intent.

Subject: 455 - Management Area 3.6A – Continental Divide National Scenic Trail- Guidelines

Public Concern #121

The Forest Service should make the following changes to the Forest Plan: (1) In the first guideline of Management Area 3.6A, after authorization for cutting or removal of trees are given, "after environmental review" should be added to the guideline. (2) Guideline 2 should be revised to eliminate an ambiguity with respect to which management area is intended, the word "management" should be deleted in this guideline. (3) On page 174, Guideline 4 should reflect the direction in the Continental Divide National Scenic Trail (CDNST) and FSM 2353.42 and 2353.44(b) part 1.

Response

(1) Cutting or removal of trees in the case of this guideline would always require a site-specific analysis as part of the authorization process, so additional wording is not needed.

(2) There is no ambiguity in guideline number 2. As stated in the guideline that section of the CDNST will be managed for the ROS class of the management area the corridor crosses.

(3) Guideline 4 in conjunction with standard 5 reflects direction in the Comprehensive Plan and Policy.

Public Concern #122

The Forest Service should allow vegetation to be altered to enhance recreational opportunities, provide scenic vistas, conserve natural historic and cultural resources, and to maintain or improve endangered, threatened, and sensitive species habitats.

Response

Guideline 1 under vegetation provides direction when vegetative management could occur.

Public Concern #123

The Forest Service should consider withdrawals for areas with a history of locatable mineral findings, allow commercial livestock and implement Best Management Practices for their management, and should allow partners and volunteers to assist in Continental Divide National Scenic Trail programs.

Response

For minerals see response to PC #118 item (5). Grazing is allowed is MA 3.6A and would follow the guidelines and standards under the grazing section of the plan. See PC #105 item (9) regarding volunteers.

Subject: 457 - Management Area 3.6A – Continental Divide National Scenic Trail - Management Approach

Public Concern #125

The Forest Service should consult with the Bridger-Teton National Forest during the planning process as some segments may best be located west of the Continental Divide.

Response

Relocation of the CDNST to a specific location is a site-specific analysis during which coordination and consultation with affected units would occur.

Public Concern #126

The Forest Service should make protection of the land resource the primary consideration in establishing and maintaining the trail to provide hikers and riders a high quality recreation experience along the Continental Dive while maintaining a constant respect for the natural environment. Partners and volunteers should be involved and contribute to the CDNST with a CDNST Unit Plan being completed within five years.

Response

The primary purpose of establishing and maintaining the CDNST comes from the Comprehensive Plan and enabling legislation, which states that the nature and purpose of the CDNST is to provide for high-quality scenic, primitive hiking and horseback riding opportunities, and to conserve natural, historic, and cultural resources along the CDNST corridor. See response to PC #105 item (9) regarding volunteers.

Public Concern #127

The Forest Service should make the following changes to the DEIS: (1) A supplemental DEIS should be created to analyze all the potential corridor routes on Map 41 and disclose the effects of revised MA 3.6A direction on other resources. (2) On page 495, potential effects to Scenic Integrity and identified Recreation Opportunity Spectrum class effects for all of the CDNST MA corridors should be provided. (3) A Supplemental Draft Plan and supplemental DEIS should be issued to identify cumulative effects based on MA 3.6A directions that is consistent with the National Trails System Act.

Response

See response to PC #105 item (6).

Public Concern #128

The Forest Service should narrow the provision to trail relocation under Management Approach to only trails relocated due to conflict versus any CDNST corridor which is relocated and should be applied to only trails developed directly by CDNST management activities or funding. The Forest should also revise the statement of management uses so that the measurement is related to visual quality or scenic quality experiences versus to non-motorized experiences within a half mile of the trail.

Response

The intent of the discussion of incompatible uses under the management approach is to cover the broad span. Narrow the scope to just trail reconstruction would not meet our intent. A non-motorized experience is a significant part of the nature and purpose of the CDNST, and thus, should continue to be listed in the first sentence of the management approach.

Subject: 460 - Management Area 3.6A – Continental Divide National Scenic Trail - Monitoring

Public Concern #129

The Forest Service should ensure that the land management plan also "establish a monitoring program to evaluate the condition of the CDNST in the management area." Forest Service Manual (FSM) 2353.44b 1.c.

Response

Required monitoring of the CDNST will be added to the revised Forest Plan.

Subject: 470 - Management Area 3.6B – Nez Perce (Nee-Me-Poo) National Historic Trail - General

Public Concern #130

The Forest Service should update Table 23 on page 126 since the table contents for over- snow motorized vehicles are different than the standards and guidelines for Management Area 3.6B. The Forest should specifically remove the "may be restricted in big game crucial range" text because over-the-snow vehicles are an exception in crucial winter range.

Response

Table 23 was reviewed with the standard and guideline for MA 3.6B. This management area includes a corridor 0.50 mile from centerline. Over-snow and snowmobile use is allowed in this management area unless it overlaps with crucial winter range, where it may be restricted. The decision maker will consider the public comments in making the final decision.

Subject: 490 - Management Area 4.2 – Scenic Byways, Scenic Areas, Vistas, and Travel - General

Public Concern #131

The Forest Service should consider adding the following verbiage to the Theme and Setting description in this section, "These corridors allow the Forest to address the fastest growing use on the SNF; which is OHV use. Increased OHV use coupled with the very popular use of site seeing and driving for pleasure make it vital that existing travel corridors, both road and trail, remain open for travel management. These corridors will also reduce conflicts and improve safety by providing loop trails for OHV users separate from vehicles. In addition, travel corridors reduce the number of unauthorized user made trails which are often used to reestablish an old existing loop route." Clarification should also be added to the paragraph on the bottom of page 180 to say, "In addition to the eight travel corridors mentioned above, four other travel routes…"

Response

Motorized use is clearly identified as a suitable use for this management area. These travel corridors are open and used by a wide variety of different modes of travel and one specific mode should not be singled out or highlighted over any other mode. Commenter misread the presentation. There are eight travel corridors. Four are scenic byways and four are other travel routes.

Public Concern #132

The Forest Service should consider making the following revisions to this section: (1) make motorized vehicle use conform to Paragraph IV B.6Bb of the Comprehensive plan for Brooks Lake through

US26/287 corridor; (2) ensure that travel corridors listed in Alternative A are maintained at or above current levels; and (3) treat the Cody to East Gate corridor separately in this Plan as it is important as a buffer to the park and possessed many scenic qualities.

Response

(1) Where MA 4.2 and the CDNST overlap in the Brooks Lake through US 26/287 corridor the MA with the most restrictive requirements rules thus management in this overlap would conform to the Comprehensive Management Plan for the CDNST.

(2) Alternative A did not have specific travel corridors like proposed in the new plan. Alternative A had larger areas emphasizing rural and roaded natural recreation opportunity spectrum settings where as all the other alternatives have the new MA 4.2 which focuses on scenic and recreational opportunities.

(3) The Cody to the East Gate corridor has many scenic qualities and is a scenic byway included in MA 4.2 along with our other byways and major scenic travel routes.

Subject: 510 - Management Area 4.3 – Back Country Access Corridor - General

Public Concern #133

The Forest Service should designate the Clay Butte Area as Management Area 1.3 Back Country Non-Motorized because of the important recreational and scenic values of the Clay Butte area and should classify the portion of Forest Road 142 passing through the area and leading to the Clay Butte Lookout as "4.3-Back Country Access Road."

Response

Back country motorized MA 1.3 acres range from the most in alternative A to the least in alternative C. Back country access corridors range from the most in alternative B to the least in alternative F. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 517 - Management Area 4.3 – Back Country Access Corridor - Management Approach

Public Concern #134

The Forest Service should classify the Morrison Road within the Proposed Sawtooth Peatbed Special Interest Area as Management Area 4.3 – Back Country Access Corridor and the area immediately north and east of the road as Management Area 3.3B – Back Country Winter Motorized.

Response

The boundary of MA 3.1C the Sawtooth Peatbed Special Interest Area has been adjusted to conform to the Morrison Jeep Trail on the northeast in alternative G. The area adjusted out of MA 3.1C was designated 3.3B.

Public Concern #135

The Forest Service should change the designation of the Morrison Jeep Trails 119 and 120 to MA 4.3 to ensure that access is preserved f or future generations.

Response

The Morrison Jeep Trail is designated as a 4.3 management area

Public Concern #136

The Forest Service should change the designation of Historical Trails 602, 603, 605, 626, and 627 to MA 3.5 or MA 3.3C on Map L. to ensure access for future generations.

Response

Within the Grizzly Bear Primary Conservation Area (PCA), generally management areas 3.A, 3.3C, 3.5A, and 3.5C are not used. The plan does not encourage the expansion of motorized use within the PCA, because of the existing secure habitat direction.

Subject: 530 - Management Area 4.5A – Proposed Kirwin Historical Area - General

Public Concern #137

The Forest Service should make the Kirwin Historical Area as a new special interest area because of its protection of plant and animal communities and keep the place difficult to access for the general public.

Response

In the various alternatives, two options for the Kirwin area were analyzed. Alternatives B, C, D, and E would designate Kirwin as a special interest area. Alternatives A and F would not. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 538 - Management Area 4.5A – Proposed Kirwin Historical Area More of area

Public Concern #138

The Forest Service should make the Kirwin Historical Area as a new special interest area and increase its size and merge with the Double D Ranch because of its because of its historical and educational potential, preserving use for future generations. Designation as a special interest area will also increase tourism and contribute to the local economy.

Response

In the various alternatives, two options for the Kirwin area were analyzed. Alternatives B, C, D, and E would designate Kirwin as a special interest area. Alternatives A and F would not. The deciding officer will consider the various options along with other comments during the decision process. Adjustments to the Kirwin Management Area and Double D Ranch were looked at and made between draft and final.

Subject: 550 - Management Area 5.1 – Managed Forests and Rangelands - General

Public Concern #139

The Forest Service should consider how this management area increases the risk of disturbance vulnerability from insects, fire, and a changing climate.

Response

The DEIS discusses the risk to the forest from insects, fire, and a changing climate. It also displays to the degree that there is an effect how management area allocations impact that risk. MA 5.1 is allocated from approximately 3 percent of the forest in alternative C to 22 percent in alternative F and approximately to 7 percent of the forest in the preferred alternative.

Public Concern #140

The Forest Service should consider taking the following information from the current forest plan and including it in the new plan: (1) "Production and utilization of large round wood of a size and quality suitable for saw timber." (2) "Apply intermediate treatments to maintain growing stock level standards." (3) Written direction that emphasized cultural treatments such as precommercial thinning.

Response

Wood fiber is included in the theme, because it represents a broader array of forest products than sawtimber. This responds to other commenters who wanted a broader reference. The desired conditions for MA 5.1 reference sawtimber as a specific product. The plan direction indicates the desired conditions that are wanted and the stocking and volume guidance is based upon the use of precommercial treatments. The plan does not direct specific methods. The management approach will be edited to include language indicating timber stand improvement treatments are used.

Subject: 551 - Management Area 5.1 – Managed Forests and Rangelands - Desired condition

Public Concern #141

The Forest Service should consider modifying the desired conditions to say, "Age class diversity is evenly distributed across age classes up to rotation length." The comparison to age class diversity on "unmanaged areas" should be deleted, as it is speculative.

Response

We reworded the sentence to improve clarity.

Subject: 558 - Management Area 5.1 – Managed Forests and Rangelands - More of This

Public Concern #142

The Forest Service should consider allocating the most productive acres of the 43,000 substantially altered acres to this management area, as well as including Two Ocean Mountain in this management area.

Response

Alternatives E and F allocate portions of the 43,000 acres to MA 5.1 and alternatives B, E, and F allocate Two Oceans to MA 5.1. The decision maker will consider the public comments requesting more 5.1 in addition to other public comments in making the final decision.

Subject: 559 - Management Area 5.1 – Managed Forests and Rangelands - Less of this

Public Concern #143

The Forest Service should consider not designating the following areas as management area 5.1: (1) Pelhand Lake to Trout Lake. This area should have no timber harvesting or new road construction and the US 26/287 corridor should be relocated off motorized routes. An alternate corridor could be made west of the divide, down Pink Creek and past Moccasin Basin. (2) The CDNST in Salt Creek Basin should be restricted to non-motorized use. (3) The Lean-to Creek area, Pole Creek, and upper part of Wayne's Creek. These areas have a significant number of dead trees from the beetles, and the remaining trees

provide coverage for elk. This is a prime foot hunting area and is known to be a location of grizzly dens and wolf presence.

Response

The final location of the Continental Divide Trail on non-motorized routes will be evaluated after the plan decision in a project-specific NEPA document. The decision maker will consider the suitability of the existing route and alternative routes and the need for future flexibility in making the final plan decision.

The decision maker will consider comments on how the Pole Creek and surrounding area should be managed along with other public comments in making a final decision. The revised Forest Plan does not make any decisions on addition of motorized routes in specific areas. It only identifies the general suitability of that option. Project-specific decisions that look at site-specific factors will determine if any specific additions are made.

Subject: 570 - Management Area 5.2 – Public Water Supply – Water Quality Emphasis - General

Public Concern #144

The Forest Service should consider ways to protect water quality by creating a sampling plan that includes administrative areas, cabins, resorts, ski areas, etc. and having management actions for ensuring these areas are complying with maintaining water quality. The SNF must place highest priority on watershed values given that much of the forest is highly erosive volcanic soil.

Response

The forest plan contains direction on protecting water quality, by implementing the Watershed Conservation Practices Handbook. The State of Wyoming requires the forest to follow our Watershed Conservation Practices Handbook as the agreed upon method for meeting state best management practices (BMPs). The forest plan also contains water and soil goals. The monitoring section of the plan contains actions to ensure soil and water goals are being protected.

Public Concern #145

The Forest Service should consider developing specific plans to monitor water quality. These plans should include an objective for maintaining the Wyoming Stream designations, monitoring the water quality as it leaves the forest, conservation district watershed management plans, coordinating the monitoring with the State of Wyoming BMP program, and using the BLM's plan to manage watershed water quality.

Response

See PC #144.

Public Concern #146

The Forest Service should consider providing an assessment of the potential for organic loading impacts to drinking water supplies associated with municipal watersheds for Cody, Wood River, and Lander

Response

This is a site-specific analysis issue and is beyond the scope of the revised Forest Plan analysis.

Public Concern #895

The Forest Service should include standards and guidelines to minimize ground disturbances and road densities, disallow off-road vehicle use as much as possible and stipulate no surface occupancy in municipal watersheds, MA 5.2.

Response

Management Area 5.2 is assigned to the municipal watershed for the City of Lander. The management area emphasizes the protection of water quality including special direction for the management of fire. The City of Lander requested that the area be assigned to a management area that allowed the full array of multiple-use activities. Though management area direction allows activities such as timber harvest and motorized recreation, it will be conducted in a way that protects water quality.

Subject: 590 - Management Area 5.4 – Managed Big Game Crucial Winter Range - General

Public Concern #147

The Forest Service should maintain groomed and ungroomed snowmobile trails in existing and new wildlife winter range areas.

Response

All alternatives except alternative C maintain existing groomed and ungroomed snowmobile trails in wildlife crucial winter range. The decision maker will consider public comment that want that direction along with other public comment in making the final decision.

Public Concern #148

The Forest Service should allow snowmobile use, especially around Sinks Canyon and Fairfield Hill, during the time when most wildlife are at lower elevations since wildlife will not be disturbed during those times. Closures may also limit access to the land we own there.

Response

Alternatives B, E, and F allow snowmobile access in winter range around Sinks Canyon and Farifield Hill. The decision maker will consider the public comments that want the access maintained along with other public comments that want the access restricted in making the final decision.

Public Concern #149

The Forest Service should consider the effects of climate change on natural resources and Management Areas 5.1 and 5.4 since disturbances, particularly from insects and fire, are likely to increase and there is a clear risk to these management areas.

Response

The effects of climate change on vegetation management and associated disturbances from insects and fire are discussed in the FEIS.

Public Concern #150

The Forest Service should be flexible with oil and gas developments and not implement No Surface Occupancy restrictions on all big game winter range because expected levels of development are low and mitigations can be developed at the project level.

Response

Alternatives E and F allocate fewer acres of wildlife winter range to no surface occupancy (NSO) for oil and gas development. The decision maker will consider the public comments requesting more and less acres of NSO for oil and gas development in addition to other public comments in making the final decision.

Public Concern #151

The Forest Service should ensure that No Surface Occupancy stipulation does not preclude exploration activities.

Response

The final plan will include direction that clearly differentiates between exploration and development and how any plan direction applies to the two activities.

Public Concern #153

The Forest Service should clarify that although the DEIS summary contains the statement "Big game crucial winter range will be managed to reduce disturbance from motorized use," the preferred alternative allows winter motorized use within big game crucial winter range where the WGFD indicates current use levels are not negatively impacting wintering big game.

Response

The revised Forest Plan will contain language cleary indicating that motorized winter use is allowed on some crucial winter range where Wyoming Game and Fish Department (WGFD)determines use levels are not negatively affecting big game.

Public Concern #154

The Forest Service should establish and protect wildlife by limiting or restricting mineral exploration and development and motorized vehicle use and/or establishing No Surface Occupancy stipulations in all crucial big game winter range (as mapped by the Wyoming Fish and Game Department) and in Inventoried Roadless Areas. In addition to protecting big game and diversity, protection of winter ranges provides prey for grizzlies and wolves, viewing and Inventoried Roadless Areas. In addition to protecting wildlife, these measures would provide prey for grizzlies and wolves, promote wildlife viewing and hunting, jobs for local outfitters and income for local businesses.

Response

Alternatives B, C, and D provide differing restrictions on oil and gas development and motorized recreation on crucial winter range and inventoried roadless areas. The decision maker will consider the public comments requesting that winter range and roadless areas be allocated to NSO and motorized recreation be restricted in addition to other public comments in making the final decision.

Public Concern #155

The Forest Service should strengthen standards and guidelines to protect sensitive wildlife species by using measurable standards.

Response

The biological evaluation presents the species conservation measures used to protect sensitive species. The interdisciplinary team did an additional review between draft and final to verify that the conservation measures are represented within plan direction. During plan implementation each project includes a biological evaluation that addresses how conservation measures are addressed for the specific project.

Public Concern #156

The Forest Service should ensure that possible lynx and wolverine habitats are not harmed by winter recreation management restrictions.

Response

The effects of winter motorized recreation on Canada lynx and wolverine are discussed in the EIS pages 155 through 157 and 192 through 193.

Public Concern #157

The Forest Service should not reclassify the area from Wiggin's Fork/Double Cabin road east to the Wind River Indian Reservation Boundary as motorized use because the area contains several extremely important big game migration routes in addition to critical winter range. Motorized use in this area would result in displacement of big game, declines in herd numbers, disturbances to key wintering and migration grounds, loss of hunting opportunities and adverse effects to the local economy.

Response

Alternatives C and D allocate this area to management areas that do not allow motorized activity. The decision maker will consider the public comments requesting less area to remain non-motorized in addition to other public comments in making the final decision.

Public Concern #158

The Forest Service should ensure that habitat characteristics required by Wyoming's Species of Greatest Conservation Need and federally threatened species remain intact by, at a minimum, conducting presence/absence surveys during appropriate seasons to ensure timber harvest practices do not negatively impact sensitive wildlife species.

Response

To address concerns regarding sensitive species and their habitat, the Draft Forest Plan, developed Goal 1. p. 47. In addition, the concern regarding wildlife surveys was addressed under management approach p. 50 (Draft Forest Plan).

Public Concern #159

The Forest Service should implement best management practices to benefit sensitive wildlife species.

Response

The plan contains direction, including standards and guidelines, to protect sensitive species.

Public Concern #160

The Forest Service should re-write the fifth paragraph on p. 284 to clarify that the big game crucial winter range timing stipulations on the Forest is December 1 to April 30.

Response

The draft plan identified for all alternativestiming restriction dates of December 1 to April 30 on big game crucial winter range.

Public Concern #161

The Forest Service should change Standard 3, pages 20 and 60 (Management Challenges, Grazing, Species of Local Concern) to read "Providing forage to maintain big game herd objectives is a priority in the management of crucial winter range used in common by livestock and big game."

Response

We reworded the standard to clarify the intent.

Public Concern #162

The Forest Service should add the phrase "within elk herd population objectives" after the word "elk" to Conservation Measure 7 (Ch.3 Affected Environment, Species of Local Concern, Rocky Mountain Elk, Desired Condition, p. 285).

Response

We agree and will make change.

Public Concern #163

The Forest Service should initiate feedgrounds only after consultation with all potential stakeholders in order to limit disease, habitat degradation, and management costs.

Response

The plan contains no proposals or direction to initiate feed grounds on the Shoshone.

Public Concern #164

590-18 The Forest Service should consider how drought and long-term stochasticities factor into assessment of crucial winter range (p. 190 DLMP).

Response

Drought is considered in managing forage on wildlife winter. Under the management approach for grazing there is a discussion on managing winter ranges during drought. This, along with additional plan direction under grazing and Management Area 5.4 direct that on winter range forage is managed to provide for big game populations.

Public Concern #165

590-19 The Forest Service should add mule deer to the discussion of Managed big game crucial winter range (p. 193, Management Area 5.4, DLMP) or explain why the species is not discussed.

Response

We changed the wording to include mule deer.

Public Concern #166

The Forest Service should consider implementation of the mapped acreages instead of the acres discussed in paragraph 3 because Map 15 shows less Elk crucial winter range and calving range discussed in the third paragraph.

Response

We will change the text in the referenced paragraph in the FEIS. We will also correct the map display in the FEIS.

Subject: 591 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Desired Condition

Public Concern #167

The Forest Service should adjust the MA 5.4 boundary to eliminate the area in T43N R109W sections 17-20 from the MA because the area has never been designated as winter range and has been used for over 30 years for snowmobiling, hunting, fishing, hiking, and camping.

Response

The area is mapped as winter range and has been for some time. All alternatives allow hunting, fishing, hiking, and camping in this area. Alternative F maps that area as MA 5.1. Alternative B maps the area as MA 5.4 and allows snowmobiling in the area. The decision maker will consider this comment along with other comments that would like the area to be closed to snowmobiling in making the final decision.

Public Concern #168

The Forest Service should take recent and potential future changes into account during the planning process, especially when describing insect activity and five needle pine decline and fire risk.

Response

The EIS describes how changing conditions are affecting insect epidemics, white pine, and fire risk.

Public Concern #169

The Forest Service should establish a new guideline for Roads and Trails for Management Area 5.4 to state: "Established roads and trails through winter range will be open to wheeled and over-snow vehicle travel as needed to provide access to non-winter range lands beyond the winter range."

Response

The plan direction under local species of concern allows existing snowmobile use on trails and play area in crucial winter range. Based on public comment, that direction will be clarified and referenced with the plan direction for MA 5.4. In addition, a map will be included to display the clarified direction.

Public Concern #170

The Forest Service should ensure that the ungroomed Horse Creek area snowmobile trails which follow roadways in the Horse Creek vicinity as well as north to the Double Cabin area can continue to pass through MA 5.4.

Response

Direction will be included in the revised Forest Plan to indicate that designated snowmobile trails in crucial winter range areas will be open to snowmobiling.

Public Concern #171

The Forest Service should remove the small parcel of winter range with a snowmobile trail from the Lava Mountain Lodge area (formerly Pinnacle Buttes Lodge) because the winter range area is very small and wildlife have been using the area with the existing snowmobile use from adjacent private land as well as with the lodge traffic.

Response

See PC #167.

Subject: 592 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Goals

Public Concern #172

The Forest Service should modify Goal 1, Species of Local Concern, p. 59 to include "Minimize human disturbance in big game crucial winter range to levels commensurate with maintaining big game populations within state designated population goals and objectives" so this goal will not be misinterpreted and wrongly applied.

Response

The goal does not imply that any specific action would be taken. Any restrictions or changes in management would be addressed through a project analysis and public comments. Other places in the plan tie plan direction to meeting big game population goals and objectives. The additional qualification is not needed in the goal.

Subject: 594 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Standards

Public Concern #173

The Forest Service should change the wording of Standard 3, Species of Concern, to read: "Forage use conflicts between big game and cattle will be evaluated on a case-by-case basis."

Response

The standard was reworded to clarify the intent.

Subject: 595 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Guidelines

Public Concern #174

The Forest Service should recognize that we support guideline 6.

Response

Thank you for your support. The decision maker will consider this support in addition to other comments in making the final decision.

Public Concern #175

The Forest Service should note on page 60, Standards for Species of Concern, number 4, that exceptions to the stipulations are possible in some circumstances.

Response

The referenced direction is a guideline not a standard. The reference to exceptions to the guideline has been incorporated into the text of the guideline. In addition, the management approach for species of local concern further discusses how exceptions are addressed.

Subject: 597 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Management Approach

Public Concern #176

The Forest Service should prohibit all human presence whenever there may be any level of potential disturbance from off-road or off-trail non-motorized uses within winter range because studies have shown that the impacts upon wintering wildlife are often greater from a person walking or someone on skis or snowshoes that it may be from motorized recreation. (http://www.snowmobileinfo.org/snowmobile-access-resources.aspx

Response

The rationale for selecting the 30 percent threshold for secure habitat is discussed in the DEIS under Species of local concern/Rocky mountain elk/Desired Condition.

Public Concern #177

The Forest Service should explain the rationale for the 30% threshold for security habitat.

Response

See response to PC #176.

Public Concern #178

The Forest Service should add "in coordination with livestock grazing permittees" to the sentence on p. 193 that states "On a case-by-case basis, commercial livestock use levels in some pastures or allotments may be reduced to ensure adequate forage remains."(DLMP, CH 2, Management Area Direction, Management Area 5.4)

Response

The change improves the presentation. The suggested change or something similar will be made in the final plan.

Public Concern #179

The Forest Service should revise the final LMP to allow snowmobile trail routes to be changed or even newly created when driven by other forest management actions.

Response

Nothing in the forest plan prevents snowmobile trails to be changed or new trails to be added in crucial winter range consistent with the exemptions allowed by the forest plan. Any such changes would be addressed in a site-specific project-level analysis that would evaluate any proposals.

Subject: 598 - Management Area 5.4 – Managed Big Game Crucial Winter Range - More of this

Public Concern #180

The Forest Service should revise Management Area direction to include both the area between homestead property (HES226) and the Sulphur Camp property of the same owners in MA 5.4.

Response

Alternative C allocates this area to MA 5.4. The decision maker will consider this comment along with other comments on winter range in making the final decision.

Public Concern #181

The Forest Service should protect the whole Absoroka front in order to protect big game winter range since if these areas were lost, substitutes could not be found.

Response

Alternative C provides the maximum amount of protection to winter range from motorized use and other management activities. The decision maker will consider this comment along with other comments suggesting how winter range should be managed in making a final decision.

Public Concern #182

The Forest Service should use HE/HS analyses to refine and further quantify Standards and Objectives (B-T NF 2012, Rowland 2000, 2005).

Response

Habitat effectiveness (HE) and Habitat suitability (HS) standards are addressed in table 11 and the associated HE/HS standards and guidelines under the wildlife section in the plan.

Public Concern #183

The Forest Service should ensure that winter travel management on big game winter range and travel at other times in sensitive wildlife areas (DLMP, p. 61, Guideline #9) is consistent with management on adjacent federal lands (e.g., Bureau of Land Management)

Response

See response to PC #1.

Public Concern #184

The Forest Service should ensure that management of crucial big game winter range on SNF lands is consistent with management of crucial big game winter range on adjacent public lands so that big game populations have adequate habitat to sustain them during that critical season of the year and over time.

Response

See response to PC #1.

Public Concern #185

The Forest Service should define "adequate quantity" as it relates to forage on big game crucial winter range (DLMP, p. 62).

Response

Such a definition will vary depending upon site-specific conditions and wildlife populations. That determination will be made during plan implementation and development of allotment management plans for livestock grazing.

Public Concern #186

The Forest Service should define a new Management Area, such as MA 3.54 in the Medicine Bow Forest Plan, to provide for big game crucial winter range in a more natural and undisturbed setting because big game are sensitive to road traffic and other disturbances and their winter ranges should be closed to snowmobiling and open roads.

Response

In the alternatives, many acres of the winter range on the Shoshone are allocated to back country management areas with little vegetation management (such as MA 1.3) that do not allow motorized activities or roads. These allocations would be similar to the management area you describe. Alternatives D and C allocate progressively more of the winter range to these types of management areas. The decision maker will consider the public comments requesting that motorized activity and vegetation management be restricted on winter range in addition to other public comments in making the final decision.

Subject: 599 - Management Area 5.4 – Managed Big Game Crucial Winter Range - Less of This

Public Concern #187

The Forest Service should consider that designation of new winter range areas may affect access to the national forest for all landowners in the private land tracts in that area.

Response

Alternative F does not include winter range restrictions and alternative B includes exemptions to winter range closure in many of the areas adjacent to private lands. The decision maker will consider those alternatives and these comments along with other comments on management of winter range in making a final decision.

Public Concern #188

The Forest Service should implement the mapped acreages (Map 15, p. 282) for elk crucial winter range and elk calving rather than the acreages discussed in the third paragraph since the mapped acreages appear to be larger.

Response

See response to PC #166.

Public Concern #189

The Forest Service should keep areas currently not open to summer motorized use as non- motorized in summer since summer use tends to create resource damage and unauthorized routes. Specific areas to consider maintaining as summer non-motorized include the area west of Shoshone Lake and east of the Popo Agie Wilderness and Moon Lake. The Forest Service should change the designation of the Telephone Draw/Castle Rock area on the Wind River Ranger District to 3.38 to make the area available for winter motorize travel, but not allow the potential future expansion of OHV trails beyond the roads in existence now. Maintaining the areas around the backcountry access corridors as non-motorized in the summer will discourage unauthorized travel and resource damage.

Response

Alternatives C and D keep more of the back country areas closed to summer motorized activity. Alternative F opens the Telephone Draw area to winter motorized activity. The decision maker will consider those alternatives along with other comments on motorized use in making a final decision.

Subject: 610 - Management Area 8.1 – Developed Recreation Areas - General

Public Concern #190

The Forest Service should include the following as goals in Management Area 8.1 – Developed Recreation Areas: All established campgrounds, picnic grounds, and other facilities on the SNF will remain open; and campground reconstruction goals for the North Fork of the Shoshone River will increase.

Response

We do not feel is it is appropriate to set a goal in the forest plan that establishes whether existing facilities will be closed or whether new ones will be built. Decisions connected to large capital improvements will be based upon site-specific factors and addressed through appropriate public processes. Reconstruction goals for a specific corridor or area are a site-specific decision and are outside the scope of the revised Forest Plan analysis.

Public Concern #191

The Forest Service should include the following as objectives in Management Area 8.1 – Developed Recreation Areas: Double the campground reconstruction objective from one to two in order to meet the demand for larger recreation vehicle campsites and to encourage additional tourism activities; include at least one campground reconstruction in the North Fork of the Shoshone River; and reconstruct one campground and/or trailhead to accommodate summer access to motorized loop trails.

Response

With the reduction of funding available for campground reconstruction and the large number of campgrounds already modernized in the past few years, a goal of “at least” one campground reconstruction project during the life of the plan was determined to be appropriate. Reconstruction goals for a specific corridor or area are a site-specific decision and are outside the scope of the revised Forest Plan analysis. Access and infrastructure for motorized use is also a site-specific decision that will be addressed once loop trail opportunities are site-specifically identified.

Public Concern #192

The Forest Service should use the plan to acknowledge the importance of developed recreation areas (Management Area 8.1) and ski-based resorts (Management Area 8.2) facilities as potentially powerful informational and educational interpretive opportunities for National Forest System users on a variety of topics, including wildlife, vegetation, or watershed management.

Response

The desired condition statement for MA 8.1 lists interpretation as an output. In addition, a guideline suggests infrastructure that is needed for information and interpretation at trailheads.

Subject: 611 - Management Area 8.1 – Developed Recreation Areas - Desired Condition

Public Concern #193

The Forest Service should consider developing a disc golf course in a portion of the front country where it would not negatively impact resources or existing recreational uses.

Response

Disc golf facilities are more of the urban-type of recreational activities that the Forest Service does not provide. Developing site-specific facilities such as a disc golf area is outside of the scope of the revised Forest Plan.

Subject: 630 - Management Area 8.2 – Ski-Based Resorts - General

Public Concern #194

The Forest Service should classify Wild Iris, Beaver Creek, and Willow Creek ski areas as No Surface Occupancy because surface occupancy would destroy the wild and remote feeling of these places, and increase danger to recreationists.

Response

NSO or no surface occupancy is being looked at and adjusted between draft and final. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 650 - Management Area 8.6 – Administrative Sites - General

Public Concern #195

The Forest Service must evaluate facilities for the National Register of Historic Places (NRHP) and work with the Wyoming SHPO to develop a memorandum of agreement to mitigate any adverse effects prior to disposal of facilities because some administrative facilities have played significant roles in the development of the National Forest and, therefore, have the potential to be eligible for listing in the NRHP.

Response

Federal actions that could include disposal of excess facilities require consultation with the SHPO and a determination of eligibility.

Subject: 670 - Miscellaneous - Attachments

Public Concern #196

No PC statement needed.

Response

Attachments provided were reviewed by the analysis team and considered for this analysis.

Subject: 671 - Miscellaneous - Incorporate by reference other comments

Public Concern #197

No PC statement needed.

Response

Information incorporated by reference in comments was reviewed by the analysis team and considered for this analysis.

Subject: 672 - Miscellaneous - Information Requests

Public Concern #198

No PC statement needed.

Response

The DEIS and supporting documents are available via the forest website.

Subject: 675 - Monitoring - General

Public Concern #201

The Forest Service should include a discussion of recommended best management practices in the DEIS and provide implementation guidelines for such practices. Without these guidelines the range of alternatives considered in the DEIS is deficient and should be revised. During the monitoring stage the Forest Service should apply the proper mitigation and diligently follow the directions. This action is needed to minimize adverse impacts a much as possible.

Response

Best management practices are discussed in the management approach section for water and soil in the Draft Forest Plan. The best management practices contained in forest Service Handbook 2509.25 Watershed Conservation Practices Handbook are incorporated by reference in the Draft Forest Plan.

Public Concern #202

The Forest Service should make monitoring a priority for enforcement and monitoring of plan decisions. Failure to making monitoring a priority is not only irresponsible but could also lead to adverse situations later.

Response

The Draft Forest Plan, chapter 3, describes the forest monitoring strategy. Monitoring items described in this chapter will regularly assess the effects of implementing the forest plan.

Public Concern #203

The Forest Service should make monitoring water quality mandatory. Monitoring should be done at least once a year more frequently in more critical areas. Monitoring standards should be quantifiable stating what is acceptable and what isn't. Failure to develop these standards is not being environmentally conscience.

Response

The revised Forest Plan, chapter 3, describes the requirements for the Forest to monitor water quality. Watershed improvement projects are monitored on an annual basis. Soil disturbance, stream health and aquatic and riparian health are monitored on a 3- to 5-year basis.

Public Concern #204

The Forest Service failed to include the monitoring section in Chapter 3.

Response

Chapter 3 of the revised Forest Plan contains the forest monitoring strategy.

Public Concern #205

The Forest Service should make monitoring a priority. If there is a shortfall in the budget is should not affect monitoring. Monitoring is one of the most important actions on National Forest System lands. Monitoring should be an agency committed action to help determine if the Forest is actually meeting the Plan's goals and objectives regardless of constraints.

Response

Monitoring of forest management effects is mandated in the 1976 National Forest Management Act. Chapter 3 of the revised Forest Plan contains the Forest strategy for monitoring forest plan implementation.

Public Concern #206

The Shoshone National Forest should consider organizing a steering committee or something similar. This has been implemented on the Bighorn National Forest and is working to the interest of all stakeholders. Steering Committee members can help Forest personnel in monitoring forest plan and project implementation, in evaluating biological, social, and economic impacts; and by identifying amendment needs and proposed solutions.

Response

The Shoshone intends to continue meeting with cooperating agencies during plan implementation. We added wording to the monitoring plan section of the forest plan about holding bi-annual meetings.

Public Concern #207

The Forest Service should eliminate all population monitoring requirements in the Revised Plan and, instead base any monitoring requirements on analysis of changes in the quantity and quality of the know habitat for the four species. The habitat should be monitored because that will provide the basis for population trends.

Response

Chapter 3, the monitoring chapter of the Draft Forest Plan includes a monitoring item for the habitat condition and trends for management indicator species. Population trends for management indicator species will also be monitored, as this is required by the 1982 Planning Rule. The forest may also use other available data sources, for example Wyoming Game and Fish data, for some monitoring information.

Public Concern #208

The Forest Service should not manage for MIS species populations, or habitat. MIS species are selected for monitoring, not for individual species management. We do not believe that any of the goals, standards, or guidelines on pages 55 and 56 of the Draft Plan are appropriate, nor do we believe the assumption of MIS presence and the requirements outlined in paragraph 1 of Management Approach on page 56 of the Draft Plan are appropriate.

Response

The Forest Service is required to monitor management indicator species populations and habitat by the 1982 Planning Rule. The decision maker will consider the public comments in making the final decision.

Public Concern #209

The Forest Service should delete the reference to monitoring SOLC population trends. The Forest Service is not required to monitor population trends of species of local concern, as stated on p 12, paragraph 4. The Monitoring Plan, see page 191, does not include population monitoring for SOLCs.

Response

The 1982 Planning Rule requires the Forest Service to "manage to maintain viable populations of existing native and desired non-native vertebrate species in the planning area." The Shoshone intends to monitor the population trends of species of local concern as one measure of our success in "managing to maintain viable populations." The monitoring driver on page 215 of the Draft Plan will be changed from monitoring secure habitat for big game to monitoring the population trends of species of local concern.

Public Concern #210

The Forest Service should streamline the Monitoring Program outlined in Chapter 3.

Response

The monitoring strategy detailed in the Draft Plan, chapter 3 was designed to be compliant with both the 1982 Planning Rule and the 2012 Planning Rule.

Public Concern #211

The Forest Service should revise its discussion in the DLMP, Chapter 3 page 179, Monitoring, Monitoring Strategy – "Evaluate the data: Resource managers will evaluate the data collected, with the goal of answering the monitoring questions, and determine if changes are needed in plan direction or outputs." This implies some type of bias, prefer the use of 'analyze' versus 'evaluate'. The adaptive management approach here is good.

Response

We agree. The wording on page 203 will be changed from "evaluate" to "analyze."

Public Concern #212

The Forest Service should consider rewording the Monitoring Strategy section in Chapter 3 page 179 DLMP, Establish monitoring priorities: Criteria from the goals and objectives are used to establish priorities for monitoring within the expected program of work and budget constraints. The Forest Service should provide the public with the monitoring priorities so that we acquire a feel for SNF management priorities. Many sections lack quantifiable Objectives and Standards, making the monitoring program addressed in Table 28 a little vague and unclear. The Forest Service should list tangible expectations via quantifiable Objectives and Standards and an associated monitoring plan in an effort to build public trust and acceptance. Without quantifiable Objectives, Standards and Guidelines it will be impossible to measure success/progress. As a result the DLMP loses tangible meaning and public trust.

Response

The goals and objectives from which the monitoring priorities were derived were developed in concert with the public during the plan revision process. Where possible, quantifiable objectives were established for resource areas. The monitoring strategy was designed to be compliant with both the 1982 Planning Rule and the 2012 Planning Rule.

Public Concern #213

The Forest Service should consider collecting baseline population information or historical population indices along with detailed monitoring strategies to assess the effects of forest management activities on management indicator species (MIS).

Response

The Forest will use existing population data for management indicator species. With implementation of the plan monitoring strategy, the Forest will begin gathering additional population data on management indicator species. These data will be used to assess the effects of forest management activities on management indicator species.

Public Concern #214

The Forest Service should consider deleting the reference to HSS 5 on page 280 because it is not appropriate or necessary for MIS. The Forest Service should consider not designating any HSS 5 on suited timberlands.

Response

The reference to HSS 5 has been clarified as a conservation measure noted under the desired condition. The analysis has been added to clarify red-breasted nuthatch, which are strongly associated with mature to older forest habitat structural stages. For the issue of mature stands on suitable timber land, see the response to PC #355.

Subject: 676 - Monitoring - Annual Monitoring and Evaluation Report

Public Concern #215

The Forest Service should reconsider the frequency of their water quality checks. Monitoring of water quality BMPs needs to be conducted annually. The Forest Service should coordinate with the State of Wyoming BMP monitoring program, adopting a similar format as the Air Quality monitoring see on page 183. Adopting the State of Wyoming BMP monitoring program could be more cost effective.

Response

The Forest has a memorandum of understanding with Wyoming Department of Environmental Quality (DEQ) that outlines expectations for implementing best management practices. Best management practices are needed to validate water quality protection during management activities.

Subject: 677 - Monitoring - Components of the Monitoring Strategy

Public Concern #216

The Forest Service is not responsible for estimating population trends of MIS species as described on Page 190 of the Forest Plan.

Response

See response to PC #208.

Public Concern #217

The Forest Service should consider raising the benchmark for trail maintenance. If snowmobile trail maintenance is included in the definition of System trails, it alone would be over the 15% benchmark for minimum trail maintenance. For this reason we believe the 15% benchmark is too low since all other trail classifications should also receive some minimum level of annual maintenance to be properly managed.

Response

Objective #2 calls for maintenance to occur on at least 15 percent of our trail system annually. This amount is the minimum we would like to meet based on historical and projected funding and targets.

Subject: 680 - Monitoring and Evaluation

Public Concern #218

The Forest Service should update how it defines what the DFCs should be. Currently they are based on hard numbers generated by traditional forestry (commodity/timber harvest) goals that supersede vague, unmonitorable and unaccountable, contradictory promises of habitat management that follow. The result is a systematic devaluing of the unique ecosystem of which this Forest is a part.

Response

The desired conditions for the revised Forest Plan are tiered to the strategic goals of the USDA Forest Service including: “Restore, sustain, and enhance the nation’s forests and grasslands; provide and sustain benefits to the American people; conserve open space; and sustain and enhance outdoor recreation opportunities.”

Public Concern #219

The Forest Service should require their Wilderness rangers to do yearly inventories collecting detailed information. Specific data collection criteria should be explained to rangers so the appropriate field data is collected and meaningful decisions can be made to maintain wilderness qualities, and accurately meet the required scores for the Ten-Year Challenge.

Response

Monitoring drivers and frequency of reporting for wilderness character are addressed in the monitoring section of chapter 3. Specifics on how the data are collected are not forest plan-level direction and are typically articulated in project-specific monitoring protocols.

Public Concern #220

The Forest Service should revise the standards and guidelines in the LMP with respect to monitoring. It will be difficult to manage and monitor effects of management actions in relationship to stated objectives and goals given the lack of quantifiable standards and guidelines in the LMP.

Response

See response to PC #212.

Public Concern #221

The Forest Service should delete Goals, Standards, Guidelines, and Management Approach for Management Indicator Species on pages 33 and 34 of the LMP, and from the direction for various management areas. The Forest Service should also delete requirements for population monitoring from the Monitoring Plan, and that you delete discussion of management requirements for management indicator species from Appendix 3. The Forest Service should modify pages 274 to 281 of the DEIS to simply discuss the species selected as MIS and their habitat needs, and that you delete all discussion of management effects on management indicator species in the DEIS.

Response

See response to PC #208.

Public Concern #222

The Forest Service should measure the number of acres of treatments designed to increase aspen and willow instead of measuring the number of acres of aspen and willow every 5 years. The Forest Service should also place whitebark pine on a 5 or 10 year monitoring cycle. These modifications in inventory should net a cost savings.

Response

Our desired condition is to have increased acres of aspen and willow. While management treatments are one way to achieve that increase, wildfire and other natural processes are another way that those cover types can change. For this reason, we will measure the acres of the cover types and not just our treatment acres. We agree that it would be beneficial to change the monitoring cycle from 1 year to 5 years for whitebark pine.

Public Concern #223

The Forest Service should identify and secure the appropriate funds for fish and wildlife monitoring and mitigation, including compensation if necessary or required. Ensure that funds designated and intended for fish and wildlife management are not redirected to other causes. Failure to secure and obligate funds needed for the development and implementation of a monitoring and mitigation plan could result in the loss of the necessary funds to implement needed monitoring and mitigation.

Response

The Forest Service annual budget allocation process includes funds for resource monitoring each year.

Public Concern #224

The Forest Service should establish and update regularly a system of tracking commitments, in plans or agreements, along with any actions contrary to those commitments. Organization is vital for successful completion.

Response

Forest projects are monitored through project implementation tracking. Agreements are monitored through the Forest Service's grants and agreements processes.

Public Concern #225

The Forest Service should ensure that laws, regulations and policies intended to conserve and protect fish and wildlife during energy development are not abdicated or abridged. Fish and wildlife habitat should not be sacrificed for energy development.

Response

See response to PC #854.

Public Concern #226

The Forest Service should establish a process for annual review and adjustments of actions that affect fish and wildlife. An adaptive management strategy is appropriate if based on established adaptive management guidelines and science. Adapting the management as needed strategy will provide the optimum habitat.

Response

Chapter 3 of the revised Forest Plan describes a monitoring strategy for fish and wildlife. Information gathered from monitoring can inform adjustments or adaptations to forest plan implementation.

Public Concern #227

The Forest Service should assure that mitigation and monitoring based on new scientific information is implemented in the energy development process. This will prevent from making unnecessary changes later.

Response

Mitigation and monitoring for site-specific energy development would be established at the project level at the time the project proposal is analyzed.

Subject: 700 - DEIS Chapter 1 - Purpose and Need

Public Concern #228

The Forest Service should study, develop and describe appropriate alternatives, such as the intermediate approach developed by the NAPgA to address the Purpose and Need, because the alternatives currently analyzed in the DEIS represent only the extremes of the spectrum of the potential actions and create all or nothing scenarios.

Response

Alternatives considered in the DEIS were developed in response to issues raised and considering available information.

The FEIS includes an alternative considering the best management practices to allow pack goat use on the forest. Pack goat movements may be controllable; however, there is a risk of free-ranging bighorn sheep coming into contact with pack goats. This alternative carries a risk of introduction of *Pasterurella spp*. through interaction of free-ranging bighorn sheep with pack goats. Although the risk of disease transmission is low to very low, even one disease transmission event could be catastrophic to a core native bighorn sheep herd. (See Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep, Shoshone National Forest 2012.) Due to the potential for disease transmission, this alternative was dismissed from detailed analysis.

Subject: 701 - DEIS Chapter 1 - Proposed Action - General

Public Concern #229

The Forest Service should maintain a strong measure of flexibility for public lands management because budgets will likely decrease, while the cost of fire suppression will surely increase in the coming years, and disturbance to the Forest, whether caused by fire, insects, or mechanical treatment, will be unavoidable.

Response

The revised Forest Plan sets the framework for future management actions. Implementation of future management actions, whether program planned or in response to natural disturbances to the forest, is flexible and depends upon future budget allocations.

Subject: 702 - DEIS Chapter 1 - Decision Framework - 1982 Planning Rule

Public Concern #230

The Forest Service should consider revising the plan to include the requirements in CFR 219.12€ to meet the 1982 Rule procedural requirements in order to construct a full range of alternatives because monetary benchmarks were not addressed in response to major resource issues.

Response

A present net value benchmark was completed between draft and final.

Subject: 704 - DEIS Chapter 1 - Public Involvement – General

Public Concern #231

The Forest Service should include a slideshow in future public outreach events to highlight some of the amazing lands and waters that are within the National Forest because the Plan public outreach sessions held in Lander only included poster-sized presentations with too much printed text and not enough photos to represent the forest and the issues.

Response

Thank you for the feedback and suggestion for more effective public communication. We will consider providing more visual material (e.g., slide shows) for presentations at future public meetings.

Subject: 710 - DEIS Chapter 1 - Revision Topics – General

Public Concern #232

The Forest Service should have included fire risk, economics, and motorized travel as revision topics in the Draft Plan because they are timely and appropriate given the amount of recent local attention to these.

Response

Revision topics were selected upon both the need for change from the existing forest plan and strong public interest in how the revised plan will answer these questions. The topics were identified repeatedly in public meetings held across the forest and by the Government Cooperators Work Group from 2001 through 2010, and validated during the scoping period in late 2010 (Summary p. viii; DEIS page 5). The draft plan provided management direction for fire and fuels (pages 66 through 70) and wildfire risk and fuels management were addressed under disturbance processes in the DEIS (pages 342 through 365).

Subject: 711 - DEIS Chapter 1 - Recreation Uses and Opportunities

Public Concern #233

The Forest Service should address the Continental Divide National Scenic Trail (CDNST), including a discussion on the need to site the corridor and provide for appropriate management direction to achieve the nature and purposes of this National Scenic Trail (FSH 1909.12 11.15), in the Special Areas and Designations, on page 8 of the DEIS, because it is a Congressionally Designated Area, and it would clearly link the CDNST to the Purpose and Need for Action and Revision Topics sections of the DEIS.

Response

Revision topic selection was briefly described in the DEIS (page 5). The revision topic discussion at DEIS page 8 pertains to new special areas and designations. The Continental Divide National Scenic Trail (CDNST) was established in 1978 and is addressed in the revised Forest Plan as Management Area 3.6A, which includes appropriate management direction.

A map will be added to depict where the CDNST 3.6A management direction will apply. (See also the response to PC #109.)

Subject: 713 - DEIS Chapter 1 - Vegetation Management

Public Concern #234

The Forest Service should emphasize cheatgrass control, as described on page xii of the DEIS, because it would prevent conversion of sagebrush to cheatgrass.

Response

Cheatgrass control falls under invasive species management, discussed in the DEIS at pages 378 through 390. The draft plan includes management direction for invasive species, including cheatgrass, at pages 63 through 65. The DEIS notes at page 131 that sagebrush is protected in all alternatives to maintain habitat conditions for sage-grouse. Sage-grouse are a sagebrush-obligate species; effects to this habitat are at pages 227 through 232 under the greater sage-grouse discussion.

Subject: 716 - DEIS Chapter 1 - Commercial Livestock Grazing

Public Concern #235

The Forest Service should change the wording in the following statement appearing in Revision Topics, Commercial Livestock Grazing, page 19 of the DEIS from "should" to "may" because the capability and suitability analysis is merely a broad-scale model and not specific enough to determine which areas "should" be available for commercial livestock grazing: "Two aspects of commercial livestock grazing will be addressed in the revised forest plan. The first- what areas of the Shoshone should be available for commercial grazing…."

Response

The revision topics were developed with public input and discussed at public meetings held across the Forest and by the Government Cooperators Work Group from 2001 through 2010. The topics are a summary of concerns. For more thorough discussion, see the livestock grazing discussion under the People and Communities – Goods and Services section in the DEIS (pages 395 through 419). Pages 395 through 397 discuss various acts, laws, executive orders, and policies that guide management of rangeland resources and commercial livestock grazing on National Forest System lands. Between the release of the DEIS and completion of the FEIS, the commercial grazing capability acres were reviewed and recalculated to reflect corrections and adjustments

Subject: 730 - Other - General

Public Concern #15

The Forest Service should consider adding a list of acronyms to the EIS and spelling out acronyms at beginning of each chapter along with making headings stand out more such as with numbers and split up chapter 3 into multiple chapters to help stop confusion.

Response

A list of acronyms was provided at page v. of the DEIS and will be located at page vi of the FEIS. To help the reader, the first use of acronyms will be spelled out at the beginning of each chapter.

Public Concern #152

The Forest Service should use adaptive management thinking and evaluation of conditions to alter potential impacts throughout the DLMP.

Response

Adaptive management is a common practice that will be used in plan implementation.

Subject: 732 - Other - Climate Change Scorecard - General

Public Concern #236

The Forest Service should disclose its climate change adaptation and mitigation policy, by resource, in the plan revision documents because the documents, as they are currently written, ignore climate change.

Response

The plan monitoring section noted additional practices that may be considered to respond to climate change at pages 260 through 261. The DEIS discussions considered information in Climate Change on the Shoshone National Forest, Wyoming (USDA 2012) and discussed anticipated effects by resource. (e.g., see pp.21, 61 through 62, 83, 103 through 104, 137 through 138, 320)

Subject: 733 - Other - Multiple Use

Public Concern #237

The Forest Service should only manage for multiple use at an appropriate scale because too many national forests have been negatively impacted by trying to do so at too small of a scale, and it is impossible for all uses to occur within the same area.

Response

As noted in the comment, it is impossible for all uses to occur within the same area. Multiple-use management is considered across the entire forest through identification of different management areas, managed for different mixes of uses.

Public Concern #238

The Forest Service should create a balanced plan that respects multiple use and sustained yield principles because it is essential to provide diverse opportunities.

Response

We developed alternative G in response to input on the draft plan to provide a balanced approach for managing the forest.

Subject: 750 - DEIS Chapter 2 - Alternatives Considered - General

Public Concern #239

The Forest Service should revise all of the proposed alternatives as they have not proved that they have studied, developed, and described appropriate alternatives for recommended action as required by 42 USC 4332(2). Furthermore, the alternatives presented lack science based decision making, details regarding adaptive management, and do not address alternate possibilities that fall between the extremes of what has been described.

Response

The majority of the comments related to this concern statement center around eliminating pack goat use in native bighorn sheep herd areas. The Forest Service reflected the current level of goods and services provided by the unit, and analyzed that as the existing condition or no-action alternative (as previously required under 36 CFR 219.12(f)(7)).

Although the risk of disease transmission is low to very low, even one disease transmission event could be catastrophic to a core native bighorn sheep herd. (See Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep, Shoshone National Forest 2013.) See also response to PC #228 regarding pack goats.

Public Concern #240

The Forest Service should reconsider all alternatives to include: greater protection of the forest, systems, and biological diversity; protection of mule deer and other wildlife and their habitat; and improved protection for fish and wildlife. The alternatives should identify a corridor for primitive and semi-primitive non-motorized use according to FFSA 2353.44(b)(1); and should provide more differences between the alternatives in regards to grazing and forest related employment data. More change is needed than what is proposed in Alternatives A and B.

Response

Alternatives C and D propose recommending additional wilderness designations with emphases on non-motorized back country (see Summary ix-x). See responses to PCs #105 and #106 pertaining to FSM 2353.44(b)(1) for the Continental National Scenic Trail.

Public Concern #241

The Forest Service should reconsider all alternatives to include: preservation of the Lander Front and Dubois area to prevent oil and gas surface occupancy; no surface occupancy on all Inventoried Roadless Areas and wilderness areas; the impact on animals from drilling in the winter ranges; improved protection for the big game habitat that will maintain their function and population numbers, update definitions for reclamation guidelines, and consider recreation as a strong use both socially and economically.

Response

Alternative G incorporates changes to suitability for oil and gas development in response to public comments received on the DEIS. Under alternative G, National Forest System lands where adjacent owners (primarily BLM and State Land) preclude surface occupancy were determined not suitable for oil and gas surface occupancy.

Public Concern #242

The Forest Service should reconsider alternatives so that the forest is not closed to pack goats. Although Alternatives E and F allow pack goats in the forest, the Forest Service should consider revising Alternative B and use Best Management Practices and mitigation measures. Alternative A represents no change, and should continue to allow pack goats, as in the 1986 forest plan. Alternatives B through D fail the MUSYA (Multiple Use Sustained Yield Act), and don't meet the NFMA (National Forest Management Act) requirements, as they eliminate pack goats. There is a need for an alternative that allows pack goats; separates their classification from herd goats, and focuses on disease prevention between pack goats and bighorn sheep.

Response

See response to PC #228 regarding pack goats. The temporary closure to pack goats would expire under alternative A. Information from the Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep Shoshone National Forest 2013 was considered for this analysis (USDA Forest Service 2013).

Public Concern #889

The Forest Service considered 3 alternatives that were not compliant with the Roadless Area Conservation Rule (RACR).

Response

Alternatives discussed in the July 2012 DEIS were developed to address the Revision Topics with the then-current direction for Wyoming. See response to PC #13 for alternatives compliant with the RACR.

If a non-compliant alternative was selected, future site-specific analyses would ensure propsed activities were compliant with the RACR per the October 1, 2012 Supreme Court decision.

Public Concern #890

The Forest Service should consider an alternative that provides management direction to restore the roaded and damaged portions of the IRAs to a roadless condition.

Response

Alternative C allocates all inventoried roadless areas to management prescriptions that prohibit motorized activity and scheduled vegetation harvest. Under that alternative, existing roads and motorized trails in inventoried roadless areas would be closed and rehabilitated.

Subject: 751 - DEIS Chapter 2 - Alternative A

Public Concern #243

The Forest Service should consider adopting Alternative A for the final forest plan. Those who have been responsible for the forest have done an excellent job and the success of their management should be noted in the final plan.

Response

Support for alternative A noted.

Public Concern #244

The Forest Service should consider adopting Alternative A for the final plan, with some revisions in regards to oil and gas. No more wilderness designations should be made, there should be an increase in motorized trails, 250,000-450,000 more acres should be made available for logging, action should be taken in regards to the pine beetle, and oil/gas leasing and surface occupancy should be permitted on forest lands that are adjacent to BLM lands.

Response

Support for alternative A, with select revisions, noted.

Alternatives A, B, E, F, and G do not include additional wilderness recommendations.

All alternatives would maintain the existing motorized trails, and alternatives D, G, B, E, and F propose additional motorized trails.

Alternatives B, C, D, E, F, and G include additional acres identified as suitable for timber production. Opportunities to increase areas suitable for timber production are limited by the amount of existing designated wilderness areas, lands that are rocky or have steep slopes, vegetation types, or conflicts with management direction.

Under alternative G, National Forest System lands where adjacent owners (primarily BLM and state land) preclude surface occupancy were determined not suitable for oil and gas surface occupancy. Alternative G provides a balanced response to the issues raised during revision, continues management that is working, and includes allocations designed to respond to public comments received on the DEIS including modifying management direction for oil and gas surface occupancy to be harmonious with adjacent BLM management plans for parcels along the Forest boundary. Alternative G is similar to alternative B. The main differences include additional acres of winter motorized recreation outside of crucial winter range, changes to summer motorized recreation, changes to suitability for oil and gas development, and modification to special areas.

Public Concern #245

The Forest Service should adopt the portion of Alternative A that designated the Washakie Management Area for semi-primitive recreation. This will prevent trail damage, abuse, trash, and noise pollution in the forest.

Response

Support for alternative A noted.

Public Concern #246

The Forest Service should consider adopting either Alternative A or Alternative B because there will be no changes to the access and use of the forest, which will result in maintaining the greatest value for the majority of forest users.

Response

Support for alternative A or B noted

Subject: 752 - DEIS Chapter 2 - Alternative B

Public Concern #247

The Forest Service should adopt Alternative B as it creates the best balance in supporting multiple use and protecting the resources of the forest. The Forest Service should consider the effects of tourism for local communities and the increased revenues that support the economy.

Response

Support for alternative B noted.

Public Concern #248

The Forest Service should adopt Alternative B under the following conditions: (1) off-trail snowmobiling opportunities will not be hindered, and all existing trails and off-trail areas will remain open (The Forest Service can use best available technology to address noise, pollution, and horsepower of snowmobiles); (2) The Lava Mountain Area, Ramshorn Basin/Deacon Meadows, Sink Canyon, North of Cyclone, Pass Brecciae Cliffs, Sublet Pass, Jade Lakes, Austin Peak, Bonneville Meadows, Jules Bowl, Togwotee, Two Ocean Mountain, Brooks Lake Area, The Beartooths, and High Lakes Wilderness Study Areas will not be closed; and (3) mountain bike and ATV use continue to be permitted. It is important that the Forest Service keeps areas available for motorized recreation and does not designate more wilderness so that it can manage the forest for multiple use in order to meet the needs of all forest users. .

Response

Support for alternative B noted, along with three conditions.

(2) Snowmobiling opportunities – existing designated snowmobile trails are proposed to be kept open. See response to PC #697.

- See response to PC #82.
- Alternatives A, B, E, and F do not recommend additional wilderness designations. Motorized recreation opportunities were discussed in the recreation section in chapter 3, and a comparison between the alternatives is provided in table 18.

The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #249

The Forest Service should adopt Alternative B for their final plan with the key change of incorporating DuNoir SMU (East, West, and South), Franc's Peak, Wood River, and Trout Creek as wilderness areas. The preferred alternative should have the highest standards for the forest, protecting the resources, limiting motorized recreation, increasing special designations (Pat O'Hara and Bald Ridge Mountains) and limiting oil and gas development.

Response

Support for alternative B noted, with suggestions that include elements incorporated in alternatives C and D. Alternatives C and D propose wilderness recommendations and eight proposed research natural areas. Alternative C would seasonally limit motorized use on existing trails and proposes a reduction in snowmobile trails (see recreation section of EIS).See also response to PC #698 pertaining to motorized use

Public Concern #250

The Forest Service should only adopt Alternative B for their final plan with the following changes to its position towards oil and gas development. Oil/gas/energy development should be allowed in the forest; road construction should be permitted in NSO high oil/gas areas; geophysical exploration activities on NSA lands should be permitted on a case by case basis; controlled surface use, timing and NSO restrictions found in the plan should not be applicable to current leases, and should be utilized where beneficial.

Response

Support for alternative B noted, with changes to oil and gas development. Alternative A includes the most acres allowing surface occupancy, followed by alternatives F, E then B.

Public Concern #251

The Forest Service should adopt Alternative B because it benefits domestic sheep grazing and bighorn sheep habitat in part due to the prohibition of pack goats, and is overall a good plan for the big game winter range.

Response

Support for alternative B noted.

Public Concern #252

The Forest Service should not adopt Alternative B as their final plan as it does not offer enough protection for the forest. It lacks in fish and wildlife protection; decreases management direction on the impacts of roads, trails, and land use authorizations; permits surface occupancy in key areas (Bald Ridge, Dead Indian Hill, Chief Joseph Scenic Hwy, Beartooth and Absaroka Corridors); does not designate any

new wilderness; and increased motorized recreation in the Wind River and Washakie districts. The Forest Service should ensure that some areas outside of the designated wilderness areas are left as backcountry non-motorized areas.

Response

Nonsupport of alternative B as a final plan, due to not enough protection for the forest noted. Fish and wildlife protection were provided in the draft plan through standards and guidelines for water and soil (pp.24 through 27), which also incorporates the Watershed Condition Framework (USDA Forest Service 2011c) and fish and wildlife species (pp. 38 through 63) and within the management area direction, with some management areas focused on providing specific habitat elements (e.g., MA 5.4 big game crucial winter range). Anticipated effects were discussed in chapter 3 of the DEIS by resource.

Figure 2 in the EIS (Summary p. x), displays the management area allocation proposed with the various alternatives, management areas 1.1, 1.1A, 1.3, 1.5A, 1.6A, and 1.6B offer wilderness and back country non-motorized areas on 86 percent under alternative C to 67 percent under alternative F. Alternatives C and D include additional recommended wilderness.

Public Concern #253

The Forest Service should not adopt Alternative B as their final plan as it decreases the accessible motorized acres down to 20% for the entire forest. These lands should not be designated as backcountry non-motorized, as they prohibit over snow motorized recreation, thereby limiting winter motorized use of the forest.

Response

We reviewed motorized winter access in response to comments received on the draft plan, and we developed alternative G in response to comments on the draft plan and DEIS. Alternative G is similar to alternative B. One of the main differences is the inclusion of additional acres of winter motorized recreation outside of crucial winter range, in addition to changes to summer motorized recreation.

Public Concern #254

The Forest Service should consider reevaluating the map for Alternative B to include the following: 1) Moving the game winter area up the valley so that the east end would be at the very eastern end of the Roaring River Subdivision. 2) Showing the trail access to Lava Mountain Lodge. This trail route should be flexible since the public route is undesirable and the private route is not guaranteed.

Response

See response to PC #154 regarding big game winter range and trail access to Lava Mountain.

Public Concern #255

The Forest Service should consider adopting a combination of Alternatives B and D. Together, these alternatives support wildlife, habitat, motorized and non-motorized recreation, and enforce/monitor motorized use so that no new trails get created. Both alternatives provide for light livestock use that will protect winter forage for wildlife along with benefits to big game, fisheries, water quality, and habitat, while also reducing invasive plant species.

Response

Support for adopting a combination of alternatives B and D noted. The decision maker will consider the public comments in making the final decision.

Subject: 753 - DEIS Chapter 2 - Alternative C

Public Concern #256

The Forest Service should consider adopting Alternative C for the final plan as it offers the best conservation of the forest resources through expanding the wilderness designations, decreasing motorized trails, prohibiting livestock grazing on big game crucial winter range, protects grizzly, lynx, and provides low likelihood of disease transmission between elk and domestic livestock; contains the desired consistency with the roadless rule, enforces no surface occupancy on all roadless areas and permits a reasonable amount of oil and gas development and timber production. This alternative appears to be the best alternative that will meet some of the needs of all of the users of the forest.

Response

Support for alternative C noted.

Public Concern #257

The Forest Service should consider adopting Alternative C for the final plan, with the following changes: (1) No surface occupancy should be added to the SNF land that lies around the BLM border and areas around Dubois; (2) Increased enforcement of trail expansion and motorized trails; (3) Increasing wilderness designations to include Windy Mountain, Carson Lake, Little Popo Agie, Pass Creek, Togwotee Pass, North Boundary, and Reef; and (4) increased restriction or complete elimination of oil and gas development on the forest land.

Response

Support for adopting alternative C noted with four conditions.

(1) No surface occupancy to SNF land around BLM border – Many comments identified issues with the preferred alternative not matching management on adjoining BLM and state lands, particularly for oil and gas management. Those comments are being addressed between draft and final. The modified preferred alternative will include changes to make management more consistent as appropriate.

(2) Increased enforcement of trail expansion and motorized trails – Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

(3) Increasing wilderness designations – Only Congress can pass legislation to create, or designate wilderness. In 2008 (edited 2013), 34 areas on the Shoshone were evaluated for potential wilderness. This process included three tests—capability, availability, and need. Capability is defined as the degree to which the area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness.

(4) Various alternatives were analyzed including a range of recommended wilderness from 628,800 acres in alternative C to 194,500 acres in alternative D to 0 acres in Alternative B. Potential areas not recommended for wilderness were allocated to other management prescriptions. Alternative F allocates the most acreage of potential wilderness to management prescriptions that allow activities that may impact the potential for wilderness, followed by alternative E and A that allocates the second highest, and alternative B and D which allocates the third highest. The deciding officer will consider the various options along with other comments during the decision process.

(5) The consideration of no oil and gas development on the forest was addressed in an alternative eliminated from detailed analysis in the DEIS. The alternatives prohibit surface occupancy for oil and gas development on varying acres of the forest. Alternative C allows development on only 7 percent of the forest. The decision maker will consider the public comments requesting little or no oil and gas development on the forest in addition to other public comments in making the final decision.

Public Concern #258

The Forest Service should consider adopting a combination of Alternatives C and D which support conservation, additional wilderness areas, increased Wild and Scenic River designations, protection of roadless areas, improved and increased migration corridors, winter range, and minimal oil and gas development. These alternatives also provide the best levels of summer and winter motorized recreation and prevent snowmobile disturbance to wolverine denning.

Response

Support for alternatives C and D noted.

Subject: 754 - DEIS Chapter 2 - Alternative D

Public Concern #259

The Forest Service should consider adopting Alternative D for their final plan as it provides a good balance of conservation, motorized and non-motorized recreation, minimal oil and gas development, protection of big game winter range (no snowmobiling), good vegetation management, supports the 8 Research Natural Areas and wilderness designations.

Response

Support for alternative D noted.

Public Concern #260

The Forest Service should consider adopting Alternative D for the final plan, with the following changes: (1) Ensure that timing restrictions are in place on all big game crucial winter ranges, (2) Designate all possible Research Natural Areas possible on the forest to ensure maximum diversity; (3) Reduce timber production to wood that is dead; (4) Additional wilderness designations; (5) Improved signage and enforcement forest wide; and (6) Ensure there is no new motorized recreation in IRAs and non-motorized winter recreation in Sunlight Pass, Togwotee Pass, and Two Ocean Mountain; (6) development of oil and gas should not be a part of this plan.

Response

Support of alternative D with changes noted.

(1) Timing restrictions on big game crucial winter range is discussed within the elk analysis (DEIS pages 285 through 288) and affected acres summarized by alternative in tables 74 and 77;

(2) Alternatives C and D consider inclusion of eight research natural areas, followed by alternatives B and E with six and three, respectively. The DEIS discusses research natural areas at pages 535 through 544;

(3) Reducing timber production to wood that is dead was considered but eliminated from detailed analysis because it is not responsive to other forest health and vegetative diversity goals.

(4) Alternatives C and D include recommending additional wilderness areas;

(5) The Forest Service continually strives to curb illegal off-road vehicle (ORV) or off-highway vehicle (OHV) use through education, signage, and enforcement and by providing quality ORV and OHV use where management area direction allows for such use;

(6) Alternatives B, C, and D comply with the Roadless Rule;

(7) The decision maker will consider the public comments requesting little or no oil and gas development on the forest in addition to other public comments in making the final decision.

Subject: 755 - DEIS Chapter 2 - Alternatives E

Public Concern #261

The Forest Service should consider not adopting Alternatives E or F. These alternatives are inconsistent with the roadless rule and legislation of non-motorized/non-mechanized use in the wilderness. They degrade crucial wildlife range and provide too much winter motorized recreation. Alternatives E and F have a negative effect on cross country ski safety, water quality, soil productivity, vegetation, and wildlife. Additionally, Alternative E inappropriately supports industrial use of the forest over tourism, and Alternative F provides the least amount of protection for transmission between domestic livestock and elk within crucial winter range. This alternative is also likely to adversely affect lynx critical habitat by increasing snowmobile use.

Response

Non-support of alternatives E and F noted. Effects of these alternatives are discussed in chapter 3 of the EIS. See response to PC #263 regarding timing restrictions on big game crucial winter range.

Public Concern #262

The Forest Service should consider implementing Alternative E or F if no other alternatives are developed, and should not be closed to goat packing.

Response

Support for alternatives E and F noted. See response to PC #228 regarding pack goats.

Subject: 763 - DEIS Chapter 2 - Exclude human presence in crucial big game winter range

Public Concern #263

The Forest Service should protect big game crucial winter range by limiting human presence to the area.

Response

Timing restrictions on big game crucial winter range is discussed within the elk analysis (DEIS pages 285 through 288) and affected acres summarized by alternative in tables 74 and 77. An alternative was considered, but eliminated from detailed study that would exclude human presence and disturbance in crucial big game winter range.

Subject: 764 - DEIS Chapter 2 - Add additional special interest areas

Public Concern #264

The Forest Service should use the Shoshone National Forest, a Region of the US Forest Service, or the conterminous United States for areal comparison or reference, not the Greater Yellowstone Region as it seems limiting and inappropriate.

Response

The spatial and temporal boundaries used in analysis vary and are discussed by resource. The Greater Yellowstone Area is used as the analysis area for appropriate resources (e.g., grizzly bear).

Public Concern #265

The Forest Service should create more Special Interest Areas to highlight unique ecological areas within the forest including the addition of the Deep Lake Slide as it may be the largest rock slide in the conterminous United States and could provide an important resource for studying mass wasting events by students and scientists. The Forest should also consider include Two Ocean Mountain, Bald Ridge, Pat O'Hara Mountain, and Breccia Peaks as potential Special Interest Areas.

Response

Special interest areas were discussed in the DEIS at pages 545 through 550. It is noted the Deep Lake Slide area was not considered for special interest area designation due to its location within a management area that allows adequate protection. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 765 - DEIS Chapter 2 - Undesignated wilderness areas, research natural areas, special interest areas

Public Concern #266

The Forest Service should provide information on how the Special Interest Areas are chosen and if there is a limit to how many Special Interest Areas can be nominated and/or selected in the Plan.

Response

Forest resource specialists followed Forest Service Manual 2372, Forest Service Handbook 1909.12, and 36 CFR 294.1 guidance for establishing and managing special interest areas. The guidelines are not prescriptive on a specific number of minimum or maximum areas to consider.

Subject: 767 - DEIS Chapter 2 - Pro-recreation

Public Concern #268

The Forest Service should consider opening up the forest to limited or no restrictions to recreation for freedom and income.

Response

A pro-recreation alternative was considered but eliminated from detailed analysis. The resource analyses note the numerous laws and administrative framework the Forest Service is required to address. Recreation opportunities will continue to be available as noted in the DEIS; motorized and non-motorized opportunities are summarized in table 18 near the end of chapter 2, and discussed in more detail in chapter 3.

Subject: 768 - DEIS Chapter 2 - Changes to travel management

Public Concern #269

The Forest Service should consider changing the designation of all 1981 motorized trails around Kirwin/Franc's Peak and Sunlight to M.A. 4.3 or M.A. 3.5 and include 100 ft. buffer so they can be part of travel management process.

Response

Alternatives that included changes to travel management were considered but eliminated from detailed analysis. The Forest intends to complete a travel management analysis sometime after the decision on the revised Forest Plan.

Public Concern #270

The Forest Service should consider not delaying the travel management plan and begin travel management planning within two years after the Record of Decision is singed for the Forest Plan revision since it would costly, inefficient, and should be included in the Forest Plan revision.

Response

See response to PC #269 regarding alternatives considered. The decision maker will consider suggestions for timing of travel management planning in this decision and future planning efforts

Public Concern #898

The Forest Service should complete a travel analysis, identify a minimum road system, and identify a list of unneeded roads for decommissioning or conversion as part of the revised plan effort.

Response

Alternatives that included changes to travel management were considered but eliminated from detailed analysis. The Forest intends to complete a travel management analysis following the decision on the revised Forest Plan.

Public Concern #901

The Forest Service should more clearly articulated in the LRMP their duty to designate motorized trails and areas to minimize impacts to forest resources and other users as required by Executive Order 11989 and 36 CFR 212.55 and recently affirmed in a federal court decision (see Idaho Conservation League v. Guzman, 2011 WL 447456 (D. Idaho Feb. 4, 2011))

Response

The other guidance section in the forest plan includes a reference to 36 CFR 212.5 Travel Management.

Public Concern #902

The Forest Service should work towards a sustainable road system by: a) minimize impacts to resources and other users from off-road vehicles in plan components and provide direction for removing illegal routes, especially in IRAs and other areas of importance to the environment and backcountry recreation; and b) manage for quality recreation and take a hard look at the consequences of significantly under-maintaining the transportation system, and how road densities impact resources and the quality of the recreational experience.

Response

The revised Forest Plan desired condition and goals for roads and trails include direction on minimizing impacts to resources and addressing unauthorized routes. The alternatives contain a mix of different allocations for motorized recreation. The analysis addresses how those different allocations impact different types of recreation activities. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 770 - DEIS Chapter 2 - No oil and gas surface occupancy Forest-wide

Public Concern #271

The Forest Service should consider oil and gas surface occupancy forest wide including big game winter range and inventoried roadless areas and not just in non-motorized areas in order to protect wildlife and keep the forest beautiful.

Response

See response to PC #688 regarding consideration of oil and gas surface occupancy.

Subject: 780 - DEIS Chapter 2 - New Alternatives

Public Concern #272

The Forest Service should consider different alternatives that support Multiple Use Sustained Yield Act and/or a Forest Health Alternative that reflect forest changes between 2006 and 2010.

Response

There is a variation across the alternatives on how different resources are emphasized. Alternative C emphasizes non-motorized recreation and less commodity production, while alternative F emphasizes motorized recreation and commodity production. The other alternatives are arrayed between the two extremes. Forest health considerations and responses to changes in vegetation conditions in the last 10 years are incorporated into all the alternatives to some degree. The most aggressive responses are included in alternative F.

Subject: 800 - DEIS Chapter 3 - Affected environment and environmental effects – General

Public Concern #273

The Forest Service should make the following changes to the DEIS: (1) The Forest should "discuss at appropriate points in the final [EIS] any responsible opposing view which was not adequately discussed in the draft [EIS] and … indicate the agency's response to the issues raised" and "insure the professional integrity, including scientific integrity, of the discussions and analyses" included in its EIS. (2) In areas of the DEIS where relevant information for assessing impacts is incomplete or unavailable the Forest must include the information if the costs of obtaining the information is not exorbitant. If the information cannot be obtained due to high costs or the means of obtaining are unknown, then agency must include in the EIS: (a) a statement that such information is incomplete or unavailable; (b) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant impacts on the human environment; (c) a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment; and (d) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. (3) The current disease model is largely dependent on assumptions, which should be studied and proven to be relied upon in the EIS. (4) The effects of mountain goats and their contribution to disease in the Shoshone should be considered in the EIS. (5) The final DEIS and Land Management Plan should be drafted without reliance on the Risk Assessment Disease Transmission (RADT) Committee's and Payette Principle Committee's findings and conclusions as the findings were prohibited by a previous legal decision against the Forest Service. (6) The DEIS must be adjusted to reflect that the majority of rangelands on the Shoshone are meeting desirable conditions for bird species and maintaining current permitted areas for grazing is not likely to change conditions. (7)

Page 12, Vision, paragraph 5- it is recommended that sentence one is modified as follows; "Forested ecosystems … while providing habitat for viable populations … species" and the second sentence modified as; "Populations of Sensitive species are stable … toward recovery," (8)There is a discrepancy in the total miles of snowmobile trails in the DEIS vs. the Land Management Plan, the discrepancy should be corrected in the final EIS and Plan.

Response

(1) Response to comments on the DEIS will be provided in the FEIS;

(2) Within the resource discussions under the "Methodology" heading, the information considered, the spatial and temporal context for effects analysis, and incomplete and unavailable informationcan be found;

(3-5) Available relevant information was considered for this analysis. DEIS Page 213 noted to see the Risk Analysis of Disease Transmission Between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep, Shoshone National Forest, 2012.;

(6) Chapter 3 in the wildlife discussions for various bird species, potential effects from livestock grazing are noted. Edit suggestions on wording and capitalization will be reviewed by a writer/editor for the final documents;

(7) Edit comments on sentences and capitalization will be reviewed by a writer/editor for final documents;

(8) The discrepancy in the total miles of snowmobile trails in the EIS and Plan will be corrected in the final documents.

Public Concern #274

The Forest Service should keep management needs consistent with BLM lands and resource management for neighboring areas. The Forest management should make best efforts to protect resources from mining, logging, grazing, and other activities that may impact the environment.

Response

See responses to PCs #1 and #688 regarding management direction coordination between Forest Service lands and BLM lands.

Public Concern #275

The Forest Service should remove the soil types listed in the R2 Capability/Suitability direction and unsuitable lands such as high recreation areas and water supplies.

Response

The timber capability analysis did address soil types that needed to be withdrawn from capable acres. The withdrawals for slope and elevation also result in the removal of some types. The percentage of land that is encompassed by recreation areas and water supplies is very small and would be the same for all alternatives. It was decided that this level of detailed analysis was not necessary for tcomparing alternative effects. These small site-specific areas are addressed within the forest plan direction and are more appropriately analyzed during plan implementation in project-level analyses.

Subject: 801 - DEIS Chapter 3 - Resource protection measures

Public Concern #276

The Forest Service should follow the alternatives for best management practices, conservation, and mitigation measures to protect and maintain the wild and natural beauty of the forest wildlands and wildernesses and protect them for future generations. Protecting roadless areas increase tourism to the region and have a positive impact to the local economy. There should be equal protection along both sides of the Forest boundary for fragile lands flanking the Absarokas and Beartooths and in the Wiggins Fork Management Area outside Dubois. The Forest should also require No Surface Occupancy to inventoried roadless areas and wildlife crucial winter ranges to protect the natural environment.

Response

See responses to PCs #144, #327, and #278 regarding best management practices.

Public Concern #277

The Forest Service needs the DEIS to discuss mitigation measures and define them as follows: (1) Avoiding the impact altogether by not taking a certain action or parts of an action; (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3)Rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) Compensating for the impact of replacing or providing substitute resources or environments.

Response

This analysis addresses programmatic management direction in the forest plan. The management approach sections in the forest plan clarify how plan direction may be applied. Mitigation for site-specific proposals is developed during site-specific analyses of proposed actions.

Public Concern #278

The Forest should discuss the best management practices in the DEIS and include any alternatives that it would implement in such practices.

Response

See DEIS page 64. The water and soil, legal and administrative framework section notes that resource protection measures include Forest Service Handbook, Region 2 Watershed Conservation Practices Handbook (found at: http://www.fs.fed.us/cgi- bin/Directives/get_dirs/fsh?2509.25!r2) and Forest Service National Best Management Practices (collectively referred to as: Forest Service Regional and National BMP Directives). See responses to PC #327. See response to PC #144 regarding plan direction.

Public Concern #280

The Forest Service should consider the following suggestions for wildlife management on the Shoshone National Forest: (1) The Forest should protect the area's wildlife by using Wyoming's Game and Fish data regarding crucial winter ranges and to decide when and where winter motorized uses can occur on this winter range. (2) The Forest should also ensure that possible lynx and wolverine habitats are not harmed by winter recreation allocations. (3) Protecting the Dunoir area as wilderness with no motorized us or surface occupancy will contribute to lynx and wolverine protection.

Response

(1) Wyoming Game and Fish data were used in the analysis regarding winter motorized use in winter range areas;

(2) Chapter 3 of the DEIS includes discussions on effects to lynx (pages 152 through 157) and wolverine (pages 190 through 193). The DEIS notes how the various alternatives incorporate the direction in the Northern Rockies Lynx Management Direction (USDA Forest Service 2007) at pages 155 through 156;

(3) Alternatives C and D recommend the Dunoir area for wilderness designation.

Public Concern #281

The Forest Service should make best efforts to protect roadless areas as an asset for backcountry use and critical wildlife habitat by enforcing the restriction of OHV and ATV use to these areas. The following areas should be enforced roadless areas: Little Pope Agie Canyon area, west and south of Shoshone Lake to the Pope Agie Wilderness Area, south of Moon Lake jeep trail to Bridger-Teton National Forest and Fitzpatrick Wilderness Area, Sheridan Pass area to Bridger-Teton National Forest, and Wiggins Fork east to the boundary of the Wind River Indian Reservation should all be enforced roadless areas protected from motorized travel.

Response

Alternatives C and D protect the most areas for roadless characteristics. The deciding officer will consider the various options along with other comments during the decision process. See also response to PC #689 regarding motorized use allocations and enforcement of off-road vehicles or off-highway vehicle use restrictions.

Public Concern #282

The Forest Service should set aside, protect, and study Bald Ridge and Pat O'Hara Mountain due to their unique ecological communities.

Response

Alternatives C, D, and G proposed including Bald Ridge and Par O'Hara Mountain as new research areas. The decision maker will consider the public comments in making the final decision.

Subject: 802 - DEIS Chapter 3 - Environmental consequences

Public Concern #283

The Forest Service needs to ensure the NEPA process is followed and the scientific integrity of an EIS by considering the appropriate studies and data and that the EIS evaluates environmental effects which include, cultural, economic, and social where they effects are direct, indirect, or cumulative.

Response

Available economic information was reviewed and considered during this analysis, see DEIS social and economic section starting at page 576. Methodology and incomplete and unavailable information are discussed at pages 577 through 580.

Public Concern #284

The Forest Service should change the direction of impacts listed in the DEIS under Environment Consequences from to the forest to the local communities supported by the activities as a consequence of the Plan and should identify the impacts as "potential adverse impacts." which is more in keeping with the intent of NEPA. It is quite irrelevant which ROS classification or particular use(s) occurs directly adjacent to any wilderness area. Such consideration and perspectives should therefore be eliminated and discounted from all impacts analysis as the final EIS and Plan are developed.

Response

Estimated social and economic impacts were summarized on pages 597 through 604 (see comparison tables 170, 171 and 172). Information has been updated to display anticipated impacts from alternative G.

The DEIS at pages 486 through 487 discusses the recreation opportunity spectrum as providing a framework for analyzing changes to recreation settings as a result of potential management activities under each alternative.

Subject: 803 - DEIS Chapter 3 - Cumulative effects summary table - General

Public Concern #285

The Forest Service should ensure that the EIS provide enough information concerning other area projects and their impacts to allow the decision-maker to decide whether or how to alter the proposed project to lessen cumulative environmental impacts.

Response

A summary of past, present, and foreseeable projects and plans are noted at the beginning of chapter 3, with summary information displayed in tables 19 and 20. Cumulative environmental impacts are considered by resource.

Subject: 804 - DEIS Chapter 3 Climate change –General

Public Concern #287

The Forest Service should consider linking best available science and conservation in order to assess climate change impacts in order sustain ecosystems, diversity, and minimized impacts from management and climate change. Things to consider include how the forest should be managed to prepare for climate change by protecting intact ecosystems (e.g., roadless areas) to facilitate climate-forced wildlife migrations and carbon dense ecosystems (e.g., mature forests) for long-term carbon storage while reducing existing stressors to enable adaptation of species (and, in the aggregate, ecosystems).

Response

Climate change was discussed in the DEIS (pages 21, 61 through 62).Climate change literature applicable for the Shoshone National Forest was considered during the analysis and preparation of Climate Change in the Shoshone National Forest, Wyoming: A Synthesis of Past Climate, Climate Projections, and Ecosystem Implications (Rice et al. 2012), which was incorporated into the various resource discussions in chapter 3 of the DEIS. Vegetation monitoring is included in chapter 3 of the revised Forest Plan.

Public Concern #288

The Forest Service should consider protecting and increasing wild lands and stopping or at least minimizing oil and gas leasing, motorized recreation, large scale timber harvest, and road construction in order to move away from fossil fuels and not be adding to global warming/climate change.

Response

Alternatives C and D offer the fewest acres available for active management disturbance. See also response to PC #287 regarding climate change.

Public Concern #289

The Forest Service should consider emphasizing fuels reduction projects, timber harvest and aspen restoration in order to minimize fire and impacts of climate change can be mitigated

Response

Alternatives F, E, A, and B offer a range of acres available for active management. See also response to PC #287 regarding climate change.

Public Concern #290

The Forest Service should consider using the Pika as Management Indicator Species for climate change in the Alpine environment since the Forest does not have one.

Response

Management indicator species are designed to address the monitoring of forest plan implementation on species and associated habitats. There is very little direction in the plan that leads to management activity in alpine habitats. Management indicator species are not the appropriate way to monitor climate change. TSeveral sensitive plants that occur in alpine habitat are addressed in the revised Forest Plan direction. These species, along with other monitoring efforts, will provide ways to monitor the effects from climate change.

Public Concern #291

The Forest Service should consider more planning opportunities for protecting watersheds and aquatic resources from climate change.

Response

See response to PC #287 regarding climate change.

Public Concern #292

The Forest Service should consider using TU's CSI climate change studies, other USFS studies, University of Wyoming studies, and others in discussions within each alternative for describing potential effects.

Response

See response to PC #287 regarding climate change.

Public Concern #293

The Forest Service should consider using "Climate Change in the Shoshone National Forest, Wyoming: A Synthesis of Past Climate, Climate Projections, and Ecosystem Implications" (Rice et al. 2012) as basis for much of its discussions and to enhance the topic of climate change in the Forest Plan including specific projections and more ecosystems analyzed in the main report and all alternatives.

Response

The suggested document was considered and cited in the resource analyses discussion in chapter 3 of the DEIS. See also response to PC #287 regarding climate change.

Subject: 810 - Water and Soil - Resource – General

Public Concern #294

The Forest Service should protect the Wind River Valley ecosystem and other wilderness because they are clean water sources and for their beauty.

Response

Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices documents are cited in the revised Forest Plan and EIS.

Public Concern #295

The Forest Service should consider erosion control before making any designs or changes in dealing with motorized used to minimize unnatural soil erosion on the forest.

Response

Erosion control is addressed in best management practices and Standard 2 of soil and water guidelines. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the revised Forest Plan and EIS

Public Concern #296

The Forest Service should make the following changes: 1-in Background section on page 24 "Watershed condition is integral to all aspects of resource management and use. Good watershed management maintains the productive capacity of soils, protects water quality and quantity and timing, sustains native species, provides beneficial uses, and reduces the threat of flood damage to Forest Service infrastructure and downstream values," 2-specify in soils section what the how exactly the soils will be maintained or improved, and 3-on Page 69, water quality, 151 paragraph add language that discusses the impacts from cutting trees to increase water yield to water quality.

Response

(1) The wording addition relative to water timing was not added. Timing is generally beyond the control of management activities, unless water storage systems are in place. We believe the tie to quality and quantity is sufficient.

(2) The revised Forest Plan identifies the desired condition to maintain soil productivity. This is commonly done by applying best management practices, which are referenced in the plan direction. Any more specificity is determined during plan implementation and the development of site-specific project plans.

(3) Impacts of cutting trees are discussed in the timber section of the EIS. Those impacts are similar, regardless of the purpose for which the trees are being cut.

Public Concern #297

The Forest Service should consider protecting soil and water from mineral development.

Response

Soil and water resources are provided protection through following FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the revised Forest Plan and EIS.

Public Concern #298

The Forest Service should consider not allowing private water rights to forest water sources and not allow the creation of water storage for hydroelectric power

Response

Management of private water rights is a site-specific issue, outside the scope of the revised Forest Plan analysis. In response to changes to water rights proposed by local governments and others, the Forest Service will work with local governments and state agencies to help move forward in ways that best protect existing water rights, community interests, and public land resources.

Public Concern #299

The Forest Service should address water quality impacts from chemicals and other pollutions since it was not addressed in the DLMP and chemical exposure increases from higher motorized use and energy development.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis. Forest Service soil and water management are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are incorporated into the revised Forest Plan and EIS.

Public Concern #300

The Forest Service should consider OHV use as less of impact in stream sedimentation than livestock or runoff from road construction or burn areas since OHV crossings don't necessarily churn up a lot of sediment and forest evaluation doesn't identify any areas where OHV is a major source of stream sedimentation.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the revised Forest Plan and EIS.

Public Concern #301

The Forest Service should preserve and maintain clean water for wildlife migration routes.

Response

Soil and water concerns are the same across the entire Forest. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are incorporated into the revised Forest Plan and EIS.

Public Concern #302

The Forest Service should consider scientifically sound use of culverts.

Response

The use of culverts follows direction found in FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the revised Forest Plan and EIS.

Public Concern #303

The Forest Service should avoid building of roads or trails over the headwaters drainages that lead into Buffalo Bill Reservoir since the reservoir has such a high siltation rate.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis. Forest plan standards and guidelines cite FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives, designed to protect soil stability and water quality.

Public Concern #304

The Forest Service should consider not increasing OHV use since wildlife require soil stability and water quality and OHV use would disrupt this for the wildlife.

Response

This issue is beyond the scope of this revision analysis effort. Travel management, including OHV use will be analyzed in a separate future analysis effort. Forest plan standards and guidelines are designed to protect soil stability, water quality, and wildlife habitat

Public Concern #305

The Forest Service should consider including a map of all ground water resources of the Shoshone National Forest to include the following: 1) major aquifers and their characteristics;2) location and extent of recharge areas; 3; Characterization of source water protection zones; 4) location of shallow and sensitive aquifers; 4) location of existing and potential underground sources of drinking water; 6) Incorporate the 2011 data from Wyoming Water Development Commission's and Wyoming State Geological Surveys (and 2003) ; 7) and incorporate the Wyoming Groundwater Vulnerability Assessment Handbook (SDVC Report 98-01, 1998) as a resource for developing maps of aquifer sensitivity and identifying shallow groundwater aquifers susceptible to contamination. Information regarding source water protection zones designated by the State of Wyoming is available on the State's Department of Environmental Quality website at http://deq.state.wy.us/wqd/www/SWP%20WHP/Documents/02560-doc.pdf.

Response

Mapping of all ground water resources is beyond the scope of the revised Forest Plan analysis.

Public Concern #306

The Forest Service should consider addressing and elaborating on how the proposed management area allocations provide for future activities that might affect water quality in the Clarks Fork of the Yellowstone to the confluence with Crazy Creek and how the project design criteria could mitigate impacts to be consistent with the Montana Total Maximum Daily Load requirement that address impairment in Wyoming. The Forest Service should consider identifying any impaired stream segments downstream for the forest, and whether activities could exacerbate or improve condition on impaired segments. The Forest Service should consider indicating that the water Quality is not known for many miles of rivers and streams within the watershed within the Forest and analyze how alternatives might affect water quality in CWA Section 303(d) listed segments and other water bodies regardless of impairment or assessment status.

Response

Regarding the 303(d) impaired stream segment of the Clarks Fork of the Yellowstone, restoration targets and total maximum daily loads (TMDLs) developed reflect conditions necessary to meet Water Quality Standards and, most importantly, to support applicable beneficial uses. Recently the Wyoming Water Quality Assessment and Impaired Waters List (2012 Integrated 305(b) and 303(d) Report) noted

improvements in water quality of this segment and stated “The Montana TMDLs have satisfied the CWA requirements for Wyoming and these impaired reaches have been placed in Category 4A.”

Regarding impaired stream segments that are not within the bounds of the Shoshone National Forest, but are within watersheds that are on the Forest: The Forest Service has been a participant in both watershed planning efforts as well as TMDL processes for segments within shared watersheds.

Subject: 812 - Water and Soil - Methodology

Public Concern #307

The Forest Plan should include measures to move watershed in the Functioning at Risk category in the Functioning Properly category. There should be additional information on where Watershed Condition Framework information could be found. And additional discussion on design criteria and BMPs that will be used to protect water quality.

Response

The revised Forest Plan contains direction indicating the desire to have watersheds in a properly function condition. In addition, reference is made to the Watershed Condition Framework which is used to record watershed conditions and to track actions conducted to improve priority watersheds. A link is provided to additional information.

On the issue of providing additional information on best management practices and design criteria in the FEIS, an appendix was added that provides a general overview of the information included in the Watershed Conservation Practices Handbook, The handbook is the repository for best management practices references in the revised Forest Plan. Per the Region 2, Watershed Conservation Practices Handbook (FSH2509.25), the Forest Service must comply with Federal, state, and local water quality laws and rules, coordinate actions that affect water quality with states, and control nonpoint source pollution (Section 313). The Forest Service must apply best management practices, considering local factors, to control nonpoint source pollution and meet water quality standards (Sections 208, 303, and 319). State-classified water uses, and the water quality they need, must be sustained to comply with the anti-degradation policy, unless states decide that vital economic and social development justify impacts (40 CFR 131.12). This handbook along with the National Best Management Practices for Water Quality Management on National Forest System Lands provides design criteria for protecting soil and water resources. The direction in the Watershed Conservation Practices Handbook is incorporated by reference into the forest plan as a standard that requires appropriate design criteria from the handbook to be used during plan implementation.

Subject: 813 - Water and Soil - Affected environment

Public Concern #308

The Forest Service should consider discussing the current conditions from soil survey data since the plan only mentions that soil survey began in the 1980s.

Response

The Shoshone National Forest soil survey was completed in 2007. This will be clarified in the FEIS.

Public Concern #309

The Forest Service should consider that energy development and increased off road vehicle use will increase impacts to soil and water resources since DEIS says alternatives have only little to no negative effects will occur from them.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis.

Subject: 814 - Water and Soil - Desired condition

Public Concern #310

The Forest Service should consider keeping natural water systems and not impacting it for livestock or open water recreation.

Response

The Forest provides opportunities and resources for a variety of uses. This also applies to water systems. Water systems in wilderness are generally in a natural condition. Alternatives with more wilderness (such as Alt C) would maintain more water systems in a natural condition. Even in areas where water is used for other uses, the watershed conditions are in good condition on the Shoshone. The decision maker will consider this input along with that from others in making a decision.

Public Concern #311

The Forest Service should clarify if it has done the assessment of present and potential productivity of the land as required by Forest and Rangeland Renewable Resources Planning act of 1974.

Response

The assessment of inquiry is beyond the scope of the revised Forest Plan analysis. The most current assessment, Future of America's Forests and Rangelands: Forest Service 2010 Resources Planning Act Assessment is available at: http://www.fs.fed.us/research/publications/gtr/gtr_wo87.pdf.

Subject: 815 - Water and Soil - Direct and indirect effects include general effects

Public Concern #312

The Forest Service should consider more in depth discussion of groundwater impacts from oil and gas development, consequences to the soil environment based on soil inventories , and watershed conditions since plan only say impacts are minor and is not addressed in Alternatives discussion of consequences, nor are what is being done to improve is discussed.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis.

Subject: 817 - Water and Soil - Climate change

Public Concern #313

The Forest Service should consider climate change when analyzing negative impacts to water since ground and surface water is required for agriculture, human consumption, wildlife, and energy development.

Response

Climate change in relation to soil and water concerns is addressed in the EIS on page 83. Rice et al. (2012) describe the potential effects in detail.

Subject: 818 - Water and Soil - Incomplete and unavailable information

Public Concern #314

The Forest Service should clarify how many watersheds are functioning at risk since page 65 says 3% and page 71 says 11%. The Forest Service should consider addressing and clarifying the additional information, data, and analysis, or discussions in the FEIS based on the EPA rating.

Response

This wording will be clarified in the final decision.

Subject: 819 - Water and Soil - Monitoring

Public Concern #315

The Forest Service should consider making requirements baseline water monitoring plan and water quality analysis in order to keep sedimentation low and keep good water for the communities that get from the forest.

Response

Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are incorporated into the revised Forest Plan and cited in the EIS.

Subject: 831 - Water and Soil - Desired Condition

Public Concern #316

The Forest Service should make the following change on page 24: Productive soils and sustainable ecosystems are maintained when soil impacts, such as erosion, displacement, compaction, burning, and nutrient drains, are managed by best management practices within historic range.

Response

We don't think it is appropriate to add the qualification “within historic range.” The concept of historic range is not considered a good management objective because of shifts that are occurring in climate and disturbance regimes.

Subject: 832 - Water and Soil - Goals

Public Concern #317

The Forest Service should make the following changes on page 24: All groundwater and surface waters meet State of Wyoming water quality standards to fully support State of Wyoming designated uses and are of sufficient quality and timing to support surrounding communities, municipal water supplies, and natural resources. Groundwater and surface water quantity, quality, and timing are consistent with landscapes that are managed for stand size and composition consistent with Historic Range of Variation (HRV).

Response

We believe the focus on quality and quantity addresses all that is needed. We have limited control of timing and timing is a subset of the quantity.

We don't think it is appropriate to add the goal tied to historic range of variation. The concept of historic range is not considered a good management objective because of shifts that are occurring in climate and disturbance regimes.

No change was made. The existing goal meets management intent.

Subject: 833 - Water and Soil - Objectives

Public Concern #318

The Forest Service should establish quantifiable standards for water and soil as well as clear objectives that address the restoration of functioning at risk watersheds to a functioning properly condition since the draft plan is lacking for water and soil while they exist for other resources. If a full restoration of watershed cannot occur during the life of the Forest Plan, then it should be noted in the EIS and the objective should be modified.

Response

We added additional information in the EIS and forest plan about the watersheds functioning at risk. There is information in the management approach that addresses how they will be addressed in plan implementation. The objectives for those areas are being handled in the context of the Watershed Condition Framework outside the revised Forest Plan and we think it is best to address the objectives within that context.

Subject: 835 - Water and Soil - Guidelines

Public Concern #319

The Forest Service should add the following paragraphs to the guidelines. 1-Page 26, under paragraph 4 –Fire and Fuels: Fire and fuels management strategies are designed to approximate the HRV for the watershed. Active vegetation management, as well as prescribe fire, is a tool preferred over indiscriminate wildfire until natural fire regimes can be restored. 2- On page 26 create a section entitled Roads and include the following new paragraph: Road management includes the use of temporary roads and road —rollup potential for temporary roads

Response

Direction on fire and fuels management and use of temporary roads is found in the fire and roads sections of the revised Forest Plan.

Public Concern #320

The Forest Service should define and increase stream buffers for native trout species for the protection of aquatic resources and health of the watershed ecology and should also identify measures used for the protection of groundwater and aquifers within oil and gas leasing areas and avoid surface disturbance to sensitive soils and slopes greater than 30%.

Response

Identifying specific protection measures for oil and gas leasing activities is a site-specific issue and is beyond the scope of the revised Forest Plan analysis. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives.

These management practices are incorporated into the revised Forest Plan and cited in the EIS.

Subject: 836 - Water and Soil - Management Approach

Public Concern #321

The Forest Service should make the following changes to Management Approach on page 26:Watershed improvement/restoration projects include activities focused on water quality, quantity, and timing, riparian and stream ecosystem function, soil productivity, and maintaining or restoring resilient vegetation conditions. Five examples include : 1) Implementing best management practices to filter sediment from runoff from roads and trails before it enters water courses and riparian areas2) Eliminating cheatgrass to restore soil productivity3) Stabilizing stream banks adjacent to infrastructure4) Active vegetation management and fire management that approximate HRV, and 5) restoring vegetation conditions impacted by intense wildfire or severe insect epidemics.

Response

Suggested changes are not made. Watershed improvement or restoration projects are generally focused on water quality, not quantity and timing. The sugested fourth item was not added. The list specifically identies those items that are factors in determining whether a watershed is functioning at risk. The suggested fourth item is a tool for addressing those factors.

Public Concern #322

The Forest Service should identify the current and/or proposed management actions that will be taken to improve the conditions of the watersheds that have some impacts or are functioning at risk.

Response

Individual watershed improvement projects are a site-specific issues and are is beyond the scope of the revised Forest plan analysis. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are incorporated into the revised Forest Plan and cited in the EIS.

Public Concern #323

The Forest Service should make sure that "soil capabilities, potentials and limitations are appropriately considered in designing management activities" in the grazing capability and suitability analysis.

Response

The livestock grazing capability and suitability analysis was reviewed and updates made accordingly in the FEIS. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are incorporated into the revised Forest Plan and cited in the EIS.

Subject: 850 - Riparian/Wetlands - Resource - General

Public Concern #324

The Forest Service should consider the effects on wetlands and riparian areas when considering the future use of motorized vehicles on the forest.

Response

The Shoshone Forest does consider the effects on wetlands and riparian areas when addressing the future use of motorized vehicles on the forest. Direction and guidance is provided in the Region 2 Watershed Conservation Practices Handbook primarily in section 12 which is referenced in the revised Forest Plan in

standards for water and soil, pages 25 and 26. The DEIS referenced the Region 2 Watershed Conservation Practices Handbook in chapter 3, section:Water and Soil, Resource Protection Measures on page 64. The handbook can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2.

Other related wetland and riparian direction and guidance is provided in both Forest Service Manual and Handbook Directives (i.e., FSM 2500 and FSH 2509.25), Executive Orders, and the National Best Management Practices for Water Quality on National Forest System Lands (FS-990a). These documents are referenced in the water and soil section of chapter 3 in the EIS.

Forest Service Handbook 7709.56 addresses road location and 7709.56b chapter 2 addresses road design. They are referenced in the roads section of chapter 3 in the revised Forest Plan.

Subject: 852 - Riparian/Wetlands - Methodology

Public Concern #325

The Forest Service should consider the following in wetland and riparian management (1) Not lumping riparian and wetland areas together as wetlands may not occur within recognized riparian zones. (2) Define fens distinctly from other kinds of wetlands and map them for planning land management activities. (3) Recognize temporary wetlands under the Plan as they are at the most risk and could be adversely affected in management actions. (4) Under Goal 8, page 33 aspires to have riparian and wetland habitats in þroper functioning condition'but this term does not relate to 4 service requirements his methodology is well below the level needed to provide water quality wildlife habitat or fisheries.

Response

(1) Wetlands are part of riparian habitat. Forest Service Manual 2509 defines Riparian Ecosystems as a transition area between the aquatic ecosystem and the adjacent terrestrial ecosystem; identified by soil characteristics or distinctive vegetation communities that require free or unbound water. Wetlands are defined as areas that are inundated by surface or ground water with a frequency sufficient to support and that, under normal circumstances, do or would support a prevalence of vegetation or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Although wetlands are defined as part of riparian habitat they are identified and managed separately on the Forest.

(2) Fens are considered a type of wetland. Fens are further defined and management direction is given in R2 FSH 2631.3. Inventory work has started in the Beartooth Mountain portion of the Forest. Continuation of this work is discussed in the revised Forest Plan Sensitive species goal number 6 (page 45).

(3) Wetlands are defined as mentioned in item (1) above.

(4) Goal 8, p 33. We will delete properly functioning from the sentence to reduce confusion.

Subject: 853 - Riparian/Wetlands - Affected environment

Public Concern #326

The Forest Service should add or refer to monitoring information to support the discussion of riparian habitat improvement in Chapter 3 of the Plan.

Response

Forest riparian monitoring consists of annual range allotment inspections and field monitoring. Riparian conditions are also updated during the Range Environmental Analysis process and then incorporated into

the Forest riparian condition data base. Best management practices site visits are conducted annually for selected range allotments and timber harvest activities including roads and stream crossings. Stream habitat surveys are periodically conducted by the hydrology and fisheries staff. All of this information is used to determine riparian condition on the Forest.

Subject: 876 - Riparian/Wetlands - Management approach

Public Concern #327

The Forest Service should discuss how riparian areas and wetlands will be protected from undue impacts and provide goals, objectives, and standards for wetlands and include seasonal and isolated wetlands and prohibit insecticide and herbicide use. Stronger buffers or setback establishments should be included.

Response

Management measures and design criteria for protecting riparian and wetland habitat is described in detail in the Region 2 Watershed Conservation Practices Handbook, primarily in Section 12 which is referenced in the Draft Plan in standards for water and soil, pages 25 and 26. In the EIS it is reference d in chapter 3, water and soil, resource protection measures on page 64. It can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2.

Chemical use management activities on National Forest System lands are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the soil and water section of chapter 3 of the EIS.

One of the primary land management strategies is to use management techniques that simulate natural processes, which includes disturbances. Periodic disturbance is an integral part of natural process on the landscape that is required for long-term sustainability of aquatic ecosystems (Kreutzweiser et al. 2012). These land management activities result in acceptable short-term disturbances with proper implementation, administration, and compliance of forest plan standards, guidelines, Region 2 Watershed Conservation Practices Handbook and other Federal and State land management direction. These short-term disturbances result in long-term benefits to the riparian ecosystem and the biota that use them including Yellowstone cutthroat trout. This approach is discussed in the draft Forest Plan in chapter 1, aquatic species on page 3 and the DEIS, chapter 3, environmental consequences, page 310.

Creating riparian buffer protection zones and setbacks for all management activities delays succession, reduces vegetative diversity and nutrient productivity, and increases the chances for large-scale fires substantially outside the natural range of variability (Van de Water and North 2012). Researchers felt that the current “hands-off” management approach for riparian habitat management under the Northwest Forest Plan will continue on an altered trajectory of ecological processes and have undesirable long-term consequences (Messier et al. 2012).

Rather than blanket setbacks and riparian buffers 0.5 mile wide, the draft plan proposes management activities, where appropriate, that simulate natural processes as much as possible. Buffers and setbacks may be used where and when appropriate and adjusted to fit the conditions including landscape. Additionally, very few of the riparian areas in the Absaroka geology (which comprises two-thirds of the Forest and contain most of the Yellowstone cutthroat trout and mountain sucker habitat) are 0.5 mile wide. This is because the drainages in the volcanic geologies are typically steep and incised due to natural geologic conditions. We have substantial riparian management direction contained in various resource areas within the proposed forest plan. The primary management reference for riparian habitat is section 12 of the Region 2 Watershed Conservation Practice Handbook, which is referenced the DEIS chapter 3,

water and soil, resource protection measures on page 64. The handbook can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2. With proper implementation, administration, and compliance, riparian habitat and the species that use them will be adequately protected.

Chemical use management activities on National Forest System lands are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the Forest Plan and DEIS.

Public Concern #328

The Forest Service should address the following: (1) The draft Land Management Plan does not acknowledge livestock damage to willows. (3) Address the impacts of conifer removal to sensitive bird species and that conifer encroachment may be exaggerated in some areas. (2) The amount of acres of willows that can be restored by working with WGFD to constrain or limit the trapping and local eradication of beavers.

Response

Livestock damage to willows is discussed in the DEIS on page 125. Acceptable livestock use levels for willow are found in the draft plan, chapter 1, guidelines for vegetation, commercial livestock grazing #4, 5 on pages 34 and 35. Willow use and potential effects are included in the Watershed Conservation Practices Handbook in section 12.1 which can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2 and the Region 2 Rangeland Training Handbook.

The effects of conifer removal to sensitive birds is discussed in the DEIS on pages 194 through 208. revised Forest Plan goal #8, page 47 addresses beaver habitat condition. Objective 3 for sensitive species on page 48 of the plan discusses beaver expansion. The management approach for aquatic habitat is discussed on page 259. In the revised Forest Plan, on page 51, collaborating with Wyoming Game and Fish Department on species population management is discussed.

Subject: 900 - Air Quality Resource –General

Public Concern #329

The Forest Service should provide for more backcountry non-motorized use because motorized use has adverse effects including degradation of air, water, and snow, disturbance to wildlife, and noise, pollution and safety issues that disrupt the quality of non-motorized use. The Forest Service should consider and address the importance of air quality in the tourism and recreation experience.

Response

Non-motorized back country recreation opportunties are provided in all alternatives (see EIS chapter 3, recreation section). Goals for air quality in the revised Forest Plan include

- “Air quality meets Clean Air Act and Wilderness Act requirements and Environmental Protection Agency-approved Wyoming air quality standards.”
- “Air quality is stable or improving in Class 1 airsheds on the Shoshone.”

Public Concern #330

The Forest Service should update page 99 of the DEIS to reflect that winter motorized use is retained in alternative B, and conduct a general conformity analysis for any project emissions occurring in an area designated as nonattainment or maintenance for the NAAQS, and note that if future activities in the

nonattainment area trigger the need for a general conformity analysis, then the general conformity analysis for such future activities would be included in the USFS's project-specific NEPA analysis

Response

The FEIS will be updated to reflect that winter motorized use is retained in alternative B and it will be noted as a guideline in the plan that any future activities in the nonattainment area would trigger the need for a general conformity analysis. The nonattainment areas fall within wilderness so such future activities are not anticipated.

Public Concern #331

The Forest Service should protect the Shoshone National Forest from the air and water pollution created by drilling, mining and unlimited exploitation by employing management direction to mitigate the impacts.

Response

The revised Forest Plan contains direction for protecting soil, water, and air resources consistent with the Clean Water and Clean Air Acts. In addition, during plan implementation, any specific mining or leasing proposed actions would be evaluated and site-specific mitigation measures would be developed specific to the proposal to protect soil, water, and air resources.

Public Concern #332

The Forest Service should maintain or provide more wilderness to protect air-sheds.

Response

The Shoshone has 60 percent of its acreage in designated wilderness. In large part, the Shoshone is a non-motorized, back country forest. Alternatives C and D propose additional wilderness recommendations. The revised Forest Plan includes goals to protect and improve the air quality in Forest airsheds.

Public Concern #333

The Forest Service should provide specific plans to monitor water and air quality and add a standard with the objective of maintaining Wyoming stream designations.

Response

This is addressed in the monitoring section in chapter 3 of the revised Forest Plan. Maintaining Wyoming stream designation is stated as goal 3 (page 23, forest plan); and soil and water standard number 1 (page 25);

Subject: 901 - Air Quality - Legal and administrative framework

Public Concern #334

901-1 The Forest Service should add No Surface Occupancy stipulations to lands adjacent to BLM lands that have no oil and gas availability in order to support the Clean Air Act, 42 U. S. C. , 7475(d) (2) (B) and that the FEIS include a discussion regarding the USFS's plans to address the CAA and 40 CFR 93 "Subpart B" General Conformity requirements for emissions from USPS-authorized activities in the UGRB Ozone Nonattainment Area.

Response

We are aware that a general conformity analysis could be required for future development that might occur within the boundaries of the Upper Green River ozone nonattainment area. Any air quality analysis

conducted as part of a future project-level NEPA analysis will be conducted in accordance with the national air quality memorandum of understanding and will include a general conformity analysis if one is required. A discussion of the Forest's plans for complying with conformity analysis requirements has been added to the EIS.The Forest will include a discussion in the FEIS regarding plans to address general conformity requirements for emissions in nonattainment areas.

Subject: 907 - Air Quality - Climate change

Public Concern #335

The Forest Service should consider conserving Shoshone National Forest lands for future generations and to curb the onslaught of global warming due to removing clean atmosphere from our planet.

Response

See PC #331.

Subject: 923 - Air Quality - Objectives

Public Concern #336

The Forest Service should establish standards for air quality that are quantifiable and measurable and that include the measurements that will be taken (p.28 DLMP).

Response

Ambient air quality standards are prescribed by State and Federal statute. These standards appeared in the DEIS on page 85. The standards must be met and compliance with these standards is evaluated with monitoring data. Pages 90 through 92 present recent monitoring data collected near the Shoshone National Forest. In addition, the Environmental Protection Agency has promulgated the Regional Haze Rule, which sets quantifiable visibility goals for all 156 Class I areas in the United States, including those located in the Shoshone National Forest (the North Absaroka, Washakie, and Fitzpatrick Wildernesses). Progress toward the visibility goals for these wildernesses is measured by the IMPROVE visibility monitoring network. This program is discussed in the EIS on pages 93 through 96 and data from representative monitors are presented.

Subject: 950 - Vegetation - Resource - General

Public Concern #337

The Forest Service should consider enhancing guidelines in the forest plan to provide adequate direction for management of forest vegetation in regards to harvesting, maintaining oldgrowth, pathogens, insect epidemics, wildfire, native wildlife, and livestock grazing. Table 4 of the forest plan and Table 29 of the DEIS do not reflect the current age class distribution by cover type especially for conifers considering the recent fires and insect epidemic. A separate table is needed to provide evidence of the shift in age class diversity by cover type reflecting the recent insect epidemic and fires. The forest service should also evaluate the development of new merchandizing methods of forest products. These actions are needed because it would provide direction for the quantity and type of management needed to help move the forest towards the desired conditions while taking into account the impacts of the recent insect epidemic. New methods of merchandizing forest products would help local markets remain viable.

Response

The vegetation data used in the analysis have been updated to reflect the changes during the last 10 years from fire and insects. The timber yield tables were adjusted to simulate the effect from the ongoing insect

epidemics. The effects analysis considers the current and future impacts from changes in fire regimes and insect epidemics. It is not the purpose of the forest plan to evaluate new merchandizing methods of forest products. The revised Forest Plan contains language to indicate that we will respond to the demand for new products.

Public Concern #338

Forest types across the Shoshone NF have moved away from their natural condition (dominated by large swaths of mature to late-successional forest) into an unhealthy fragmented state which hinders the viability of many species such as the fisher, pine martin, lynx, brown creeper and others. Desired conditions should address the proportion of the landscape targeted for management of the different plant community types, based on long-range range of natural variability. Desired conditions should maintain and protect the biological diversity (tree species and wildlife) in the Shoshone National Forest while considering the effects of drought and climate change. Snags should be retained in post-fire stands and be expressed as a goal with standards-based thresholds in the plan. Additional forest disturbance will exceed what the forest can support. These actions are needed to preserve wildlife species richness and viability in low elevation forested lands and move the forest towards its historic variability

Response

Only a small percentage of the forest is actively managed. Most of the disturbance that happens on the forest is naturally occurring. The majority of the forest will remain in an unmanaged state. The desired conditions for vegetation indicate how much of each cover type is desired on the forest. The revised Forest Plan contains direction for retaining snags in managed areas. Currently there is no shortage of snags on the forest.

Public Concern #339

The Forest Service should consider maintaining the current levels of harvesting and oil and gas production because any increase in harvesting or oil and gas production will reduce the quality of the visitors' desire for a pristine experience.

Response

Alternatives B, C, and D all project total timber harvest below current harvest levels. No increase in oil and gas development is projected in any of the alternatives. The decision maker will consider these alternatives along with other comments in making a final decision.

Public Concern #340

The Forest Service should update its approach of wilderness management using best available science. The Forest Service should increase management of the forest, rangelands, big game crucial winter range and reduce livestock usage. This is needed because the Shoshone NF needs to ensure the viability of the big game populations which promotes tourism the mainstay of the Cody, WY economy.

Response

The portion of the Forest actively managed in the alternatives varies widely between alternative C and alternative F, which manages over twice as many acres as alternative C. No active management can occur in designated wilderness areas. Within this range, the alternatives provide habitat for big game populations to meet Wyoming Game and Fish population objectives. The decision maker will consider comments on increasing area of active management along with other comments asking for less active management in making a final decision.

Public Concern #341

What is an example of the Forest Service's plan for early detection and planned response when encountering new invasive species?

Response

With respect to invasive species (plant, pathogen, vertebrate, or invertebrate species), rapid responses are defined as the quick and immediate actions taken to eradicate, control, or contain infestations that must be completed within a relatively short time to maximize the biological and economic effectiveness against the targeted invasive species. Depending on the risk of the targeted invasive species, rapid response actions may be supported by an emergency situation determination and emergency considerations would include the geographic extent of the infestation, distance from other known infestations, mobility and rate of spread of the invasive species, threat level and potential impacts, and available treatments.

Public Concern #342

The Forest Service should consider a conservative approach to land management in the sagebrush steppe habitats. The Forest Service should consider including in the forest plan requiring a minimum retention of 150 linear feet per acre of coarse wood debris. The Forest Service should consider including in the forest plan provisions for retaining not less than 10 snags per acre throughout the Forest. These actions are needed because the sagebrush steppe ecosystem is home to many rare or declining wildlife species.

Response

The revised Forest Plan contains direction to maintain and protect sagebrush habitat, including specifics on protection from fire and invasive species. The desired conditions for snag densities across the forest are generally above 10 snags per acre. In the small portion of the forest that is actively managed, a lower density is specified. Currently there are high densities of snags across the forest. In managed areas of the forest, the plan contains guidance on maintaining a minimum level of down woody debris.

Public Concern #343

The Forest Service should offer proof that supports their claim that forest cover and species diversity have increased or have remained similar to historic distribution?

Response

In the EIS under the vegetation section there is a section titled "Comparison of current cover type distribution to historic distribution" that explains the conclusion on the current vegetation distribution. Though there are dramatic changes occurring from insect and fire disturbances, those changes do not change what is desired in the future. What is changing is the starting position. These changes are increasing diversity by moving the forest away from a landscape dominated by large expanses of mature forest.

Public Concern #344

The Forest Service should consider making the following changes:

The Forest Service should change "annual estimate" to "average annual" for TSPQ and ASQ. On pages 118-120 of the Forest Service discusses vegetation structure components. The last paragraph on page 119 regarding the effects of the insect epidemic on 70 percent of the conifer stands on the Shoshone NF appears to trump all other discussion on pages 118 and 119. If the large shift in age class distribution is occurring because of the widespread insect epidemic, why spend any time discussing those other "minor" trends?

It states on page 119 that Table 29 shows the shift from older forests to younger forests. Data in Table 29 does not show the shift from older forest to younger forests as mentioned in the previous page.

The Forest Service should consider deleting paragraph 5 on page 120 of the DEIS. It is a repeat of the information provided in the first paragraph of page 120.

The Forest Service should consider including discussion and rationale about how and why there are differences between Tables 28 and 32 of the DEIS and what is the justification behind those changes.

The Forest Service should delete the fourth paragraph reference on page 280 of the DEIS forthe designation of old growth late successional forest. Habitat is not appropriate or necessary or management indicator species. The Forest Service should not designate suitable timberlands as old growth or late successional habitat.

The Forest Service should have as much specificity on the impacts of livestock grazing as it does when identifying snags per acre.

The Forest Service conflates the issue of streambank stability with streambank alteration. This section deals with annual move on use criteria so a long-term parameter such as streambank stability is inappropriate. Streambank alternation is the appropriate measure here. (pg. 315 DEIS)

On page 132 of DEIS, the Forest Service should call cheatgrass an invasive species not a noxious weed.

Response

The change was not made to average annual for TSPQ and annual sale quantity (ASQ) . The EIS numbers are providing an estimate of effects. They do not establish any direction. The Forest Plan is where the direction is established and it is written there to provide management flexibility.

Discussing the minor as well as the major changes helps to put the minor changes into context.

The table 29 reference was not meant to justify the statement. It was just a reference to the table. The reference was removed to avoid confusion.

Paragraph 5 was deleted.

Table 32 in the EIS is incorrect. It should match table 1 from the revised Forest Plan. That table is more aligned with table 29 in the EIS. Table 32 will be replaced.

We will take a look at the reference to late successional forest. This language may not be exactly right. For issue of mature stands on suitable timber land see PC #355.

Range data are provided in chapter 3 of the EIS as well as a more detailed breakdown in appendix F.

We will revise the sentence to say “invasive species.”

Public Concern #345

The Forest Service should review tables 103, 104, 105 and 106 for accuracy and consistency. Specifically are the acres in Table 104 and the costs in revenues in Table 105 calculated on an annual or decadal basis? Is the volume in Table 103 only from suited timberlands, or does it also include volume from OVM lands? Also, we are confused about which volumes in Table 103 are in MCF and which are in CCF

Response

See PC #636.

Subject: 953 - Vegetation - Affected environment

Public Concern #346

The Forest Service should consider revising as the forest plan where it states that "riparian vegetation composition and structure are similar to what would be expected with natural disturbance process". The forest plan needs to contain direction on how to treat riparian areas.

Response

The direction in the Watershed Conservation Practices Handbook referenced in the standards section for soil and water contain direction for managing riparian areas.

Public Concern #347

The Forest Service should consider revising the vegetation discussion on pages 106-139 of the DEIS as it appears to be out-of-date. Additionally, the Desired Conditions in Table 1 and Table 3 of the Draft Plan likely cannot be achieved and will prove to be much more constraining to on-the-ground implementation than anticipated in the DEIS. The DEIS is not showing the shift in age classes resulting from the insect epidemic and therefore fails to address impacts on management decisions.

Response

The EIS discussion on vegetation is updated to reflect the impacts from recent insect epidemics and wildfire. The current condition is based upon recent updated vegetation inventories. Appendix B to the EIS contains information on the update. Though insects and fire are changing the current vegetation condition, those changes do not change what is desired in the future. What is changing is the starting position not where we want to end up.

Subject: 954 - Vegetation - Affected environment - Rangeland

Public Concern #348

The Forest Service should consider the existing monitoring data and the current conditions of rangeland and expound on the positive trends when analyzing other resources and resource uses.

Response

Existing montoring data is used to present the current effects of livestock grazing on the forest. That information is presented in the rangeland discussion in the EIS. Livestock grazing has the potential to impact forest resources and that potential is portrayed in the EIS effects discussion. The effects discussion also indicates that with the implementation of best management practices and other grazing management those effects are mitigated. The EIS effects discussion also points out some areas that need improvement from past impacts.

Subject: 955 - Vegetation - Affected environment - Cover types

Public Concern #349

The Forest Service should consider using fire not harvesting as the desired method of managing for species composition and age class diversity within aspen stands. The forest plan should manage for the retention of mature aspen stands and to allow aspen stands to be overtaken by conifers, creating a mixed aspen-conifer woodland of superior value to wildlife. The Forest Service should monitor aspen stands

that are within grazing permit boundaries to prevent excessive damage resulting from over grazing or trampling. These actions are needed to provide age and size class diversity within aspen stands for forest health and wildlife species that desire early, mid, or late seral habitat.

Response

Aspen is not a commercial species on the Shoshone. Any management activity for aspen would be strictly for the purpose of benefiting aspen. The revised Forest Plan includes direction that both mechanical and fire treatments are used to enhance aspen. The plan contains direction to maintain a diversity of age classes for aspen.

Public Concern #350

The Forest Service should clarify the benefits of management techniques versus wildfire for the purposes of aspen restoration. Aspen restoration through management is safer and easier to regulate the intensity of disturbance. Even though aspen is a non-commercial species, its importance on commercial lands should not be underrated. Single use of commercial lands is a sure way to continually perpetuate conflict.

Response

The discussion in the EIS is specific to management on suitable timber lands and does not imply that any management technique is preferable across the forest. Being that suitable timber lands are generally accessible, the use of mechanical treatments is commonly more feasible. In addition, given the accessibility of suitable timber lands, wildfire is generally controlled easier and as such wildfire is less of a factor in perpetuating aspen on suitable timber lands.

The statement in the management approach about balancing aspen restoration activities against the need to provide commercial species on suitable timber lands was placed in response to some publics that believe this should be considered. It does not imply single use on suitable timber lands, but reflects that one of the primary purposes is to manage for commercial species.

Subject: 957 - Vegetation - Affected environment - Unique habitats

Public Concern #351

When evaluating impacts to some riparian areas from livestock grazing the Forest Service should use photos less than 10 years old. Current impacts must be determined by more recent aerial photos or more current monitoring information. If estimating impacts in the field, the Forest Service should use a quantifiable method not ocular estimates when evaluating environmental impacts of utilization by livestock. In order to make the best judgement concerning impacts to riparian area the most recent photos are essential for having up to date information. Similarly, when evaluating impacts in the field, a quantifiable method is better than an ocular estimate.

Response

The vast majority of riparian site-monitoring photographs and data collected within livestock grazing allotments is more recent than 10 years. Both quantitative and ocular methods are used to monitor riparian areas, depending on the sites' existing condition, type, and resource issues involved.

Subject: 958 - Vegetation - Desired condition

Public Concern #352

The Forest Service should better define what "desired conditions" are to help define the desired management techniques to achieve the desired goals. The Forest Service should also, develop a

quantifiable means of measuring management indicators. By doing so the Forest Service would develop goals and a method for determining their success in moving towards their desired goals.

Response

The revised Forest Plan direction, particularly desired conditions, is somewhat general in nature to allow for flexibility. More specificity is in the underlying plan components, which provide additional direction. The assessment of site-specific conditions and situations is done at the project level. The plan is not intended to include direction for each possible situation, but rather to provide a framework within which the site-specific project analysis is done.

Public Concern #353

The Forest Service needs to explain how achieving the desired percentages by cover type will affect the cover type percentages within suitable timberlands. The Forest Service should maintain the current combined acreage of Douglas-fir, spruce/fir, and lodgepole pine on suited timberlands.

Response

The only way that cover type desired conditions could impact suitable lands is if the plan directed that type conversion should occur. There is no such direction in the revised Forest Plan. The plan direction is to maintain a mix of cover types that is based upon site capability.

Subject: 959 - Vegetation - Direct and indirect effects

Public Concern #354

The Forest Service should conduct an objective investigation of the potential adverse effects of thinning and forest manipulation in this ecosystem including their effects on old forests and the wildlife that depend on old forests.

Response

The effects of potential management actions are discussed in the EIS. Harvest levels in any of the alternatives represent a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200 acres a year.

Subject: 962 - Vegetation - Direct effects - Vegetation structure components

Public Concern #355

The Forest Service may not be able to manage 5 to 15% of each forest type with long, 150 year for lodgepole pine (LP) and 200 year rotation for all other species, especially in MA 5.1. These desired conditions may not be achieved due to beetle epidemics and fire and would result in reduced outputs. Inventory data is not precise enough to achieve desired conditions in DEIS Table 3.

Response

The desired condition should be easily achievable. It does not require that 5 to15 percent of the suitable timber lands be in an old age class, but rather that 5 to 15 percent of all lands be in an old age class. The guideline associated with the desired condition is tied to watershed boundaries. Watersheds are never entirely made up of suitable timber lands. There are commonly inclusions of steep lands, inaccessible areas, visually sensitive areas, and other management areas that are not suitable timber that can provide older stands. It would generally not be necessary to manage suitable timber lands on long rotations to meet the old age class desired condition.

Public Concern #356

The Forest Service should place more emphasis on habitat management through mechanical means to create a diverse and mixed age forest and grassland mosaic.

Response

On managed lands, mechanical treatments are a key component in plan implementation. That direction is reflected in the revised Forest Plan.

Subject: 965 - Vegetation - Climate change

Public Concern #357

The Forest Service should include projected climate change effects, including longer summers, shorter winters and changes in water runoff timing. These changes could affect extent and location of wildlife habitat and may affect species dependent on various vegetation types.

Water availability for agriculture, municipal, and recreation use could impact residents, tourists, and local economies.

Response

The effects of climate change on vegetation are discussed in the EIS. See also response to PC #287.

Subject: 966 - Vegetation - Incomplete and unavailable information

Public Concern #358

The Forest Service DEIS, should cite scientific studies that support "disturbance effects may aid White Bark Pine restoration".

Response

The referenced guidance Whitebark Pine Strategy for the Greater Yellowstone Area provides such support.

Subject: 967 - Vegetation - Monitoring

Public Concern #359

The Forest Service should clarify in PLAN Chapter 3 if monitor techniques refers to the old range condition classes of poor, fair, good, and excellent.

Response

It refers to that technique or something similar. The revised Forest Plan isn't going to provide a specific technique. It just indicates that range condition should be monitored. Techniques can change as new science becomes available.

Public Concern #360

The Forest Service should add moth sites/moths, harvested big game gut piles, and vegetation/climate to White Bark Pine cone production as key grizzly bear food sources to DLMP page 210.

Response

Only certain grizzly bear food items that can be impacted by land management activities will be monitored. Moth sites, already monitored by the Interagency Grizzly Bear Study Team, could be added to the monitoring plan. Gut piles are not a result of land management activities.

Public Concern #361

The Forest Service should monitor White Bark Pine natural regeneration, use a 5 or 10 year monitoring cycle and measure treatment acres designed to increase aspen, willow and WHITE BARK PINE to determine vegetation health.

Response

Whitebark pine is being extensively monitored. Some of the latest information is the referenced guidance Whitebark Pine Strategy for the Greater Yellowstone Area. We are monitoring cover type rather than treatment acres, because some of the changes we hope to get are from natural fire impacts and other natural succession. We agree it would be a good idea to change the monitoring cycle from 1 year to 5 years for whitebark pine.

Subject: 981 - Vegetation - Desired condition

Public Concern #362

The Forest Service should justify and explain the desired conditions percent in plan Table 1, page 31. These figures appear to be low and not science based and that the Vision, Goals and Objectives seem to be moving toward a Desired Future Condition(DFC) defined by outdated forestry practices, at the cost of other important natural resources..

Response

The desired condition numbers for cover type are based upon current conditions and an assessment of the mix of past cover types. Specifically for aspen, it is based upon information that the reduction for aspen cover type is less than other forests. A section will be added to appendix B of the EIS to explain the development of the numbers.

Public Concern #363

The Forest Service should document recent historic patch size in more discrete groups, 250 acres would be a desired patch size.

Response

We don’t agree that the patch size for desired conditions should change to 250 acres. Patch size will tend to be smaller on managed lands because of the limits on the size of harvest units. We also don’t agree that there should be a goal that back country management areas should have patch sizes similar to managed lands. Natural processes will dominate in the back country areas as opposed to managed lands. No changes were made.

Public Concern #364

The Forest Service should not manage age class distributions using a ―preservation strategy such as presented in the Guidelines for Vegetation #7. Instead, age class distributions should be maintained through stand growth projections.

Response

The guideline does not prescribe a preservation strategy. See PC #355.

Public Concern #365

The Forest Service should include the following changes on page 30: Forest vegetation exists in a diversity of age classes and variable patch size across the Shoshone. In areas that receive no or infrequent vegetation management actions (management area categories 1, 2, and 3), natural processes such as fire and insects are the predominant disturbances that influence stand structure and landscape patterns and patch size. It is desirable to move the vegetation of management category 3 (backcountry and Inventoried Roadless Areas) into stand structures and landscape patterns similar to management categories 4, 5, and 8. This can be accomplished through prescribed fire as well as mechanical treatment using temporary roads for access.

Response

We don't agree with the goal that back country management areas should have patch sizes similar to managed lands. The desired condition is for natural processes to dominate in the back country, which will result in a more variable patch size.

Public Concern #366

The Forest Service should revise the out-of-date Vegetation discussion and description on DEIS pages I06 -139 is, and the Desired Conditions in Table 1 and Table 3 of the Draft Plan. These conditions cannot be achieved and will prove to be much more constraining to on-the- ground implementation than anticipated.

Response

See PC #347.

Public Concern #367

The Forest Service should revise desired conditions in table 3. These conditions will become an unintended liability when planning forest management projects.

Response

The desired conditions are a long-term goal, and though fires and insect epidemics may make it difficult to meet them in the short term, projects can still be implemented to begin the process of moving toward the desired condition. The revised Forest Plan does not require that the conditions be met in the short term.

Public Concern #368

The Forest Service should review current and desired age class distribution and cover type conditions to account for insect epidemics and fire effects to ensure desired conditions and predicted timber outputs can be achieved.

Response

See PC #587.

Public Concern #369

The Forest Service should not reduce combined Douglas-fir, spruce/fir, and lodgepole pine cover type acreage on suitable timberlands.

Response

See PC #353.

Public Concern #370

The Forest Service should describe how suitable timberlands management would be affected by the Desired Percentages by Cover Type across the entire Shoshone NF as shown in DEIS page 31, Table I.

Response

See PC #353.

Subject: 982 - Vegetation - Goals

Public Concern #371

Goal 2 on page 33 talks about restoring cover types that are declining do to succession to conifer. Drop the succession to conifer qualifier. It doesn't matter why they are declining.

Response

We agree that the qualification is not needed the goal will be changed.

Public Concern #372

On page 118 of plan change the text to say the Forest Service should restore and maintain a diverse range of ecosystems including aspen, White Bark Pine, sagebrush and willow cover types, properly functioning riparian areas, rangelands to favor native species, and resist invasive species, and lodgepole pine patch size within historic range of variability.

Response

The text on page 118 is a general summary of direction that is specified later in the revised Forest Plan. There is no need for it to be as complete as the direction it references. No change is made.

Public Concern #373

The Forest Service should manage lodgepole and other forest type stand size within historic range of variability in management categories 3, 4, 5 and 8.

Response

There is difficulty in trying to achieve a natural range of variability for stand size on managed lands because of the NFMA limits on the size of harvest units, particularly for even-aged treatments. Whether the treatment occurs in larger patch sizes or smaller patch sizes, the impacts on water production would be similar. No change was made.

Public Concern #374

The Forest Service should rewrite Goal #2, Page 33, to include: "On non-suited timberlands, manage conifer forest types to maintain or expand aspen, willow, grassland, and sagebrush cover type."

Response

Cover types are managed for the lands that are capable of supporting them. Aspen, willow, and sagebrush cover types are not classified as suitable timber lands. Where conifer succession is encroaching on these habitats, it is appropriate to remove them. The management approach in the revised Forest Plan contains language that the trade-off between commercial and non-commercial species should be considered on suitable timber lands. The suggested change was not made.

Public Concern #375

The Forest Service should quantify White Bark Pine natural regeneration through a monitoring program rather than focusing on restoration. White Bark Pine (WHITE BARK PINE) is evolving to deal with die-offs.

Response

Whitebark pine is a sensitive species and is already being extensively monitored on the Forest. See Whitebark Pine Strategy for the Greater Yellowstone Area referenced in the vegetation section of the revised Forest Plan.

Public Concern #376

The Forest Service should plant or use other mitigation after prescribed fires and wildland fires to maintain native plant communities and reduce risk of conversion to cheatgrass or other invasive plant dominated systems.

Response

After a wildfire, a Forest burned area rehabilitation (BAER) team assesses watershed effects. These watershed assessments include management of invasive species. This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis.

Subject: 983 - Vegetation - Objectives

Public Concern #377

The Forest Service should justify the need to increase aspen cover type by 10,000 acres, and leave language open so more than 2500 acres can be mechanically treated for restoration.

Response

The objective is based upon moving the current distribution of aspen toward the desired conditions in the next 10 to 15 years. The 10,000 acres represents an almost 50 percent increase in current acreage. Based upon comments received, the objective was increased. There is language in the vegetation management approach that indicates the desire to accelerate achieving desired conditions for aspen.

Public Concern #378

The Forest Service should restore historic fuel loading, landscape patterns and stand age classes in Management Areas 3, 4, 5, and 8.

Response

Objectives for fuel loadings are addressed in the fire section of the revised Forest Plan. The requested direction is found in other plan components.

Public Concern #379

The Forest Service management should increase aspen age class diversity since the majority of stands are mature.

Response

The plan desired condition for aspen is to manage for a variety of age classes.

Public Concern #380

The Forest Service should increase aspen acreage but not in MA 5.1 where it would conflict with providing forest products.

Response

See PC #374.

Public Concern #381

The Forest Service should justify the low goal or emphasize the need to restore considerably more than 750 acres of whitebark pine due to unprecedented and probable white pine blister rust mortality. It is doubtful that treating only 750 acres would stabilize, or reverse whitebark pine decline. This objective makes it appear that opportunity is limited by seedling availability; although science supports disturbance may promote blister rust resistant seedlings.

Response

The objectives for whitebark pine are based upon the strategy outlined in Whitebark Pine Strategy for the Greater Yellowstone Area, the reality that dollars will be limited for restoration during the next 10 to 15 years, and the general inaccessibility of whitebark pine stands. The objective was reviewed and has been raised. The objective is based upon what we feel is achievable now. If the situation changes, we can change the objective. The desired condition statement for whitebark pine sets the true measure of what we want to achieve.

Public Concern #382

The Forest Service should describe if Forest-wide direction for Invasive species, Objectives and Standards acres are based on assessments or inventories? This is not clear.

Response

Inventories for both aquatic and terrestrial invasive species have been conducted on the forest. Both the analysis and revised Forest Plan direction are based upon those inventories.

Public Concern #383

The Forest Service, DLMP, page 18, Forest Health, Resolution, Vegetation Goals and Objectives should maintain a diverse range of age-classes within all plant community types.

Response

This direction is included as part of the desired condition direction. We don’t feel it is necessary to also include this direction as an objective.

Subject: 984 - Vegetation - Standards

Public Concern #384

The Forest Service should increase vegetation management acres objectives if they are not based on an assessment or inventory. Acres identified in vegetation Objectives 1, 2 and 4 seem low for the 2.4 M acre Forest.

Response

The objectives are based upon comparing the existing conditions to the desired conditions and assessing what can realistically be achieved in the next 10 to 15 years. The objectives do not create a limit on what can be achieved if the situation changes. The goal is always to achieve the desired condition.

Public Concern #385

The Forest Service should use prescribed fire and suppression techniques in tandem with mechanical treatment to manage fire severity and size.

Response

Fire is addressed in the fire section of the revised Forest Plan. We added some language on use of mechanical treatments in the management approach for fire.

Public Concern #386

The Forest Service should better describe where a Standard is referencing (depending upon) a Guideline in USDA, The Forest Service, DLMP, page 49, Standards for Sensitive Species, Standard #11 - "Retain large diameter snags and roost trees for cavity-nesting birds and bats as described in the vegetation section." The use of Standards and Guidelines in this document is most confusing.

Response

Standards and guidelines are both to be achieved in implementing the revised Forest Plan. There is no difference in whether we want to achieve the intent of the direction. The difference is whether any modification to them will be documented in a plan amendment and a NEPA document or in a NEPA document alone. Direction where it is envisioned that there may be extenuating circumstances requiring flexibility and site-specific variation in achieving the purpose of the direction are more commonly placed as guidelines. In this case, the direction that snags be retained for species is a standard, because that is not variable. The snag guideline in the vegetation section is more about how to retain the snags. That situation is much more variable and, because of the desire to maintain flexibility, it is included as a guideline.

Public Concern #387

The Forest Service, DLMP, page 49, Guidelines for Sensitive Species - should be Standards for conservation of the species, their wording is more stringent than Guidelines.

Response

Both standards and guidelines are to be achieved in implementing the revised Forest Plan. There is no difference in whether we want to achieve the intent of the direction. The difference is whether any modification to them will be documented in a plan amendment and a NEPA document or in a NEPA document alone. Directions where it is envisioned that there may be extenuating circumstances requiring flexibility and site-specific variation in achieving the purpose of the direction are more commonly placed as guidelines.

Public Concern #388

The Forest Service should develop more Standards with quantifiable language addressing the major vegetation communities.

Response

See PC #387.

Public Concern #389

The Forest Service EIS Vegetation Guidelines 5, 7, 8, 9 have quantifiable language and should be moved to Standards.

Response

See PC #387.

Public Concern #390

The Forest Service should limit timing restrictions for elk calving to instances where there is a demonstrated need for a specific project area.

Response

Alternatives with less timing restrictions are considered in the EIS. The decision maker will consider comments supporting less timing restrictions along with public comments supporting more in making the final decision. The revised Forest Plan does include management direction for exceptions and mitigation for projects to improve winter range vegetation conditions.

Public Concern #391

The Forest Service should combine Standards #I and #2, and retain the following language from Standard #2-Will be on a case by case basis when good data support the action."

Response

The standards are separated because the certainty of the elk parturition data on the different areas varies. The wording was specifically developed based upon the difference. No change was made.

Subject: 985 - Vegetation - Guidelines

Public Concern #392

The Forest Service should use genetic rust-resistant White Bark Pine seedlings for plantings. It is a huge economic waste to collect seed, raise, and plant non-resistant seedlings.

Response

Currently, the quantity of rust-resistant seed is insufficient to meet all reforestation needs. Once there is adequate seed, only rust-resistant seedlings will be planted.

Public Concern #393

Until rust-resistant seedling become available, to insure natural selection against rust and to maintain important cone production, The Forest Service should emphasize natural regeneration for White Bark Pine restoration.

Response

Natural regeneration is used in many areas, but is not always adequate. In those cases, seedlings are planted to meet reforestation objectives.

Public Concern #394

The Forest Service vegetation standards should be more quantity specific. The guidelines stating that livestock grazing impact should not occur in fens, does not eliminate livestock grazing in fens. None of these are standards they are all guidelines.

Response

The guidelines concerning fens establish that livestock grazing is not planned or desired in these vegetation types, but recognizes that occasionally some incidental use may occur.

Public Concern #395

The Forest Service should define "unit," and What is a "moderate level" of streambank stability under Draft Land Management Plan, Chapter 1- Forest-wide Direction, Guidelines for Vegetation, p.35.

Response

In terms of rangeland management, unit and pasture are used interchangeably. “A moderate level “of streambank stability refers to its ability to resist impact and remain intact and functioning. It is one level of measurement used in the Greenline Stability Index monitoring method.

Public Concern #396

The Forest Service DLMP should include the revised Plan requirement for “Older” age class on suitable lands. It should be “0,” and “Middle” age class and should be clarified as 20 to 80 years for lodgepole pine, and 20 to 120 years for spruce/fir and Douglas-fir.

Response

See PC #355.

Public Concern #397

The Forest Service should delete Guideline #7, which requires 10% “Older Age Class” by watershed, because it cannot be achieved, due to beetle epidemics and fires effects, and it is even more restrictive than Table 10.

Response

See PC #355.

Public Concern #398

The Forest Service should delete Table 5, a summary of Table 30, because Table 30 is not relevant for the Shoshone NF. THE FOREST SERVICE DLMP Vegetation Guideline #8 is adequate for snag retention in timber harvest areas.

Response

Table 5 applies to unmanaged lands and helps to quantify the desired condition for snags. Guideline 8 applies to lands where management activities take place. There is no conflict between the two, and table 5 would not impact activities suitable timber lands. We don’t see the need to delete the table.

Public Concern #399

The Forest Service should delete Guideline #7 it is not necessary since desired age class distribution is in Table 3.

Response

Guideline #7 is necessary to help define how the desired condition will be achieved. Also see PC #355.

Public Concern #400

The Forest Service should not include two different measures of age class distribution, one based on percentage of management areas 4, 5 and 8 and the other based on percent of forested acres within 6th level watersheds. There is no reason to include two different measures of age class distribution.

Response

These are not two different measures of the same thing. The desired condition provides the overall guidance on what is to be achieved. Guideline #7 provides additional direction of how achievement of that desired condition is to be considered during project planning. The interdisciplinary team believes that both pieces of direction are needed to achieve the desired condition.

Public Concern #401

The Forest Service should consider natural regeneration options as well as planting for restoring White Bark Pine.

Response

See PC #393.

Public Concern #402

Some Vegetation and Forest Products Guidelines under Forest-wide Direction for Vegetation, (specifically those indicating when livestock should be removed from a unit and snag density requirements), appear to be Standards not guidelines. The Forest Service should change these Guidelines to Standards.

Response

See PC #387.

Public Concern #403

The Forest Service should change the revised The Forest Service Plan requirement for "Older" age class on suitable lands, it should be "0," and "Middle" age class should be clarified as 20 to 80 years for lodgepole pine, and 20 to 120 years for spruce/fir and Douglas-fir forest types.

Response

See PC #355.

Public Concern #404

The Forest Service should delete Guideline #7, which requires 10% "Older Age Class" by watershed, be because it cannot be achieved, due to beetle epidemics and fires effects, and it is even more restrictive than Table 10.

Response

See PC #355.

Public Concern #405

The Forest Service should add these words to DLMP page 60, Guidelines #4 and #5 - 'Will be on a case by case basis when good data support the action."

Response

The best data are currently being used for crucial winter range designations. The revised Forest Plan direction allows exceptions for projects that improve winter range conditions. The plan also contains direction in the management approach for local species of concern to work with Wyoming Game and Fish to address shifts in winter range.

Public Concern #406

The discussion in the second paragraph on page 123 for Lands Suitable for Timber Production is applicable to the Forest Service.

Response

Thank you for the comment.

Public Concern #407

The Forest Service should add a Guideline stating an intent to salvage merchantable sawtimber from natural events such as wildfire, blowdown, insects, and disease on suited timberlands, plus other lands suited for timber harvest when consistent with MA direction.

Response

See PC #654.

Subject: 986 - Vegetation - Management approach

Public Concern #408

It is important that the Forest Service create dependable and stable supplies (sustained yield) of timber if local industry is to remain viable and continue to be an available vegetative

Response

The revised Forest Plan contains goals and objectives to supply forest products over time.

Public Concern #409

The Forest Service plan should increase forest health treatments to reduce catastrophic fire risk and provide dead and dying timber products for economic benefit.

Response

The plan goals and objectives are for managing both fire and insect epidemics.

Public Concern #410

The Forest Service plan should provide management direction that would replace invasive Kentucky bluegrass types with native plant communities in wetland-riparian areas.

Response

This is a site-specific issue and is beyond the scope of the revised Forest Plan analysis.

Public Concern #411

The Forest Service plan will maintain and enhance aspen vegetation types that are appropriate for the forest.

Response

Thank you for the support

Subject: 1000 - Species Diversity - General

Public Concern #412

The Forest Service should prioritize greater wildlife, prey and predator alike, and wildlife habitat protection, including corridors and healthy ecosystems, because animals rely on protected areas for survival, seeing wildlife on the Shoshone moves people, and hunting is an economic driver for the surrounding communities.

Response

All alternatives provide for maintaining the viability of species on the forest as well as providing other resources. Some alternatives, such as C and D, place a greater emphasis of providing for wildlife species

that prefer more secure habitat. The decision maker will consider those alternatives and these comments along with other comments on management in determining how much emphasis to place on wildlife in making a final decision.

Public Concern #413

The Forest Service should maintain current hunting regulations because it's important to keep populations from exceeding their carrying capacity.

Response

The State of Wyoming manages hunting regulations, not the Forest Service. Management of hunting regulations is outside the scope of this decision.

Public Concern #414

The Forest Service should address wildlife population viability to ensure their existence for posterity.

Response

Providing for wildlife viability is a key objective in the regulations that govern preparation of the revised Forest Plan. The analysis in the EIS addresses wildlife population viability for all alternatives. In addition, a biological assessment and evaluation are prepared for the preferred alternative that addresses viability.

Public Concern #415

The Forest Service should protect bison and bison habitat.

Response

See response to PC #412. Bison were not identified during forest plan development as an animal needing specific habitat requirements that weren’t already identified for other wildlife species such as elk and bighorn sheep. Bison habitat along the North Fork of the Shoshone will be maintained with the implementation of revised Forest Plan direction identified under Species of Local Concern, revised Forest Plan pages 59 through 63.

Public Concern #416

The Forest Service should simplify Management Indicator Species direction so that it is possible to implement.

Response

We believe that the plan direction for management indicator species is achievable.

Public Concern #417

The Forest Service should strengthen big game and ungulate habitat protections, including winter range security, calving/breeding areas, migration routes, transitional areas and stopover areas because big game is particularly affected as its habitat is compromised by development.

Response

All alternatives provide some level of protection for big game including protection of calving areas, reduced disturbance during winter on crucial winter range, and management to accommodate big game passage. Alternatives C and D provide greater protection through increased acres designated to management areas with less active management than alternatives E and F. Varying levels of protection have different trade-offs in providing other resource opportunities. The decision maker will consider

comments on what level of big game protection should be provided along with other comments in making a final decision.

Public Concern #418

The Forest Service should protect biodiversity, particularly insects and plants, because plants and insects of the Shoshone National Forest hold pharmaceutical promise to benefit future generations of Americans through advanced medicine.

Response

Large areas of the Shoshone receive little active management and are primarily in a natural condition. All of the alternatives maintain biodiversity.

Public Concern #419

The Forest Service should specify in "Past, Present, and Future" Land Use Change Question 16 the ways in which, and extent to which, human activities outside of protected areas are altering ecological processes and biodiversity inside of protected areas.

Response

On a Forest-wide scale other than motorized use, human recreation use has not been identified as having a cumulative effect on wildlife. In specific isolated areas, it may have an impact, but at the scale of the revised Forest Plan analysis, it was not considered significant.

Public Concern #420

The Forest Service should strengthen bear and wolf habitat protection in order to support populations leaving Yellowstone National Park boundaries and to keep the larger ecosystem intact.

Response

Best available science provided the foundation for grizzly bear and gray wolf habitat conservation (see biological assessment and biological evaluation). All alternatives provide some level of protection for the grizzly bear and gray wolf. Some alternatives, such as C and D, provide greater protection than E and F. The decision maker will consider comments on what level of protection should be provided.

Public Concern #421

The Forest Service should increase non-game wildlife protection by strengthening plan standards and guidelines to protect wildlife species, including retention of large-diameter snags and roost trees.

Response

The revised Forest Plan includes direction for protecting wildlife species. Plan direction was developed within the context that less than 10 percent of the Forest is actively managed. The vegetation includes a specific guideline for maintaining snags within the timber harvest project areas.

Public Concern #422

The Forest Service should select MIS species that inform, guide and monitor wildlife diversity rather than those that support management direction, such as red-breasted nuthatches and non-native trout that tolerate fragmentation and degraded aquatic conditions, respectively.

Response

The management indicator species selection process isoutlined in the revised Forest Plan, appendix 3, pages 279 through 282. Rationale for not selecting other species is includeded in the project record.

Public Concern #423

The Forest Service should emphasize protection of lower-elevation forested lands that provide habitat for many resident and migrating wildlife species.

Response

The revised Forest Plan includes direction for maintaining all forest types including those found at lower elevations. Alternatives provide varying levels of wildlife emphasis. The decision maker will consider these comments along with other comments in making a final decision.

Public Concern #424

The Forest Service should maintain the number of proposed management indicator species at four and not require "Forest-wide estimates of population trends for each management indicator species" as stated on page 56 of the draft plan.

Response

The provisions of the 1982 regulations, under which we are preparing this plan, indicate that "Population trends of the management indicator species will be monitored and relationships to habitat changes determined."

Public Concern #425

The Forest Service should include consider the following: (1) Include a brief summary of the cumulative effects of management programs on all wildlife species. (2) Discuss if and how snowmobiles are having adverse effects on sheep. (3) Use the most current published science in all fish and wildlife decisions, particularly with energy development. (4) Incorporate science- based mitigation when making decisions about fish and wildlife management and energy development. (5) Utilize a third-party review of development and mitigation proposals. (6) Establish a qualified "science review team" and engage science-based organizations for fish and wildlife management and development decisions.

Response

The effects, including cumulative effects of the alternatives on a suite of wildlife species including federally threatened, endangered and proposed, regional forester sensitive species, management indicator species, and species of local concern were analyzed in the EIS. These species represent a multiple of species that use similar habitat.

Management effects on bighorn sheep habitat are discussed in the EIS pages 213 through 216. Guidelines for winter motorized use on bighorn sheep crucial winter range are identified in the revised Forest Plan page. 60.

The wildlife management approach sections in the revised Forest Plan identify how best available science is incorporated into management actions on the Shoshone. The identification of a third party review or science review team is outside the scope of forest plan revision.

Public Concern #426

The Forest Service should include population level triggers identified for each Management Indicator Species and adaptive management protocols designed to effectively plan for negative changes and impacts.

Response

The revised Forest Plan identifies that management indicator species populations will be monitored. The assessment and evaluation of any trends will be made in the 5-year evaluation reports. The plan does not predetermine what level of population change triggers a change in the plan or what that change should be. Those determinations are made with the information gathered at that time.

Public Concern #427

The Forest Service should reconsider its proposed reduction of the number of Management Indicator Species, include objectives and quantifiable standards for MIS, and change the wording on page 55 of the draft to read: "MIS will be evaluated and reported in context with trends in habitat conditions."

Response

The change in management indicator species in consistent with the latest guidance on designation of managment indicator species. The number of management indicator species is not synonymous with what habitats are being protected. There are over 30 wildlife species and over 40 plant species representing numerous habitats that are being provided for in the forest plan direction. The suggested language is included in the management approach.

Public Concern #428

The Forest Service should promote the guidelines shown on page 60 of the draft to standards.

Response

The difference between a standard and guideline is discussed in the revised Forest Plan pages 23 through 24. Guidelines for species of local concern identified in the plan pages 60 through 61, did not meet the rigor for becoming a standard.

Public Concern #429

The Forest Service should establish wildlife and fisheries impacts thresholds, including indicators, and establish and annually apply policy to mitigate or curb impacts and prevention methods to maintain wildlife and fish numbers.

Response

The revised Forest Plan establishes direction on how to implement the plan and also identifies items to monitor to gauge that implementation. Assessment of monitoring and what should be done as a result of that assessment occurs separately. The plan does not predetermine what actions should be taken.

Public Concern #430

*The Forest Service should make the following changes: (1) reference and include elements of the Wyoming State Wildlife Action Plan in the forest plan. (2) Make the final plan more coherent since at the moment it is confusing. (3) Cla*rify which sensitive species will actually receive management consideration (4) note the fol*lowing issues: Appendix 3 of the draft LMP "displays the emphasis species selected" on the SNF. Table 31 Selected Emphasis Species lists 28 terrestrial sensitive species; one of them is shown to 'not occur' on the SNF, and at least 5 others are shown as 'not confirmed'. Elsewhere we are told: "In 2012, 34 terrestrial and 3 aquatic wildlife species...shown on the regional forester's sensitive species list occur or have the potential to occur on the SNF" (LMP, p. 46). Which sensitive species that have the potential to occur on the SNF were excluded in this Plan revision, and why? What species were considered but not selected? This information should be disclosed. Appendix 3 (p. 266) states: "For a description of the process used to select these species and a summary of those considered but not selected, refer to the project record for the Emphasis Species Categories document." When I*

inquired about obtaining the Emphasis Species document, I was told by N. Bryan Armel (email 11/16/2012) that: "The wording in the document is not quite correct. The document being referred to is Appendix 3 in the Plan. At one point the complete document wasn't going to be included in the plan and the wording didn't get adjusted once we decided to put the whole document in the appendix." If Appendix 3 is "complete document", it certainly does not describe the process used to select species, nor does it show which species were considered but dropped. An example of a sensitive species that occurs on the SNF that is not included by Table 31 (with no explanation) is provided in Attachment 1 of this letter (American three-toed woodpecker). (5) Table 31 is frequently contradicted by information in the DEIS. (6) Many of the Habitat descriptors in Table 31 are do not accord with LMP Table 47. (6) Fix problems with stating the occurrence and habitat of sensitive species (Appendix 3 LMP) because of the potential for ignoring species and their habitat needs. (7) The Plan draft needs to do a stronger job of summarizing and presenting habitat information, (8) should clarify if the database mentioned on page 50 of LMP exists and was used to make the plan. (9) The Alternatives in the Draft RMP/EIS must recognize the impacts of gas and oil development on wildlife.

Response

(1) Wyoming's State Wildlife Action Plan is referenced in the draft forest plan under management approach on page. 61, but is not referenced under the sensitive species section. It has been added to sensitive species also.

(2) Edits have been made where appropriate to clarify plan information.

(3) All sensitive species receive management consideration and that is discussed in the biological evaluation. Not all sensitive species received specific standards or guidelines.

(4) The revised Forest Plan page 46 was corrected to reflect the number of sensitive species analyzed in the biological evaluation.

We corrected the wording in the draft EIS on page 266 to reflect that the document used to disclose the selection process for management indicator species only is in the project record. All other species selected to be emphasis species are discussed in appendix 3.

The American three-toed woodpecker is no longer on the regional forester's sensitive species list, and thus, was not analyzed in the biological evaluation.

(5-6) Table 31 in appendix 3 in the DEIS has been corrected to be consistent with the wording used in the EIS.

(6-7) Species habitat-specific information is included in the biological assessment and biological evaluation, which are part of the project record.

(8) The database currently used and reflected in the revised Forest Plan, management approach, page 50 is maintained by the University of Wyoming, Natural Diversity Database. There is no guarantee in the future that this same database will be used, thus, no change is needed in the revised Forest Plan.

(9) Those species impacted by oil and gas development along with other management actions, and the effects on these species are disclosed in the EIS.

Public Concern #431

The Forest Service should avoid or minimize management activities that result in the creation of edge environments or negative edge effects.

Response

The effects of edge creation are not a Forest-wide issue, thus it was not brought forward during the revised Forest Plan analysis. The effects of management activities that impact species by edge habitat will be analyzed at the site-specific or project-level analysis.

Public Concern #432

The Forest Service should correct the wording for Alternative C to reflect that commercial livestock grazing would be eliminated from elk and bighorn sheep crucial winter ranges as designated by the Wyoming Game and Fish Department, but not eliminated from all big game winter ranges (see page 38 of the DEIS).

Response

The effects analysis in the EIS was corrected to analyze commercial livestock grazing on big game crucial winter range by all alternatives.

Subject: 1001 - Species Diversity - Terrestrial wildlife

Public Concern #433

The Forest Service should consider providing additional support to grouse populations since they seem to be declining.

Response

Ruffed grouse are included as a management indicator species in the draft forest plan page 54.

Public Concern #434

The Forest Service should incorporate the Starkey Project conducted by the Oregon Department of Fish and Wildlife and the USDA Forest Service at the Starkey Experimental Forest and Range for additional material on motorized recreation effects to deer and elk.

Response

We revised the effects from motorized use on big game in the FEIS to include some results from the Starkey Experimental Forest and Range.

Public Concern #435

The Forest Service should use HE/HA analyses conducted with best available science, such as models developed by Sawyer et al (2001), Rowland (2000, 2005) B-T NF (2012), and Hillis (1991), before management activities such as energy development, motorized access, expanded recreational activities and vegetation management in order to better manage migration routes, stop over areas, and transitional habitats in order to assure the long term health and survival of big-game species.

Response

Shoshone National Forest biologists determined that a habitat effectiveness model (HE) was not needed because most herd units were over objective and the landscape lacks open roads. One of the biggest impacts to elk on the Forest is during hunting seasons, therefore, the focus in the revised Forest Plan is to provide adequate security during hunting seasons. Elk herds on the Shoshone show a preference for migration into Yellowstone National Park and wilderness, lessening the importance of HE values in the summer.

Public Concern #436

The Forest Service should consider using the red squirrel as the Management Indicator Species to indicate upper-elevation conifer zones, and to reflect logging and fuel treatments affecting mature conifers, for the following reasons: Red Squirrels depend completely on cone- producing conifers and inhabit local areas rather than migrating; midden-density monitoring can be used to quantify squirrel presence in belt transects; and they are an important food source for grizzly bears.

Response

In the January 2012 preliminary draft Forest Plan, the red squirrel was identified as a potential management indicator species for lodgepole pine. After public comment, the habitat concern changed from lodgepole pine to mature conifer and snags. During the final management indicator species selection process, it was determined that the red-breasted nuthatch was a more appropriate species for this habitat.

Public Concern #437

The Forest Service should base winter closures on available data showing the number of animals using the proposed closure area.

Response

We are using Wyoming Game and Fish's winter range classification data, which is based upon survey information. Because of the variation that can occur over time, flexibility is built into the plan for us to work with Wyoming Game and Fish to make adjustments if on-the-ground conditions change.

Public Concern #438

The Forest Service should consider focusing on habitat preservation due to continuing and future climate change, forest health, wildlife stress, and loss of habitat from fires and energy development.

Response

Large areas of the Shoshone are not actively managed. Alternative F has 10 percent of the forest classified as suitable timber lands. For all other alternatives, approximately 5 percent of the forest is classified as suitable timber lands.

Public Concern #439

The Forest Service should consider preserving the best pure genetically buffalo available and stop killing wolves.

Response

The State of Wyoming manages wildlife populations. The Forest Service manages wildlife habitat. Wildlife population management is outside the scope of this decision.

Subject: 1002 - Species Diversity - Legal and administrative framework

Public Concern #857

The Forest Service should delete "assume sensitive species presence "on page 50 of the Land Management Plan as it goes beyond the Forest Service's legal obligations.

Response

The management approach of assuming presence of a species is followed by "or implement surveys to achieve adequate detection probabilities…."

It is not be possible to survey for all species in all habitat areas. Where species habitat relationships are understood, it is reasonable to assume presence when analyzing potential impacts.

Subject: 1003 - Species Diversity - Methodology

Public Concern #440

The Forest Service should plan for ecological sustainability using a broad suite of measurable biological indicators such as ecological integrity.

Response

The revised Forest Plan includes direction for providing species habitat. Plan direction was developed within the context that less than 10 percent of the forest is actively managed. Much of the forest is unmanaged where natural processes prevail.

Subject: 1004 - Species Diversity - Wildlife Corridors

Public Concern #441

The Forest Service should protect the Clarks Fork River corridor connecting the Beartooth Plateau with the Absaroka/Yellowstone region and the Union Pass corridor connecting the Absaroka/Yellowstone with the Wind River since these are some of the most important wildlife habitat on the Forest.

Response

The alternatives have a range of managed lands with alternatives C and D having more back country non-motorized areas and alternatives E and F having more managed lands. The decision maker will consider these comments which recommend managing more corridors under non-motorized management areas along with other comments in making a final decision.

Public Concern #442

The Forest Service should include no surface occupancy stipulations or timing restrictions to protect ungulate migration routes.

Response

The alternatives allow different levels of oil and gas development on big game ranges. Alternatives C and D provide the greatest area that does not allow surface development for oil and gas. The decision maker will consider comments on limiting oil and gas development on big game ranges along with other comments in making a final decision.

Public Concern #443

The Forest Service should state which specific linkage areas are necessary to improve connectivity for wide-ranging species such as wolverine, lynx, wolves, and grizzly bears.

Response

Habitat availability, distribution, and connectivity for these species on the Shoshone is addressed in the EIS, biological evaluation, and biological assessment. The conservation assessments for these species address connectivity across the broader landscape. The EIS analysis uses the information in the conservation assessments. Identification of specific linkage areas and how they improve connectivity is beyond the scope of the revised Forest Plan analysis.

Subject: 1010 - Threatened endangered proposed candidate species - General

Public Concern #444

The Forest Service should revise the T&E, Proposed, and Candidate Species section to include strategic vision and eliminate vague and ambiguous wording such as " maintain or improve" which contrast with hard timber objectives which do not support efforts to "maintain" limiting habitat.

Response

Strategic vision is provided in the management approach section and tiers to the individual conservation strategies and recovery plans for the various threatened and endangered species (revised Forest Plan pages 44 through 45).

Public Concern #445

The Forest Service should allow snowmobiles since they do not disturb animals other than grizzly bears and wolves.

Response

Snowmobiles are allowed in certain management areas (revised Forest Plan pages 126 through 129).

Public Concern #446

The Forest Service should be sensitive to leasing in terms of disease transmittal and forage availability to threatened and endangered species.

Response

The analysis considered the impact of domestic sheep and goat presence in bighorn sheep habitat, and we incorporated appropirate management constraints into the revised Forest Plan. No other disease transmissions from domestic livestock to threatened and endangered species were identified as a concern.

Public Concern #447

The Forest Service should protect threatened, endangered and sensitive species at the project and district levels and should not allow projects that adversely affect sensitive species habitat if occupancy is unknown.

Response

The process for analyzing effects to threatened, endangered, and sensitive species is provided in Forest Service Manual 2670 and used in the revised Forest Plan page 50. Management projects will be analyzed on a site-specific basis, and are outside of the scope of the revised Forest Plan analysis.

Public Concern #448

The Forest Service should include the three-toed woodpecker in the list of sensitive species in the Forest Plan since it is a R2 sensitive species.

Response

Although the American three-toed woodpecker was once on the Region 2 sensitive species list, after analysis from the forests in the region it was determined the species no longer required sensitive species conservation. This species was removed from the Region 2 sensitive species list in the December 28, 2011, sensitive species update.

Public Concern #449

The Forest Service should not merely maintain the status quo, but should comply with the ESA by using all available methods to recover ESA listed species.

Response

Goals for threatened and endangered are discussed on revised Forest Plan page 40, and include recovery of the species under the Endangered Species Act.

Public Concern #450

The Forest Service should consider doing the following: (1) reword Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #8, Page 43, Chapter 1, to align more closely with the Conservation Strategy, using the following wording: "Inside the Primary Conservation Area, work with livestock grazing permittees to resolve conflicts and/or change management on cattle allotments or portions of cattle allotments with recurring conflicts. If conflicts cannot be resolved, livestock management will follow the Conservation Strategy." (2) acquire and assemble accurate information on the habitats for each of the 'emphasis sensitive species. (3) On Page 44, "Management approach" and Section 7should be rewritten to conform to the Forest Service's legal obligations. (4) Comments related to quantification of monitoring and standards are lacking as it relates to sensitive, indicator, or federally listed species. (5) On Page 46 it states "The regional forester designates sensitive species if population or habitat is trending downward or if little information is available on population or habitat trends." this should be changed since having little information on a species does not necessarily imply they are "sensitive".

Response

(1) The management approach for threatened and endangered species, (revised Forest Plan, page 46), noted grizzly bear habitat will be managed using the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area. We reworded this guideline for clarity.

(2) Relevant information on habitats for analyzed species was reviewed and included in the management approach for sensitive species in the revised Forest Plan on page 50.

(3) The intent is not to quote the exact wording out of every legal act or document, but to state that the acts and documents will be used as required to guide the management.

(4) The revised Forest Plan identifies the items to be monitored. Additional specificity on how that monitoring will occur is developed as part of revised Forest Plan implementation. This allows more flexibility and for protocols and methods to be changed when new information is available.

(5) Direction for sensitive species comes from the regional forester which is followed in this revised Forest Plan.

Public Concern #451

The Forest Service should note that there is no Appendix 1 in the Draft Land Management Plan, Chapter 1- Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #7, p. 43.

Response

Appendix 1 in the revised Forest Plan is found on page 250.

Public Concern #452

The Forest Service should exercise caution with management activities that could temporarily or permanently decrease secure habitat for sensitive species and result in ESA listing.

Response

Management restrictions in sensitive species habitat were considered and displayed in the revised Forest Plan pages 48 through 50.

Public Concern #453

The Forest Service should seek full recovery for grizzly bear and wolf populations across all suitable habitats throughout the SNF and should conserve dispersal corridors and target viable populations for both species of more than 50 breeding individuals (Ne) and more than 500 total individuals in each population to maintain genetic viability and provide a sufficient breeding population to avoid inbreeding depression for both species.

Response

Grizzly bear and gray wolf habitat are managed with best available science including the appropriate species conservation strategy or recovery plans (revised Forest Plan, pages 41 through 46).

Subject: 1020 - Threatened endangered proposed candidate species - Gray wolf

Public Concern #454

The Forest Service should revise guideline #5, page 43 to reflect current science regarding limiting factors of wolf den sites.

Response

We used best available science for Guideline 5, page 43, however the biological assessment was updated to include current den site literature. This guideline has been relocated to the sensitive species section upon delisting of the wolf.

Public Concern #455

The Forest Service should protect wolves and other predators because they are keystone species.

Response

Wolves and other species considered predators and their habitat conservation are addressed in the revised Forest Plan, pages 38 through 46.

Public Concern #456

The Forest Service should revise Table 8, DLMP, page 39 to reflect the delisting of the gray wolf.

Response

We revised this table and moved gray wolves to the sensitive species section.

Public Concern #457

The Forest Service should identify areas of core gray wolf use, including denning areas for each pack, and target these areas for road closure in order to maintain habitats most suited to the persistence of viable populations of wolves on the SNF.

Response

We addressed denning area restrictions in the revised Forest Plan with Guideline 5 (page 43) and Standard 2 (page 48). Gray wolf direction is located under the sensitive species section in the revised Forest Plan.

Public Concern #458

The Forest Service should address the impacts of recreational wolf hunting and provide standards to minimize impacts on the overall viability of wolf populations.

Response

Recreational hunting, including for wolves is beyond the scope of this analysis. Management of gray wolf habitat is addressed in management approach, on page 45 in the revised Forest Plan. We will include Wyoming's Wolf Management Plan in the revised Forest Plan.

Public Concern #459

The Forest Service should consider wolves for special classifications within Forest Service policy, in part to counteract the lack of any management by the state in the predator area.

Response

Gray wolf management is addressed in the revised Forest Plan on pages 38 through 45. The gray wolf will be moved to the sensitive species section because it's been delisted.

Public Concern #460

The Forest Service should adopt provisions prohibiting wolves from being killed on the forest during denning season and pup rearing season except in response to legitimate conflicts with livestock or people.

Response

See response to PC #458.

Subject: 1030 - Threatened endangered proposed candidate species - Canada lynx

Public Concern #461

The Forest Service should eliminate snowmobile use in lynx habitat.

Response

Snowmobile use in lynx habitat is addressed under Guideline 15, revised Forest Plan page 44, and is consistent with the direction in the Northern Rockies Lynx Management Direction.

Public Concern #462

The Forest Service should place restrictions, such as those listed in Brunnel et al. (2006), on snowmobiles in lynx conservation areas because snowmobiles impact lynx survival and population viability.

Response

The document (Brunnel et al. 2006) is not site-specific to the Shoshone National Forest. It does investigate the potential impacts that coyotes using snowmobile trails to access deep snow areas may have on lynx. The biological assessment will be edited to include this literature. See also response to PC #461.

Public Concern #463

The Forest Service should reassess and remap Canada lynx habitat on the Shoshone National Forest DEIS using the habitat model developed by the U.S. Fish and Wildlife Service.

Response

Mapping of lynx habitat is discussed in the EIS pages 152 through 153, including the mapping of critical habitat by the Fish and Wildlife Service.

Public Concern #464

The Forest Service should replace Goal 4 on page 40 of the draft plan with the following statement because the potential for lynx conservation on the Shoshone National Forest is questionable: "Adhere to the Northern Region Lynx Amendment Management Direction and actively participate in efforts to review the occupied status of the SNF as new information becomes available."

Response

The Northern Rockies Lynx Management Direction amended forest plans in March 2007. Direction in the revised Forest Plan retains the 2007 Amendment as is. No change to Goal 4 is needed. We edited the revised Forest Plan, page 45, to note under the management approach for Canada lynx, “Actively participate in efforts to review the occupied status of the Shoshone NF as new information becomes available.”

Public Concern #465

The Forest Service should reassess the effects of compacted snow routes on Canada lynx using best available science, and Kolbe et al. (2007), in particular, who found no evidence that compacted snow routes increase competition from other species to levels that adversely affect lynx populations.

Response

The document (Kolbe 2007) is not site-specific to the Shoshone National Forest. It does investigate the potential impacts that coyotes using snowmobile trails to access deep snow areas may have on lynx. We considered Kolbe 2007 and included it as a reference in the biological assessment.

Public Concern #466

The Forest Service should not increase snowmobile use in the Wyoming High Lakes Wilderness Study Area or allow motorized use in the Union Pass area in order to protect Canada lynx critical habitat and to reduce the potential for negative effects to lynx.

Response

The effects of snowmobile use on Canada lynx is discussed in the EIS on page 155 and in detail in the biological assessment. The decision maker will consider the public comments in making the final decision.

Public Concern #467

The Forest Service should revise Appendix Table 3 because it incorrectly identifies early successional conifers as lynx habitat types and, therefore, does not reflect the best available science.

Response

We agree, and we changed lynx habitat to “Mature forest and dense young conifers.”

Public Concern #468

The Forest Service should use the revision process as an opportunity to revisit decisions and direction in the Northern Rockies Lynx Amendment for the Shoshone NF, and either incorporate the entire Northern Rockies Lynx Amendment into the Plan or open up NRLA direction to modification and exclude lands suitable for timber production from lynx habitat.

Response

Amending the entire Northern Rockies Lynx Management Direction is outside the scope of this project.

Public Concern #469

The Forest Service should make sure the description of Canada lynx habitat shown in Plan Table 8 and DEIS Table 35 is consistent and the more accurate description in Table 35 be used.

Response

See response to PC #467.

Public Concern #470

The Forest Service should correct "8 to 12 percent" written in paragraph 6 of page 153 because it appears to be an error.

Response

The literature cited in the EIS page 153 is correct for the 8 to 12 percent and is from page IV-2-14 (WGFD 2010)

Public Concern #471

The Forest Service should exclude suitable timber production lands from lynx habitat designations and delete the following statement from page 154 of the draft plan because of the small percentage of suited timberlands and the low number of acres harvested annually: "timber harvest" is a primary risk factor" to Canada lynx habitat.

Response

Amending the Northern Rockies Lynx Management Direction is outside the scope of this project. The Northern Rockies Lynx Management Direction, which is incorporated into the revised Forest Plan pages 41 through 44, analyzed the effects of land management activities on lynx habitat including timber harvesting, therefore the EIS included timber harvesting and its effects on lynx habitat.

Public Concern #472

The Forest Service should delete the last sentence in paragraph 1 on page 154, and the second paragraph under Canada lynx on page 45 of the proposed plan should be deleted because paragraph 3 states, "there is no conclusive evidence that, if competition exists between lynx and other predators, it exerts a population-level threat on lynx."

Response

The sentence in the revised Forest Plan on page 154 does not refer to lynx competitors having a population-level threat on lynx; it simply states groomed trails may allow access to lynx competitors.

Public Concern #473

Given that population trend data for lynx are unavailable for the Shoshone National Forest, the Forest Service should develop special standards and guidelines prioritizing conservation for lynx critical habitat, including preclusion of timber harvest in important spruce/fir habitat and a snowmobile ban, because snowmobile trails create travel ways for coyotes, the most important lynx competitor.

Response

Specific standards and guidelines for Canada lynx are in the revised Forest Plan pages 41 through 44. The effects of timber harvesting and snowmobile trails on lynx are analyzed in the biological assessment.

Public Concern #474

The Forest Service should prioritize lynx recovery, protect and improve lynx habitat and dispersal corridors, and provide passage structures.

Response

Canada lynx habitat protection, for recovery, is emphasized in the revised Forest Plan pages 38 through 44.

Subject: 1040 - Threatened endangered proposed candidate species - Grizzly bear

Public Concern #475

The Forest Service should prioritize protection of the grizzly bear and grizzly bear habitat by preventing logging and the creation of additional motorized trails within it because motorized trails degrade grizzly bear habitat and increase human/grizzly conflicts, and the grizzly bear is an important bellwether species, indicating the health of the entire ecosystem.

Response

Grizzly bear habitat protection, for recovery, is emphasized in the revised Forest Plan pages 38 through 44. The effects of land management activities are addressed in the DEIS pages 174 through 180 and in more detail in the biological assessment.

Public Concern #476

The Forest Service should not construct a zip line within the Sleeping Giant Ski Area because it is located within prime grizzly bear habitat.

Response

The Sleeping Giant Project is a site-specfici analysis outside the scope of the revised Forest Plan analysis.

Public Concern #477

The Forest Service should not focus on additional grizzly bear and grizzly bear habitat protection because grizzly range expansion has reduced the amount of forest users, negatively impacting the local economy.

Response

Management of grizzly bear habitat is discussed in the revised Forest Plan on pages 33 through 45, and is consistent with the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area.

Public Concern #478

The Forest Service should loosen restrictions outside the Primary Conservation Area for grizzly bear management because the Greater Yellowstone Ecosystem population is biologically recovered according to the U.S. Fish and Wildlife Service, Montana Fish, Wildlife, and Parks, and Wyoming Game and Fish Department.

Response

See comment to PC #477. Standards developed in the revised Forest Plan on pages 41 through 42 for grizzly bears and their habitat, focuses mainly on the primary conservation area (PCA) and not areas outside of the PCA.

Public Concern #479

The Forest Service should modify the following statements in the Draft Land Management Plan because it would offer forest commercial users more flexibility as grizzly bear populations expand and recover: "desired distribution and abundance of threatened, endangered, proposed and candidate species are maintained," on page 38 of the DEIS should be modified to, "desired distribution and abundance of threatened, endangered, proposed, and candidate species, reflective of effective habitats and confirmed historic distribution on the SNF are maintained"; and "Restrict permitted activities at moth sites until a comprehensive site management plan is developed," on page 39 of the DEIS should be modified to, "Allow permitted activities to occur at moth sites until a comprehensive site management plan assists the Forest in developing decisions regarding potential restrictions based on best available science."

Response

Habitat for threatened and endangered species is managed according to established and approved recovery plans and conservation strategies (revised Forest Plan page 38) which is the desired condition the Forest wants to reach. The Forest is taking a conservative approach regarding moth site management until a strategy for these sites is developed (revised Forest Plan page 45)

Public Concern #480

The Forest Service should remove the word "outside" from the following statement in Guideline 8 on page 41 of the Draft Land Management Plan because it would allow management direction to employ more restrictive measures within the Primary Conservation Area (PCA), yet provide more flexibility to livestock operators outside the PCA: "Inside and outside the Primary Conservation Area, cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices may be placed under long-term non-use agreements or retired as opportunities arise with willing permittees."

Response

See response to PC #477. Under the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area the Shoshone has an obligation to manage grizzly bear habitat in the primary conservation area and adjacent areas where occupancy is anticipated and acceptable (Conservation Strategy age 5).

Public Concern #481

The Forest Service should permanently close existing inactive, vacant grazing allotments, particularly the vacant sheep allotments because livestock grazing poses the largest conflict with grizzly bears.

Response

A guideline for vacant allotments was displayed in the Draft forest plan on page 73. A guideline for allotments with reoccurring grizzly bear/livestock conflicts appears in the revised Forest Plan page 43.

Public Concern #482

The following areas should be managed as MA 1.3, backcountry non-motorized, because they are located within the Primary Conservation Area, are heavily utilized by grizzly bears throughout the spring through fall, and motorized routes are key factors in grizzly bear conflicts and deaths: Sunlight Basin; Gravel Bar, Beem Gulch, and Huff Gulch on the south side of Sunlight Road.

Response

See response to PC #31.

Public Concern #483

The Forest Service should not allow oil and gas surface development in in Primary Conservation Areas or occupied grizzly habitat because it increases the chances of human- bear conflicts and further reduces the already small percentage of their historical range available to them.

Response

Standard 12 in the revised Forest Plan, page 42, does not allow surface occupancy for mineral development in primary conservation areas.

Public Concern #484

The Forest Service should permanently close sheep and cattle allotments, inside and outside of the Primary Conservation Area, particularly in the following allotments, because they are high-conflict areas where grizzlies have died as a result: Bench, Beartooth/Face of the Mountain, Table Mountain, Dunoir, Ramshorn/ParqueCreek/Horse Creek, Wiggins Fork and Wind River Allotments.

Response

The effects of livestock grazing on grizzly bears were discussed in the DEIS pages 167 and 176 through 179. A guideline for allotments with reoccurring grizzly bear/livestock conflicts appears in the revised Forest Plan on page 43, and has been reworded for clarity.

Public Concern #485

The Forest Service should protect grizzly bear army cutworm moth sites by not encouraging public access to them because of the decline of additional primary grizzly food sources, such as the white bark pine and cutthroat trout, and the potential for disturbance to moth sites by public access.

Response

Access to army cutworm moth sites is a concern of the Shoshone that is addressed in the revised Forest Plan Standard 7, page 41, and under management approach, grizzly bears, page 45.

Public Concern #486

The Forest Service should emphasize proper sanitation techniques and implement food storage requirements in suitable grizzly habitat throughout the Shoshone National Forest because it would reduce conflicts between grizzly bears and humans.

Response

Food storage requirements are already mandatory on the entire Shoshone National Forest for all activities that require a permit. This will be added to the biological assessment. In the revised Forest Plan, Guideline 16 on page 44 was developed to allow food storage infrastructure to be installed on the entire Forest.

Public Concern #487

The Forest Service should define what "other management tools" it will use to minimize conflicts in the grizzly bear PCA, otherwise, these other management tools will never be applied as a result of direction.

Response

As discussed in the draft forest plan, management approach, grizzly bears, page 45, not defining "Other management tools" allows the Shoshone the flexibility for adaptive management or best available science, or both, to determine later what these tools might be.

Public Concern #488

The Forest Service should verify the status of the grizzly bear and gray wolf listed as G4/S1 on page 146 and specify what it means.

Response

The G4/S1 Nature Serve ranking for grizzly bear and gray wolf listed on page 146 of the draft forest plan is correct. These rankings are discussed below table 35 in footnote 1 on page 146 of the draft forest plan.

Public Concern #489

The Forest Service should change the language to minimize conflicts with grizzly bears in the following sections to reflect grizzly bear presence on the entire forest, rather than in just the Primary Conservation Area because grizzly bears have recently been documented on the Washakie Ranger District: Page 41, Standards for T&E Species Table, line 6; and Guidelines 6 and 16 on pages 43 and 44.

Response

Management of grizzly bear habitat is discussed in the revised Forest Plan on pages 33 through 45 and is consistent with the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area, which was adopted for the revised Forest Plan. To ensure grizzly bear habitat is managed outside of the primary conservation area (PCA), in the revised Forest Plan, Guideline 4 on page 42, Guidelines 6 and 8 on page 43, and Guideline 16 on page 44 were developed.

Public Concern #490

The Forest Service should maintain a functioning, robust population of white bark pine (WBP), and must include the literature and reasoning for harvesting WBP within the final land management plan because long term analysis for loss of WBP has led the courts to use WBP as a reason to continue listing the grizzly bear as endangered.

Response

See responses to PC #358, #361, and #381 regarding whitebark pine.

Public Concern #491

The Forest Service should continue adhering to the Grizzly Bear Conservation Strategy after grizzly bear recovery and delisting.

Response

Grizzly bear habitat will be managed using the Conservation Strategy or best available science (revised Forest Plan, management approach, page 45.

Public Concern #492

The Forest Service must realize that under the Grizzly Bear Conservation Strategy it has agreed to "no net increase" in development or in the footprint of existing development within a Primary Conservation Area.

Response

In the revised Forest Plan, Guideline 11, p. 42 deals with development in the grizzly bear primary conservation area and is consistent with the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area.

Public Concern #493

The Forest Service should emphasize, but not place sole focus on the maintenance of the four key grizzly bear food sources (white bark pine seeds, army cutworm moths, ungulates, and spawning cutthroat trout) identified in the guidelines on page 42 of the draft plan draft plan because grizzly bears are adaptable omnivores and focusing on four food sources is not a reliable method to ensure population viability.

Response

Management of grizzly bear habitat is discussed in the draft forest plan pages 33 through 45 and is consistent with the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area, which was incorporated for the revised Forest Plan.

Public Concern #494

Instead of encouraging public use at grizzly bear moth sites, the Forest Service should increase its grizzly bear interpretive and educational efforts near Sylvan Pass at the east gate, where there are typically roadside bears in the summer months, by adding summer seasonal staff to keep both people and bears safe.

Response

Access to army cutworm moth sites is a concern of the Shoshone that is addressed in the draft forest plan Standard 7, page 41 and under management approach, grizzly bears, page 45. In the draft forest plan, Standard 6 deals with minimizing grizzly bear/human conflicts using information and education and is an integral part of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area. Interpretive and educational efforts may be considered in a site-specific effort, which outside the scope of the revised Forest Plan analysis.

Public Concern #495

The Forest Service should perform Section 7 consultation for all projects with potential to affect grizzly bears or their habitat, including lands outside of the Primary Conservation Area.

Response

The Endangered Species Act requires consultation on listed species when their habitat(s) may be affected, no matter the location of the habitat (revised Forest Plan, management approach, page 44). The Forest Service consults with the U.S. Fish and Wildlife Service for projects with the potential to affect listed species or their habitats.

Public Concern #496

To minimize contact and confrontation between the public and grizzly bears, the Forest Service should abandon its support for public access sites to observe foraging grizzly bears and use video cams and live-stream via FS website instead.

Response

Access to army cutworm moth sites is a concern of the Shoshonethat is addressed in the revised Forest Plan Standard 7 on page 41, and under management approach, grizzly bears, page 45.

Public Concern #497

The Forest Service should increase the amount of wilderness and roadless areas for grizzly bear protection because roads negatively impact grizzly bears.

Response

Roads and their effects on grizzly bears is discussed in the EIS pages 174 through 175. See reponse to PC #27 regarding recommended wilderness areas.

Public Concern #498

The Forest Service should not allow snowmobiles in grizzly bear denning habitat or key bear habitats, such as avalanche chutes, winter ranges, mature white bark pine stand and army cutwork moth sites, because it could negatively affect grizzly bear foraging and increase the potential for human-bear conflicts.

Response

Winter motorized use and its effects on grizzly bears is discussed in the DEIS on page 175. The decision maker will consider the public comments in making the final decision.

Subject: 1050 - Forest Mammals - American marten

Public Concern #499

The Forest Service should remove or modify language on page 186 of the DEIS to reflect findings that coyotes did not require compacted snow routes to access winter snowshoe hare habitat (Kolbe et al. 2007).

Response

The sentence in the EIS on page 186, “Greater winter travel via snowmobiles could theoretically alter snow conditions and allow low-elevation predators to access more winter habitat due to snow compaction” acknowledges a potential of predator access. The document (Kolbe 2007) is not site-specific to the Shoshone National Forest. It does investigate the potential impacts that coyotes using snowmobile trails to access deep snow areas may have on lynx. The biological assessment considered and included this literature.

Public Concern #500

The Forest Service should maintain the marten as a focal species for mature and overmature (old growth) forests.

Response

Focal species is not a category under the planning regulations being used to revise our forest plan. American marten is included in the sensitive species category in the revised Forest Plan.

Subject: 1070 - Forest Mammals - Northern American Wolverine

Public Concern #501

The Forest Service should cite relevant science if they plan to use the 2007 Northern Rockies Lynx Management Direction (NRLMD) for wolverine management since that direction was never intended for wolverine management.

Response

The EIS does not say that lynx direction is being used to manage for wolverine. The EIS is an effects analysis that points out that implementation of lynx direction will also benefit wolverine habitat.

Public Concern #502

The Forest Service should use the best available science in managing wolverine denning areas and should not eliminate snowmobile use without consideration of eliminating other winter activities and without assessing whether these activities have had adverse effects on wolverine denning in the past.

Response

There is no direction in the revised Forest Plan that snowmobiling would be restricted for wolverine dens. The EIS points out that this was something that may be considered. Any such consideration would be subject to a site-specific decision made at the project level with the latest information and science. For the FEIS, wolverine is now being analyzed as a proposed species. The latest information indicates that snowmobiling is not a risk factor for wolverine. Therefore, the revised Forest Plan will not have any specific direction to restrict snowmobiling in wolverine denning habitat. As before, project plans may consider the impact of snowmobiling on wolverine dens in a site-specific analysis.

Public Concern #503

The Forest Service should make the recovery of wolverines a top priority on the SNF and provide for the large, remote areas that the species requires.

Response

Large expanses of the Shoshone are unmanaged and provide remote areas without management activity or other disturbances. Alternatives C and D provide the greatest areas of remote habitat. The decision maker will consider comments asking for greater areas of remote habitat along with other comments in making a final decision.

Public Concern #504

The Forest Service should conduct analyses to determine which roadless areas are most important for core wolverine habitat and movement corridors, close these areas to motorized use, and develop site specific conservation plans.

Response

See response to PC #503.

Public Concern #506

The Forest Service should determine the effective population (Ne) of breeding adults necessary to maintain viable wolverine populations using accepted scientific formulae, and then make a determination that "excess" numbers of wolverines above this threshold are actually present in order to make a determination that individuals may be lost without threatening overall population viability. The Minimum Viable Population levels currently accepted are a Ne of at least 50 breeding adults.

Response

Determining the effective population level for such a large-ranging low-density species as the wolverine is more appropriate at a planning level much larger than one national forest. This is beyond the scope of the revised Forest Plan.

Subject: 1090 - Forest Birds - Boreal Owl

Public Concern #507

The Forest Service should explicitly plan for the viability of the boreal owl throughout potentially suitable habitat on the Forest.

Response

Large expanses of the Shoshone are unmanaged and provide extensive areas of late successional habitat. Management activity that could impact owl habitat occurs on less than 10 percent of the forest. Alternatives C and D provide the greatest areas of habitat, while alternative F provides the least. The decision maker will consider comments asking for more owl habitat along with other comments in making a final decision.

Subject: 1100 - Forest Birds - Northern Goshawk

Public Concern #508

The Forest Service should delete Standard 1 for sensitive species, page 48, since there is a large amount of habitat for the goshawk on the Forest, inventories to document goshawks are expensive, and NFMA only requires that the species viability be assured.

Response

Though overall risk to the species is low, the goshawk is still a sensitive species that requires some attention and management. The relatively modest requirements in the revised Forest Plan, will not significantly impact timber operations, while still maintaining a minimum level of protection for the goshawk.

Public Concern #509

The Forest Service should modify Standard 8 for sensitive species (p. 48) to reflect long-term sustainability or habitat availability at the Forest scale or delete it.

Response

See response to PC #508.

Public Concern #510

The Forest Service should delete Standard 7 for sensitive species; it would be impossible to enforce because actions detrimental to one species would be beneficial to others and actions adverse in the short term could be beneficial in the long term. The standard would limit habitat restoration options, increase NEPA costs, and make the SNF vulnerable to litigation.

Response

The trade-offs between different species can be addressed at the project planning stage. The standard requires that the impacts be analyzed and considered which needs to be done in the biological evaluation. We changed the wording to clarify the intent.

Public Concern #511

The Forest Service should establish standards and guidelines that require surveying and monitoring prior to activities like fuel treatments, logging, or gas leasing to determine what sensitive species are in the area and exactly where they are.

Response

The management approach describes how the presence of sensitive species will be considered during site-specific project planning.

Public Concern #512

The Forest Service should strengthen the standard to "identify alternate and replacement nest stands of comparable habitat quality" and should prohibit management activities that are likely to impact the suitability of nesting habitat.

Response

The revised Forest Plan includes direction for protecting goshawks that was developed within the context that less than 10 percent of the Forest is actively managed. The risk impact to goshawks from timber harvest is minimal. The revised Forest Plan direction provides an appropriate level of protection, given the level of risk.

Public Concern #513

The Forest Service should reference the regional conservation assessment and other current literature in the LMP, manage the goshawk at a landscape scale, and provide a means for 1) estimating existing suitable nesting habitat and 2) managing conifer forests to provide adequate nesting and foraging habitat across the forest landscape in lower elevation forests where goshawks are known to nest.

Response

Current literature for the goshawk and all other sensitive species is listed in the biological evaluation prepared for this project. Large expanses of the Shoshone are unmanaged and provide remote areas without management activity or other disturbances. Alternatives C and D provide the greatest areas of remote habitat. Standards and guidelines in the revised Forest Plan provide an appropriate level of protection, given the level of risk to the species.

Subject: 1120 - Grassland/Sage Mammals - Rocky Mountain bighorn sheep

Public Concern #514

The Forest Service should consider not banning pack goats in the forest as a means to stop disease spread to Bighorn Sheep since pack goats are not like other domestic goats, pack goats are tethered at night and monitored by humans, pack goats are trained, GPS tracking collars on pack goats, pack goats have pathogen testing, there is permitting for pack goat trips, designation of corridors for pack goats, Bighorn can catch diseases from other animals on and off the forest, wolves may be more of an impact on Bighorn population that disease, hunting could be more of an impact on Bighorn Population, pack goat elimination goes against multiple use, habitat change may be more of an impact, there is no requirement to enhance Bighorn population, pack goats are less impactful on the environment than other pack animals, can set up mitigation measures for to prevent pack goats from spreading disease, an outright ban can cause a ripple effect amongst other forests, allows those that cannot walk easily to see the backcountry

Response

Alternatives E and F in the FEIS do propose to allow pack goat use in bighorn sheep habitat. The effects of these alternatives along with the other alternatives is disclosed in the FEIS.

Public Concern #515

The Forest Service should provide scientific research used for the EIS to document that disease transmission occurs between pack goats and bighorns, provide information that shows there are no mitigation measures, show information on other possible causes for Bighorn population decline, explain how it will meet that standard of and what is authorized use from statement "do not allow recreational pack goat use in core native bighorn sheep ranges, except for authorized use," should explain its

"concern" in the Draft LMP and DEIS and indicate the scientific information supporting that concern, and describe the guidelines in the LMP that explain how forest will manage risk from pack goats.

Response

The Bighorn Sheep Disease Risk Assessment (USDA Forest Service 2012) prepared for the DEIS contains all of the literature used to prepare that document. The risk assessment is part of the project record. Authorized use refers to pack goat use that is authorized by a Forest Service permit. Standards in the revised Forest Plan developed for sensitive species, including the bighorn sheep, are expected to reduce the risk of disease transmission between domestic goats and bighorn sheep.

Public Concern #516

The Forest Service should consider a moratorium on Bighorn Sheep Hunting and view other threats, such as predators and competition with other species to do analysis of impacts to bighorn sheep of the Shoshone Land Management Plan Revision, have domestic sheep and/or goat use not overlap with bighorn sheep even if that includes banning pack goats completely to stop spread of disease, if any treatment is discovered it should be implemented immediately, close bighorn sheep crucial winter range to humans, work with The Wyoming Wild Sheep Foundation, and protect the Bighorn Sheep since past and future hunting brings in money to the economy.

Response

Hunting and fishing regulations are determined by the Wyoming Game and Fish Commission and are outside the scope of this project. All of the alternatives provide for some level of protection that reduces the risk of contact between domestic sheep and bighorn sheep. Alternatives B, C, and D reduce the risk of contact and the potential for transmission more than the other alternatives. The decision maker will consider those alternatives and these comments along with other comments on management in making a final decision. Standards for big game crucial winter including bighorn sheep are disclosed in the revised Forest Plan on page 59.

Public Concern #517

The Forest Service should consider making the following changes:1- define and give time frame to improvements of habitat; 2- define the critical time period that human access would be limited in bighorn sheep wintering areas; 3- logic is wrong since occupied wolf habitat does not eliminate bighorn sheep habitat; 4- the statement that closest portion of the remnant Temple Peak herd is about 28.9 km from the domestic sheep allotments on the Shoshone is false and additionally, the map of 'occupied' habitat relied on for this analysis is highly inaccurate; 5-on page 208 remnant herd, this is not a true "classification" of the Wyoming Game and Fish Department; 6-On Page 209 sheep herds, it should be included with pack goats; 7-on Page 209 blanket statement sheep in Yount's Peak herd are non-migratory is incorrect; 8-page 212 the statement "Suitable bighorn sheep habitat within these domestic sheep allotments on the Shoshone is very limited as a vast majority of the land is forested and within occupied habitat of gray wolves"since wolves don't make habitat unsuitable; 9-page 214 say closure for the 26 km buffer is to protect foraying bighorn sheep from coming into contact with pack goat; 10-page 214 is an opportune place to discuss the Wyoming Statewide Bighorn/Domestic Sheep Interactions Working Group's work and publications; 10- elaborate on the problems the Trout Peak Bighorn Sheep Herd has.

Response

(1) Habitat improvement projects identified in the revised Forest Plan are dependent upon budgets that are determined independently from this planning process. It is expected that habitat improvements would occur within the life span of the planning document.

(2) Management activities that disturb big game, including bighorn sheep, should be restricted from December 1through April 30 (revised Forest Plan, page 60).

(3) The map used to identify occupied bighorn sheep habitat and domestic sheep allotments is the best available information.

(4) The EIS was edited to remove “by the WGFD.”

(5) The EIS was edited under Francs Peak Bighorn Sheep Herd to say “No pack goat use occurs within this core native herd range.”

(6) The EIS was edited to include the language about the Yount’s Peak Bighorn Sheep Herd.

(7) The EIS was edited to remove the reference to wolves on the Temple Peak Herd.

(8) The EIS was edited removing the buffer language since the Forest Service has no authority on other public or private lands.

(9) The Wyoming State-wide Bighorn Sheep/Domestic Sheep Interaction Working Group and its recommendations are referenced under management approach, sensitive species in the revised Forest Plan on page 52.

(10) The information on the Trout Peak Herd was updated to 2012 Wyoming Game and Fish data.

Subject: 1125 - Grassland/Sage Mammals Disease

Public Concern #518

The Forest Service should not prohibit pack goats in bighorn sheep habitat as there is not enough scientific evidence to support disease transmission. The Forest should provide potential mitigation measures, such as health certification, and conduct further studies and research to determine if pack goat presence in bighorn sheep habitat and comingling result in disease transmission. The Forest should consider protection measures, including tethering or fencing instead of the prohibition of domesticated goats from bighorn sheep habitats.

Response

All alternatives provide some level of protection for maintaining viability of bighorn sheep, as well providing other resources. Some alternatives, such as A, E and F, allow for domestic pack goat use in core native bighorn sheep habitat. The decision maker will consider comments to determine what level of risk of contact in core native bighorn sheep habitat should be allowed.

Public Concern #519

The Forest Service should prohibit domestic sheep and goats in bighorn sheep habitat to reduce the chance of disease transmission and to not allow the establishment of buffer zones to act as a method to manage disease transmission.

Response

See responses to PC #517 and #518.

Public Concern #520

The Forest Service should utilize domestic sheep allotments outside of bighorn sheep range as forage reserves and/or allotments which could host relocated domestic sheep and follow the recommendations from the Wyoming Statewide Domestic Sheep/Bighorn Sheep Interaction Working Group (IWG) pertaining to additional management consideration to achieve separation between domestic sheep and goats and bighorn sheep.

Response

The only two remaining domestic sheep allotments on the Shoshone are still active but currently in a non-use status. The Wyoming State-wide Bighorn Sheep/Domestic Sheep Interaction Working Group and its recommendations are referenced under management approach, sensitive species in the revised Forest Plan on page 52.

Public Concern #521

The Forest Service should consider adapting the recommendations in the Cody brucellosis management action plan developed by the Wyoming Governor's Brucellosis Coordination Team and Wyoming Game and Fish Department under all alternatives.

Response

The Wyoming Governor's Brucellosis Coordination Team Management action plans are already incorporated as discussed in the revised Forest Plan age 62.

Subject: 1130 - Grassland/Sagebrush Birds - Brewer's sparrow and Sage sparrow

Public Concern #522

The Forest Service should make a change to Ch. 3, Affected Environment. Brewer's Sparrow and Sage Sparrow, Risk Factors, on page 218 to state that livestock grazing is not a risk factor to sparrows, but specific livestock grazing management may be a risk factor.

Response

The word "management" is already used in that same sentence which implies livestock grazing management. No change needed in the sentence.

Subject: 1160 - Grassland/Sagebrush Birds - Greater sage-grouse affected

Public Concern #523

The Forest Service should make the following changes to the Land Management Plan: (1) In Goal 7, page 47 the word contiguous should be looked at as there is no scientific evidence that sagebrush was ever continuous under natural disturbances, or can be sustained over time and the addition of, "-to the degree possible considering other resource values" should be made to the sentence. (2) Connect with the local sage-grouse working groups around the forest to fill in gaps in population estimates or trends that are missing in the DEIS for inclusion into the final Land Management Plan.

Response

Discussion regarding the use of unfragmented habitat by sage-grouse is documented in the biological evaluation prepared for this project. No wording change is needed. The Shoshone is a minor player in the sage-grouse arena as it contains no core habitat and contains some late-summer brood-rearing habitat only. Additional population data for the Shoshone were not needed for this analysis.

Public Concern #524

The Forest Service should take into account the impacts of coal-bed methane natural gas and deep well fields to leks when establishing buffers in the Draft EIS as the current .25 mile buffer is insufficient to adequately conserve breeding sage-grouse as determined by past research. The Forest should also be sure that all Alternatives apply analysis using the best and most current science and include mitigation and monitoring guidelines set forth by the CEQ in 2011. Increased levels of protection need to be considered

in all of the RMP/EIS Alternatives regarding crucial winter habitats as research has demonstrated that sage-grouse will avoid otherwise suitable wintering habitats once the habitat has been developed for energy production, even after lek buffers have been applied. The Forest must implement the right conservation practices in the right locations to preclude the need to list the species as threatened or endangered.

Response

The Shoshone has no known sage-grouse leks at the time of this writing. Should a lek be located on the forest, during proposed management actions, site-specific mitigation measures will be developed using best available science.

Subject: 1190 - Grassland/Sagebrush Birds - Short-eared owl

Public Concern #525

The Forest Service should remove "livestock grazing" from the discussion on fragmentation from Ch. 3. Affected Environment. Short-eared Owl, Risk Factors on page 240 as disturbances from new range improvements may cause fragmentation, grazing itself does not.

Response

Since "management" is used in the same sentence as livestock grazing, the sentence implies livestock grazing management can fragment the habitat. A more detailed analysis is contained in the biological evaluation that is part of the project record.

Subject: 1270 - Riparian Amphibians - Boreal western toad

Public Concern #526

The Forest Service should consider that the species names of boreal toad and northern leopard frog have changed Boreal Toad is Anaxyrus boreas borease and northern leopard frog is Lithobates pipiens.

Response

The scientific name for boreal toad (*Anaxyrus boreas boreas*) was correct in the DEIS; but the northern leopard frog has been corrected in the FEIS.

Public Concern #527

The Forest Service should consider clarifying and/or changing the following: 1-the claim that the boreal toad, Columbia spotted frog, and northern leopard from "all occupy similar habitat" is misleading; 2- Why do spotted frogs and leopard frogs receive scant or no further mention after paragraph 6 in Chapter 3 and really only mention Boreal Toads; 3- how 'assessing the impact of non-native trout on amphibian populations" provide a conservation measure; 4- how conservation measures incorporated into the forest plan goals, objectives, standards and guidelines; 5-better demonstrate where amphibians occur and what might constitute 'high value'; 6- why does Table 68 limits consideration to spruce/fir and aspen; 7-Table 68 and the conclusions based on it require revision, using accurate information; 8-there is a false premise that toads exist 'at higher elevations which makes the conclusion inaccurate; 9-"Although impacts could occur if timber sale activities occurred around a currently extant yet unknown population or breeding site, it is unlikely that this would occur due to historic knowledge and continued survey requirements and conservation measures." (P. 263) is an illogical sentence due to sparse knowledge of current populations; 10- clearly state continued survey requirements" for amphibians; 11- management goals, requirements, standards, etc., are not written adequately to address the unique habitat needs of amphibians; 12- The

limited language regarding amphibians on page 51 (DLMP) fails to adequately address amphibian populations.

Response

The three amphibian species discussion has been edited to more consisely disclose their affected environment and effect in the EIS.

Edits were made to the statement in the EIS page 263 to clarify the meaning. The information in table 68 of the EIS will be reviewed for accuracy.

The revised Forest Plan, page 50, management approach, outlines the process for site-specific project analysis where by "when in suitable habitat, assume sensitive species (includes amphibians) presence or implement surveys to achieve adequate detection…."

Conservation measures for amphibians taken from the biological evaluation were incorporated into the revised Forest Plan. In addition, the watershed practices handbook (Forest Service Handbook 2509.25) mentioned in the revised Forest Plan page 51 and Forest Service Manual 2631.3 (DEIS p. 142) provide for riparian, wetland and fen protection to the benefit of amphibian species.

Public Concern #528

The Forest Service should consider these sensitive amphibian species are at unusually high risk and in need of protection measures compared to most of your other sensitive vertebrates due to: lack of known occupied sites and the disappearance of these known populations would be a significant conservation issue, diseases including those spread by non-native trout, rotenone piscicide will kill amphibian larvae, fuel treatment activities, and wild-land fire. Due to these issues there is a real possibility that some or all of these sensitive amphibian species could be extirpated at the district levels or the Forest level.

Response

See response to PC #527.

Public Concern #529

The Forest Service should consider maintaining adequate cover components from any management activities and conservation measures for both staff and boaters to limit the spread of aquatic diseases.

Response

See response to PC #527. Aquatic invasive species and their effects from management activities proposed in all of the alternatives are discussed in the EIS pages 310 through 319.

Public Concern #530

The Forest Service should consider the following Recommendations for sensitive amphibians, to include in standards and guidelines: 1-Highlight the need to identify and protect isolated and non-perennial wetlands, including pools, marshes, seasonally wet meadows, spring and seeps;

2-Establish buffer areas around amphibian habitat for various management activities, as recommended by the Region Species Conservation Assessments. These vary from 100' to 2.5 miles; 3-Include measures to protect amphibian sites from fire retardant chemicals, which can be deadly; 4-Establish standards for the height of sedge/grass to be maintained in wetland areas grazed by livestock; 5-Stipulate the survey requirements for amphibians in management project areas; 6-Advise the need to clean and disinfect footwear and gear to avoid spreading amphibian diseases; 7-Maintain a database on amphibians on the SNF that can be easily accessed, used, and updated by your specialists.

Response

See responses to PC #527 and PC #529. Determining survey and disinfectant protocol for amphibian species is outside the scope of this document. The current database for wildlife species is managed by the Wyoming Natural Diversity Database out of the University of Wyoming.

Subject: 1290 - Riparian Amphibians - Northern leopard frog

Public Concern #531

The Forest Service should consider that managing aquatic habitat alone does not provide adequate protection for amphibians on the SNF especially the Northern Leopard Frog, since populations are thought to be declining.

Response

See response to PC #527.

Subject: 1300 - Caves and mines mammals - Fringed myotis

Public Concern #532

The Forest Service should consider adding language about that White-nose syndrome since it is expanding westward and has decimated populations of certain bat species in the eastern and central U.S

Response

Region 2's White-nose Syndrome Response Plan is referenced in the revised Forest Plan on page 53 and in the EIS on pages 144, 188, and 267. White-nose Syndrome is also discussed in the biological evaluation prepared for the revised Forest Plan.

Subject: 1340 - Management Indicator Species - Ruffed Grouse

Public Concern #533

The Forest Service should consider in section 9.8 RUFFED GROUSE, 9.8.1 Draft Land Management Plan included mechanical treatments as another tool in aspen regeneration and treatments and not just fire and should support the revision of 18 to 4 Management Indicator Species.

Response

Mechanical treatment in 2,500 acres of aspen habitatis listed as an objective in the EIS page 34.

Public Concern #534

The Forest Service should consider justifying how Ruffled Grouse can by a Management Indicator Species since they cyclical population changes that has nothing to do with Aspen stands, is regularly hunted, and there is no historical demographic data are available to use as a basis for monitoring.

Response

The management indicator species selection process was outlined in the revised Forest Plan, appendix 3, pages 279 through 282. Rationale for not selecting other species is listed in the project record. A monitoring protocol that we found being used in Minnesota will be modified for use on the Shoshone.

Subject: 1360 - Management Indicator Species (MIS) - Red-breasted nuthatch

Public Concern #535

The Forest Service should provide better justification or reconsider the choice of selecting the red-breasted nuthatch as a management indicator species due the fact that the species' population can fluctuate widely based on conditions elsewhere in the western United States without being driven by local management actions as noted on page 278 of the DEIS.

Response

In the January 2012 draft forest plan. The red squirrel was identified as a potential management indicator species for lodgepole pine. After public comment, the habitat concern changed from lodgepole pine to mature conifer and snags. During the final management indicator species selection process it was determined that the red-breasted nuthatch was a more appropriate species for this habitat. The management indicator species selection process is outlined in the revised Forest Plan, appendix 3, pages 279 through 282. Rationale for not selecting other species is listed in the project record.

Subject: 1390 - Species of local concern - Rocky Mountain elk

Public Concern #536

The Forest Service should make the following changes to the Draft Management Plan: (1) Under Desired Conditions on page 57, Minimize human disturbance in big game crucial winter range. We suggest SNF officials consider changing that wording to: —"Minimize human disturbance in big game crucial winter range to levels commensurate with maintaining big game populations within state designated population goals and objectives. (2) For Standards 1 and 2 on page 60, the timing restrictions for elk calving be limited to instances where there is a demonstrated need for a specific project area and recommend combining Standards #1 and #2, retaining the following language from Standard #2; "will be on a case by case basis when good data support the action." (3) On page 60, incorporate the following language into Guidelines #4 and #5; "will be on a case by case basis when good data support the action". (4) The Plan should include an analysis of Habitat Effectiveness and Habitat Security associated with each alternative to evaluate existing conditions and potential impacts. (5) The Plan should include calving research by Arthur Middleton and Matt Kaufman that discusses pregnancy rates and calf mortality.

Response

(1) Minimizing human disturbance on big game crucial winter range (Goal 2, revised Forest Plan) not only benefits elk and deer, but also those species that utilize big game for their survival. No change is needed.

- The Shoshone worked cooperatively with Wyoming Game and Fish to determine documented parturition areas on the Forest that justified the timing restrictions.
- The results are the limited areas identified in the revised Forest Plan on page 60. All other areas are more flexible and are included in Standard 2 on page 60. We edited the EIS page 293 to include the timing restriction dates selected in the revised Forest Plan (December 1 through April 30).

  The Shoshone worked closely with the Cooperators during plan revision to identify areas of existing winter motorized use that occurred on big game crucial winter range. Exceptions to motorized use on crucial winter range were identified and incorporated into management area allocations in the revised Forest Plan.
- The Shoshone wildlife biologists felt that a habitat effectiveness model (HE) was not needed because most herd units are over objective and the landscape lacks open roads. One of the biggest impacts to

elk on the Shoshone is during hunting seasons, therefore, the focus in the revised Forest Plan is to provide adequate security during hunting seasons. Elk herds on the Shoshone show a preference for migrating into Yellowstone National Park and wilderness, lessening the importance of HE values in the summer. Impacts of the various alternatives to elk security are analyzed in the EIS pages 285 through 291.

- The Middleton and Kaufman studies were considered and added where appropriate to the elk analysis in the EIS.

Public Concern #537

The Forest Service should make the following changes to the DEIS: (1) Include in the DEIS that livestock, under properly managed grazing systems, are a tool that may improve forage conditions for elk. (2) Table 75 of the DEIS does not display timing restrictions for motorized use for each alternative; the Forest should provide the information and disclose the areas that will be impacted by these restrictions. (3) Under Affected Environment. Species of Local Concern, Rocky Mountain Elk, and page 288 add the following language: "The disease known as Brucellosis is caused by the bacteria Brucella abortus and is transmitted when a susceptible animal contacts and ingests bacteria following the abortion or stillbirth from an infected female. Exposure of a susceptible animal to the bacteria elicits an antibody immune response that can be detected (with varying degrees of accuracy) following one to several unique blood tests. When several or more animals are tested from a population within a given time period, this provides an index of exposure (but not infection) to the bacteria. This mathematical proportion of exposure (i.e., those animals that are antibody-positive divided by the sample population) is commonly referred to as'seroprevalence. "

Exposure of elk to brucellosis was first documented at the National Elk Refuge in 1933, and since then, has been documented in elk attending all 22 Wyoming state-operated winter feedgrounds on the adjacent Bridger-Teton National Forest, as well as winter free-ranging elk from western Wyoming, northeastern Idaho, and southern Montana. Seroprevalence of brucellosis in elk attending Wyoming winter feedgrounds averages about 25% and generally declines to levels less than 10% in winter free-ranging elk throughout the Greater Yellowstone Area. However, winter free-ranging elk habituating lands of the Shoshone National Forest in Wyoming, particularly those areas north of Lander and Dubois, have had seroprevalence levels as high as 22%.

It has long been recognized that elk of the Greater Yellowstone Area are a reservoir of brucellosis. Despite the use of winter feedgrounds, strain 19 vaccination, and several other best management practices, the threat of spillover from elk to domestic livestock has been realized and confirmed several times in the past decade. As elk herds of the Shoshone National Forest have continued to grow and utilize winter habitats in similarity to winter feedgrounds, it is likely that these elk will maintain elevated seroprevalence and also pose a threat to adjacent livestock operations. Most recently, this particular threat was realized following confirmed spillover of brucellosis from winter free-ranging elk of the Shoshone

National Forest to adjacent livestock on private lands. Whether from elk attending feedgrounds or winter free-ranging, elk-to-livestock transmission events have caused economic and logistical constraints for livestock producers and induced time-consuming policy changes at state and federal levels.

Alternative C would provide the least potential transmission of brucellosis with domestic livestock. Alternative C would minimize disturbance to wintering elk, making it more likely they would remain on all Forest winter ranges, including crucial winter range. Without some type of

timing restriction on elk crucial winter range, there is the potential of elk moving off the Forest to adjacent private property, increasing the opportunity for elk to intermingle with livestock. Alternative F

would provide the greatest opportunity of transmission with domestic livestock because it proposes no timing restrictions on disturbing activities in elk crucial winter range,

thereby providing the least amount of protection from disturbance during the critical winter months. Alternatives D, B, E, and A would provide disturbance free habitat in a descending order from the most to least, but all would provide more protection from winter disturbance then Alternative F."

Response

The benefits to elk by livestock grazing are mentioned in the EIS on page 411.

Timing restrictions (December 1 through April 30) on crucial winter range for motorized use did not change by alternative, which appears in the revised Forest Plan on page 60. We edited the EIS page 293 to include the timing restriction dates selected in the revised Forest Plan.

We agree and added the language on brucellosis that was provided.

Public Concern #538

The Forest Service must recognize the importance of migratory routes necessary between critical areas for elk and that oil and gas exploration activities can not only remove productive habitat, but create migration barriers.

Response

See response to PC #442.

Public Concern #539

The Forest should increase enforcement efforts to reduce unauthorized motorized traffic for elk habitat conservation and limit human access to elk calving and wintering areas to reduce potential disturbance during these critical time periods. The Forest should follow Standard 1 for Species of Local Concern in the Draft Management Plan.

Response

The forest plan contains direction on maintaining secure habitat and protecting big game ranges from motorized recreation. The issue of amount of enforcement is a budget-related issue that is beyond the scope of the Revised Forest Plan analysis.

Public Concern #540

The Forest Service should make the best attempt at managing elk habitats with the following: (1) Restrict logging of forest patches in the primarily open areas that compromise winter range. (2) Reduce open road densities to preserve habitat quality, create smaller home ranges and create higher elk survival rates. (3) Withdraw winter range areas from oil and gas development to reduce calf abandon rates. (4) Human activities should be prohibited on elk winter ranges between November 15 and April 30 to not impact elk distributions.

Response

See response to PC #417. The decision maker will consider comments on what level of big game protection should be provided along with other comments in making a final decision.

Subject: 1400 - Species of local concern - Mule deer

Public Concern #541

The Forest Service should consider increasing mixed mountain shrub habitats at mid-elevation, enhance transition range between winter and summer ranges, have liquids collected in pipelines rather than stored at well pads and hauled off with tanker trucks, and limit human access in winter range to help with survival.

Response

We edited the revised Forest Plan to include a goal of improving mixed mountain shrub habitats.

As stated in the draft forest plan on page 63, Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats will be used to provide guidance during mineral development.

Public Concern #542

The Forest Service should consider that wells, compression stations, and associated roads can lead to avoidance/displacement and habitat loss for mule deer thus moving the mule deer to agricultural areas leading to more problems.

Response

See response to PC #541.

Public Concern #543

The Forest Service should take into consideration the migration corridors of mule deer when planning and enacting developments since impacts to the corridor could lead to isolation issues with mule deer.

Response

See response to PC #541.

We edited the EIS to include language about rangeland fences and their potential impacts to big game.

Subject: 1410 - Species of local concern - Moose

Public Concern #544

The Forest Service should consider adding the following for Moose: 1-in conservation measures add monitoring component to assess the health and vigor of riparian, deciduous shrub habitats; 2-in conservation methods include reclamation i.e. prescribed fire and reclamation for habitat; 3-on page 297 add "and livestock grazing permittees" after Wyoming Game and Fish Department; 4- add an additional guideline concerning moose and wildfire and consult with the Bridger-Teton National Forest and Wyoming Game and Fish Department.

Response

(2) Monitoring of site-specific habitat improves such as those in moose habitat will be developed at the project level and is outside the scope of this document.

(3) The EIS was edited to include reclamation to the conservation measure.

(4) The allotment planning in willow communities discussed in the EIS page 297 already includes the livestock grazing permittee.

(5) The revised Forest Plan page 62 discusses wildland fire in big game habitat. Consultation with Wyoming Game and Fish and adjacent national forests will occur when applicable.

Public Concern #545

The Forest Service should consider limiting human access in the wintering habitat of moose due to its below objective population size in the forest.

Response

Big game crucial winter range, including that for moose, restricts management activities from December 1 through April 30 (revised Forest Plan, page 60).

Subject: 1450 - Aquatic, Riparian and Fisheries Resources - General

Public Concern #546

The Forest Service should set aside money to stock all of the lakes in and around Strong Creek Basin with trout to provide employment opportunities.

Response

Stocking lakes outside of wilderness is the primary responsibility of the Wyoming Game and Fish Department. Stocking of lakes inside the wilderness is conducted in accordance with the Wilderness Act. Therefore, this comment is outside the scope of this planning document.

Public Concern #547

The Forest Service should include grizzly bear, lynx, and other riparian species (i.e. northern dipper and water shrew) to the Draft Land Management Plan as other potentially impacted species from snowmaking operations.

Response

The effects of snowmaking on wildlife species is addressed in the FEIS and not in the revised Forest Plan. In the revised Forest Plan, Management Area 8.2, Guideline 12 on page 199, is intended to address snowmaking at the site-specific, project scale.

Public Concern #548

The Forest Service should establish 0.25 mile buffers along sensitive waters including intermittent and ephemeral streams occupied by sensitive fish species for portions of the year to protect important spawning and brood-rearing habitat; should examine the effects to fisheries both native and wild trout, including streams containing conservation populations of Yellowstone cutthroat trout ; should also make best efforts to prevent the decrease of Yellowstone cutthroat trout and other sensitive species populations from habitat fragmentation and degradation, maintaining long-term hydrologic and riparian function, channel stability, and the spread of invasive species through the placement and removal of barriers; and finally should also detail how the monitoring of barrier removal/installation is conducted.

Response

About half of the Forest is in non-wilderness lands that may be actively managed for various resources consistent with the mission of the Forest Service. One of the primary land management strategies is to use management techniques that simulate natural processes, which includes disturbances. Periodic disturbance is an integral part of natural process on the landscape required for long-term sustainability of aquatic ecosystems (Kreutzweiser et al. 2012). These land management activities result in acceptable short-term disturbances with proper implementation, administration, and compliance of forest plan

standards, guidelines, Region 2 Watershed Conservation Practices Handbook and other Federal and State land management direction. These short-term disturbances result in long-term benefits to the riparian ecosystem and the biota that use them, including Yellowstone cutthroat trout and mountain suckers.

Creating riparian buffer protection zones and setbacks for all management activities delays succession, reduces vegetative diversity and nutrient productivity, and increases the chances for large-scale fires substantially outside the natural range of variability (Van de Water and North 2012). Researchers felt that the current "hands-off" management approach for riparian habitat management under the Northwest Forest Plan will continue on an altered trajectory of ecological processes and have undesirable long-term consequences (Messier et al. 2012). Other "setbacks" that are proposed in the revised Forest Plan such as dispersed camping near streams and lakes, oil and gas, or other development activities are based on various land management directions, field observations and incorporate the unique geologies, and stream and lake habitat types found on the forest. Buffers and setbacks, when utilized, generally are not a "one size fits all" situation as suggested by the commenter due to the unique geologies and stream habitat types on the Forest. Buffers and setbacks generally do not simulate natural processes, which includes disturbances. Additionally, the buffers and setback widths (0.25 mile on either side of the stream for a total of 0.5 mile wide) proposed by the commenters generally do not fit the unique geologies, steep topography and habitat types found on the Forest. This is especially true for the Absaroka Volcanic geology that makes up about two-thirds of the Forest. Stream drainages in the volcanic geologies are typically steep and incised due to natural processes. Rather than blanket setbacks and riparian buffers 0.5 mile wide, the revised Forest Plan allows management activities, where appropriate, that simulate natural processes as much as possible. Buffers and setbacks may be used where and when appropriate, fitting the landscape and situation. We have substantial riparian management direction contained in various resource areas within the proposed forest plan and analyzed in the EIS. This approach is primarily discussed in the draft forest plan in chapter 1, aquatic species on page 3 and the DEIS, chapter 3, environmental consequences, page 310. The primary reference for riparian habitat management is the Region 2 Watershed Conservation Practice Handbook, Section 12. The handbook can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2. With proper administration and compliance, riparian habitat and the wide array of species that are associated with it will be protected.

We work closely with Wyoming Game and Fish Department (WGFD) on Yellowstone cutthroat trout population and habitat restoration and protection. The Forest is part of the Yellowstone cutthroat trout rrangewide working group with various geographic management units (GMUs) identified. Two GMUs are partially on the Forest: The Bighorn and Upper Yellowstone GMUs. From these documents and interagency coordination, we developed a list, updated annually, of potential management activities on the Forest to help restore Yellowstone cutthroat troup populations and habitat. The coordination efforts are noted in the Yellowstone cutthroat section of the revised Forest Plan and in chapter 3 of the EIS.

Public Concern #549

The Forest Service should examine effects on route sustainability and potential for sedimentation into water sources and other water quality concerns.

Response

Effects of roads and trails on water resources were considered and discussed in chapter 3 of the EIS. Management activities are guided by the Region 2 Watershed Conservation Practice Handbook, referenced in chapter 3 in the water and soil and fisheries sections. The handbook can be found at: http://www.fs.fed.us/cgi- bin/Directives/get_dirs/fsh?2509.25!r2.

Public Concern #550

The Forest Service should consider the following recommendations for amphibian management: (1) It is important to acknowledge that amphibians are more sensitive to changes in water quality than trout and rely on different habitats, both aquatic and terrestrial. (2) Add at least one species of amphibian to the Management Indicator List (MIS) as none are currently present and will be an indicator to both aquatic and terrestrial environments. (3) Diseases that affect amphibians are completely different from those found in fish and must be consider in riparian management. (4) Amphibians and trout do not mix well, a healthy trout population does not indicate a healthy amphibian population. (5) Add more amphibian specific language to the "sensitive species" chapter of the Management Plan as well as the need to maintain the terrestrial component of riparian areas. (6) There should be more emphasis on the importance of keeping currently trout-free streams and ponds free of troy if they support healthy amphibian populations.

Response

(1-6) The effects to amphibians including water quality and diseases is addressed in the biological evaluation prepared for the revised Forest Plan. Amphibians were initially considered in the management indicator species process (Otto 2011), but were not selected as it was determined that watershed conservation practices included in the draft forest plan (management indicator species, management approach, stream trout, page 56) for the five trout species, will maintain or improve habitat for amphibian species. In the draft forest plan, sensitive species section, management approach, aquatic species, page 51, the effects to amphibians due to introduction of trout is analyzed at the site-specific project level.

Public Concern #551

The Forest Service should consider the following recommendations for riparian management: (1) Forest personnel should ground –truth riparian areas to ensure that buffers provide adequate protection. (2) The Forest Plan should include measures that guarantee that livestock will be reduced or excluded from riparian areas using methods that do not require the development of fences, which can obstruct wildlife passage. (3) Road density in floodplain areas should be minimized and all illegally created motorized trails should be closed to prevent impacts to riparian areas. (4) A Forest wide Standard should be placed making all areas within 100 yards of fens No Surface Disturbance zones to protect the fens from timber harvest, mineral development, and road building. (5) The Forest Plan should include measures to move watershed in the Functioning at Risk category in the Functioning Properly category. (6) The Forest should provide enhanced protection for watersheds with pure populations of rare and native fishes, including the Yellowstone cutthroat trout and mountain sucker.

Response

(1) See PC response #548 regarding riparian buffers.

(2) Fences are authorized and an integral part of livestock management on National Forest System lands and is outside the scope of this document

(3) See PC #324 regarding roads in riparian areas.

(4) See PC #325 regarding management of fens.

(5) The revised Forest Plan contains direction indicating the desire to have watersheds in a properly functioning condition. In addition, reference is made to the Watershed Condition Framework, which is used to record watershed conditions and to track actions conducted to improve priority watersheds.

(6) Yellowstone cutthroat trout and other sensitive fish species are identified and considered when conducting land management activities.

Subject: 1452 - Aquatic, Riparian and Fisheries Resources - Methodology

Public Concern #552

The Forest Service should consider in the Land Management Plan (LMP) that either non-native trout indicate degraded biological conditions on the SNF or provide a sound argument why

‘properly functioning habitat’ in this ecosystem should include non-native aquatic species since stream trout is defined to include non-native trout species.

Response

Non-native trout are part of the stream trout proposed as a management indicator species for aquatic habitat. Historic native trout stream species on the Shoshone National Forest included Yellowstone cutthroat trout and mountain whitefish. Distribution was limited to about half of the potential stream habitat on the Forest due to numerous natural barriers that blocked upstream fish migration and colonization. Many streams and lakes on the Forest were subsequently planted with various non-native and some native trout. Due to the introduction of non-native fish species, and habitat modification or degradation range-wide, conservation populations of Yellowstone cutthroat trout have been significantly reduced and are now confined to less than half of their historic range on the Forest. Conversely, the amount of stream miles currently with trout (both native and non-native) on the Forest has about doubled from these fish introductions since white settlement. Almost all potential fish stream habitat is now occupied by some type of stream game trout.

Current stream game trout species on the Forest include Yellowstone cutthroat trout, Snake River cutthroat, rainbow trout, rainbow-cutthroat hybrids, brook, brown, lake trout, and arctic grayling.

From a management indicator species perspective, the stream trout that would be most sensitive to habitat disturbances and occur in many areas of the Forest are cutthroat trout, rainbow trout, and their hybrids. Brook trout are the most common stream species on the Forest, but are somewhat more tolerant of poorer habitat conditions of all the game trout species. Brown trout are generally found in low densities in some of the lower stream reaches on the Forest near the boundary and are more tolerant to habitat disturbances, but not as much as brook trout. Lake trout and arctic grayling are rare in Shoshone streams. Although some species are more tolerant of poorer habitat conditions their numbers, condition and distribution in conjunction with relevant habitat characteristics are good indicators of stream conditions.

Through working cooperatively with Wyoming Game and Fish Department (WGFD) and Forest monitoring we have good historic and current information on stream game trout species distribution, densities and condition. Although mountain whitefish are in the trout family, WGFD generally does not closely monitor this species.

Stream game trout species generally would show more cumulative land management effects than lake fish species since streams drain watersheds that these fish occupy.

In conclusion, we have good long-term information for stream game trout. We have no other good management indicator species information for stream or riparian species on the Forest. At this point, any other information would be costly and timely to obtain and we would not have historical information for comparison. As a result, we propose to use the appropriate aquatic habitat condition indicators in combination with the appropriate management indicator species stream game trout information to determine the condition and trend of stream and riparian aquatic habitats.

Also see (Otto 2011) on the rationale and selection of Forest management indicator species.

Subject: 1453 - Aquatic, Riparian and Fisheries Resources - Affected environment

Public Concern #553

The Forest Service should consider not having trout as the sole Management Indicator Species (MIS) for riparian since it goes against showing the diversity, value, and vulnerability and how management will affect riparian.

Response

See response to PC #552.

Subject: 1454 - Aquatic, Riparian and Fisheries Resources - Desired condition

Public Concern #554

The Forest Service should consider removing the statement in Ch. 3, Affected Environment. Effects from Livestock and Big Game Grazing, Aquatic Resources, p. 315 "As the livestock numbers and use increase, we will begin to reach the upper limits of acceptable use and potential for adverse aquatic resources effects, especially if additional allotments and use were added," since adding additional allotments and increasing use does not equate to an adverse effect on aquatic resources if livestock grazing is managed well.

Response

The identified statement in chapter 3, affected environment,. effects from livestock and big game grazing, aquatic resources, (previously DEIS page 315) has been changed to "As the livestock numbers and use increase, we may begin to reach the upper limits of acceptable use and potential for adverse aquatic resources effects, especially if additional allotments and use were added," since adding additional allotments and increasing use does not equate to an adverse effect on aquatic resources if livestock grazing is managed well.

Public Concern #555

The Forest Service should consider not allowing non-native species of fish in the forest since it is not a desired condition and disrupts the natural ecosystem.

Response

Management of fish species on the Forest outside wilderness is the primary responsibility of the WGFD. In wilderness, we follow the guidance provided in the Wilderness Act. We work closely with WGFD and encourage management and restoration of native fish species whenever possible.

Subject: 1455 - Aquatic, Riparian and Fisheries Resources - Direct and indirect effects

Public Concern #556

The Forest Service should consider making a strong discussion on protections for aquatic species and impacts from mineral and energy development and their support roads on aquatic species.

Response

The Forest does address potential effects from roads and potential minerals development in chapter 3 of the EIS. See various sections of the Region 2 Watershed Conservation Practice Handbook that is cited in chapter 3. The handbook can be found at: http://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?2509.25!r2.

Subject: 1459 - Aquatic, Riparian and Fisheries Resources- Monitoring

Public Concern #557

The Forest Service should consider explaining How will you 'guide and monitor' the many terrestrial wildlife species that depend on riparian and wetland habitats by using fish as an indicator?

Response

See response to PC #552.

Subject: 1476 - Aquatic, Riparian and Fisheries Resources - Management Approach

Public Concern #558

The Forest Service should consider not allowing Wyoming Game and Fish Department and others to plant game fish in wilderness since it does not lead to untrammeled wilderness.

Response

See response to PC #555.

Public Concern #559

The Forest Service should fix the citation on page 53 since it is Montana Fish Wildlife Parks, 2010.

Response

We corrected the note citation in the revised Forest Plan.

Subject: 1500 - Rare Plants - Resource – General

Public Concern #560

The Forest Service should recognize the importance of the Shoshonea population on Bald Ridge. It is the world's largest population of this plant species, and since the whitebark pine stand where it occurs burned over a decade ago, this area serves as a natural laboratory to evaluate the disturbance response of this keystone species at its lower elevation limits.

Response

These comments will be considered along with others by the decision maker. The potential Bald Ridge Research Natural Area is considered in the range of alternatives presented in the revised Forest Plan. *Shoshonea pulvinata* is a Region 2 sensitive species and management is addressed in both the EIS and Revised Forest Plan in the sensitive species sections.

Subject: 1600 - Fire and Fuels Management - Resource General

Public Concern #561

The Forest Service should stop prescribed burning. Because it releases mercury into the air and causes health problems such as lung cancer, heart-attacks, strokes, pneumonia, allergies, and asthma attacks.

Response

The Forest conducts prescribed fires in accordance with the air quality standards established by the Environmental Protection Agency and Wyoming Department of Environmental Quality. This includes being issued a permit by the Wyoming Department of Environmental Quality to burn; burning when smoke dispersal conditions are favorable to ensure air quality standards are not violated; notifying jurisdictional fire authorities and nearby public of planned prescribed burning; and post-burn monitoring and reporting.

Public Concern #562

The Forest Service should not be logging timber during an insect epidemic because there is a chance you are cutting timber that is resistant to the insects.

Response

In areas where the epidemic is occurring, the most common silvicultural practice is to conduct salvage or sanitation harvests. Salvage harvest only removes the dead trees, while sanitation harvests remove those trees that are already weakened or most suceptible to attack. The remaining healthy trees remain and perpetuate the stand. Management activities, including logging, will be analyzed in site-specific analyses, outside the scope of this forest plan revision analysis.

Public Concern #563

The Forest Service should continue efforts to enhance vegetation and healthy tree growth in beetle killed sections of the forest. This is needed because of extreme potential for fires from beetle killed trees.

Response

Fire and fuels' Goals 4, 5, and 6 (revised Forest Plan, page 67) along with Objectives 1, 2, and 3 (revised Forest Plan, page 68) allow for continued efforts to manage vegetation to reduce the risk to resources and other values from unwanted wildfire. In addition, goals and objectives for insect and disease provide direction for managing vegetation to enhance vigor and growth.

Public Concern #564

The Shoshone NF should conduct prescribed burns within areas of beetle killed trees. The Forest Service should allow nature to take its course. The Forest Service should use fire as a restorative tool rather than using more expensive methods of vegetative restoration. Prescribed burning will remove at a controlled rate the additional ground fuels associated with beetle killed trees and free up money for fighting wildfires in a WUI or for weed control and erosion control after wildfires and include a reference to the Interagency Prescribed Fire Planning and Implementation Procedures Guide to provide additional information to the public. Additionally the forest should warn hunting and recreation public when prescribe burning.

Response

The Forest has and proposes to continue to use a mix of tools to reduce hazardous fuels and to maintain or restore ecosystems. This includes using mechanical treatments and prescribed fires in areas where using wildfire to accomplish resource benefits is not practical. Managing naturally ignited wildfires to

accomplish resource benefits on a landscape scale is currently authorized under the current forest plan and is proposed to continue in the revised Forest Plan. Desired condition, goals, objectives and standards (revised Forest Plan, pages 66 through 70) described in the fire and fuels section provide guidance and direction that allow for the use of a variety of tools to accomplish vegetation, restoration, and protection objectives. The public is notified when prescribed burning is planned during site-specific implementation.

Public Concern #565

The Forest Service should cut down on timber sales. Current climatic changes, forest health, and the loss of habitat from fires are compelling reasons to preserve habitat. Slash from timber sales will put a lot of fine fuel on the ground. If a wildfire got started it would destroy more habitat.

Response

Silvicultural prescriptions that are prepared for all timber harvesting projects include objectives and methods for treating slash from harvesting operations to reduce the amount of fuel available to burn in a wildfire. In general, loss of habitat from wildfires burning on the Shoshone National Forest has not been an issue. In the past, wildfire has been an important tool for maintaining and restoring vegetation and wildlife habitats. Resource protection and benefit goals, objectives, standards, and guidelines for wildlife, vegetation, and other resources have been identified throughout the revised Forest Plan as well as potential effects documented in multiple sections of the EIS. In addition, alternatives C and D reduce the amount land available for suitable timber production and harvesting.

Public Concern #566

The Forest Service should utilize all the tools available and the best available science to manage the Shoshone NF. Timber harvesting, fuels treatments, and prescribed burning should be implemented where needed to promote a healthy forest, enhance wildlife habitat, and reduce fire severity. The Forest Service when considering management options should make fire protection the basis for management decisions. Proper management through logging, mechanical fuels treatment and fire help to maintain a diversely aged forest and provide varied habitat and reduce the threat of wildfire where possible. These actions are needed to help move watershed conditions to their respective Historic Range of Variation. . Additionally the forest should clarify since the information for accepted and predicted changes to vegetation is not presented well in the current Draft, and is not documented as required by the 1982 Planning Rule.

Response

The Forest has used and proposes to continue using a mix of tools to reduce hazardous fuels and to maintain or restore ecosystems and to accomplish protection objectives where high-valued resources and developments are present. This includes using mechanical treatments and prescribed fires in areas where using wildfire to accomplish resource benefits is not practical. Desired condition, goals, objectives and standards described in the fire and fuels section (revised Forest Plan, pages 66 through 70) provide guidance and direction that allow for the use of a variety of tools to accomplish vegetation, restoration, and protection objectives.

All wildfires are evaluated relative to land management goals and objectives which include protection objectives and opportunities to accomplish resource benefits. All wildfires receive a management response based on the values at risk, costs, potential for success and threats to public and firefighter safety. These items are addressed in more detail in the fire and fuels section of the revised Forest Plan (Goals 1, 2 and 3 on page 67; Standards 1 through 6 on page 67; and management approach on page 69).

Potential changes and effects to vegetation and watershed conditions are discussed in detail in the EIS.

See response to PC #373 regarding natural range of variability.

Public Concern #567

The Forest Service should develop management methods that are light on the land. There needs to be a reduction of impacts on the natural processes of wildlife, ecology and fire.

Response

Standards and guidelines along with the implementation of best management practices for all land management activities have been developed and are documented in multiple locations throughout the revised Forest Plan. During site-specific analysis proposed management methods will be reviewed for site-specific conditions.

Public Concern #568

The Shoshone NF should reconsider the proposed WUI boundaries. These boundaries are out of scale with WUIs seen on other national forests, where the WUI might reach a half-mile or so back into national forest lands. Map 20 shows the WUI extending the entire width of the national forest west of Dubois to the forest's western edge (at least 20 miles wide when measured from Dubois), and south of Lander (where it also extends the entire width of the national forest). How can this be justified? Is the Forest Service really intending to thin and log all of this country?

What will this manipulation have on native wildlife? How much will all this cost? How will you do this without building roads? Will there be a loss of tree species diversity; will subalpine fir and spruce be largely eradicated as 'ladder fuels'? How will you prevent establishment of invasive plant species following so much disturbance? How often will you have to repeat the thinning to prevent the trees and brush from getting re-established? What evidence do you have that this won't in fact increase fire danger, due to drying of the forest floor, increased wind through the opened forest, and re-growth of brush in clearings? What size trees will be removed? How will you deal with all the logs and slash? Do these kinds of areas really make people safer from wildfires?

The plan states that "Past fire suppression policies have resulted in vegetation changes and have allowed fuels to develop to higher than natural levels in some areas on the Shoshone." What scientific evidence do you have that fuel levels are "higher than natural levels"? Which specific areas are you referring to?

The objective to "reduce hazardous fuel ratings on 100,000 to 250,000 acres" is also alarming. This is an enormous amount of acreage to treat. The plan should present scientific evidence that reduction of "hazardous fuels" will affect wildfire spread and intensity. It should also discuss, in detail, what exactly these treatments will be, where they will be, how they will be accessed, and what their effects will be on wildlife, invasive species, soils, riparian zones, wilderness qualities, and scenic values. No mechanical treatments should take place in inventoried roadless areas, wilderness study areas, wilderness areas, or research natural areas.

Response

The wildland urban interface (WUI) boundaries in the revised Forest Plan were derived from the Community Wildfire Protection Plans (CWPP) for Fremont, Hot Springs, and Park Counties. These plans were prepared by the Counties and not by the Forest Service. The recommendation for communities to prepare CWPPs stems from the Healthy Forest Restoration Act (HFRA). The HFRA helps facilitate expedited administrative procedures and improved coordination between Federal agencies and local communities in planning and implementing fuel reduction projects. The development of a CWPP includes designation of WUI areas which helps identify priority areas for hazardous fuels treatments near at-risk communities. The designation of the WUI boundaries in the CWPPs and display of the boundaries in the revised Forest Plan do not translate to a decision that the Forest Service plans to thin and log all or most of the areas. The goals and objectives in the revised Forest Plan for vegetation and hazardous fuels

provide guidance on how many acres are likely to be treated. Management areas designated in the revised Forest Plan provide direction on what type of treatments may occur and where. General descriptions of priority areas for treatment are also noted in the desired condition and management approach descriptions in several areas of in the revised Forest Plan (pages 38, 69, 184 through 209). revised Forest Plan management prescriptions in these areas are aligned with locations identified as priority areas for fuels treatment in the CWPPs.

The Revised Forest Plan hazardous fuel treatment objective of 100,000 to 250,000 acres is consistent with what occurred on the Forest during the 10-year period from 2002 through 2011. During this period approximately 57,000 acres of fuels reduction was accomplished using mechanical and prescribed fire treatments in the front country. Wildfires accounted for an additional 183,000 acres of hazardous fuels reduction. Most of these acres involved back country locations such as wilderness and roadless areas. The estimated acres to be treated and treatment methods relative to the different management areas for the next planning period are noted in various locations throughout the revised Forest Plan and EIS. Mechanical treatments such as timber harvesting in combination with prescribed fire are emphasized in Management Areas (MAs) 4, 5, and 8. These are the same management areas that include or are adjacent to priority areas for fuels projects identified in the CWPPs. Prescribed fire and naturally ignited wildfire will be the primary tools to accomplish fuels reduction and other resource benefit objectives in the back country and wilderness management areas (MAs 1, 2, and 3). The potential changes to vegetation and effects on other resources are documented in the various resource sections of the chapter 3 of the EIS.

Standards and guidelines to avoid or minimize the impacts from fire management activities are described for multiple resources in chapter 1 of the revised Forest Plan. In the context of forest vegetation communities, the relationship of fuels to fire behavior attributes such as fire intensity is a matter of basic fire physics. The more fuel (trees, grass, and down dead and woody material) available to burn under the range of typical fire season conditions, the greater the potential for more intense and longer-duration burning wildfires when ignition occurs. Fires that burn in more dense forest types burn longer and hotter and are consequently more difficult to control. An example on the Shoshone National Forest that illustrates the benefits from a thinned forest can be found in the North Fork corridor west of Wapiti, Wyoming, where the Gunbarrel Fire burned in 2008. Numerous structures were threatened by intense surface and crown fire burning in heavy timber. Timber harvesting to thin the forest along with other fuels reduction work had been completed in areas around and adjacent to the structures. When the fire front reached these treated areas, the fire behavior was significantly reduced and firefighters were able to quickly extinguish fires before they reached the structures. This event was documented in a report titled “Fuel Treatment Effectiveness Report” (Weldon 2008).

Public Concern #569

The Forest Service should rethink its management philosophy. Fire has been burning ecosystems for hundreds of millions of years, helping to shape global biome distribution and to maintain the structure and function of fire-prone communities. Wildfire is widely acknowledged to be the primary architect of patch dynamics in coniferous forest ecosystems. The Forest Service should not try to exclude wildfire as part of its management options; it should embrace it and look for avenues of using it for desired results.

Fire is key to aspen “seedling” recruitment, and following the 1988 fires in Yellowstone, aspen recruitment was heavily correlated with burned areas (Turner et al. 2003). Fire is crucial because it exposes mineral soil the best seedbed for successful germination.

Interior forest birds and elk favor burned areas as foraging areas. Animals seek out burned sites for the newly available minerals and for the flush of plant growth.

Effective fire suppression has promoted dwarf mistletoe expansion and intensified pine beetle outbreaks. Periodic fire promotes forest health by killing trees infected with mistletoe and it removes trees that would sustain or further a buildup of beetle populations.

The effectiveness of fire suppression is also highly dubious. The result has been counterproductive: larger, more intense forest fires in recent years.

There is little evidence to suggest that pursuing a let-burn policy on the Shoshone would lead to catastrophic wildfires. Despain and Sellers (1977) pointed out that during the early years of the let-burn policy in Yellowstone, most wildfires were small. This would likely be the case on the SNF as well.

Response

Managing naturally ignited wildfires to accomplish resource benefits on a landscape scale is authorized under the current forest plan and is proposed to continue in the revised Forest Plan (page 68). The Forest has managed several large wildfires during the last 10 years that had responses based on protection and resource benefit objectives. For large fires that have occurred on the Forest, aggressive suppression actions have generally been limited to those portions of the fire that were threatening WUI, forest developments and infrastructure, and other resources that we did not want to burn. The revised Forest Plan continues with a similarapproach. All wildfires will be evaluated relative to land management goals and objectives which include protection objectives and opportunities to accomplish resource benefits. All wildfires receive a management response based on the values at risk, costs, potential for success and threats to public and fire fighter safety. These items are addressed in more detail in the fire and fuels section of the revised Forest Plan (Goals 1, 2 and 3 on page 67; Standards 1 through 6 on page 67; and management approach on page 69).

Public Concern #570

Today's fires are a by-product of successful fire suppression strategy during the last century. Now if a fire becomes large it is hard to contain the fire irrespective of the amount of resources being used to control it, thus making recent large fire very costly to fight. Steps need to be taken to return the Shoshone NF into a healthy forest and not one prone to large fires due to the excess fuels.

Response

Some of the revised Forest Plan goals and objectives for vegetation and fire and fuels are intended to restore and maintain resilient ecosystems that are consistent with a healthy forest. This includes using wildfires on a landscape scale to accomplish resource benefits, where appropriate. Protection of resources that may be negatively impacted by wildfire is also indicated in various goals, objectives, and standards. Response to and use of wildfire will continue to be based on the values at risk, costs, potential for success, and threats to public and firefighter safety. These items are addressed in more detail in the fire and fuels section of the revised Forest Plan (Goals 1, 2 and 3 on page 67; Standards 1 through 6 on page 67; and management approach on page 69).

Public Concern #571

The Forest Service should obtain and maintain adequate equipment and personnel to successfully fight fire at all times. Failure to have the proper equipment or trained personnel could lead to catastrophic results. Both in terms of acres burned or lives lost due to faulty or inadequate equipment.

Response

This comment is outside the scope of the revised Forest Plan analysis.

Public Concern #572

The Forest Service should consider adding this statement on page 68 of the Forest Plan, Identify areas where commercial treatments are feasible and prioritize high risk areas for mechanical commercial fuels reduction. The Forest Service should delete a portion of Guideline #10, page 58 of the Forest Plan: "except when values would not be cost effective to protect".

Response

Timber suitability is used to identify the areas appropriate for timber harvest. The fire section contains a goal indicating that risk should be reduced adjacent to communities. No standard was added.

Relative to Guideline #10, the direction is worded as it is based upon the realization that in some situations the cost of protecting the resource would exceed the value of the resource itself. Other direction in this section continues to point out that suitable timber lands are a valued resource that should be protected. Guideline #10 was not changed.

Subject: 1602 - Fire and Fuels Management - Methodology

Public Concern #573

The Forest Service needs to incorporate reductions in Forest Service budgets and wildfire suppression costs. This information is needed to reflect which programs will be impacted and how do these impacts affect local communities. It is important for this information to be included in both the NPV calculation and the net public benefits calculation.

Response

Annual budget fluctuations and the relationship to accomplishing forest plan goals and objectives are addressed on page 4 of the revised Forest Plan. Effects from fire and fuels management on other resources are discussed throughout chapter 3 of the FEIS. Information regarding suppression cost will be added to the fire and fuels analysis section in chapter 3 of the FEIS.

Public Concern #574

The Forest Service should utilize fall burning to meet air quality standards. Burning in the fall would broaden the window for prescribed burning allowing the burning of fewer acres at a time. This in turn would reduce the amount of particulates associated with prescribed burning in the air at one time.

Response

The Forest currently conducts prescribed burning in all seasons in accordance with established air quality standards and other prescription parameters identified in approved burn plans. The revised Forest Plan does not add or change any seasonal restrictions regarding the use of prescribed fire, but reiterates the need to adhere to current air quality standards (revised Forest Plan, page 28). Site-specific burn plans will be developed prior to prescribed burning to ensure adherence to air quality standards.

Public Concern #575

The Forest Service should reword Guideline #3; the forest plan should not preclude aggressive fire suppression strategies and tactics. These actions are needed to reduce the total number of acres burned or protect high value resources. Guideline #3 should reference the state of Wyoming BMPs, identify areas where equipment should not be used, and provide direction for mitigation rehabilitation.

Response

Water and soil Guideline #3 (Revised Forest Plan, page 28) does not exclude the use of aggressive suppression strategies and tactics. The suggestion to reword the guideline will be considered during the decision phase of the analysis.

Subject: 1604 - Fire and Fuels Management - Desired condition

Public Concern #576

It's good the Forest Service is using prescribed burning as the preferred management choice instead of clear-cutting. Burning is a better choice and more natural looking for management than clear-cuts.

Response

The revised Forest Plan does not indicate that prescribed fire is the preferred management choice instead of clearcutting as indicated by the comment. Prescribed fire is just one of several tools that may be used including the full range of silvicultural treatments to remove trees and manipulate vegetation.

Public Concern #577

The Forest Service should consider addressing and clarifying the conflict with the discussion on page 429 and the Alternative B paragraph on page 425 because it appears that achieving the desired condition is a more significant driver than the demand for timber products. 586

Response

We clarified the discussion on page 425 to better describe the intent of timber production on suitable lands.

Subject: 1605 - Fire and Fuels Management - Direct and indirect effects

Public Concern #578

The Forest Service should disclose in the DEIS the amount of anticipated wildfire and their associated direct and indirect costs. Disclosing this information may have an impact on the final alternative selected.

Response

Wildfire management costs will be included in the fire and fuels analysis section of chapter 3 of the FEIS.

Public Concern #579

The Forest Service should reconsider its selection of Alternative B as the preferred alternative. Alternative B proposes extreme disturbance in the lower elevation areas.

Response

We will consider the comment about not selecting alternative B as the preferred alternative because of the amount of disturbance in lower elevation areas in the decision phase of the analysis.

Subject: 1606 - Fire and Fuels Management - Cumulative effects

Public Concern #580

The Forest Service should analyze the use of resources for timber and wildlife and future uses in relationship to disturbance vulnerability. Disturbance from insects and fire are likely to increase with climate change and there is a clear risk to areas designated under Management Areas 5.1 and 5.4 in the Preferred Alternative.

Response

The wildlife and timber sections in chapter 3 of the EIS discuss the potential effects from wildfire, insects, and disease. The potential effects of climate change on disturbances such as fire, insects, and diseases are also discussed in chapter 3 of the EIS (pages 359 and 371).

Subject: 1607 - Fire and Fuels Management - Climate change

Public Concern #581

The Forest Service needs to re-evaluate the anticipated amount of unplanned ignitions. The Forest Service is estimating that there will be approximately the same amount in the next ten years as there has been in the previous ten years. This estimate seems low given the warming climate trends and anticipated shifts in fire regimes.

Response

The primary factors influencing the rationale to use the previous 10 years of acres burned by wildfire are the combination of fuel conditions in forested areas and climate trend. Insects have affected over 1 million acres of forest community types causing a substantial increase in dead trees, and subsequently, more fuel that is readily available to burn when conditions are right. Climate trends during the past 10 years were biased toward being warmer and drier, although there appears limited correlation between snowpack and spring precipitation with occurrence of large fires on the Shoshone in any given year. Similar vegetation and climate conditions are expected to be present during the next planning period and large fires are likely to continue; however, as more of the landscape burns, fewer acres become available to burn as well as recent burned areas become a barrier to spread for new large fires. Additionally, goals, objectives, and standards for fire and fuels management in the existing Forest are basically the same as what is being proposed in the revised Forest Plan.

Subject: 1608 - Fire and Fuels Management - Incomplete and unavailable information

Public Concern #582

Page 35 of the DEIS mentions increasing aspen cover type on 2,500 acres and restoring approximately 750 acres of whitebark pine on suitable and generally accessible acres. Does "suitable" refer to suitable timber lands? The Forest Service should consider placing an emphasis on aspen restoration on aspen clones within conifer types wherever possible. Conifer cover types having decadent aspen with opportunities to remove conifers and expand declining aspen clones are significant in aspen restoration.

Response

It does refer to suitable timber lands. The actual goal in the plan states that 750 acres of whitebark pine will be restored. That restoration is not restricted to suitable lands. The EIS discussion reflects the reality that because of cost that restoration is more likely to occur on suitable lands and accessible areas. The actual location of restoration activities will be determined during project-level analysis. Aspen restoration will commonly occur in conifer types since natural succession patterns result in aspen being replaced by conifer types. Project-level plans will determine the location of restoration activities, but conifer removal from aspen clones will likely be a significant component of that activity.

Subject: 1626 - Fire and Fuels Management - Management Approach

Public Concern #583

The Forest Service should change the Preferred Alternative from a passive approach to a more active management of resources. The episodic and unpredictable nature of wildfires and a wildfire-based management approach will not create the jobs and sustainable economic activity that would most benefit local counties. By providing only minimal direction for active management opportunities for preemptive treatments to lessen direct and indirect wildfire costs and insect susceptibility, the preferred alternative will have substantial impacts to local economies.

Response

We will consider the comment to change alternative B to “more active management of resources” during the decision phase of the analysis.

Subject: 1650 - Insects and Disease - Resource General

Public Concern #584

The Forest Service should consider removing beetle killed trees from the forest by fire or other methods in order to make a healthier forest and help to minimize fuel for large wildfires, especially around Seven D Ranch.

Response

All alternatives allow the use of a variety of tools including prescribed fire and mechanical treatments to reduce fuels. Specific locations for where treatments will occur are addressed in site-specific project-level analyses, outside the scope of the revised Forest Plan analysis.

Public Concern #585

The Forest Service should clarify the following items in the DEIS: 1-more adequately account for the effects of the insect epidemics and fires of the last decade on age classes, snags, and species mix since the source used is based on inventory in 1999 and not more recent; 2- report the current and projected number of acres affected by the beetle kill and blister rust epidemic

Response

The Forest Inventory Analysis data are the most recent available for the Shoshone. The mapping of cover types and stand structure do reflect the changes that have occurred as a result fires and the insect epidemics. That mapping was first completed in 2004, and has been periodically updated to reflect changes from insect epidemics and fire. Over 60 percent of the vegetation mapping has been updated since 2004. In addition, the impacts of the insect epidemic were modeled in the projections of timber volumes.The EIS also uses recent data from insect aerial surveys and the EIS discussion projects the current trends.

Subject: 1652 - Insects and Disease - Methodology

Public Concern #586

The Forest Service should consider cleaning up the ground of dead wood, down fall, dead trees in order to protect the land from disease.

Response

The importance of leaving woody material on the ground after timber harvest for nutrient cycling is discussed in the EIS chapter 3 vegetation section – coarse-woody debris (EIS page 123). Revised Forest Plan soil and water Goal 4 addresses the need to maintain or improve long-term levels of organic matter and nutrients. Forest Service soil and water management activities are guided by FSH 2509.25, Region 2 Watershed Conservation Practices Handbook, and Forest Service National Best Management Practice directives. These management practices are cited in the revised Forest Plan and FEIS.

Subject: 1654 - Insects and Disease - Desired condition

Public Concern #587

The Forest Service should consider taking into account recent and future potential changes in insect activity and fire risk in planning process since it seems the forest is using out of date information as basis for models and forest needs to keep trees alive for timber uses.

Response

The vegetation data used in the analysis have been updated to reflect the changes that have happened in the last 10 years from fire and insects. The timber yield tables were adjusted to simulate the effect from the ongoing insect epidemics. The effects analysis considers the current and future impacts from changes in fire regimes and insect epidemics.

Subject: 1656 - Insects and Disease - Cumulative effects

Public Concern #588

The Forest Service should consider discussing uses of resources for timber and wildlife and future uses in relation to disturbance vulnerability since disturbances from fire and insects is likely to increase with climate change in Management Areas 5.1 and 5.4.

Response

The revised Forest Plan includes direction on managing for a resilient forest in the face of changing climate in insect epidemics. The impacts of fire and insects in the last decade are used as a basis for predicting the impacts in the next 10 to 15 years. Though the pace of change may increase over time, the next 10 to 15 years is best predicted by the immediate past and not by estimates of what may happen 50 years in the future.

Subject: 1670 - Insects and Disease - Background

Public Concern #589

The Forest Service should have the Land Management Plan document clearly the amount of acres by species of mature and old growth forest that has been lost to recent, widespread insect and disease outbreaks and how this will affect future populations of wildlife species associated with older forests.

Response

In the vegetation section, the EIS documents the current acreage of older age classes and how they are affected by the alternatives, fires, and insect epidemics. Acres impacted by insects are presented in the EIS with a breakdown by timber species. The effects on wildlife populations that use older forests are also presented in the EIS. In many cases, insect epidemics do not eliminate a stand's ability to meet the need of wildlife species that use older stands as habitat. Many components of older stands such as multiple stories, dead and down material, and older trees still exist in stands impacted by insects. There will be

fewer older trees, but there still can be enough older and mid-age trees to dominate the stand conditions and structure.

Subject: 1677 - Insects and Disease - Management Approach

Public Concern #590

The Forest Service should identify in the Land Management Plan how they arrived at the management approach to reduce stands to a basal area of 70 square feet or less and identify where this practice been successful and the effects on wildlife species that are dependent on such forests for cover and food and also clarify how cutting trees prevents or controls marked beetle infestation expansion.

Response

The science regarding bark beetles and trees killed consistently indicates that stand conditions are the most important component in how large an epidemic will become. Spruce stands that are most susceptible to spruce beetle outbreaks generally have the following characteristics (Schmid and Frye 1976):

(1) Are located in creek bottoms,
(2) Have large diameter host trees,
(3) Have high basal areas; and
(4) Have a large proportion of spruce in the canopy.

Stands that are most susceptible to Douglas-fir beetle outbreaks have the following characteristics (Furniss et al. 1981):

(1) Stand density, stands stocked at 80 percent or more of normal are most susceptible,
(2) Stand age, trees 120 years of age and older being the most susceptible; and
(3) Proportion of Douglas-fir in the canopy.

In lodgepole pine, susceptibility to mountain pine beetle is based on three factors (Amman et al. 1977):

(1) Average tree diameter,
(2) Average tree age, and
(3) Location by latitude and elevation.

The mountain pine beetle outbreak in the 1930s indicated that tree size (diameter) and stand density are likely important to beetle behavior and outbreaks in these pine systems (Perkins and Roberts 2003).)

In all cases, the indication is that stand conditions will be the deciding factor in whether a beetle epidemic occurs. Reducing stand density and stand diameter will lead to less susceptible stands. The practice is most successful if stands are treated before beetle epidemics, as it creates a landscape that is less susceptible to large-scale epidemics. Once a large epidemics has begun, it becomes more difficult to treat areas effectively; instead treatments are aimed at priority areas to maintain desired stand conditions.

Subject: 1700 - Invasive Species - Resource general

Public Concern #591

The Forest Service should note that Canada thistl is growing in abundance on the north side of the Clarks Fork of the Yellowstone Wild and Scenic River just downstream from the Wright Place and near the mouth of Canyon Creek.

Response

This is a site-specific issue and is beyond the scope of the revised Forest plan analysis. Thank you for informing the Forest of this noxious weed location.

Public Concern #592

The Forest Service should maintain wilderness to guard against weed infestation.

Response

These comments will be considered along with others by the decision maker. See response to PC #27 regarding recommended wilderness.

Public Concern #593

The Forest Service should follow the State of Wyoming Aquatic Invasive species law and Wyoming Game and Fish Commission regulations calling for mandatory inspection of all conveyances (i.e., watercraft and other water bearing equipment) that enter the state before using Wyoming waters.

Response

The Forest works closely with and follows State of Wyoming Aquatic Invasive Species (AIS) laws and direction. This also includes Forest Service AIS direction found in the Shoshone National Forest Aquatic Invasive Species Action Plan (2013) and Shoshone Forest Fire Resource Protection guidelines (2013). These documents were primarily based on Region 4 of the Forest Service Aquatic Invasive Species program and resource management direction and guidance. Currently, fire suppression equipment will not be stopped or inspected by Wyoming Game and Fish personnel. The Forest plans to have invasive species cleaning stations where both weeds and AIS would be treated and cleaned when equipment arrives and when it leaves the Forest.

Public Concern #594

The Forest Service should recognize that the spread of noxious weeds as a result of OHV recreation is inconsequential because of efforts to educate OHV users and routine maintenance performed by most OHV users. The map showing invasive plant location shows no noticeable infestations in the south Shoshone outside of Lander, an area that has an abundance of OHV use.

Response

It has been long recognized that road and trail corridors, livestock, wildlife, and recreationists are vectors for invasive plant spread. The revised Forest Plan and EIS include direction for early detection and rapid response for treating invasive species across the Forest regardless of source.

Your comments will be considered along with others by the decision maker.

Subject: 1701 - Invasive Species - Legal and administrative framework

Public Concern #595

The Forest Service should recognize that noxious weed detection and control are integral to management of other natural resources and should note our support for your record of controlling noxious weeds.

Response

Thank you for your support of the Forest’s invasive species program. This comment will be considered along with others by the decision maker.

Public Concern #596

The Forest Service should change Wyoming Game and Fish Department Aquatic Invasive Species Management Plan to Wyoming Game and Fish Commission Aquatic Invasive Species Management Plan (p. 380).

Response

We changed the name of the document.

Subject: 1706 - Invasive Species - Cumulative effects

Public Concern #597

The Forest Service should add language addressing hauling water and the potential of spreading aquatic invasive species to the cumulative effects discussion on p. 394.

Response

Discussion is now included.

Subject: 1709 - Invasive Species - Monitoring

Public Concern #598

The Forest Service should correct the inconsistency in the monitoring plan that requires annual monitoring Forest-wide and in the Greater Yellowstone area but monitoring of invasive plants in wilderness only every five years. Since Wilderness Rangers are in the backcountry throughout the summer, they should include invasive plant survey reports as part of their tours so that invasive plant surveys are easy to report annually.

Response

The annual Forest-wide treatment monitoring will include the acres treated in wilderness. The monitoring item for invasives in wilderness is tied to a wilderness stewardship goal that is reported every five years. Data used for both items are the same and are captured annually.

Subject: 1750 - Commercial Livestock Grazing - Resource – General

Public Concern #599

The Forest Service should consider closing any inactive or vacant lots permanently since livestock are biggest conflict with grizzly bears or even eliminating commercial grazing on the forest since the owners pay so little and the animals destroy the land.

Response

Based on issues and concerns relating to an individual allotment, site-specific analysis determines allotment closures and elimination of commercial livestock grazing. Adaptive livestock management strategies and forage utilization guidelines are implemented to reduce conflict with grizzly bears and protect rangeland resources. Commercial livestock grazing fees are established by law and not determined by the Forest Service.

Public Concern #600

The Forest Service should consider limiting or even closing commercial grazing including Clark's Fork River since the cattle are getting out of their allotments and going into areas that local communities have water permits for drinking water and the cattle are overgrazing food areas that big game like elk use for

winter food sources leading to them having poor nutrition and low pregnancy rates and it takes away from seeing true wildlife in the forest.

Response

Special use permits for domestic water sources that occur within livestock grazing allotments allow for the construction of fences to prevent livestock and wildlife from accessing the site. The permit holder is responsible for maintaining these exclosures. Allowable forage utilization levels on identified big game winter range are lower than other rangelands to account for and provide adequate forage for wildlife.

Public Concern #601

The Forest Service should consider no monetary compensation for livestock killed by cattle.

Response

The Forest Service does not compensate owners for livestock killed by cattle or any other animal.

Public Concern #602

The Forest Service should consider making the following changes : 1- Include in the plan: manage livestock in post-fire environments to avoid impacts to heritage resources; 2- Add this guideline: Avoid grazing and activities such as feeding, salting, herding, or placing water developments in areas where heritage resource have become exposed due to wildfire; 3- Add this guideline: Heritage personnel are consulted prior to making improvements or changes to historic grazing-related structures (e.g. cow camp structures, cabins); 4-Throughout the DEIS,the "Effects from Livestock Grazing"are characterized and most discussions include effects from big game. Some headings include "Big Game"and others do not. Please make headings consistent throughout the DEIS and add "and Big Game"after "Livestock.," 5- SNF and USFS as a national agency will work with ranchers to manage the non-forested and forested landscapes to provide forage for both wildlife and domestic livestock; 6- Grazing permits should remain at no less than 2012 levels; 7- Ranchers should not be penalized for other resource degradations which are not directly linked to livestock use; 8- Should clarify how much land on the forest is capable of commercial livestock grazing since the DEIS statement of 16% contradicts table 98; and 9- On page 40 change wording to "Inside the Primary Conservation Area, the agency will always work with livestock grazing permittees to resolve conflicts and/or change management on cattle allotments or portions of cattle allotments with recurring grizzly bear conflicts. If conflicts cannot be resolved, livestock management will follow the Conservation Strategy." " 10-On page 73 of DLMP change the language changed to specify that when Forest Service and Wyoming Game and Fish wildlife biologists determine that available forage cannot support both wildlife and livestock, wildlife is given priority for available forage. 11- Page 20 fails to implement any changes to reduce conflicts between livestock and predator; 12-ON page 16 the direction provided in nearly identical to or even more limited than the previous Forest Plan and not a new change in direction that is suggested. 13- Consider closing allotments and not just nonuse agreements"with "willing permittees" 14-On page 19, change should to may for the statement "Two aspects of commercial livestock grazing will be addressed in the revised forest plan. The first¬ what areas of the Shoshone should be available for commercial grazing…" 15-On Page 16, the "Need for change"section that includes the need to "improve critical wildlife habitat and to prevent negative impact on riparian areas" the forest should remove these items from the AMS as no change in current management is necessary to reach desired conditions in these areas.16- expand the discussion to address how range improvements will be protected from impacts associated with vegetation management, prescribed fire, recreation use and road construction. 17-support broad consideration of adaptive management techniques, such as exclusions and upland water developments; 18-protection of stream corridors through use of a minimum 100 foot buffer in areas of livestock grazing. 19-expanding the policy of prohibiting domestic sheep to occupied habitat outside the PCA.

Response

(1) This concern is addressed in Guideline 3 for commercial livestock grazing.

- This concern is addressed in Guideline 3 for commercial livestock grazing.
- This concern is addressed in the management approach for commercial livestock grazing.
- This is addressed in the FEIS.
- The revised Forest Plan provides direction and guidance for cooperative resource management with grazing permittees on the Shoshone National Forest; however, it cannot dictate national policy.
- This concern is addressed in Objective 1 and reflects the average level of commercial livestock grazing over the past 20 years.
- Permittees are held responsible for only the management of and impacts resulting from livestock grazing. However; changes in allowable use or planned grazing may occur as a result of varying resource conditions that are outside the control of the permittee.
- Table 98 displays the total acres in allotments and the capable acres within those allotments (approximately 32 percent). The narrative statement reflects the capable acres in allotments as a percent of the total acreage of the Forest (approximately 2.5 million acres) i.e., 16 percent.
- This input was considered along with other public input on the same item. In response to this and other comments, we edited the revised Forest Plan to clarify the intent of the direction. This issue would be more appropriately addressed in the commercial livestock grazing section.
- Most wildlife populations do not reside year around or rely solely on forage from the Forest. It takes cooperation between the Wyoming Game and Fish Department, Forest Service, and adjacent landowners to provide for complete wildlife habitat needs. Allowable forage utilization levels for livestock take into account the needs of wildlife as well.
- Potential resolutions noted on page 20 include: long-term non-use agreements and avoidance through the use of Forage Reserves and vacant allotments. This section is not intended to address all the possible management changes to reduce livestock/predator conflicts. More specific management direction is covered in chapter 1, livestock grazing and at the site-specific (allotment) analysis level.
- Page 16 is the Summary of the Analysis of the Management Situation. It is not intended to provide direction. Little change is suggested because desired conditions in relation to livestock grazing are generally being met or satisfactory progress is being made to meet them.
- This option is a part of the Grizzly Bear Conservation Strategy and is analyzed when and where appropriate.
- We changed the text to say: "...The first, what areas of the Shoshone are suitable and capable of supporting commercial livestock grazing…."
- A change in the focus of resource management is needed to better address the small percentage of critical wildlife habitat and riparian areas that are not meeting or moving toward desired conditions. Expanded use of adaptive management techniques, such as: forage reserves, intensive herding, off-site stock water, and livestock utilization monitoring are examples of potential techniques to address these issues.
- This issue would be addressed in a site-specific analysis for any proposed project or activity.
- See new language proposed for comment #15 above.
- Protection of streambanks and associated riparian areas is addressed through the allowable use standards and guidelines. Structural protection (fences) would not be a practical solution for all stream corridors and could have potential negative effects on wildlife.
- The Grizzly Bear Conservation Strategy addresses this issue.

Public Concern #603

The Forest Service should consider continued commercial grazing on the forest since it fulfills as part of our middle lands, working landscapes, production areas of essential commodities, quality rural ambiance, and the American cultural icons (ranches) of a living legacy.

Response

This concern is addressed under the goals and objectives for commercial livestock grazing.

Public Concern #604

The Forest Service should consider that the DEIS should identify all lands potentially capable of supporting grazing and determine whether grazing is suitable given the management objective for that area, minimize the areas the cattle can roam, and reduce the animal units per acre since economic impacts of grazing is not adequately captured in current document.

Response

The EIS identifies capable and suitable lands for livestock grazing. Standards and guidelines for livestock grazing account for the other resource needs and uses for all management areas, were applicable. It is neither necessary nor desirable to arbitrarily reduce allotments or stocking rates to achieve the overall goals and objectives of the revised Forest Plan. The economic analysis completed as a part of the EIS is adequate for determining the benefits and impacts of livestock grazing.

Subject: 1751 - Commercial Livestock Grazing - Legal and administrative framework

Public Concern #605

The Forest Service should continue to work with permittees to limit additional restrictions on working ranches due to predator expansion.

Response

The Forest will continue to work with permittees to avoid conflicts with predators and follow the management guidelines in the Grizzly Bear Conservation Strategy.

Subject: 1752 - Commercial Livestock Grazing - Methodology

Public Concern #606

The Forest Service should consider elaborating on the referenced changes to management practices and new strategies associated with livestock grazing and identify the features of an effective adaptive management plan that may be expected for future grazing allotment analyses.

Response

As each allotment and livestock operation is unique, so too are the potential management practices. The discussion of these specific alternatives is appropriately addressed at the allotment-level analysis.

Subject: 1753 - Commercial Livestock Grazing - Affected environment

Public Concern #607

The Forest Service should consider making the following changes: 1- Adding this information to the discussion on page 402 (Ch. 3,Commercial Livestock Grazing, Affected Environment) to clarify why sheep grazing permits are currently not issued on the Clarks Fork and Greybull Ranger Districts; 2- On

Ch. 3, Commercial Livestock Grazing, Affected Environment. Pg. 405 add language from the Region 2 Planning Desk Guide- Rocky Mountain Region Process Paper: A Process to Determine Rangeland Capability and Suitability and Standards for NEPA Display and must be evident in the several places, including the EIS, Land Management Plan and Appendix B. 3-include adaptive management strategies that could be implemented if monitoring indicates excessive livestock conflicts.

Response

(1) The decision document resulting from NEPA analysis at the allotment level concluded that the likelihood of conflicts with grizzly bears and wolves and the potential for disease transmission between domestic and Big Horn Sheep was too high to support the issuance of permits for domestic sheep grazing.

- The documentation of the process that was used for determining rangeland capability and suitability is in appendix B of the FEIS.
- See response to PC #615, PC #172 item 1.

Public Concern #608

The Forest Service should consider best science for current management of livestock on riparian areas since during winter months ungulates congregate to lower elevation and riparian areas.

Response

We use the best available science to manage all vegetation types including riparian areas.

Subject: 1754 - Commercial Livestock Grazing - Desired condition

Public Concern #609

The Forest Service should consider reducing livestock grazing in wildland urban interface areas such as Sink Canyon and Landor Front/Limestone Mountain and allow growing season rest from grazing.

Response

The existing livestock grazing management systems incorporate either deferred use or rotational rest, or both, to allow plants to complete their growing cycle prior to livestock use. Eliminating livestock grazing in the wildland-urban interface has the potential to increase the likelihood of occurrence and intensity of wildfires.

Public Concern #610

The Forest Service should consider changing pg. 73 "On big Game Winter ranges, livestock grazing can be utilized as a tool to improve forage conditions and maintain big game use on winter ranges" since this is not Best Science especially with drier conditions. Desired condition should focus more emphasis on elk and deer winter range and thus changes to commercial livestock grazing.

Response

The section referenced deals with commercial livestock grazing and desired conditions relevant to that topic. The beneficial use of livestock to improve forage conditions is documented in the literature cited.

Subject: 1755 - Commercial Livestock Grazing - Direct and indirect effects

Public Concern #611

The Forest Service should consider benefits of commercial livestock grazing such as it being a tool to improve Elk habitat by enhancing forage habitat.

Response

This is stated in the management approach section for commercial livestock grazing on page 73 of the revised Forest Plan.

Subject: 1756 - Commercial Livestock Grazing - Cumulative effects

Public Concern #612

The Forest Service should consider including a summary discussion of specific BMPs and adaptive management strategies to protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat from grazing impacts and limiting grazing intensity, frequency or season of use where resource management objectives are not being met.

Response

Best management practices and adaptive management strategies are included in the appendice H.

Subject: 1757 - Commercial Livestock Grazing - Climate Change

Public Concern #613

The Forest Service should consider climate change may create need to modify grazing practices.

Response

Grazing management response to changes in resource conditions, for any reason, is applied by incorporating adaptive management strategies.

Subject: 1758 - Commercial Livestock Grazing - Incomplete and unavailable information

Public Concern #614

The Forest Service should utilize the higher value in the Present Net Value (PNV) calculations and other impact analyses so that the grazing contribution is accurately reflected relative to other resources. The Forest should realize that grazing is often in direct conflict with production of forage for big game and is only a limited application as a habitat modification tool for wildlife enhancement.

Response

Due to the numerous variables involved, it is generally not possible to determine an exact contribution or impact, so a conservative estimate or range of values is used for analysis. While livestock and wildlife may use the same rangeland resources, following the allowable use standards and guidelines assures that adequate forage remains for the established big game populations.

Subject: 1759 - Commercial Livestock Grazing - Monitoring

Public Concern #615

The Forest Service should monitor livestock grazing and require that fence maintenance be brought to the attention of operators. Better grazing monitoring is requested in the Warm Springs area north of Union Pass to assure over use does not occur.

Response

Adequate maintenance of structural range improvements is a condition of the Term Grazing Permit. Allotments are monitored for compliance with the permit terms and conditions and to assure livestock grazing does not exceed the specified allowable use level.

Public Concern #616

The Forest Service should only change livestock management if it is the reason desired conditions are not being met and change the guideline in the Draft Land Management Plan, Chapter 1- Forest-Wide Direction for Vegetation, Commercial Livestock Grazing #4, page 34 to: "Livestock management should be modified when conditions are not moving toward desired conditions due to current livestock grazing management and as determined through trend condition and monitoring,"

Response

While this would generally be the case, many times livestock management needs to be modified even if livestock use is not the primary reason resource conditions are not being met, i.e., impacts from fire, insects, or drought. Management of specific allotments will be addressed through the site-specific allotment management plans.

Public Concern #617

The Forest Service should consider adding a discussion on monitoring requirements, including the parameters to be monitored and the monitoring frequency, for water quality, wildlife impacts, general timing of adaptive management implementation and effectiveness, and soil quality parameters.

Response

Chapter 3 in the revised Forest Plan contains information on the monitoring strategy, including monitoring questions and potential monitoring items.

Subject: 1770 - Commercial Livestock Grazing - Background

Public Concern #618

The Forest Service should address impacts of removing Animal Unit Months (AUMs) on the Shoshone as their removal may have a significant impact on individual livestock grazing permittees, ranches, and communities.

Response

These impacts are addressed and considered in the economic analysis section.

Subject: 1771 - Commercial Livestock Grazing – Desired Condition

Public Concern #619

The Forest Service should add the following to the Land Management Plan: "As Endangered Species Act (ESA) listed predators become biologically recovered, as is the case with both grizzly bears and wolves, and as ESA restrictions become relaxed during and after the delisting process, the SNF will actively work with ranchers/permittees to make every effort to minimize adverse predator impacts to livestock in order to help keep working ranches working."

Response

Regardless of the listing status of grizzly bears and wolves, the Forest Service will continue to work with permittees to minimize conflicts with livestock and the resulting impacts. Specific to the grizzly bear, the

guidelines presently implemented through the Conservation Strategy are the management practices that will make delisting possible and would continue to be required even after delisting. Currently, the State of Wyoming is responsible for managing the grey wolf.

Subject: 1774 - Commercial Livestock Grazing - Standards

Public Concern #620

The Forest Service should add "Existing range improvements can be maintained" to the Draft Land Management Plan, Chapter 2-Management Area Direction, Standards for Management Area 1.5A, Commercial Livestock Grazing #9, page 144.

Response

The revised Forest Plan allows commercial livestock grazing to occur in the area. See Guideline #8 in the FEIS. Maintaining structures needed for grazing is part of commercial livestock grazing and does not need to be stated separately.

Subject: 1776 - Commercial Livestock Grazing - Management Approach

Public Concern #621

The Forest Service should correct the grazing capability to reflect actual and documented distribution by livestock and ensure that strong management practices are continued including the protection of all wetlands from grazing.

Response

Because livestock will use or occupy areas that are not capable of supporting and sustaining grazing, actual livestock distribution would not be an accurate display of rangeland capability.

Subject: 1800 - Forest Products - Resource General

Public Concern #622

The Forest Service should take a conservative approach to logging to include replanting and cleanup. Selective harvesting may be allowed but not clearcutting. The Forest Service should use the old adage that 'less is more' should be used with the management of the Shoshone Forest. The less we try to change and control it the more the forest will give us. Clearcutting fragments the forest and has negative impacts on some of the residual flora and fauna.

The Forest Service should take a cautious approach to logging. Since climate change is apparently accelerating, the SNF should manage for the greatest conservation and the least environmental impact.

Response

Harvest levels in any of the alternatives represent a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres per year, and alternative F is about 1,200 acres a year. Clear cutting is a small percentage of the harvest conducted. Though the alternatives don't precisely predict the mix of harvest treatments, the acre projections are based upon continuing the harvest levels and treatments that have been used under the current plan. In the last 20 years, the forest has averaged 25 acres of clearcutting a year in timber sales.

Public Concern #623

The Forest Service should consider hiring a professional forester from outside the Forest Service. This person or firm should have an unbiased opinion for creating a map and management plan for a 100 year cycle for logging saleable lumber. Techniques could be based on board feet per year and could be either clear cutting or select cutting. This will do many things like create jobs, eliminate forest fuels that have been built up for years, create fire breaks to protect private property, reduce bug and disease infestations, create healthier forests and create better habitat for our wild animals. Encourage logging it was viable here once before and it could be again if you could set it up to where a private company could make a living doing it.

Response

The current forest plan provides a long-range management plan for timber management. It projects timber harvest to continue in a manner similar to current levels. Though there have been fluctuations in the harvest levels historically, the trend has been relatively constant over the last 30 years and is projected to continue during the next 10 to 15 years.

Public Concern #624

The Forest Service should not log. Logging is bringing on extensive climate change resulting in adverse climatic conditions.

The Forest Service should stop clearcutting because it causes forest fragmentation. Fragmentation degrades habitat, splinters wildlife and plant populations, and contributes to species extinction on local and regional scales. These effects are greater than the loss of habitat alone, because as fragmentation progresses, remnant patches of habitat within disturbed areas become isolated from one another, thus preventing dispersal of animals and plants between them (Andren 1994, Bender et al. 1998). As the forest becomes progressively fragmented, the viability of native plants and wildlife is increasingly endangered, and the likelihood of extirpation increases.

The Forest Service should stop clearcutting because of the negative effects of the depth of edge influence. Clearcutting has a number of serious ecological consequences making it incompatible with the maintenance of healthy, functioning ecosystems. For instance, clearcutting increases the likelihood of insect irruptions by weakening trees along the edges and creating single-aged monocultures of insect-intolerant early successional tree species (Berryman 1986). Compounding the problem, the efforts by Forest Service managers to eliminate beetle outbreaks are unwarranted and counterproductive. Samman et al. (2000) concluded that past timber harvest practices have actually made forests more susceptible to beetle outbreaks, and that forest mangers could render their forest less vulnerable to irruptions by allowing outbreaks to run their course. Clearcutting has significant long-term effects on soil communities leading to loss of forest productivity. Clearcutting creates forest edges of a type that have harmful ecological effects. Research has discovered that hard edges left behind by clearcuts make nesting birds more susceptible to predators than more gradual natural edges (Ratti and Reese 1988, Rufenacht and Knight 2000). Clearcutting creates favorable environments for invasions of non-native plant species, which are opportunistic and prefer open, disturbed habitats. Nonnative species can have disruptive effects on native ecosystems and invasions should be actively discouraged through forest management. Because of the destructive effects of clearcutting on ecosystem health and the Forest Service's inability to mitigate its impacts, the inevitable conclusion must be that a moratorium on clearcutting is needed for the Shoshone National Forest. Even-aged harvest methods that create clearcuts over the long term, such as seed-tree cuts and two-stage selection cuts, should also be prohibited.

We propose a forest wide Natural Fire policy to drive the landscape-scale dynamics of forest succession. The obvious solution is to reintroduce stochastic forest disturbances into the forest landscape and to allow

them to proceed along their natural courses. This policy will apply forest-wide, except in designated areas along the urban-forest interface, where special protection from wildfire would be granted.

The Forest Service should stop clearcutting because natural disturbance is better for the health of the ecosystem. Natural disturbances interact in complex ways which determine the natural patterns of forest succession-- patterns which are crucial to maintaining the viability of forest species, communities, and ecosystems. The inability of timber harvest programs to effectively imitate natural patterns of disturbance has been well-documented in the scientific literature (Mladenoff et al. 1993, DellaSala et al. 1995, Huff et al. 1995, Wallin et al. 1996, Franklin et al. 1997, Aplet 2000, Lowsky and Knight 2000, Dillon et al. 2005).

Response

Providing timber products while protecting ecosystem integrity is part of the purpose and need for the Shoshone National Forest. We added to chapter 2 of the EIS a discussion on why an alternative that includes no timber harvest is not considered in the EIS. Harvest levels in any of the alternatives only represent a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200 acres a year. Clear cutting is a small percentage of the harvest conducted. All alternatives provide habitat for wildlife species. The decision maker will consider these comments along with input from other commenters in making a final decision.

Public Concern #625

The Forest Service should continue logging. Commercial use or providing commercial products from National Forests is appropriate and it's good for wildlife.

The Forest Service should provide enough trees killed by fire or insects, or that are senescent or overstocked, for logging to be profitable and to sustain new local and regional wood products industry. Logging is a necessary and reasonable approach for improving forest health and landscapes. Additional logging should occur in other areas accessible by existing roads. The Forest Service should also look at possibly seeking a temporary lifting of the Roadless Rule. By providing reliable local timber supplies, the SNF will support creation of new employment and industries in surrounding communities and constructively address wildfire fuel burdens before fire makes its own decisions.

The Forest Service should increase the amount of acres suitable for logging from 250,000 to 450,000 acres. This would help timber sales have adequate terrain for logging access.

The Forest Service should consider raising the amount of acres suitable for timber production in Alternative A. There are more acres proposed for oil and gas development than suitable for timber production in Alternative A, yet timber is a more renewable resource.

Response

All of the alternatives provide some level of timber harvest for commercial purposes. The number of suitable timber acres varies across the alternatives, but they are all higher than the current situation. Changing the Roadless Rule is beyond the scope of the revised Forest Plan. With current rules and regulations, the maximum amount of acres available for suitable ground is near the amount included in alternative F. The decision maker will consider the public comments requesting more suitable timber acres in addition to other public comments in making the final decision.

Public Concern #626

The Forest Service should not log lesser known roadless areas but reclassify them as wilderness. This action would protect these areas from logging.

Response

No scheduled timber production is allowed in roadless areas in alternative B, and any timber harvest would be consistent with the types of harvest allowed in the roadless rule. Alternatives C and D allow no timber harvest in roadless areas. The decision maker will consider the public comments requesting no timber harvest in roadless areas in addition to other public comments in making the final decision.

Public Concern #627

The Forest Service should not expand the suitable timber lands. This would be an extreme amount of disturbance in the lower-elevation areas.

The Forest Service should consider the extensive beetle-killed forest acreages and the resulting threats of more frequent fire regimes and blown-down timber will be more than the current funding and staffing levels of SNF will be able to handle. Concentrate on those without adding acreage for a non-existent timber market.

Response

All alternatives, but A, expand suitable timber lands, though acres of actual harvest will decrease in alternatives C and D, and will be slightly decreased in alternative B. Harvest levels in any of the alternatives only represent a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200 acres a year. Though it fluctuates year to year, a market for the timber sold from the Shoshone does exist. The decision maker will consider the public comments requesting no increase in suitable timber lands in addition to other public comments in making the final decision.

Public Concern #628

The Forest Service should select the least amount of acres designated as suitable for timber production. The current wild and relatively undeveloped condition of the Shoshone forest lands are the foundation for thriving outdoor-recreation based sustainable economies in Lander and Dubois. These economies are not derived from commodity production on forest lands; therefore, the Forest does not need to expand opportunities for timber production on these lands.

Response

The alternatives project various harvest levels with harvest acres lower than the current forest plan in alternatives C and D. Harvest levels in any of the alternatives represent only a very small percentage of the Shoshone. The decision maker will consider the public comments requesting a low number of suitable timber acres in addition to other public comments in making the final decision.

Public Concern #629

The Forest Service should maximize the conservation of old-growth and closed-canopy forest in order to counterbalance the depletion of these mature forest types as a result of beetles and climate change. The Forest Service should also maintain the 1986 level of harvesting. The Forest Service should create a standard in the Forest Plan that places a moratorium on clearcutting on the SNF. Uneven-aged management is preferable for interior forest species such as the boreal owl. Since there is only one commercial-scale lumber mill remaining in Wyoming and it does not get a large proportion of its timber from the SNF there isn't a need to expand the suitable acres for timber harvest.

Response

Harvest levels in any of the alternatives represent only a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200

acres a year. Harvest levels vary across the alternatives, but for most of the alternatives are similar to the current plan. Clear cutting is a small percentage of the harvest conducted. In the last 20 years, the forest has averaged 25 acres of clearcutting a year in timber sales. The Revised Forest Plan contains guidelines for maintaining a percentage of harvested watersheds as older stands. The vast majority of the forested acres on the Shoshone are not identified as suitable timber lands and will remain in a natural condition. The decision maker will consider the public comments requesting no increase in suitable timber lands in addition to other public comments in making the final decision.

Public Concern #630

The Forest Service should not conduct salvage logging as a result of insect outbreaks or fires. Snags and woody debris created by forest fires or insect outbreaks play an important role in maintaining the forest ecosystem health and function. The Forest Service should also consider stopping fuels treatment thinning prescriptions. Fuels treatment thinning at best are unproven and counterproductive at worst, prescribed fire should be the preferred method of fuels reduction. No fuels treatment of any sort should be allowed outside Residential-Forest Interface areas approximately ¼ mile of currently existing structures.

The Forest Service should stop offering below cost timber sales. The Forest Service has no business spending tax dollars on programs that are clearly contrary to the public interest and are wholeheartedly opposed by an overwhelming majority the taxpayers. In cases where timber sales offer clear management benefits, below-cost sales are allowable only in cases where they are approved by the public in the form of a majority of public comments supporting the sale during the NEPA process.

Response

The revised Forest Plan contains guidelines for maintaining snags and woody debris in harvest areas. The alternatives contain differing levels of vegetation treatments, with the lowest amounts in alternatives C and D. Harvest levels in any of the alternatives represent only a small percentage of the Shoshone. The decision maker will consider the public comments requesting less vegetation treatment in addition to other public comments in making the final decision.

The issue of how budget dollars are allocated relative to what targets are produced is beyond the scope of the analysis. Congress determines dollar allocations and how associated products are to be produced with those dollars.

Public Concern #631

The Forest Service should preserve adequate amounts of old-growth during the present planning period and the Forest Service needs to plan for the creation of additional old-growth in the future through the natural processes of forest succession. The depletion of old-growth is one of the most important threats to its ecosystem health, and represents an issue that demands immediate redress. A number of species on the SNF are old-growth obligates, absolutely dependent on old-growth forests for their survival.

Response

The revised Forest Plan contains guidelines for maintaining a percentage of harvested watersheds as older stands. The vast majority of the forested acres on the Shoshone are not identified as suitable timber lands and will remain in a natural condition. Harvest levels in any of the alternatives only represent a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200 acres a year.

Public Concern #632

The Forest Service should only do limited clearcutting. As a general rule clearcutting is not needed as a management tool on the forest. It is recognized that there are times when it is the best option after a stand replacement event.

Response

Harvest levels in any of the alternatives represent only a very small percentage of the Shoshone. All alternatives, except F, project harvest of well under 1,000 acres a year, and alternative F is about 1,200 acres a year. Clear cutting is a small percentage of the harvest conducted. In the last 20 years, the forest has averaged 25 acres of clearcutting a year in timber sales. The plan contains a guideline that states “Clearcutting should be used only where it is the optimum method for meeting desired conditions and objectives.”

Public Concern #633

The Forest Service should revise Table 13 in the Forest Plan and Table 103 in the DEIS so they are consistent. The Forest Service should consistently discuss the ASQ as a decadal volume (per NFMA Section 13), or an annual average of that decadal volume. The Forest Service should go to a larger top diameter for dead lodgepole pine, other conifer sawtimber, aspen and POL. Consistency with ASQ will help the reader follow the flow of discussion. Increasing the top diameter from 6'to 6-8'would allow critical flexibility to deal with deteriorating dead sawtimber on the Shoshone NF

Response

The numbers in tables 13 and 103 are consistent, but they present that data in different ways for different purposes.

The documents will be reviewed to ensure that the ASQ is presented appropriately.

The timber utilization numbers are based upon a Regional Standard and will not be changed for the revised Forest Plan. Utilization standards can and have been modified to deal with specific project situations.

Public Concern #634

The Forest Service should delete “unless it was…effects” from the first sentence, third paragraph, page 82 of the Forest Plan.

Response

The qualification in the sentence will remain. The sentence still identifies suitable timber lands as a high value assessment, but allows us to not protect it from fire when that fire would be beneficial or have no effect. One example is where we have a stand of dead trees on suitable ground that has no commercial value. In some cases, fire may accelerate the recovery of timber vegetation on that stand.

Public Concern #635

The Forest Service should display and discuss annual growth, mortality, and biologic potential for both suitable and non-suitable timberlands in the Forest Products section on page 420 of the DEIS. Providing a visual display and discussion will help compare suitable and non- suitable timberlands. The Forest Service should review paragraph 4, page 425 and the “Demand and Future Timber Products” paragraph on page 429. It appears that achieving DFC is a more significant driver than demand for timber products.

Response

We added a discussion on growth and mortality of timber resources into the affected environment from the FIA report for the forest. We reworked the effects discussion to clarify the purpose and need for timber harvest in alternative B.

Subject: 1802 - Forest Products - Methodology

Public Concern #636

The Forest Service should review the following tables, 103, 104, 105 and 106 because they are somewhat confusing, and need to be reviewed for accuracy and consistency. Specifically, are the acres in Table 104 and the costs and revenues in Table 105 calculated on an annual or decadal basis? Is the volume in Table 103 only from suited timberlands, or does it also include volume from OVM lands? Also, which volumes in Table 103 are in MCF and which are in CCF. Currently these tables do not make sense. Data in Tables 103, 104 and 105 are not mathematically sound. There should be some explanation for Table 103 why some numbers are in Mcf and others are in Ccf.

Response

The information and display of the information in tables will be clarified.

Subject: 1804 - Forest Products - Desired Condition

Public Concern #637

The Forest Service should not let timber companies have carte blanche in tree cutting. Timber companies desire only to select trees that will make them money and would prefer to leave trees that aren't as profitable for them.

Response

This is outside the scope of this decision. Timber contractors do not have a choice of what product to remove from a site. The Forest Service designates what should be removed in the contract.

Public Concern #638

The Forest Service should reclaim all acres associated with a timber sale to preexisting conditions. This will help preserve the aesthetic nature of the landscape.

Response

The revised Forest Plan contains standards and guidelines to protect the other resources and visuals that are also found on a harvest site. Sites valued high for their visual resources contain more direction on how they can be treated. Over time, as sites regenerate and vegetation grows, there is less and less evidence of harvesting activities.

Subject: 1820 - Forest Products - Background

Public Concern #639

The Forest Service should recalculate the average annual harvest of timber stated in the Forest Plan. Given the extensive conifer mortality that has occurred on the forest, was the volume of available timber recalculated for this plan? Is the 1994 estimate still valid?

Response

Vegetation data used in the analysis has been updated to reflect the changes that have happened in the last 10 years from fire and insects. The timber yield tables were adjusted to simulate the effect from the ongoing insect epidemics. The volume estimates are based upon these updates.

Subject: 1821 - Forest Products - Desired Condition

Public Concern #640

The Forest Service should consider revising the discussion under "Desired Conditions" to include, "A sustainable mix of timber products responsive to traditional, non-traditional, and new market demand, including that of local industry, is provided." This is needed to acknowledge a changing market

Response

We will revise the wording to improve clarity.

Subject: 1822 - Forest Products - Goals

Public Concern #641

The Forest Service should delete "except when … protect" in the Forest Plan, page 75, Goal #4.

Response

The goal is worded as it is based upon the realization that in some situations the cost of protecting the resource would exceed the value of the resource itself. Other direction in this section continues to point out that suitable timber lands are a valued resource that should be protected.

Public Concern #642

The Forest Service should consider changing on page 53 of the DEIS, "annual estimate" to "average annual" for TSPQ and ASQ. This will provide flexibility for management.

Response

The change was not made. The EIS numbers are providing an estimate of effects. They do not establish any direction. The revised Forest Plan is where the direction is established and it is written there to provide management flexibility.

Subject: 1824 - Forest Products - Standards

Public Concern #643

The Forest Service should revise Table 14 of the Forest Plan to include the following changes for lodgepole pine cover type: 1) add clearcut with reserve trees and seed tree under the even- aged column and, 2) add clearcut with reserve trees under the two-aged column. In the same table the Forest Service lists White-bark Pine and Limber Pine as trees that can be harvested using certain methods. Given the high mortality risk for both of these species, should they be targeted for commercial harvest? In mixed conifer stands that are harvested, how can saplings and seedlings of these 2 species be protected to ensure that they will persist in

Response

Clearcut with reserves and seed tree with reserves were added under the two-aged column. Seed tree is already listed and an approved even-aged management prescription. Limber pine and whitebark pine are generally not treated as commercial species, but that does not mean they cannot be harvested and used

consistent with management direction in the plan. Stands are often managed for a mix of conifer species and could be done for limber pine and whitebark pine based upon the other plan direction for those species.

Subject: 1825 - Forest Products - Guidelines

Public Concern #644

The Forest Service should consider modifying and or adding the following guidelines (page 78): To Guideline 4 add: Meet vegetation desired conditions of stand size. Add new guideline: Uneven-aged systems are not appropriate for the stands with an historic fire regime II, IV, V (stand replacement burn severity.) Clearcutting with reserve trees is the most appropriate prescription. Modify Guideline 8: Harvest activities for the purposes of timber production should be used when there is reasonable assurance the harvested lands can be restocked within five years after final regeneration harvest. Otherwise, the expense of restocking should be considered as a cost to the greater vegetation objective. Add new guideline: Utilizing the Stewardship end results contracting is the preferred instrument for conducting forest product activities. Retained receipts can fund, above and beyond annual budgets, for additional stewardship treatments. Also very important, these instruments, because they allow for project proposals and are awarded on a ―best value criteria, provide the potential for innovative solutions. There is also the potential for cost savings through economy of scale by bundling multiple activities/treatments into a single contract. Finally, there are incentives, through agreements, for non-profit organizations with mutual interest to assist with additional resources. Add new guideline: Inventoried Roadless Area acres that are―generally suitable for harvest can be accessed using temporary roads (if feasible) and logging systems, such as cut-to-length, forwarders, and/or excalines that afford treatment to meet vegetation desired conditions. Modify Guideline 10 to include: Overtime, however, the application of timber harvesting to obtain vegetation desired conditions should lessen the threat to suitable timber lands from unmanageable wildfire.

Response

Guideline 4 wasn’t changed. That guideline is a based upon NFMA requirements and is somewhat standardized across Region 2. It is complete as written. The suggested addition is not needed.

A guideline specifying the appropriateness of uneven-aged systems to certain fire regimes was not added. Those decisions are made on a site-specific basis, and we don’t want to limit the flexibility of choosing prescriptions at the project level.

Guideline 8 wasn’t changed. Like Guideline 4, it is based upon NFMA requirements and is standardized across Regions 2.

A guideline on the preference for stewardship contracting was not included. Specifying specific tools for implementing plan direction is not included as forest plan direction. The revised Forest Plan indicates what is to be accomplished and the method of accomplishing that direction is decided at the project level. Some of the proposed language was added to the management approach discussion on stewardship contracting.

A guideline on temporary roads in inventoried roadless areas was not added. Additional language on the use of temporary roads in inventoried roadless areas was added under the management approach for inventoried roadless areas in the suitable uses section.

The suggested qualification to Guideline 10 is more a statement of the effects of implementing forest plan direction and not a statement of direction to apply during implementation of the revised Forest Plan. The change was not made.

Public Concern #645

The Forest Service should revise Forest Products Guideline #1 on page 78 is not appropriate. There is no reason for "timber harvest activities" to be singled out in the Draft Plan for review by an interdisciplinary team to ensure consistency with desired conditions and objectives. We expect all activities on the Shoshone NF, not just "timber harvest activities", to conform to the forest plan. We recommend that you delete Forest Products Guideline #1.

Response

Guideline 1 wasn't deleted. That guideline is based upon NFMA requirements and is standardized across Region 2.

Public Concern #646

The Forest Service should revise Guideline #6, regarding even-aged prescriptions, is confusing. Is the intent to favor uneven-aged prescriptions, or is the intent to favor clearcutting over seed tree or shelterwood prescriptions? Is it even necessary?

Response

The intent is not to favor a particular prescription in the plan. We agree that it is not necessary. Guideline 6 is dropped.

Public Concern #647

The Forest Service should delete a portion of Fire and fuels Guideline, #10, page 58 – Delete "except when … protect."

Response

The direction is worded as it is based upon the realization that in some situations the cost of protecting the resource would exceed the value of the resource itself. Other direction in this section continues to point out that suitable timber lands are a valued resource that should be protected. The Guideline was not changed.

Subject: 1826 - Forest Products - Management Approach

Public Concern #648

The Forest Service should increase the use of temporary roads to allow for the use of mechanical treatments to improve forest health and restoration activities. This will provide temporary access that can be restored after the project is completed.

Response

Temporary roads are used routinely as needed for harvest operations. All the alternatives project the use of temporary roads. Harvest projections are not restricted by any temporary road limits.

Public Concern #649

The Forest Service should include more specific recommendations are needed in the LMP on how the SNF will manage and monitor white- bark pine and limber pine communities over the next planning

period. These trees are being threatened by beetle attack and whitebark pine blister rust. The result of these two threats could have a severe impact on the whitebark pine and limber pine communities.

Response

Whitebark pine is a sensitive species and is already being extensively monitored on the Forest. See Whitebark Pine Strategy for the Greater Yellowstone Area referenced in the vegetation section of the revised Forest Plan. Limber pine is not followed as closely as whitebark pine, but it is benefiting from some of the same efforts.

Public Concern #650

The Forest Service should revise the lynx habitat guidelines referencing them in the Forest Products section of the LMP as harvest management projects will need to be evaluated at the level of the Lynx Analysis Unit during the planning phase. Management of lynx habitat has not been incorporated into the LMP in a meaningful way. The appendices provide what is required to be done for lynx but the plan itself does not incorporate management standards and guidelines for lynx habitat in a meaningful way.

Response

See response to PC #471 concerning changing the lynx direction. In the revised Forest Plan, the lynx direction is included in the appendix, but is also cross referenced into the main document. The FEIS includes an analysis that reflects the direction in the revised Forest Plan including the direction for lynx.

Public Concern #651

The Forest Service should consider limiting timber production to 100,000 acres. Without a current market for timber products and a dubious future, there isn't any reason to create large timber sales if you are not going to be able to sell them.

Response

Though it fluctuates year to year, a market for the timber sold from the Shoshone does exist. Most of our timber sales are purchased.

Public Concern #652

The Forest Service should review and ensure that 2,130 acres of precommercial thinning in lynx habitat is adequate for timber management objectives. We also recommend that you allow those acres of precommercial thinning "per decade" instead of "for the next 10 to 15 years". Further, we were unable to find the language in the Draft Plan to actually authorize the 2,130 acres of precommercial thinning in lynx habitat, and recommend that you ensure such language is included in the Revised Plan and Record of Decision. These actions are needed to authorize and promote lynx habitat improvement work.

Response

The acres are based on an estimate that was made when the lynx amendment was done and we believe it is still accurate. A discussion on the connection of precommercial thinning to producing timber is included, as well as a reference to the 2,130 acres.

Public Concern #653

The Forest Service should review the last paragraph of page 531 of the DEIS, 43,000 acres in the Shoshone NF inventory of roadless areas "no longer meet roadless characteristics". The DEIS does not identify where those acres are located. However if they no longer have roadless characteristics and they are forested acres, then they should be available for timber production and should be considered for designation as lands suitable for timber production.

Response

Alternatives E and F consider managing some of the inventoried roadless areas that no longer have roadless characteristics for timber production. Other alternatives manage those lands under the Roadless Rule direction. The decision maker while consider the public comments on how these altered lands should be managed in making the final decision.

Public Concern #654

The Forest Service should consider adding a Guideline under Forest Products stating an intent to salvage merchantable sawtimber from natural events such as wildfire, blowdown, insects, and disease on suited timberlands, plus lands not suited for timber harvest when consistent with MA direction. This would help move the salvage area toward the desired condition of the management area.

Response

We believe this intent to salvage timber is addressed in the revised Forest Plan. The back country management areas already have a reference to salvage in the guidelines for vegetation. The management approach for timber products talks about the emphasis on salvage activities during the life of the plan.

Public Concern #655

We agree with the separate calculation of ASQ and Predicted Annual Volume based on anticipated budgets.

Response

No response needed.

Public Concern #656

The Forest Service should maintain throughout the planning documents that ASQ is a decadal number. This will prevent confusion when comparing other planning documents.

Response

ASQ (annual sale quantity) is an average annual number. The documents will be reviewed for consistency and clarity. The definition is included in the glossary.

Public Concern #657

The Forest Service should on page 420 display and discuss annual growth, mortality, and biologic potential for both suitable and non-suitable timberlands in the Forest Products section. This will provide a comparison of the two types of management.

Response

See response to PC #635.

Public Concern #664

The Forest Service should consider adding offering stewardship end results contracts for up to 10 years since it will offer longer contracts and have a better value for forests.

Response

Specifying tools for implementing plan direction is outside the scope of the revised Forest Plan analysis. The plan indicates what is to be accomplished and the method of accomplishing that direction is decided at the project level. We added some of the language to the management approach discussion on stewardship contracting.

Subject: 1850 - Special Forest Products - Resource - General

Public Concern #658

The Forest Service should consider allow timber industry development as long as there is oversight and industry held accountable.

Response

All logging activities are done under contracts that include provisions designed to meet forest plan direction.

Public Concern #659

The Forest Service should consider discussing more how to use timber for local artisans and craftspeople since there does not seem to be much demand for timber.

Response

Though it fluctuates year to year, a market for the timber sold from the Shoshone does exist. Most of our timber sales are purchased. In addition, the revised Forest Plan does contain direction on the desire to provide for new and changing markets.

Subject: 1872 - Special Forest Products - Management Approach

Public Concern #660

The Forest Service should consider adding a discussion in the DEIS about goal to help maintain or create processing capacity and infrastructure in local communities since it is unknown how communities will be impacted amongst the various alternatives.

Response

The EIS includes a discussion on how volume changes across the alternatives and how timber-related labor income will change over the alternatives. The labor income analysis does provide information on how the alternatives affect the local economy. Whether any particular alternative can support the creation of a new mill involves too many variables to assess and goes beyond just what volume is available from the forest. It would include items like mill size and how well the mill could compete against other buyers. Such an analysis is beyond the scope of the EIS.

Subject: 1900 - Land (Special Uses) - Resource - General

Public Concern #662

The Forest Service should consider more opportunities for backcountry skiing, packrafting, and mountaineering and make it easier to do multiple year round activities without have to do multiple proposals, applications, and compete in multiple prospectus offerings since this would benefit both public, commercial entities, and the forest.

Response

Issuance of a prospectus or accepting an application for a special use permit for any type of recreational activity is a site-specific decision and analysis and is not at the forest plan level.

Subject: 1924 - Land (Special Uses) - Standards

Public Concern #663

The Forest Service should consider changing in the plan on page 173 so that the standards are established that support desired recreation settings and activities that are consistent with the nature and purposes of the CDNST and on page 50 switching guideline 10 to a standard.

Response

The standards on page 173 support the nature and purposes of the CDNST with standards for outfitting and guiding activities that only allow those types of authorized activities that do not interfere with the nature and purposes of the trail.

We feel Guideline #10 on page 50 is more appropriate as a guideline than a standard. A guideline is a course of action that should be followed to achieve a goal, while a standard is something that has to be followed and any deviation must be analyzed and documented in a forest plan amendment.

Subject: 1950 - Minerals - Resource – General

Public Concern #665

The Forest Service should consider prohibiting mineral exploration and leases in areas where they are already prohibited, winter game ranges, inventoried roadless areas and should be restrained by stipulations in the Land Management Plan since mining destroys wild lands.

Response

Alternatives B, C, and D provide differing restriction on oil and gas development on crucial winter range and inventoried roadless areas. The decision maker will consider the public comments requesting that winter range and roadless areas be allocated to no surface occupancy in addition to other public comments in making the final decision.

Subject: 1951 - Minerals - Legal and administrative framework

Public Concern #666

The Forest Service should consider the Energy Policy Act of 2005, the Energy Policy Conservation Act Amendments of 2000, the Resource Planning Act and 36 CFR 2822.03 and follow their requirements when making any changes to Minerals section of the Forest Plan.

Response

The alternatives analyzed in the EIS display a range of options for designating where oil and gas development is suitable. This range goes from alternative C, where no surface occupancy is allowed on a majority of the forest, to alternative F, where surface occupancy is allowed on a majority of the forest. The FEIS examines the effects of the alternatives to oil and gas development as well as to other forest resources. The decision maker will consider the trade-offs in making a final decision.

Public Concern #667

The Forest Service should make every effort possible to minimize any damage from mining.

Response

The revised Forest Plan identifies areas of the forest that are suitable for mining. It also contains direction on protecting water and wildlife resources. Site-specific mitigation for any mining operation would be developed during the project-level planning phase for any mining operation.

Subject: 1952 - Minerals - Methodology

Public Concern #668

The Forest Service should consider putting more detail into areas listed and stipulations for No Surface Occupancy since they are only vaguely referenced.

Response

Maps for no surface occupancy allocations are available at a scale that enables areas to be located on the ground. Those maps are too large to include in the documents.

Subject: 1954 - Minerals – Desired Condition

Public Concern #669

The Forest Service should consider no surface development/occupancy on the forest especially for the Absaroka Front.

Response

The consideration of no oil and gas development on the forest was addressed in an alternative that was eliminated from detailed analysis in the EIS. The alternatives prohibit surface occupancy for oil and gas development on varying acres of the forest. Alternative C allows development on only 7 percent of the forest. The decision maker will consider the public comments requesting little or no oil and gas development on the forest, in addition to other public comments in making the final decision.

Subject: 1955 - Minerals - Direct and indirect effects

Public Concern #670

The Forest Service should consider making the following changes to the DEIS: 1-On page 457, 1st paragraph add "If the project proponent proposes alternative mitigation that the USFS and WGFD believes is better than the protection provided by the timing stipulations, then the timing stipulations maybe waived;" and address contaminations of groundwater and Line Creek from the 2006 Windsor Energy gas explosion since the forest had addressed the New World Mine water impairment but not the explosion impacts.

Response

On a project decision any standard or guideline could be modified with the proper documentation to accomplish the desired mitigation differently. This option is already covered generally in the plan direction.

The Line Creek Watershed is not classified as an impaired watershed. If that situation changes in the future, it will be managed as such.

Subject: 1958 - Minerals - Incomplete and unavailable information

Public Concern #671

The Forest Service should consider adding a discussion on the benefits of additional no surface occupancy constraints and what is the lost opportunity cost.

Response

The EIS contains a discussion on the effects of no surface occupancy acres on land available for development. The projections under all alternatives for future development are low and very low. This is not related to land available, but rather it is related to the likelihood of development occurring. Given the low likelihood of development and the projections that any development would be small, any lost opportunity costs are low.

Subject: 1960 - Minerals - Monitoring

Public Concern #672

The Forest Service should consider the various impacts that oil and gas development does to sage grouse populations since it impacts their leks and nesting areas especially from the secondary roads built; also consider impacts to other birds and managing to minimize these impacts.

Response

The EIS projects a very low potential for any oil and gas development on the forest. As such, the potential for impacts are very low. Any project that did occur and is implemented under the revised Forest Plan would have to address any impacts and meet plan direction to protect sage grouse habitat.

Subject: 1961 - Minerals - Oil and Gas Leasing

Public Concern #673

The Forest Service should continue to allow Oil and Gas Leasing and Development on the Forest as long as it takes into account that it will mitigate measures to minimize impacts to recreation, fish, wildlife, and wilderness through strict protections and follows regulations for economic improvements such as jobs and tax money. No areas currently open to leases should be closed. After leasing has ceased the areas should be returned to its natural state.

Response

The revised Forest Plan contains direction to mitigate the effects of oil and gas development. The alternatives allocate varying acres open to oil and gas development. The decision maker will consider the public comments that request that oil and gas development acres not change in addition to other public comments in making the final decision.

Public Concern #674

The Forest Service should consider not allowing oil and gas leasing and development on the forest. But if that cannot be a feasible goal the forest should at least minimize it with no surface occupancy (NSO) on wilderness areas, crucial winter game ranges, highly erodible soil areas, riparian areas, Special Management Areas, areas were adjacent BLM is NSO, and roadless areas along with increasing buffers. This should be done to protect fish, wildlife, recreation activities, beauty of the forest, water, and clean air, and tourist economy for local communities. There are plenty of areas outside the forest that no to increase on forest especially with most of the forest having low potential.

Response

See PC #669.

Public Concern #675

The Forest Service should consider that management is the primary basis for the lack of development potential, since Maps 35 and 36 show the increase in NSO over areas that have high potential and with this design it will make it difficult to build support systems needed for development of a lease which makes a bad precedent for multi-use land.

Response

The land suitable for oil and gas development varies across the alternatives with alternatives C and D being lowest and alternatives A and F being highest. The decision maker will consider the public comments requesting more area be open for oil and gas development in addition to other public comments in making the final decision.

Public Concern #676

The Forest Service should consider some indication of possible future revisiting the Oil and Gas restrictions on drilling and the possible extension of exclusion areas and should be done with public commenting

Response

Once the revised Forest Plan is complete, in the future the leasing decision for the Shoshone will be updated to be more consistent with the plan direction. An EIS will be prepared as part of that decision. The leasing decision will be guided by the revised Forest Plan, but it is not restricted to what the plan states and it could amend the forest plan direction.

Public Concern #677

The Forest Service should consider developing management approaches for wildlife, recreation and energy development that are consistent with Bureau of Land Management neighboring lands and other public lands in the Greater Yellowstone Ecosystem. The forest should take into account the BLM's draft Resource Management Plans.

Response

See PC #1.

Public Concern #678

The Forest Service should consider adding the following tables: 1-on page 455 make a table similar to table 118 but showing oil and gas potential for development including the percent of high development potential, percent of moderate development potential, percent of low potential, percent of very low potential, and percent of no potential; 2-. an additional table should be included on page 455 detailing acres of high, low, very low, and non-existent development potential and how they are affected by various alternatives , 3- a discussion of anticipated effects from an increase in road development attributed from oil and gas activities.4- no estimate of the reasonably foreseeable development (RFD) is included in the DEIS and should be 5- a revision to the 1995 Shoshone ROD for oil and gas leasing is necessary.

Response

Additional analysis addressing the potential of oil and gas development is in the EIS. The EIS analysis projects that it is unlikely that there will be oil and gas development under any of the alternatives, given the past history and potential for development. The roads section of the EIS addresses the impacts from

development of oil and gas. Any detailed analysis of impacts from roads related to oil and gas development is beyond the scope of this analysis.

A new Shoshone leasing decision will be done sometime after the revised Forest Plan is complete. The EIS references the reasonably foreseeable development done by the BLM, and uses that information in the analysis.

Public Concern #679

The Forest Service should establish a plan for the increase in future development of oil and gas, how the Forest will manage potential new exploration and development standards in the Shoshone, and the associated resource impact risks based on the DEIS assessment and establish a defined buffer for all forest resources. The Draft Land Management Plan should include a comprehensive list of measures and practices that address oil and gas impacts and an updated directional drilling reference, as the current reference is out of date.

Response

The revised Forest Plan contains direction to mitigate the effects of oil and gas development. The alternatives allocate varying acres open to oil and gas development. More detailed direction on how oil and gas will be developed will be addressed in future NEPA analysis such as the Leasing decision and specific development proposals.

Public Concern #680

The Forest Service should increase monitoring for all oil and gas activities to ensure that resource impacts are kept to a minimum.

Response

Monitoring of oil and gas development will be identified during project-level analysis of any proposals. There is currently no oil and gas development on the forest.

Public Concern #681

The Forest Service should consider the potential harm and impacts to water resources and how water resources may become depleted in the Forest Plan since a great deal of water would be utilized every stage of oil and gas development. A complete analysis of oil and gas development techniques and how they affect and are affected by the geology and hydrology of the proposed area should be completed prior to use.

Response

The revised Forest Plan contains direction to mitigate the effects of oil and gas development. Additional specific mitigation would be developed in association with any project proposal. Any future proposal would include NEPA analysis that would disclose the effects of any proposed development.

Public Concern #682

The Forest Service should make the following changes to the Draft Plan: (1) Discuss the impact of roads, pipelines, and transmission corridors associated with oil and gas activities which include soil disruption, habitat fragmentation, sediment erosion, and providing areas for noxious weed infestations. (2) Under Guidelines for threatened, endangered, proposed, and candidate species, re-write "Adverse effects from locatable mineral operations to threatened, endangered, proposed, and candidate animal species or their habitats should be avoided or minimized" so that the statement is less vague, which could allow for unregulated mineral development depending on perspective. (3) A goal should be added to Chapter 1,

Forest-wide direction, Minerals, Goals, Objectives and Standards that address the analysis of impacts to other uses (i.e. wildlife, recreation) and address the spectrum of mitigation from no development to on site mitigation.

Response

The EIS analysis projects that it is unlikely that there will be oil and gas development under any of the alternatives, given the past history and potential for development. There is also no current or anticipated locatable mineral development on the Shoshone. In the EIS, the various resources talk in a general way to the types of impacts that can occur from mineral development. Any specific analysis effects will occur in association with future NEPA analysis if and when mineral development is proposed. There is no requirement to analyze impacts from activities that are not anticipated. The no-action alternative management activites would occur. The plan contains standards and guidelines for soil, water, wildlife, and invasive weeds that provide direction on how all management actions should be implemented to protect those resources. That direction also applies to mineral development and will provide for protecting resources during mineral development.

Public Concern #683

The Forest Service should make the following change to the DEIS, a map should be added for clarity to represent the 8,750 acres of land currently leased on the forest.

Response

A map will be added.

Public Concern #684

The Forest Service should determine adequate funding for sustainable fish and wildlife management, including monitoring, in areas proposed for energy development and establish a long term "mitigation trust" to benefit fish and wildlife.

Response

These types of proposals are beyond the scope of the revised Forest Plan analysis and would be developed and addressed during the NEPA analysis phase of a proposed project.

Public Concern #685

The Forest Service should identify, map, and add to management plans "special places" with exceptional resource concerns or values where energy development should not be allowed.

Response

These types of areas are identified in the revised Forest Plan. The management areas for special area designation generally do not allow oil and gas development. Public comment identified some additional areas for consideration, and the decision maker will consider those comments and others in making the final decision.

Subject: 1982 - Minerals - Goals

Public Concern #686

The Forest Service should consider modifying the goals section to allow for responsible mineral development and additionally modify Goal 2 (page 85) to include: provide for mineral resource development, especially in high oil and gas occurrence potential areas.

Response

The mineral development goal applies to all areas of the Forest were the revised Forest Plan identifies that the area is suitable for development, regardless of the underlying potential. To emphasize high occurrence areas would imply that there is a lesser desire for development in other suitable areas. A change in the goal for mineral development was not made.

Subject: 1983 - Minerals - Objectives

Public Concern #687

The Forest Service should consider developing quantifiable Objectives with associated Standards enumerating thresholds and types/levels of development since are needed for public to accept this plan and should coordinate with other agencies on this plan since it appears that this plan does not align with the management objectives for oil and gas suitability set forth in the Bureau of Land Management Bighorn Basin Resource Management Plan and Lander Resource Management Plan (RMP).

Response

See PC #1 and PC #682.

Subject: 1986 - Minerals - Management Approach

Public Concern #688

The Forest Service should consider the following: (1) stating where surface occupancy associated with mineral development is suitable on the Forest or where there is a NSO restriction. (2) Areas designated as NSO geophysical exploration activities should be evaluated on a case-by-case basis and this modification be included under Management Approach. (3) Coordinate with BLM on the Forest Plan and disclose the effects its decisions could have on adjacent BLM lands and how they were reached

Response

For oil and gas, a map is provided for each alternative that indicates where surface development is suitable. For locatable minerals, development is generally suitable outside of withdrawn areas as noted in the suitable uses section of the plan. Additional direction is provided in the revised Forest Plan to address the suitability for geophysical exploration activities. Further work was done to coordinate oil and gas suitability direction between Forest Service and BLM lands (see PC #1).

Subject: 2000 - Roads and Trails - Resource – General

Public Concern #689

The Forest Service should reduce motorized traffic within the forest and all existing inventoried roadless areas should remain so, with no new motorized road or trail development. There are enough roads on the forest and no more additional roads should be added as the focus of the forest should be wild and backcountry-based recreation. The Forest also needs to enforce the regulations of inappropriate use of off road vehicles on non-designated routes.

Response

We analyzed various alternatives concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Table 146 identifies inventoried roadless areas and what management area they are allocated to by alternative. The deciding officer will consider the various options along with other comments during the decision process.

The Forest Service will continue to manage inventoried roadless areas according to the most recent direction resulting from court rulings related to 2001 Roadless Area Conservation Rule.

We analyzed various alternatives for both existing and projected additional road miles by alternative in table 131. The deciding officer will consider the various options along with other comments during the decision process.

The Forest Service continually strives to curb illegal ORV or OHV use through education, signage, and enforcement and by providing quality ORV and OHV use where management area direction allows for such use.

Public Concern #690

The Forest Service should make an effort to remove washboards from road surfaces and consider closing roads that have not been used in many years. Reduce edge effects from new road construction by establishing harvest units along existing roads.

Response

Removing washboards from specific road surfaces is a site-specific road maintenance issue outside the scope of the Revised Forest Plan analysis. However, the Revised Forest Plan provides general Forest-wide direction for roads and trails, and in chapter 1 and management areas specific direction in chapter 3, all existing roads would remain open under alternatives A, B, D, E, and F. Alternative C would decommission approximately 100 miles of roads currently open to the public under the most recent motor vehicle use map. The deciding officer will consider the various options along with other comments during the decision process.

New road construction is projected at 2 to 4 miles depending on the alternative. The edge effect from new road construction will be minor under any alternative.

Public Concern #691

The use of any ATVs should be restricted from use on forest lands as banning their use is an effective way to maintain the ecological integrity of the entire ecosystem.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #692

The Forest Service should allow the use of the Pinnacle Butte trail and associated old trail by four-wheeler, hiking, bicycling, etc. to connect two areas that would be a benefit for recreationalists and commercial business properties.

Response

The Pinnacle Butte trail will not be open to motorized uses, as that type of use does not conform to the enabling legislation that set aside the Dunoir for “non-vehicular” recreation. Most non-motorized forms of

recreation are allowed, such as hiking. Bicycle use was analyzed and the deciding officer will consider the various options along with other comments during the decision process.

Public Concern #693

The Forest Service should 1-provide an analysis of roads that are open for use in the winter for over-snow vehicles; 2 clarify a discrepancy in the total amount of acres that are available for summer motorized vehicle use; 3- correct a conflict in roads and trails suitable uses between the 2009 Continental Divide National Scenic Trail (CDNST) Comprehensive Plan and Forest Service Manual (FSM 2353.4). Modify the direction to be identical to the guidance found in FSM 2353.44b parts 10 and 11; 4- needs to edit the wording in the Forest Plan to stat that temporary road construction is not allowed in Inventoried Roadless Areas (IRAs) except outside of the IRAs and only when absolutely necessary. The wording used in the plan should better reflect the construction and management of new temporary roads as these temporary roads will open areas to the potential of increased OHV traffic, which in turn will have an impact to wildlife. Temporary roads may also impact the environment from increased erosion and sedimentation if the road is not reclaimed quickly. 5- Change the designation to MA 4.3 or 3.5 with a 100 ft. boundary for all 1981 motorized trails around Kirwin/Franks Peak and Sunlight areas so that they can be part of the Travel Management process. 6- Change the designation of the Morrison Jeep trail to MA 4.3 on its entire route to ensure that its historical usage is kept intact. 7- Add a definition for "Trail: A linear route managed for human-powered, stock, or OHV forms of transportation or for historical heritage values. Trails are not generally managed for use by four-wheel drive or high clearance vehicles. 8- On page 105, Roads and Trails – in the first sentence, replace "over 1,127" mile of road with "approximately 1,130 miles" of NFS roads on the Shoshone NF as stated on page 461 of the DEIS; 9- Include a summary discussion and map of foreseeable road construction and reconstruction, by alternative, based on revised management area allocations. 10- Design criteria and BMPs should be summarized in the FEIS; 11-address the effects of and the cost of subsidized road building.

Response

(1) In all areas across the Shoshone National Forest, over-snow vehicle use is not restricted to designated roads and trails, therefore, the effects analysis for this type of use is analyzed by the percentage of the Shoshone and location on areas where over-snow vehicle use is allowed.

(2) There is no discrepancy in the EIS presentation. It identifies the total miles of roads and trails available. It indicates the use is only allowed on designated routes. It also identifies the acres of the forest that are suitable for establishing motorized routes. It does not say that there will be routes established to each acre of the suitable ground. There are also map displays that show what areas that are suitable for motorized routes, actually have existing routes.

(3) The Revised Forest Plan is consistent with both the Comprehensive Management Plan and FSM 2353.44b parts 10 and 11. Motorized use by the general public is generally prohibited unless that use is consistent with the applicable land management plan and is designated in accordance with 36 CFR part 212, Subpart B and the vehicle class and use we allowed on that segment of the CDNST was constructed as a road prior to November 10, 1978.

(4) The revised Forest Plan states that road construction in inventoried roadless follows the Roadless Area Conservation Rule. Road construction and reconstruction is prohibited except in some very limited exceptions.

(5) Management area boundaries are being looked at between draft and final and are being adjusted where appropriate. The deciding officer will consider the various options along with other comments during the decision process.

(6) In the FEIS, the boundary of MA 3.1C the Sawtooth Peatbed Special Interest Area was adjusted to conform to the Morrison Jeep Trail on the northeast. The area adjusted out of MA 3.1C was designated 3.3B.

(7) The revised Forest Plan glossary already has a definition of a trail that meets our needs. A trails is defined as "A route 50 inches or less in width or a route over 50 inches wide that is identified and managed as a trail."

(8) Road mileages will be corrected so that the mileages in the revised Forest Plan and FEIS match.

(9) Table 117 shows the miles of different roads projected by functional class and by alternative. Locations and specifics of new road construction are a site-specific analysis and not part of a broader Forest Plan analysis. At the forest plan level, the management area allocations show where future construction may or may not be looked at.

(10) Forest Service regional and national best management practice directives are incorporated by reference in the document, and as such, do not need to be summarized.

(11) We are not aware of any subsidized road building that occurs on the forest.

Public Concern #694

The Forest Service should place signage and pedestrian gates along the north boundary of the Swamp Lake Special Interest Area, Chief Joseph Scenic Byway and Beartooth All-American Road to provide public access and inform the public of Swamp Lake's ecological importance

Response

These are site-specific comments and requests appropriate to be considered for future site- specific interpretation efforts, and outside the scope of the revised Forest Plan.

Public Concern #695

The Forest Service should ensure that adequate road access is created and allowed for area access when issuing mineral leases for subsurface occupancy.

Response

In most cases, management areas allow road construction to the extent allowed by existing laws to honor existing rights.

Public Concern #696

The Forest Service should 1- Make all of Rattlesnake Mountain MA 3.5 from the BLM on the east to the Wilderness boundary on the north to the private land on the west so that the area can be managed for motorized summer and winter use as needed based on snow levers and elk herds. 2- Make all of Carter Mountain MA 3.5 from the BLM to the Carter Mountain Summit so that the area can be managed for motorized summer and winter use as needed based on snow levers and elk herds. 3- Add to the MA 3.5 description that motorized trail construction, maintenance, and use is allowed even in roadless areas.

Response

(1) and (2) Management area boundaries are being looked at between draft and final and are being adjusted where there are no resource concerns. The deciding officer will consider the various options along with other comments during the decision process.

(3) A statement will be added to the roadless section of the revised Forest Plan clarifying that motorized trails are allowed in roadless areas per the Roadless Area Conservation Rule.

Public Concern #697

The Forest Service should maintain all trails and roads in the new plan and an emphasis should be placed on creating loops and trail extensions that will accommodate a variety of OHV users. Easily accessible and well-maintained trailheads for motorized users and expansion of existing motorized trail systems should be specifically mentioned as a goal for the plan. Creation of new roads and trails will help reduce the number of illegal roads and trails on the forest. The Forest Service should also re-open some of the roads that have been closed in the last 30 years, specifically in the Meeteetse area. Designated snowmobile trails should continue to be provided through all existing wildlife existing range areas and designated trails should be provided through new areas whenever a new winter range would cut off access to open snowmobile areas beyond the newly created winter range. Plans for future summer motorized planning should take into account the information provided by the Forest's summer trail rangers. The Forest Service should evaluate and ensure that motorized trail loops are provided and available for riders of different abilities.

Response

Site-specific decisions on which roads or trails allow motorized and non-motorized uses is a travel management decision and is oustside the scope the revised Forest Plan process. The Plan includes broad goals including one to provide a variety of motorized loops for riders of different abilities.

Snowmobiling in winter range was worked out in partnership with the Wyoming Game and Fish Department based on crucial winter range coverages. Designated snowmobile trails within crucial winter range were kept open.

Public Concern #698

The Forest should examine roads and trails to close any that may threaten the wilderness character of the adjoining lands or have impacts on wildlife or have not been in use for many years. The Forest should make an effort to close all user-created roads and trails as they impact the natural environment. The Forest Service should consider not increasing the number of trails and roads on the forest because of the displacement of animal populations away from roads and, increase in human accidents and recreation type harassments, and increase in illegal trail offshoots from legal roads. The Forest Service should not consider adding new routes when the 1400 miles of roads and trails are not get adequately monitored and maintained. The Forest Service should consider not expanding motorized trails until the current system can be managed adequately. The Forest should protect aquatic resources from road impacts.

Response

1. The effects analysis under the wilderness section in chapter 3 of the EIS analyzes effects to designated wilderness resulting from the various alternatives. This included effects to the recreation opportunity spectrum (ROS) of Shoshone National Forest lands from motorized allocations.
2. Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C and a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #699

The Forest Service should consider encouraging human and animal powered transportation to help maintain fields, streams and rivers.

Response

The Forest Service provides for a multitude of recreational uses, including human- and animal-powered types of transportation.

Subject: 2001 - Roads and Trails - Legal and administrative framework

Public Concern #700

The Forest Service should add language to the Roads and Trails section specifying how non- motorized trails are to be managed in accordance to the amended 2006 Classification System and the goals for Roads and Trails (page 107) should be split into two sections, "roads and motorized trails" and "non-motorized trails" since there are more trail miles than road miles, but the goals are mostly for motorized roads; non-motorized trails need their own goals and objective section so that they are properly address in the land management plan.

Response

The Forest Service Handbook 2309.18 Trails Management will be added to the other guidance section of the revised Forest plan.

We feel trails are properly addressed in the revised Forest Plan with Objectives #2 and #3 and Guidelines #1 and #2. In addition, roads and trails management area specific direction is included where needed in each specific management area.

Public Concern #904

The Forest Service should provide information on the requirements in the Directive Memorandum and the regulations in the Background section of the Plan. This should include explaining that the Forest Service is required to complete a science-based analysis to identify unneeded roads for decommissioning or conversion to other uses, and future projects and plans with road-related elements will be informed by its findings

Response

The direction for those tasks is referenced in the other guidance section under roads and trails. The travel management process is also addressed in the management approach section under roads and trails.

Subject: 2004 - Roads and Trails - Desired condition

Public Concern #701

The Forest Service should consider closing 110 miles of open roads.

Response

All existing roads would remain open under alternatives A, B, D, E, F and G. Alternative C would decommission approximately 100 miles of roads currently open to the public under the most recent motor vehicle use map. The deciding officer will consider the various options along with other comments during the decision process.

Overall, our objective is that there are fewer than 1,400 miles of roads with a goal that roads and trails not needed for long-term objectives are decommissioned, stabilized, and restored to a more natural state.

Public Concern #702

The Forest Service should consider making the following changes to the Draft Plan: 1-add "no net loss of transportation system infrastructure" as a desired condition; 2-should give direction for future road design and maintenance for varying economic conditions; 3-on page 106 should provide direction for non-Shoshone National Forest entities to provide physical and financial maintenance of roads to keep roads from getting closed; 4-add Mineral discussions in management area sections.

Response

Our objective is that there are fewer than 1,400 miles of roads with a goal that National Forest System roads and trails needed for long-term objectives and to meet desired conditions are constructed and maintained in a manner that provides for user safety and minimizes impacts to natural resources. How that is accomplished, for example with partnerships, is not a forest plan-level decision or discussion. Minerals and access and roads needs for that activity are covered under the specific minerals section in the revised Forest Plan.

Public Concern #703

The Forest Service should consider adding more roads for people to see the beauty of the forest. The Forest Service should not close areas to OHV use without sound determinations since many trails have been closed in the northern section of the forest.

Response

See PC #702 and PC #697.

Subject: 2005 - Roads and Trails - Direct and indirect effects include general effects

Public Concern #903

The Forest Service should disclose spatial information related to the transportation system, including road density data and use the enhanced analysis to inform the final decision and plan components to ensure that water, wildlife, and habitats are adequately protected. Information should include where roads and trails are distributed within the forest and where and what route densities exist, e.g., do high road densities overlapping with important resources such as crucial big game habitat, municipal watersheds, etc.?

Response

Secure habitat is used as a surrogate for road density in the EIS analysis. Secure habitat is represented by areas that are not near roads. See the discussion under elk in the EIS. Maps are included in the EIS that display the location of all existing motorized routes. The EIS analysis for each resource considered the impacts from roads as appropriate for that resource.

Subject: 2006 - Roads and Trails - Cumulative effects

Public Concern #704

*The Forest Service should consider adding to the DEIS pg. 428 a statement about the effects from the appropriate management of Nationa*l Scenic and Historic Trails and FEIS include a commitment to require dust managemen*t measures for future projects where such application is deemed necessary to reduce impacts, and to add design criteria and Best Management Practices be summarized in the FEIS.*

Response

As outlined in FSM 2353.44b, all projects need to consider impacts to the Continental Divide National Scenic Trail (CDNST). Management direction used for establishing measurement indicators revolved around direction related to the scenery management system and recreational opportunity spectrum. Effects to scenic trails, such as the CDNST, are calculated by identified management objectives related to recreational opportunity spectrum and scenic integrity objectives with a 1-mile-wide corridor. Therefore, alternatives were analyzed by scenic integrity objectives and recreation opportunity spectrum proposed by each alternative, as they relate to the existing CDNST corridor.

Subject: 2021 - Roads and Trails - Desired Condition

Public Concern #705

The Forest Service should consider adding to the Desired Conditions section of the Forest Plan a statement the intention is to make the Forest road system as sustainable as possible by maintaining needed roads adequately, and reclaiming unneeded roads, including unauthorized roads, especially in IRAs and other ecologically important areas. Also state that the minimum road system should reflect long term funding expectations, and minimize adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance, and not economical and environmentally friendliness of temporary roads for work in roadless areas.

Response

We received numerous comments, both positive and negative, on the impacts of roads within roadless areas. Our current desired conditions adequately address roads within roadless areas and the revised Forest Plan direction follows the Roadless Conservation Rule. See also response to PC #898 regarding identifying minimum road system.

Subject: 2022 - Roads and Trails - Goals

Public Concern #706

The Forest Service should consider making the following changes in Goals of the Forest Plan:

1- add a goal that states temporary roads, properly designed and constructed, will afford economically and environmentally efficient access to Inventoried Roadless Areas and non- Inventoried Roadless Areas suitable timber acres; and 2- Goal 9 should include a statement of how resource impacts will be reduced or eliminated.

Response

1. Road construction and reconstruction is prohibited except in some very limited circumstances, so adding the suggested goal would not be appropriate.
2. Goals are broad statements that describe conditions that will contribute to the attainment of desired conditions. Goals describe the ends to be achieved rather than the means of doing so.

Subject: 2023 - Roads and Trails - Objectives

Public Concern #83

The Forest Service should consider adding 1-2 new ATV trail loops each year rather than just three over the life of the plan to increase summer motorized opportunities and prematurely limit summer motorized use.

Response

An objective in the roads and trails section of the revised Forest Plan states “At least three new wheeled motorized trail loop opportunities are available.” This objective is realistic and could occur over the life of the plan. The objective does not limit the opportunity to develop additional trails if the opportunity is available.

Public Concern #707

The Forest Service should consider making the following changes in Objectives of the Forest Plan: 1-create a separate section for non-motorized trails; 2-For Item 1 “Maintenance occurs on at least 60%” clarify if the objective is to maintain this or change; 3-For Item 2 “Maintenance occurs on at least 15%” clarify if the objective is to maintain this or change;4-For Item 3 begin the statement with the number of motorized trails in deferred status and then have object suggest that they will lower it so much each year and give a time frame; 5- in the trails section make a statement about clearing beetle killed trails both down and adjacent but still standing trees; and 6- revise objective 4 to read “All unauthorized routes will be closed and rehabilitated as soon as possible.”

Remove the objective that says, “There are fewer than 1,400 miles of National Forest System roads on the SNF” and replace it with an objective that says, “The road system on the SNF can be maintained to standard under projected revenues.”

Add the following objectives:
** Designate a system of roads and trails for biking, and, once done, disallow off route mechanized travel.*
** Routes identified for decommissioning through the Travel Analysis Process or another process will be closed, decommissioned and reclaimed to a stable condition as soon as practicable.*

Modify objective 5 to say, “Consider adding additional recreational opportunities if sufficient need is demonstrated and funding for construction and maintenance is projected.”

Response

(1) The discussion of desired conditions is already broken down between desired conditions for motorized trails versus non-motorized trails. Where a distinction is needed in the objectives, goals, standards, and guideline, the type of trail has also been identified.

(2 and 3) The objectives are based upon the total miles at any time. So whether total miles go up or down, the indicated percentage of those miles will be maintained.

(4) The miles of trails needing deferred maintenance changes frequently, thus it is not listed in a forest plan as it would even vary between the draft and final documents. That is also why instead of a percentage, a specific mileage figure of 10 miles is used. The timeframe is within the life of the revised Forest Plan.

The decision maker will consider the public comments regarding additional edits to the objectives in making the final decision.

Subject: 2024 - Roads and Trails - Standards

Public Concern #905

The Forest Service should add the following standards to the Roads and Trails section of the Plan:
**Every road and trail has an approved Management Objective.*
**Close and rehabilitate temporary roads as soon as they are no longer needed for project purposes;*

**Motorized activity will not occur off a designated system of roads, trails, and areas.*

Response

We added a guideline to address unauthorized routes. The decision maker will consider the public comments in making the final decision.

See also response to PC #898 regarding travel management analysis.

Subject: 2025 - Roads and Trails - Guidelines

Public Concern #708

The Forest Service should consider making the following changes in Guidelines of the Forest Plan: 1-Guideline 4 pg. 108 "4. All unauthorized routes will be closed and rehabilitated as soon as possible;" 2-In the Special Management Areas 1.6A and 1.6B discuss Minerals and Roads and Trails under Standards and Guidelines. 3-Reword the guideline under Minerals to say "Any new road constructed under a special use permit or for mineral activity must be closed and obliterated at the conclusion of permitted activities, unless the road is determined to be needed and and availability for public use is evaluated pursuant to NEPA."; 4-Retitle the subsection "Minerals and Special Uses."

Response

3. We deleted the word "new."
4. Road and trail construction for any purpose is displayed in table 23. Both MA 1.6A and 1.6B do not allow road construction. The decision maker will consider the public comments regarding additional edits to the guidelines in making the final decision.

Public Concern #906

Add the following guidelines:

**When designating motorized trails and areas, minimize impacts to forest resources and other users.*
**Annual progress is made toward achieving a sustainable road system through maintenance, decommissioning, and reclamation.*

Response

Direction on having a road system that has limited impacts on other resources and is sustainable is included in the desired conditions and goals. See also response to PC #898 regarding travel management analysis.

Subject: 2050 - Recreation - Resource – General

Public Concern #709

The Forest Service should consider providing more opportunities for commercial guiding of backcountry skiing, pack rafting, and mountaineering in more locations and make the process simpler for getting permits to help local businesses but should not lead to oversaturation of outfitters, limit size of groups to keep experiences enjoyable but not severely impact the land, make changes to the language in guidelines for recreation concerning group size, and where recreation demand exceeds capacity or significantly changes the recreation experience, alternative management strategies are evaluated and management adjusted.

Response

See PC #662.

Public Concern #710

The Forest Service should consider prioritizing and even expanding recreation since many enjoy the forest for a variety of recreational experiences including motorized and backcountry for current and future generations and forest should not just be set aside for wildlife and industry and should do so in manner that prevents damage to the forest, helps local economies, takes into account future changes in amounts of people recreating in forest, and does so in consistency with neighboring lands.

Response

Our desired condition for recreation is to provide a diversity of year-round recreation opportunities that attracts increasing numbers of visitors to the Shoshone, thereby providing economic and social benefits to local communities.

Public Concern #711

The Forest Service should consider not closing any land to any type of motorized recreation in both winter and summer along with closing any types of access including motorized, non- motorized, and dispersed camping to allow people to get to see things they otherwise would not be able to.

Response

See PC #693 items 1 and 2.

Public Concern #712

The Forest Service should consider adding more parking by climbing walls, to maintain current bolting regulations, not have any restrictions, and not think about liability since climbers know what they are getting into.

Response

Addition of infrastructure such as a climbing wall at specific locations is a site-specific decision not handled at the forest plan level.

We changed bolting regulations in the revised Forest Plan with the addition of Standard #12 in MA 1.6 Designated Wilderness. This standard restricts the use of power drills for installing fixed protection, including webbing, bolts, or pitons, and practices such as chipping, glue, and epoxy for hand and footholds, or use of other fixatives for climbing. We also added Guideline #9, which says that fixed anchors are appropriate and allowed where necessary to enable a rappel when no other safe means of descent are available, in areas impassable by the use of removable anchors, and in areas where resource conflicts do not exist.

Public Concern #713

The Forest Service should discuss the impact of banning pack goat recreation and should be done under NEPA requirements.

Response

The impacts of not allowing pack goat recreation are discussed in the species diversity and terrestrial wildlife section of chapter 3 in the FEIS.

Public Concern #714

The Forest Service should consider making the following changes to the forest: 1- separate lanes on roads for motorized and non-motorized for safety; 2-create some visitor centers for education assets; 3-make education with recreation a desired condition especially concerning wilderness; 4-inceasing the

buffer between camping and water bodies; 5- in the LMP section on recreation replace the word provide with evaluate since opportunities needs to be evaluated before provided; 6- add to the alternatives better big game habitat information that includes specific protection measures aimed at maintaining function and population parameters, reclamation guidelines defined and updated, recreation be considered as strong a use, both in terms of economic and social impacts, as other diverse uses on the SNF; 7- create a designated ski areas in the Wind River District at the Pinnacles, Deception Creek, Falls Campground and Sublette Pass, and the Two Ocean Mountain areas. 8- banning open fires.

Response

(1) Designating the class and mode of travel on a route is a travel management decision outside the scope of the revised Forest Plan and will be addressed during a future travel management planning effort.

- Construction of specific developed recreation sites such as a visitor center is a site-specific analysis and not part of a forest plan-level decision.
- Major issues and educational needs facing designated wilderness areas are addressed in site-specific education plans and Information Needs Assessments that are produced for each wilderness area and are not a forest plan-level document. Educational and recreational activities are covered in the desired conditions through the statement "Forest management strategies support recreational and educational activities when in alignment with the preservation of wilderness character."
- Guideline #2 sets the distance a campsite should be from lakes or wet meadows to at least 200 feet, and 100 feet from streams or creeks.
- We considered a wording edit. Part of providing opportunities is the initial evaluation of recreation opportunity spectrum present.
- Big game habitat information and protection measures are included in the species of local concern section of the revised Forest Plan.
- The Forest already provides numerous ski areas including one in this general area and at this time is not looking to develop additional designated areas.
- Campfires are a valid part of the camping experience and as such are not planned to be banned under normal conditions. Site-specific bans would be looked at based on an identified resource impact or severe burning conditions.

Public Concern #715

The Forest Service should consider emphasizing non-motorized recreation to keep the forest wild, have solitude, and curb illegal activity.

Response

See PC #691.

Public Concern #716

The Forest Service should view Timber Harvesting as a benefit to recreation.

Response

Timber harvesting can have a beneficial or a negative impact, or both, on recreation depending on the timing and type of recreational activity of concern. Impacts of timber management on recreation uses are discussed in chapter 3 of the EIS.

Public Concern #717

The Forest Service should consider limiting hunting, fishing, and other recreational activities on the Forest.

Response

Recreation is a valid use of National Forest System lands. Any limits of use set would be in a site-specific analysis and based on some resource concern not set at a forest plan level. Hunting and fishing are administered by the State of Wyoming and are outside the authority of the Forest Service.

Public Concern #718

The Forest Service should consider the following revisions to the Shoshone National Forest plan: 1) clarifying and describing in detail the outstanding remarkable values (ORV) in order to protect the unique values in the LMP. 2) clarifying the description, definition, and design a clear method of use for summer use management verses winter use management to decrease the likelihood of resource damage, disturbance of wildlife, and conflicts with non-motorized users. 3) The Forest Service should consider adding and incorporating the Wyoming Wilderness Act of 1984 into the Shoshone National Forest Plan. 4) clarifying which areas in the forest should have roaded access with the objectives for multiple use . 5) analyze the effects of Special Interest areas on recreation and conduct an effects analysis (CEQ 1502.16 Environmental Consequences).

Response

(1) The Forest's remarkable values are described in the desired condition for the Forest which indicates that "The Shoshone is rugged, remote, and wild. It plays a key role in providing locals and travelers an opportunity to connect with nature and experience wildlife. The rich western heritage provides a trail based infrastructure into and through the back country and continues to instill a sense of adventure and freedom."

(2) Summer versus winter recreation dates are a site-specific decision made in travel management and may change from area to area based on resource concerns.

(3) The 1984 Wyoming Wilderness Act is listed in the EIS under the Legal and Administrative Framework.

(4) Table 23 in the revised Forest Plan displays which management areas allow motorized vehicles and road or motorized trail construction. In addition, the desired condition section for each management area discusses motorized access.

(5) The effects of special interest areas on recreation will be analyzed and added to the FEIS.

Subject: 2051 - Recreation - Legal and administrative framework

Public Concern #719

The Forest Service should make best efforts to keep forest lands fee free.

Response

The question of fees on National Forest System lands is outside of the scope of a forest plan revision.

Public Concern #720

The Forest Service should add Executive Order 13195 to page 475 of the DEIS.

Response

Thank you for your comment. The referenced Executive Order 13195 will be added to the FEIS:

"Executive Order 13195 Transportation Equity Act for the 21st Century (Public Law 105-178) which aims to achieve the common goal of better establishing and operating America's national system of trails."

Subject: 2052 - Recreation - Methodology

Public Concern #899

The Forest Service should manage for quality recreation. To do this the final LRMP and FEIS must accomplish the following:

Identify recreational preferences of user groups in terms of experiences and settings;

Identify physical and biological characteristics that make land suitable for different kinds of recreation;

Identify places and settings where visitors can achieve specific experiences, while ensuring protection of resources and, in the case of motorized designations, minimizing impacts to forest resources and other users18;

Explain how decisions result in quality opportunities for different types of activities;

Use the Recreation Opportunity Spectrum (ROS) to proactively plan for recreation opportunities that will maximize social and ecological sustainability as required by the ROS handbook; and

Ensure that management activities do not shift ROS settings.

Response

Chapter 3 of the EIS discusses analysis of recreation resources per current planning direction found at 36 CFR 219.8 (b)(2) Sustainable recreation; including recreation settings, opportunities, and access; and scenic character; and at 36 CFR 219.10(a)(1),10 (b) Requirements for plan components for a new plan or plan revision. (1) The plan must include plan components, including standards or guidelines, to provide for: (i) Sustainable recreation, including recreation settings, opportunities, and access, and scenic character. Recreation opportunities may include non-motorized, motorized, developed, and dispersed recreation on land, water, and in the air.

Subject: 2053 - Recreation - Affected environment

Public Concern #721

The Forest Service should add a paragraph to Affected Environment, Transportation System, page 477 of the DEIS detailing the significant increase of illegal ORV that have been created since the last Forest Plan and how the Forest Service will address these illegal ORV trails and ensure that the area from Wiggins Fork through Bear Creek and east to the Wind River Indian Reservation boundary to maintain the largest area where no further motorized use should be permitted.

Response

The DEIS addressed the increased use and popularity of off-road vehicle (ORV) use on the Shoshone National Forest (motorized use trends page 482). Regarding “illegal ORV use,” the Forest does not have a means by which to accurately predict such behavior. Regardless, the Shoshone National Forest plans to curb such illegal use through education, signage, and enforcement and by providing quality ORV use where management area direction allows for such use.

Subject: 2054 - Recreation - Desired condition

Public Concern #722

The Forest Service should consider increasing access to the forest as deemed necessary especially access to the Beaver Creek Ski area as use has increased and current parking is dangerous and create a Middle Fork trail bypass for safer equestrian use.

Response

Access to a specific ski area or construction of a specific trail, or both, are project-level analysis and decisions are not within the scope of the revised Forest Plan analysis.

Public Concern #723

The Forest Service should not mark any trails, restrict motorized recreation and travel to preserve the wilderness state by providing non-motorized recreational uses.

Response

See response to PC #698 (item 2).

Public Concern #724

The Forest Service should clarify the desired conditions for recreation that state,"…—partnerships are a significant tool to help provide public use and year round recreation alternatives" as it currently appears to be a statement and should ask, "Would the forest service like to increase partnerships? Would they just like to maintain current partnerships? Where partnerships analyzed in the DEIS? How are the different in preferred alternative?" For the Land Management Plan, under Recreation uses and opportunities, Resource condition and trend on page 10, "wildlife viewing" should be added to the list of most popular activities and under Need for change on page 10, "Management practices should anticipate the impacts of continued increases in recreational use, recognizing that there is a point at which increased use begins to have significant, negative impacts on the total Forest resources." should be added and under Projection of demand and need, page 10, "The intent of this plan is to achieve a balance with current uses and currently demanded uses, without future detriment to the resources of the Forest."

Response

The use of partnerships to provide recreational opportunities is a desired condition whether it is maintaining existing partnerships or developing new ones. A forest plan does not get into that level of detail. Partnerships are not analyzed across the alternatives because they are a way we could possibly get work done not what we plan to do for work like new motorized trails opportunities.

The list referenced is not a list of every popular activity on the Forest but just a selected list of "some" of the popular activities.

Generally, we don't anticipate a significant jump in recreation demand such that wide-scale negative impacts on the total Forest resources is foreseeable, thus, the current wording in the recreation need for change and projection of demand are acceptable.

Public Concern #725

The Forest Service should designate Two Ocean Mountain and Sublette Pass area as winter non-motorized as the area is easily accessible for winter non-motorized recreation and the presence of snowmobiles poses a safety risk and that Beartooth Pass have snowmobile use restricted after the Beartooth Highway is open for motorized wheeled vehicle traffic for safety reasons between motorized

and non-motorized winter use. The forest should also consider providing non-motorized recreation opportunities near Lander as it will provide easy access to the wilderness.

Response

In the various alternatives, two options for the Two Ocean area were analyzed. Alternatives A, B, E, F and G would kept this area open to all uses, and alternatives, C and D would close the area to winter motorized use. The deciding officer will consider the various options along with other comments during the decision process.

Closure of the Beartooth Plateau to snowmobiles once the road is open for wheeled traffic is a site-specific travel management decision and not a forest plan decision.

Various alternatives for winter non-motorized use (MA 3.3C) were analyzed from a low of 4,563 acres in alternative F to a maximum of 98,030 acres in alternative E. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 2055 - Recreation - Direct and indirect effects

Public Concern #726

The Forest Service should consider that snowmobiles have less impact on the forest compared to other non-motorized means of travel.

Response

All types of recreation uses may have impacts other resources (i.e., cultural, terrestrial wildlife, botanical, economic, or recreational) and the effects analysis for recreational uses, including snowmobiling are identified in chapter 3 of the EIS.

Public Concern #727

The Forest Service should recognize the effects of pay avoidance and how RV and ATV campers have created a level of resource damage, primarily to soils and vegetation.

Response

Both developed (fee sites) and dispersed recreation (no-fee sites) are valid uses of the Shoshone National Forest. Effects to vegetation and soils from dispersed recreation are covered in the botanical and soils sections of chapter 3 of the EIS.

Public Concern #728

The Forest Service should consider making the following changes to the DEIS: (1) On page 412, Effects from Recreation, 3rd paragraph: add language to address potential impacts of adding fencing to manage livestock on wildlife. (2) On page 489-Recreation-Environmental Consequences, General Effects the forest should change the language in the statement, '"In general, alternatives that increase levels of non-motorized recreational opportunities will generally increase the quality and quantity of non-motorized, recreation" since an increase in quantity does not automatically mean the quality of non-motorized recreation will also increase.

Response

(1) The section referenced addresses the effects of recreation on grazing activities and does not pertain to effects on wildlife from grazing activities such as fencing, see wildlife analysis section.

(2) The term “In general” is used so that the reader does not get the impression that this will always be the case, therefore the language will not change in the FEIS. The general discussion is to convey when more opportunities are present, use may be spread over different areas allowing individuals seeking non-motorized recreation opportunities in more areas with reduced use.

Subject: 2058 - Recreation - Incomplete and unavailable information

Public Concern #729

The Forest Service should consider the following changes in over-snow vehicle use in the Land Management Plan: (1) Page 492-Travel Management- Over-snow Vehicle Use, correct the general conclusion to include that that dispersed snowmobiling occurs across the forest wherever there is sufficient snowfall and is not just where authorized. (2) The Land Management Plan should be revised and the DEIS should show justification as to why there is such a drastic policy shift in acres between Alternatives A and B of motorized use areas and how they are effected by no longer allowing over-snow travel in backcountry motorized areas.

Response

(1) We will clarify the wording in the revised Forest Plan to state where snowmobiling is allowed.

(2) The 1986 Forest Plan generally allowed over-snow motorized vehicle use in management areas allocated to non-motorized recreation, including the Dunoir Special Management Unit (MA 1.6B). Only summer motorized use was specifically restricted in these areas. Though current plan allocation permits the use, over-snow motorized vehicle use is not occurring in all acres that are open to that use under the 1986 Forest Plan.

Subject: 2059 - Recreation - Monitoring

Public Concern #730

The Forest Service should monitor ATV usage by whatever means to determine what is actually needed and build a plan from the data, not through public opinion and make the best effort to reduce illegal off-road and off-trail usage.

Response

All-terrain vehicle (ATV) use is monitored through both trends in ORV registrations and what field-going ORV rangers observe during their patrols. The Shoshone National Forest plans to curb illegal use through education, signage, and enforcement and by providing quality ORV use where management area direction allows for such use.

Subject: 2060 - Recreation - OHV

Public Concern #731

The Forest Service should consider not adding any more motorized trails or expanding OHV use on the forest in roadless areas (23 miles of new ORV trails and 3 loop trails) because of violations of the off road policy, riding in closed areas, and the damage to fragile alpine areas. The Forest Service should consider the impact of OHV’s on the river drainages such as Sunlight, Dead Indian, Elk Creek, Beem Gulch, Huff Gulch, Gravel bar, Company Creek, Trail Creek, Lodgepole Creek, Crandall because of the uniqueness of the areas and damage to critical wildlife habitat. The Forest Service should consider the impact of OHV’s on Grizzly bear habitat and human/bear conflicts. The Forest Service should consider habitat effectiveness (HE) and habitat security (HS) analyses prior to the addition of loop trails or additional motorized access because loop trails and increased motorized use will negatively impact wildlife.

Response

(1) See response to PC #698 (item 2).

(2 and 3) Chapter 3 of the DEIS discloses the effects of each alternative by resource area. This includes recreational impacts to the following resources on the Shoshone National Forest; wildlife, riparian areas, aquatic species and water resources.

Public Concern #732

The Forest Service should consider reopening cultural and historic OHV trails and roads that have been closed in past years because no funding or forest service labor will be required to reopen the trails to motorized use. The Forest Service should consider keeping current OHV areas open in the Beartooth areas because so many areas are being closed to OHVs. The Forest Service should not remove any motorized access from the Shoshone National Forest because of the economic benefits and boosts to local communities hunting access, and 80% of the forest is currently closed to OHV's. The Forest Service should consider keeping and expanding motorized access to the forest open because it would limit use by elderly and handicapped. The Forest Service should consider designating many of the existing jeep roads as Jeep-OHV-Motorcycle trails to concentrate the motorized use on the forest. The Forest Service should consider adding additional connecting trails and loop trails to the ATV trails system in the Dubois area.

Response

See response to PC #698 (item 2).

Public Concern #733

The Forest Service should consider reducing and limiting the use of motorized vehicles in the Shoshone National Forest because of noise and pollution and to preserve the wilderness quality. The Forest Service should consider the impact of OHV's on the environment in their analysis because of increased technology; distance covered and speed of OHV's and the increased damage to roadless areas. The Forest Service should consider the safety and user conflict between motorized and non-motorized users. The Forest Service should consider increased signage and regulation of OHV's and OHV riders riding illegally to increase safety of the trails, limit resource damage, to prevent trespass on private property, and from encroaching on hiking only trails. The Forest Service should consider no OHV use in areas adjacent to Yellow Stone Park to maintain the integrity of the Yellowstone Ecosystem. The Forest Service should consider no 4-wheeler use by hunters. The Forest Service should consider increased protection of inventories roadless areas (Fitzpatrick Wilderness Area and Popo Agie Wilderness Area) from encroaching motorized use.

Response

The Forest Service is tasked with providing quality recreational opportunities for the growing diversity of activities managed on National Forest System lands. As mentioned in the recreation section of chapter 3 of the EIS, "Recreational use trends on the Shoshone have been affected by the increasing population in adjacent communities and changes in technology related to recreational activities." Regardless, the Shoshone National Forest strives to provide safe, legal recreational opportunities through education, signage, and enforcement, and therefore, providing quality OHV opportunities where management area direction allows for such use.

Public Concern #734

The Forest Service should consider and apply the travel management plan and the roadless rule to define if areas are suitable for motorized use and motorized trail construction by monitoring current use and level of use on trails. The Forest Service should consider utilizing existing motorized trails and creating

connections with existing roads to of the improve backcountry experience for OHV users. The Forest Service should consider the historical use of trails designated for motorized vehicles which were closed in 1981 and referenced in the Shoshone National Forest Travel Maps (Map H: area 1, Map K: area 2, Map M: Sunlight Basin). The Forest Service should consider and identify the activities that are popular with OHV enthusiast in the development of the travel plan. The Forest Service should consider a proactive and balanced approach in creating an objective in the plan of a baseline inventory of user-created trails and monitoring the progress toward elimination of the those trails. The Forest Service should consider using tools and resources available to forest planners such as Blue Ribbon Coalition, National Off-Highway Conservation Council and Americans for Responsible Recreation Access to in the trail system planning effort to provide quantity, quality, maintainable, and enough diversity and challenge to satisfy the OHV user.

Response

We considered roadless areas designation during the allocation process to different management areas. The conversion of existing trails from non-motorized to motorized or completing an inventory of non-system routes, or both, are travel management decisions or a project, and as such, beyond the scope of the revised Forest Plan analysis.

Use of different resources and tools during trail construction will be addressed in a site-specific analyses and implementation.

Public Concern #735

The Forest Service should consider the unsubstantiated impacts and the conflicts in science on OHV use because of the misconceptions associated with OHV recreation and resource damage to wildlife, soil erosion and sedimentation in streams, vegetation, invasive plants, and noxious weeds.

Response

The Forest Service strives to use the best available science in determining impacts and conflicts associated with OHV use. Chapter 3 of the EIS discloses these impacts and conflicts associated with OHV use.

Subject: 2061 - Recreation - Snowmobile

Public Concern #736

The Forest Service should consider not adding any more wilderness areas and keeping the High Lakes Wilderness Study area in the Beartoooths, the area just above Lava Mountain Lodge or the adjoining subdivision in the Wind River Valley, the Two Oceans Peak and the Togwotee Pass area open for winter motorized recreation, and multiple uses as outlined in Alternative B, with possibly setting an area aside as non-motorized for skiers and snowmobilers. Snowmobilers provide economic benefits to the area and are already prevented from using 80% of the Shoshone National Forest. The Forest Service should consider continuing snowmobile use in all Inventoried Roadless Areas, and multiple use areas. The Forest Service should consider continuing snowmobile use in all existing wildlife winter range and in new winter range areas if it would cut off access to open snowmobiling areas.

The Forest Service should consider continuing off-trail cross country snowmobiling where it is currently permitted.

Response

Thirty-four areas on the Shoshone were evaluated for potential wilderness. Various alternatives were analyzed including recommended wilderness ranging from 628,800 acres in alternative C to 194,500

acres in alternative D to 0 acres in alternative B. The deciding officer will consider the various options along with other comments during the decision process.

Various alternatives where analyzed concerning motorized winter use allocations. These ranged from a high of 887,600 acres available for winter motorized in alternative A to a low of 103,000 acres in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Just because an area is an inventoried roadless area does not mean snowmobile use is restricted. Typically, the only reason snowmobile use is restricted is because of critical winter range or some other resource issue.

Existing snowmobile trails through winter range remain in all alternatives.

Different off-trail snowmobiling opportunities were analyzed under the winter motorized

Public Concern #737

The Forest Service should consider the environmental impacts of winter motorized use to air quality and watershed that provides drinking water from the snowpack. The Forest Service should consider prohibiting snowmobile use in winter ranges, big game migration corridors, lynx habitat and potential wolverine habitat because of the increased motorized vehicles in wilderness study areas causing mortality, habitat loss and harassment of wildlife. The Forest Service should consider prohibiting snowmobile use in areas abutting Yellowstone National Park.

Response

Chapter 3 of the EIS discloses the effects of each alternative by resource area. This includes recreational impacts to wildlife, watersheds, and air, as well as other resources on the Shoshone National Forest. The soil and water analyses considered the overall effects of activities on soil and water. The air quality analysis considered the overall carbon emissions from activities on the forest. The deciding officer will consider the various options along with other comments during the decision process

Public Concern #738

The Forest Service should consider increasing areas devoted to human powered snow sports and decreasing motorized use in the forest. The Forest Service should consider closing the Togwotee Pass and Two Oceans Peak to snowmobiles because of the safety hazard, the conflict of multiple uses, and the destruction of the terrain and solitude for skiing and snowboarding. There are very few back country areas unimpeded by snowmobile traffic.

Response

See PC #736 second paragraph and PC #725 first paragraph.

Public Concern #739

The Forest Service should consider reducing the impact of wilderness trespass by over snow vehicles by providing winter trail maps that display the location of winter trails and trailheads in relation to wilderness boundaries and increasing signage along highways adjacent to designated wilderness. The Forest Service should consider increasing law enforcement patrols in wilderness trespass areas. The Forest Service should consider confining motorized use to current designated trails and areas. The Forest Service should consider having Game and Fish authorize snowmobile use.

Response

The discussion of providing trail maps, signing, and increasing law enforcement patrols are not forest plan issues. Trail maps are available that show the requested information and signing is provided at choke points.

Different alternatives to motorized use for both summer and winter were analyzed and considered. See PC # 698 item 2.

Public Concern #740

The Forest Service should consider and clarify in their analysis that conflicting science has shown the effects on wildlife from snowmobiles are minor. The Forest Service should consider clarifying and providing scientific support for winter motorized activities that compaction from snowmobiles harden the snow that may alter spring runoff patterns resulting in soil erosion and gullies.

Response

The effect of winter motorized activity on wildlife varies depending upon the particular wildlife species being addressed. The effects of winter motorized use are addressed by species throughout the species diversity section in the EIS page 140.

Winter motorized activities have relatively low potential to adversely affect water and soil resources. Damage to vegetation and soil erosion can occur if there is inadequate snowpack to protect these resources. The Forest Service Handbook 2509.25, Watershed Conservation Practices Handbook (Region 2) specifies management measures for protecting soil and water resources.

Public Concern #741

The Forest Service should consider clarifying the capability assessment and its use in the analysis because motorized use in the wilderness areas is prohibited and whatever opportunity a given area offers for snowmobiling is irrelevant to its wilderness qualities and potential.

Response

In 2008 (edited 2012), 34 areas on the Shoshone were evaluated for potential wilderness. This process included three tests—capability, availability, and need. Capability is defined as the degree to which the area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness. This evaluation was completed for areas that are currently not designated wilderness and may allow snowmobiling.

Public Concern #742

(1) The Forest Service should consider revising the statement on Page 7 under the "Recreation Uses and Opportunities" section of the DEIS from "Existing opportunities for motorized use on snowmobile trails, motorized trails, and roads will continue." to document and clarify that off- trail snowmobiling will also be allowed to continue on the Shoshone National Forest.

(2) The Forest Service should consider revising the statement on Page 8 under the "Recreation Uses and Opportunities" section of the DEIS from "Proposed research natural areas and special interest areas preclude future expansion of motorized use in those areas. All existing uses in those areas can remain, including continued use of the Morrison Jeep Trail that passes through the Sawtooth Peatbed Geologic Area." to add an additional statement clarifying that "off-trail snowmobiling would not be eliminated by creation of the proposed Beartooth Butte RNA".

(3) The Forest Service should consider revising the DEIS on page 33 and 34 to update the management areas in roadless areas to management areas that allow winter motorized use and maintain historic areas used by snowmobiles because the statement "New summer motorized trails allowed in some inventoried roadless areas with existing winter motorized use are retained." conflicts with inventoried roadless areas having management areas that do not allow winter motorized use.

(4) The Forest Service should revise and clarify the discrepancy in the number of snowmobile trails between the various section s of the EIS and plan (page 478 and 492). 5) The Forest Service should consider the amount of dispersed snowmobiling in its analysis of projected and existing snowmobile trails (Table 137).

Response

(1-3) The changes were not made. The EIS includes alternatives that analyze different allocations that vary in what areas are open or closed to motorized activity. Some of the alternatives are consistent with these comments and some are consistent with comments made by others. The decision maker will consider these comments along with those of others in selecting a final allocation on where motorized activity is suitable.

(4) The difference between tables on pages 478 and 492 in chapter 3 of the EIS is due to table 123 on page 478 summarizing miles of system trails whereas table 136 summarizes miles of system roads.

(5) Table 137 shows the total miles of existing and projected trails open to over-snow vehicle use. This table and the discussion to follow on pages 492 and 493 of the EIS are used for a comparative analysis for snowmobile recreational opportunities across all alternatives.

Subject: 2062 - Recreation - Bicycle

Public Concern #743

The Forest Service should consider keeping the Dunoir and Togwotee Pass area open to mountain bikers for summer recreation opportunities on the Pinnacle Butte Trail because it is one of the few wilderness settings open to mountain bikes to enjoy the scenic beauty and wildness, mountain bikes do not leave a permanent trace on the forest, and because of the significant economic benefits to the local community. The Forest Service should consider hosting some volunteer trail maintenance days on the Pinnacle Butte Trail.

Response

See PC #692.

Public Concern #744

The Forest Service should consider closing the Pinnacles and Buffalo Plateau region to mountain bikers because of the damage to the fragile alpine region and safety issues with other users. Mountain bikers should not be an exception to the wilderness rule. The Forest Service should consider prohibiting mountain bikes in the Line Creek Plateau Research Natural area, on trails 628 and 761 within the Wild and Scenic River corridor, and in the lesser known roadless areas.

Response

See PC #692.

Mountain bikes are allowed in the Line Creek Research Natural Area (RNA) on existing trails and as restricted, do not pose a threat to the RNA resources.

Mountain bikes are a valid and acceptable use in both the Clarks Fork Wild and Scenic River corridor and roadless areas and that use will continue to be allowed in the revised Forest Plan.

Public Concern #745

The Forest Service should consider maintaining and expanding all back country recreational opportunities for mountain bikers. The Forest Service should consider engaging in a forest- wide trail system planning effort to expand recreational opportunities for mountain biking. The Forest Service should consider the following areas for mountain bike trails: south and west of the Chief Joseph Highway summit, Sunlight Basin, Beartooth Mountain, Rattlesnake Mountain, Backwater, Elk Fork, Sweetwater Drainage, North Fork of Shoshone River, Pahaska Tepee – Sleeping Giant Area, Carter Mountain Area, and the Bobcat and Houlihan Trails in the Aldrich Creek Area.

Response

Mountain bike use is allowed in most areas of the Forest outside of designated wilderness and the Dunoir (table 23 of the revised Forest Plan). Considering specific areas for mountain bike trails is a site-specific analysis that is not at a forest plan level and was not analyzed in the revised Forest Plan.

Public Concern #746

The Forest Service should consider not adding mountain bike use on current hiking only trails, and require that mountain bikes stay on a designated system road, trail, or area.

Response

The decision to change allowed uses on specific trails is a site-specific analysis, more appropriately addressed under the future travel management analysis, and outside the scope of the revised Forest Plan analysis.

Public Concern #747

The Forest Service should consider clarifying and not applying the definition of bicycles from within 36 CFR 261.2 to the legislative command of the 1972 Act for the Dunoir Special Management Area, or other areas recommended for wilderness designation. "Vehicle" and the application of that definition to exclude bicycles do not support the Congressional intent.

Response

The term vehicle is adequately defined in 36 CFR 261.2. How this definition pertains to the Dunoir and the legislative intent in the enabling legislation is still open to some interpretation. Various options for bicycle or vehicle use within the Dunoir were considered and analyzed. Alternatives C and D include recommending areas for wilderness designation. Alternative A, B, E, F, and G do not include recommendations for wilderness designation. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 2063 - Recreation - Noise Pollution

Public Concern #748

The Forest Service should consider increasing the analysis in the plan Alternatives and to address the impacts and levels of noise pollution on wilderness and front country because well- established techniques exist to quantify and map sound impacts. The Forest Service should consider the impact that motorized vehicles, mineral development, and engine noises have on the ecosystem, wildlife, winter range, local breeding bird populations, and the virtues of the remote recreation experience.

Response

When considering effects to existing wilderness management of recreation opportunity spectrum objectives play a role. Analysis of these objectives across the alternatives allows for identifying varying degrees of recreation development that correspond with varying degrees of noise pollution. The more acres devoted to more developed recreation opportunity spectrum settings, the higher likelihood of negative effects to existing wilderness. Conversely, the fewer acres devoted to more developed recreation opportunity spectrum settings, the lower the likelihood of negative effects to existing wilderness. Comparative analysis of the differences in the total acres of the recreation opportunity spectrum settings immediately adjacent to the wilderness boundary is used to compare alternatives. Finally, chapter 3 of the EIS discloses the effects of each alternative by resource area. This includes recreational impacts to the following resources on the Shoshone National Forest; recreation, wildlife, riparian areas, aquatic species, and water resources.

Subject: 2064 - Recreation - Trails

Public Concern #749

The Forest Service should consider not adding any new trails in areas already off-limits to motorized vehicles. The Forest Service should consider adding no new trails for motorized vehicles because of the financial burden of building and maintaining new motorized trails.

Response

See PC #691.

Public Concern #750

The Forest Service should consider increasing maintenance of non-motorized trails to protect water quality and resource damage. The Forest Service should consider recruiting volunteers to assist with trail maintenance and use monitoring.

Response

Our goal is to do maintenance on at least 15 percent of our trails annually. We feel this is an achievable goal based on past and projected budgets. We welcome volunteer partnerships. Currently, we have volunteers such as the Shoshone Backcountry Horsemen helping with trail maintenance.

Public Concern #751

The Forest Service should consider adapting a policy that considers each user-created trail as a candidate for inclusion in the trail system. User developed trails provide access to many popular climbing, and paddling destinations. They are the result of an unmet need. The Forest Service should consider adapting a "Hub and Spoke" network to include user developed trails. The Forest Service should consider creating a proactive plan to eliminate user created, unauthorized routes because of the resource damage to watersheds, wildlife habitat, soil erosion and the diminished trail maintenance funding. The Forest Service should consider adding a trail goal that creates multiple use non-motorized day use loop trails designed for hikers because the Shoshone National Forest has a very limited number of day use trails. Creation of more day use trails would increase the use of the forest by local users.

Response

Inclusion of any user-created routes into the system is considered on a case-by-case basis and a site-specific travel management decision, and is outside the scope of the revised Forest Plan process.

Guideline #4 under the roads and trails section provides that “New unauthorized routes should be closed and rehabilitated as soon as practicable.”

Our intent for loop trails is covered under the trails desired condition which states “High quality loop trails exist for both motorized and nonmotorized recreation.”

Public Concern #752

The Forest Service should consider providing cross country skiing not adjacent to snow mobile areas and designated ski trail maintenance, to include widened track by tree removal and protection from wayward snowmobile use.

Response

Various alternatives were analyzed concerning motorized use allocations. These ranged from a high of 823,900 acres available for summer motorized in alternative F to a low of 322,400 acres available in alternative C. The deciding officer will consider the various options along with other comments during the decision process.

Currently, not all ski areas are closed to snowmobile use. The issue of closing cross-country ski areas to snowmobiles is a travel management decision and is outside the scope of the revised Forest Plan. The issues of tree removal, maintenance, and law enforcement at existing ski areas are not forest plan issues and are not addressed in the revised Forest Plan.

Public Concern #753

The Forest Service should consider prohibiting access to areas currently 0ff-limits to motorized vehicles and closing motorized trails in sensitive wildlife areas.

Response

See PC #698 item 2 and PC #697 second paragraph.

Public Concern #754

The Forest Service should consider clarifying and correcting the inconsistencies in the trail mileages on page 478. The numbers in the EIS are inconsistent with the total trail miles presented in the draft LMP. The miles in the LMP does not include the summer motorized trail miles and the EIS dos not include the single track motorized (motorcycle) miles.

Response

There was an inconsistency between trail mileages in the draft forest plan and those identified in the DEIS. This inconsistency has been corrected in the revised Forest Plan and the FEIS.

Public Concern #818

The Forest Service should consider leaving historically used trails and roads open for ATV use since many have closed recently.

Response

Alternative F in the EIS allocates large portions of the forest to management areas that allow motorized access including areas that allowed such access prior to the existing forest plan. The decision maker will consider those public comments for keeping these areas open along with comments of others who would like the areas closed in making the final decision.

Subject: 2081 - Recreation - Desired Condition

Public Concern #755

The Forest Service should consider addressing and clarifying the proposed language for Management Area 3.3A – Back country recreation year-round motorized because there are several contradictions and misstatements: under desired conditions revise the language to promoting motorized recreation and given a clear and distinct preference across the board over non-motorized uses in all 3.3A managed areas.

Response

The order of motorized or non-motorized will be changed to highlight our preference. The preference for motorized is also highlighted in Goal #1 which is to "Provide year round motorized recreation opportunities" and Goal #2 which states "Increase diversity of motorized experiences."

Public Concern #756

The Forest Service should consider addressing and clarifying "Recreation Uses and Opportunities" on page 7 and 8 to add that off-trail snowmobiling will also be allowed to continue in the Beartooth Butte RNA including use of the Morrison Jeep trail and through the Sawtooth Peatbed Geologic Area.

Response

Both of these are addressed in table 23, which lists the management areas and what motorized and mechanized use is allowed.

Subject: 2082 - Recreation - Goals

Public Concern #757

The Forest Service should consider addressing and clarifying the recreation goals to include:

1) how and why the preferred alternative supports the recreation goal of increasing tourism, complete an analysis on public benefit effects of increased and decreased motorized recreation across all alternatives, and add "while not compromising the integrity of important wildlife habitats to Goal 1 on page 90; 2) adding an additional goal to those stated on page 90 to retain all existing dispersed camping sites unless environmental degradation is occurring; 3) revise recreation goal 2 on page 174 to include implementing the direction in the 2009 CDNST Comprehensive Plan Chapter III €, and FSM 2353.42 and 2353.44(b) part 1 following the supportive direction that is found in parts 7 through 11and to identify the CDNST Comprehensive Plan as an Other Authority (FSM 2353.01d); 4) revising the goals stated for Management area 3.3A to focus solely on motorized preference to enhance attainability of the goal and to address safety concerns by removing non-motorized use.

Response

(1) How a selected alternative supports the goals in a forest plan is unknown until specific projects are implemented associated with the plan. The environmental effects of the different motorized alternatives were identified in the EIS effects analysis for recreation. The economic effects were analyzed and are disclosed starting on page 576 of the EIS.

(2) Decisions to close or keep a dispersed campsite locations open are site-specific decisions, and as such, a goal to keep all of them open is not included in a forest plan-type document.

(3) Page 174 included guidelines for recreation. Guideline #2 is consistent with the CDNST Comprehensive Management Plan and FSM 2353.42 and 2353.44 as written.

(4) See PC #755. In addition, while motorized use is the primary driver of MA 3.3, non-motorized use is also allowed and there is no safety concern with mixing the uses in this management area.

Subject: 2083 - Recreation - Objectives

Public Concern #900

The Forest Service should carefully assess recreational use data and design a recreational strategy that is responsive to user trends and preferences to the degree possible within the capacity of the land, and is affordable under projected revenues, before committing to build three motorized loop trails.

Focus plan components more on providing quality recreation to visitors, maintaining to standard the associated infrastructure, and ensuring positive experiences. For instance, consider including a plan component that says that the SNF will complete a Recreation Strategy informed by best available data that will drive recreation program priorities including maintenance, enforcement, construction, and monitoring through the plan life.

Response

The objective for additional loop trails would apply to areas that are suitable for such trails. Any specific development would be consistent with other plan direction to protect forest resources and other recreation opportunities. Before any new loop trail is established, a project-level environmental analysis would be conducted to ensure consistency with plan direction.

Subject: 2084 - Recreation - Standards

Public Concern #758

The Forest Service should consider addressing and clarifying the recreation standards to include: 1) adding a definition of "party" (in the terms of recreation) to glossary table 18 on page 91 and to clarify how the group size decision would be made and if the decision is subject to NEPA; 2). clarifying the recreation standards on page 173 because it is inconsistent with the comprehensive plan and policy and does not address the direction in FSM 2352.44(b)(1); 3) revising the standards to include stronger management protection standards and reduce motorized recreation in some sensitive backcountry areas because they are not reflected in Alternative B. and 4) revising the standards on page 90 to include a second quantifiable standard addressing the maintenance of habitat integrity through the use of HE/HS analyses and thresholds.

Response

(1) A definition of party associated with these standards has been added to the glossary. Any decision to change group size limits is a site-specific decision that would be analyzed separately.

(2) The proposed standards and guidelines are consistent with the CDNST Comprehensive Management Plan (CRMP). For example the CRMP requires, where possible, that the CDNST is located in primitive or a semi-primitive non-motorized recreation opportunity spectrum setting, but allows others if it is not possible. Direction in FSM 2353.(b)(1) requires a forest in a land management plan to establish a management area for the CDNST broad enough to protect it (the plan established MA 3.6A, which includes a corridor within 0.50 mile of centerline of the trail); prescribe desired conditions, objectives, standards, and guidelines (the revised Forest Plan establishes these); and establish a monitoring program (the plan discusses monitoring requirements).

(3) Without know what "sensitive backcountry areas" being referred to, this question is difficult to address. We believe that we addressed needed standards and guidelines for motorized use and analyzed a variety of options for the deciding officer to choose from.

(4) Habitat effectiveness (HE) and habitat suitability (HS) standards are addressed in table 11 and the associated HE/HS standards and guidelines under the wildlife section in the revised Forest Plan.

Subject: 2085 - Recreation - Guidelines

Public Concern #759

The Forest Service should consider making the following changes to Recreation Guidelines: 1- under Management Area 2.2A, correct Guideline 14 to ensure motorized recreation opportunities in the winter are specifically included in the final plan; 2-under Management Area

2.3 please clarify in Guideline 5 where it states "Over-snow motorized use is allowed in areas currently open to such use" since it is inconsistent with RNA language which states non- motorized and Beartooth Butte RNA is in alternatives B, C, D which is popular snowmobile

area; 3-under Management Area 3.3A Guideline 2 states "Some trails may be restricted to non-motorized use" we object to this since this goes against MA 3.3A direction that should be for true motorized use areas and thus should be removed.

Response

(1) Limited winter motorized opportunities are included and authorized in management area 2.2A per direction in the desired condition section, stating the area provides a non-motorized recreational opportunity in the summer and motorized and non-motorized recreation opportunities in the winter. In addition, table 23 clarifies where winter motorized is suitable and authorized. A variety of winter motorized opportunities were analyzed. See PC #698 (item 2).

(2) Table 23 clarifies where winter motorized use is suitable and authorized.

(3) Guideline #2 is consistent with MA 3.3A direction. Although a management area emphasis may be motorized like MA 3.3A is, there may be locations where incompatible uses need to be separated.

Subject: 2086 - Recreation - Management Approach

Public Concern #760

The Forest Service should consider the following management approaches: 1-not opening more roads for recreation since the forest cannot manage regulations on the currently open roads; 2- remediation and or enforcement are not viable alternatives; 3-concerning recreation pack goats, the now-temporary closure order be expanded to include all 4 ranger districts and be permanently embedded; 4-recreation management specifics should allowed to adapt as use patterns change.

Response

(1) The miles of existing and projected additional roads by alternative were identified in table 131. The deciding officer will consider the various options along with other comments during the decision process.

(2 and 3) Different alternatives were analyzed associated with recreational pack goat use and are identified in table 53. The deciding officer will consider the various options along with other comments during the decision process.

(4) Implementation of recreation management specifics are adaptable within the goals, objectives, standards, and guidelines of the revised Forest Plan.

Public Concern #761

The Forest Service should consider on page 91 add "…which do not compromise the integrity of wildlife habitat" to "Forest recreation management focuses on community and visitor interests, new as well as traditional recreational activities, and year round enjoyment of outdoor recreation on the Shoshone."

Response

Wildlife habitat and recreation conflicts are covered in the desired condition with the following statement "Established recreation opportunities are maintained where not in conflict with other resources."

Subject: 2100 - Designated Wilderness and Recommended Wilderness - Resource – General

Public Concern #762

The Forest Service should maintain all existing wilderness areas and create all of the proposed wilderness areas to protect wildlife and rich biodiversity and preserve wild and scenic beauty of the Shoshone for future generations

Response

The existing designated wilderness areas are maintained in all alternatives considered. See response to PC #257 (item 3) regarding additional wilderness recommendations.

The forest planning process requires that unless otherwise provided by law, all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the Wilderness Act of 1964 should be evaluated and considered for recommendation as potential wilderness areas during plan development. To satisfy this requirement, an evaluation of areas for potential wilderness was completed in 2008 (edited 2013). Thirty-four areas were evaluated for capability and availability, using the process identified in Forest Service Handbook 1909.12, chapter 70. See appendix C of the FEIS.

Public Concern #763

The Forest Service should not add any additional designated wilderness areas since currently 80% of the forest is already designated as wilderness or open to non-motorized uses. Reduced motorized use on the forest will have a negative impact to the local economy; The Forest Plan should keep more options available for multiple uses.

Response

The forest planning process requires that unless otherwise provided by law, all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the Wilderness Act of 1964 should be evaluated and considered for recommendation as potential wilderness areas during plan development. To satisfy this requirement, an evaluation of areas for potential wilderness was completed in 2008. Thirty-four areas were evaluated for capability and availability, using the process identified in Forest Service Handbook 1909.12, chapter 70.

Public Concern #764

The Forest Service should remove any considerations or perspective from all impacts analysis from the final EIS and Plan since the Wyoming Wilderness Act in Section 504 – Prohibition of Buffer Zone, states that "non-wilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area."

Response

Public Law 98-550-Oct. 30, 1984 otherwise known as The Wyoming Wilderness Act of 1984, specifically states: PROHIBITION ON BUFFER ZONES

SEC. 504. Congress does not intend that the designation of wilderness areas in the State of Wyoming lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that

nonwilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.

The 1964 Wilderness Act defines wilderness as an area of undeveloped Federal land retaining its primeval character and influence without permanent improvements or human habitation. Currently, effects to wilderness are measured by how any particular project or planning effort modifies the wilderness character of a wilderness area. The forest planning process requires that unless otherwise provided by law, all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the Wilderness Act of 1964 should be evaluated and considered for recommendation as potential wilderness areas during plan development. New areas considered for recommendation for wilderness designation have the potential effect of protecting wilderness resources. In addition, these areas preserve wilderness character through management efforts to maintain the five wilderness qualities (Natural, Untrammeled, Solitude or a pristine and unconfined type of recreation, Undeveloped and Other Features) that define wilderness character.

Only Congress can pass legislation to create wilderness, therefore, management area (MA) allocation for recommended wilderness (MA1B) does not create designated wilderness. MA1B, recommended wilderness, protects the values that make the area suitable for wilderness designation. Management strategies for recommended wilderness may affect recreation opportunities and experiences within these areas. The revised Forest Plan and the FEIS do not create buffers or perimeters around existing wilderness. Nor do they suggest precluding nonwilderness activities in areas immediately adjacent to wilderness, simply because the area is immediately adjacent to wilderness. Management areas, which provide direction on what activities are allowed immediately adjacent to existing designated wilderness, are established without regard to whether these nonwilderness activities could be seen or heard from within any wilderness area. The purpose and requirement for disclosing environmental effects to designated wilderness is required under the National Environmental Policy Act (NEPA) of 1969. The essential purpose of NEPA is to ensure that environmental factors are weighted equally when compared to other factors in the decision-making process undertaken by Federal agencies such as the Forest Service. The act establishes the national environmental policy, including a multidisciplinary approach to considering environmental effects in Federal government agency decision-making processes such as Forest Plan Revision.

Public Concern #765

The Forest Service should not follow the conclusion on pages 105 and 106 of the Draft EIS, Volume 2 which states that there is no clear consensus from the public of additional wildernesses are needed on the forest since that is not an adequate reason to include recommendations.

Response

The statement referenced is on page 107 of appendix C which is the potential wilderness evaluation document. This statement is in the section summarizing public input associated with additional wilderness. Appendix C has been updated. The deciding officer will consider the various options along with other comments during the decision-making process.

Public Concern #766

The Forest Service should address and clarify motorized use in the wilderness for administrative purposes as it is a discrepancy in management of wilderness areas.

Response

Administrative motorized use in wilderness is governed by both the Wilderness Act and Forest Service directives which are listed under the legal and administrative framework sections of the EIS.

Subject: 2105 - Designated Wilderness and Recommended Wilderness - Direct and indirect

Public Concern #767

The Forest Service should include the wilderness evaluation acres for MA 3.6A on page 514 of the DEIS.

Response

Thanks for your comment. We will add MA3.6A to table 147 in the FEIS.

Public Concern #879

The Forest Service should examine how the various alternatives will impact wilderness character on the nationals forest – that is how the alternatives will also impact the areas found in the Wilderness Evaluation report to have Wilderness character.

Response

The wilderness section in the FEIS includes a table that displays how the wilderness evaluation areas are allocated in each of the alternatives. The effects discussion also identifies the impacts of various activities associated with different allocations. Other maps in the FEIS can be used to determine how individual areas are allocated.

Subject: 2107 - Designated Wilderness and Recommended Wilderness - Climate Change

Public Concern #768

The Forest Service should make the preservation of the wild, intact habitats the highest priorities as the Shoshone National Forest is a national recognized climate indicator forest; protection from fragmenting development and motorized use will not only sustain a healthier ecosystem but would also serve to buffer the effects of present climate change and slow local contributions to ongoing climate change.

Response

The alternatives in the EIS display a range of options for how to manage the forest. Alternative C allocates the most land to wilderness and non-motorized uses. The decision maker will consider those public comments that prefer that type of management along with other public comments in making the final decision.

Subject: 2125 - Designated Wilderness and Recommended Wilderness - Guidelines

Public Concern #769

The Forest Service should elevate Guideline 13 under Guidelines for Management Area 1.1 – Wilderness to a Standard so that posting boundaries is mandatory versus being an option at the local forest District since good on the ground signing is critical to proper motorized management.

Response

Posting of wilderness boundaries in this guideline is associated with motorized incursions, thus, this guideline focuses on those areas with the highest potential for incursions, These areas include known areas of trespass for winter motorized use and where motorized routes are adjacent for summer motorized since there is a requirement to stay within 300 feet of a motorized road and trail.

Subject: 2126 - Designated Wilderness and Recommended Wilderness - Management Approach

Public Concern #770

The Forest Service should maintain the responsible and sustainable stewardship of land through traditional grazing rights in recommended and designated wilderness areas and provide any requirements regarding reduction in livestock grazing where impacts to wilderness values are occurring.

Response

Grazing and grazing rights within designated and recommended wilderness would follow Forest Service directives.

Public Concern #771

The Forest Service should not allow construction of new range improvements within wilderness areas as this is a violation of the Wilderness Act.

Response

The Wilderness Act and Forest Service directives allow new range improvements within wilderness if they are needed to protect wilderness values. The revised Forest Plan complies with the Wilderness Act.

Subject: 2150 - Designated and Eligible Wild and Scenic Rivers - Resource – General

Public Concern #60

The Forest Service should clarify the segment descriptions for the Middle Popo Agie River and Wiggins Fork on the page 56 map to be, "Headwaters to Shoshone boundary."

Response

We made the change.

Public Concern #772

The Forest Service should consider giving the 13 identified river segments as Wild and Scenic River Designation, including Lower Sunlight Creek.

Response

Only Congress can designate or add a river segment into the Wild and Scenic River system. During the forest plan revision effort, the Shoshone is required to make eligibility and classification determinations but not suitability or designation recommendations.

Public Concern #773

The Forest Service should consider clarifying the following items: 1-what does the Wild and Scenic River designation mean for where river's cross private land especially concerning restrictions; 2- include a stream- by-stream description of the analysis for all streams eligible and not, why 13 of 26 made the list; 3-explain why Crandall Creek, North Fork Popo Agie, and Grinnell Creek were not found eligible; 4-explain the rational for Outstanding Remarkable Values Paddling on streams or not; 5-why are there Outstanding Remarkable Values differences between DEIS and Draft LMP for same waterways.

Response

(1) There is only one designated wild and scenic river on the forest—the Clarks Fork of the Yellowstone. Private properties along this designated river are not restricted as we only have authority to manage the Federal lands associated with a designation.

(2 –5) The Wild and Scenic eligibility document will be revised to address public comments received on the draft.

Public Concern #774

The Forest Service should consider delaying suitability determinations for eligible Wild and Scenic Rivers until these actions are triggered by proposed impacts or conservation actions and regularly update the public on eligibility inventory.

Response

The introduction to the wild and scenic river section indicates that suitability is not being conducted at this time and describes when a suitability determination might kick in. See FEIS appendix D.

Public Concern #775

The Forest Service should consider Dead Indian Creek downstream from the Dead Indian Creek Campground and the segment of Sunlight Creek downstream from Wyoming Highway 296 should be proposed as additions to the Clarks Fork of the Yellowstone Wild and Scenic River.

Response

See PC #773 items 2 through 5.

Public Concern #776

The Forest Service should consider closing roads and prohibiting bicycles within wild and scenic river corridors.

Response

Bicycle use is a valid use of wild and scenic river corridors. Roads within the one designated wild and scenic river are grandfathered in by the enabling legislation.

Public Concern #777

The Forest Service should consider that following stream routes for wild and scenic designation in addition to those already mentioned: North Fork of Shoshone River, South Fork of Shoshone River, Dead Indian Creek, Beartooth Creek, Wood River, North Fork of Popo- Agie River, Little Popo-Agie River, East Dunoir Creek, West Dunoir Creek, Clark's Fork, Wiggins Fork, Frontier Creek, Wind River, and East Fork of Wind River. These rivers should be considered due to their scenic, wildlife, geologic, and recreational qualities.

Response

See PC #773 items 2 through 5.

Subject: 2152 - Designated and Eligible Wild and Scenic Rivers - Methodology

Public Concern #778

The Forest Service should consider in order to be assessed as outstandingly remarkable for Wild and Scenic River Designation; a river-related value must be a unique, rare, or exemplary feature that is

significant at a comparative regional or national scale and not just both and to identify and document all potential Outstanding Remarkable Values that reflect the iconic character of the Forest's rivers and streams.

Response

See PC #773 items 2 through 5.

Public Concern #779

The Forest Service should consider any of the free-flowing streams on the Shoshone National Forest that contain healthy populations of Yellowstone Cutthroat Trout should be found eligible for Wild and Scenic designation based upon a "fish" Outstanding Remarkable Value since Wood River was.

Response

Not all streams with Yellowstone cutthroat trout populations are considered as an outstandingly remarkable value. The wild and scenic river eligibility document will be revised to reflect public comments and will address each stream evaluated by the interdisciplinary team.

Subject: 2175 - Designated and Eligible Wild and Scenic Rivers - Guidelines

Public Concern #780

The Forest Service should consider No Surface Occupancy stipulations that include a defined buffer for Wild and Scenic River segments and corridors.

Response

No surface occupancy is applied to the designated wild and scenic river corridor. All action alternatives protect the eligibility of the potentially suitable river segments until a suitability determination is made.

Subject: 2200 - Inventoried roadless areas - Resource – general

Public Concern #13

The Forest Service should consider following Roadless Area Conservation Rule since it will allow motorized activities without the new for roads in roadless areas and should do a detailed plan for M.A. 3.6A to include scenery management.

Response

Alternatives A, B, and C are consistent with the Roadless Area Conservation Rule. The revised Forest Plan contains direction for scenery management in management area 3.6A.

Public Concern #781

The Forest Service should consider maintaining, not reclassifying, and perhaps increasing Inventoried Roadless Ares and not allowing any new roads/trails including in winter months and No Surface Occupancy including the following areas. Wood River, Franc's Peak, the DuNoir Special Management Unit, Beem Gulch, Huff Gulch, Wiggins Fork/Double Cabin , Little Popo Agie Canyon, Pat O'Hara Mountain, Gravelbar and Trout Creek and perhaps increase roadless areas since these areas purify air and water, provide wildlife habitat, protect area for future generations, the Supreme Court allowed Roadless Rule to stand, prevent ORV damage, cut costs for maintenance, noise ruins nature experience, and prevent soil erosion.

Response

The Forest Service will continue to manage Inventoried Roadless Areas according to the most recent direction resulting from court rulings related to 2001 Roadless Area Conservation Rule.

Public Concern #782

The Forest Service should consider allowing snowmobiling in inventoried roadless areas.

Response

The Forest Service does allow snowmobiling in inventoried roadless areas. In other words, snowmobiling is not prohibited simply because the area is managed as an inventoried roadless area.

Public Concern #783

The Forest Service should consider designating all roadless areas as wilderness since they could be lost due to Wilderness and Roadless Area Release Act (H.R. 1581).

Response

In 2008 (edited 2012), 34 areas on the Shoshone were evaluated for potential wilderness. This process included three tests—capability, availability, and need. Alternatives C and D include some of the evaluated areas as recommendations for wilderness designations. Some of the areas considered for potential wilderness were also roadless areas. An alternative that would recommend all roadless areas for wilderness designation was considered but eliminated.

Public Concern #784

The Forest Service should consider controlling illegal ORV use in roadless areas including South Fork and Wiggins Fork roadless areas which has had a lot of illegal use noticed by hunters and is hurting wildlife habitat.

Response

The Forest Service continually strives to curb illegal ORV use through education, signage, and enforcement and by providing quality ORV use where management area direction allows for such use.

Public Concern #785

The Forest Service should consider closing timber roads and unauthorized routes when harvest is completed and to protect soils.

Response

The Forest Service frequently closes temporary roads after they are no longer needed for administrative purposes such as fuels reduction and timber harvesting. Site-specific road management is analyzed in project-specific analyses and is outside the scope of the forest plan revision analysis.

Public Concern #786

The Forest Service should consider changing the following: (1) deleting 'as required by law' from the first sentence on page22. (2) Include specific management area direction that is less restrictive than the RACR in the Revised Plan.

Response

The Forest Service does not have the authority to change congressional legislation or presidential proclamations. This includes changing the wording of the 2001 Roadless Area Conservation Rule (RACR).

Public Concern #787

The Forest Service should consider creating a roadless management area that is outside wilderness designation to protect roadless areas that won't get wilderness designation.

Response

The Forest Service will continue to manage inventoried roadless areas according to the most recent direction resulting from court rulings related to the 2001 Roadless Area Conservation Rule. This will include areas outside of wilderness that continue to be managed as inventoried roadless areas.

Public Concern #788

The Forest Service should consider not have roadless areas since OHV won't stay on the trail if there is no trail.

Response

The Forest Service continually strives to curb illegal ORV or OHV use through education, signage, and enforcement and by providing quality ORV and OHV use where management area direction allows for such use.

Public Concern #789

The Forest Service should consider if inventoried roadless areas have been altered to no longer have altered characteristics it should be opened up for timber harvest under 36 CFR 294.13(b) and 36 CPR 294.13(b)(4) "timber may be cut, sold, or removed in inventoried roadless areas."

Response

The Forest Service does not have the authority to change congressional legislation or presidential proclamations. This includes changing the wording of the 2001 Roadless Area Conservation Rule.

Public Concern #892

The Forest Service should establish desired and management prescriptions for non-IRA lands that maintain roadless value and characteristics.

Response

The plan allocates all lands with a management prescription including lands outside inventoried roadless areas (IRAs). The alternatives contain a mix of allocations for these lands. Some that emphasize non-motorized, non-commodity uses such as alternative C, and others that emphasize motorized and commodity uses such as alternative F. The decision maker will consider the range of public comments on how these lands should be managed in making a final decision.

Subject: 2202 - Inventoried roadless areas - Resource – Methodology

Public Concern #891

The Forest Service should take a hard look and disclose the impacts to roadless values and characteristics for each alternative and delineate IRA boundaries in the final LRMP management area maps. As part of this analysis provide information about adjacent roadless areas on lands administered by other federal agencies such as the Bureau of Land Management (BLM) and the National Park Service, as part of the cumulative effects analysis to help reviewers to evaluate the alternatives.

Response

The EIS includes a discussion on the effects of the alternatives on inventoried roadless areas. Maps of inventoried roadless areas are included in appendix C of the FEIS. Inventoried roadless areas only occur on National Forest System lands, so there is no comparison with adjacent BLM lands. The BLM does have ACEC (Areas of Critical Environmental Concern) areas adjacent to the Shoshone. Those are addressed in cumulative effects under research natural areas. Most of the other National Forest System land adjacent to the Shoshone is wilderness. Appendix C on wilderness evaluation does include discussion on lands with wilderness characteristics in the Greater Yellowstone Area.

Public Concern #790

The Forest Service should ensure No Surface Occupancy for oil and gas development in all Inventoried Roadless Areas.

Response

The areas associated with no surface occupancy are being looked at between draft and final and are being revised. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #791

The Forest Service should not allow the creation of any new motorized roads or trails all Inventoried Roadless Areas and manage these areas as non-motorized back country recreational areas. Any Inventoried Roadless Areas that have already been impacted by motorized use should be rehabilitated instead of excluded.

Response

See PC #781. Table 146 identifies inventoried roadless areas and the management areas to which they are allocated by alternative. The deciding officer will consider the various options along with other comments during the decision process.

Public Concern #792

The Forest Service should continue to allow snowmobiling in Inventoried Roadless Areas.

Response

Being in an inventoried roadless area has no bearing on whether snowmobiling is allowed. Winter motorized use is based on what the management area designation allows or does not allow. A variety of alternatives were analyzed for winter motorized and are displayed in table 129. The deciding officer will consider the various options along with other comments during the decision process.

Subject: 2209 - Inventoried roadless areas - Monitoring

Public Concern #793

The Forest Service should seek increased funding to maintain and monitor established trails to increase the amount of accessible land to motorized travel, but continue to manage and monitor the areas to ensure that there are no negative impacts to wildlife and use by recreationalists.

Response

Increased funding is an issue outside of the scope of the forest plan analysis. Monitoring will follow the monitoring strategy identified in chapter 3 of the revised Forest Plan.

Subject: 2250 - Research Natural Areas – General

Public Concern #794

The Forest Service should consider adding 8 new Research Natural Areas including Bald Ridge and Pat O'Hara Mountain for studying climate change, ecology, and protecting wildlife and rare plants.

Response

Both alternatives C and D in the EIS include all eight research natural areas. The decision maker will consider the input from those who want all eight areas along with other public comment in making the final decision. Alternative G, developed to respond to comments on the draft plan, includes adding eight research natural areas totaling approximately 68,000 acres.

Public Concern #795

The Forest Service should consider leaving Research Natural Areas especially Beartooth Butte and Line Creek Plateau open to over snow motorized use as it currently is.

Response

Some alternatives in the EIS leave these areas open to snowmobiling, while other close them. The decision maker will consider the input from those who want snowmobiling access maintained along with other public comment in making the final decision.

Public Concern #796

The Forest Service should conduct the necessary research to apply best science.

Response

Best available science is used in the EIS analysis. Conducting research is beyond the scope of the revised Forest Plan analysis. The Forest Service Research Stations conduct research activities, and various research articles where considered during this analysis.

Public Concern #797

The Forest Service should consider making the following changes: 1-add a map that shows all watersheds with important streams labeled and Research Natural Areas to determine if streams will be protected in those areas especially Upper Pat O'Hara Creek; 2- describe specific management protocols for RNAs when not within wilderness.

Response

The management area maps supplied with the EIS displayed the location of the research natural areas and streams that occur in those areas. Research natural areas appear on map 58, which includes the wilderness boundaries for reference.

The direction for managing recreation in proposed research natural areas, including recreational uses, is found in direction associated with Management Area 2.3 in the revised Forest Plan.

Subject: 2255 - Research Natural Areas – Direct and indirect effects include general effects

Public Concern #893

The Forest Service should explain which RNAs are allocated to alternatives A, B, E and F, which plant communities would not be represented in the RNA system, state which RNAs are included in existing or

[proposed] Wilderness and explain the rationale for recommending only some of the identified potential RNAs in the preferred alternative.

Response

The applicable proposed research natural areas (RNA) and special interest areas (SIA) are included in the alternative description in chapter 2 of the EIS.

Map 58 displayed the locations of the potential RNAs and potential SIAs with the wilderness boundary. Many of the potential RNAs are located within wilderness areas

The Potential Research Natural Areas report (USDA Forest Service 2008) included a summary of species represented in attachment B. This report is referenced in the revised Forest Plan and the FEIS.

The decision maker will consider the whole range of input provided by the public on what RNAs and SIAs to include in the final decision.

Public Concern #894

The Forest Service should conduct an assessment to better understand the potential for harm to recommended RNAs and SIAs by analyzing the effects of prescribed management within one mile of potential RNA and SIA boundaries and identify possible changes to the management of buffer lands

Response

RNA analyses were completed following the Guidelines for Research Natural Area Analysis by National Forests within the Rocky Mountain Region (USDA Forest Service 1997). Initial analyses were completed in 1999, and updated in August 2008 (USDA Forest Service 2008).

Subject: 2271 - Research Natural Areas – Desired Condition

Public Concern #798

The Forest Service will ensure the following for additional Research Natural Areas (RNA) and other special use designations: (1) Continuation of historical grazing areas. (2) No change in grazing capability and suitability of proposed RNA. (3) Any fence building to preclude grazing mandated by the Forest Service will be constructed by the USFS. (4) Ranchers shall not be penalized for other resource degradation not directly linked to livestock use.

Response

Proposed research natural areas are located in areas that have little conflict with livestock grazing. Any grazing that occurs is incidental and is addressed through allotment management. The EIS contains a discussion of effects of livestock grazing on RNAs in the RNA section.

Subject: 2277 - Research Natural Areas - Management Approach

Public Concern #799

The Forest Service needs to provide direction or requirements to address livestock grazing currently located within Research Natural Areas (RNA) and should add a statement clarifying that off-trail snowmobiling would not be eliminated by the creation of the proposed Beartooth RNA since the Recreation Uses and Opportunities' section allows for existing trail use to continue in other RNAs.

Response

See PC #798 for livestock grazing. See PC #795 for snowmobiling.

Subject: 2300 - Special Interest Areas – Resource - General

Public Concern #800

The Forest Service should clarify if there would be any impacts to private land holders that have lands adjacent or near to proposed Special Interest Areas.

Response

There are no private lands near any of the proposed special interest areas.

Public Concern #801

The Forest Service should create the three proposed Special Interest Areas to highlight geological and historical aspects of the forest and their support for plant and wildlife communities and preserve the existing Special Interest Area at Sawtooth Peatbed. Bald Ridge and Pat O'Hara Mountain should be added to Special Interest Areas.

Response

Both alternatives C and D in the EIS include all special interest areas. The decision maker will consider the input from those who want all special interest areas along with other public comment in making the final decision.

Subject: 2350 - Scenery Resources – General

Public Concern #802

The Forest Service should not allow drilling along Chief Joseph Highway because the area between the Sunlight Valley and Beartooths is a preferred scenic touring route and drilling would diminish its ecological value.

Response

Drilling, mineral exploration, and all forest management activities must comply with the Scenery Management System (SMS). Within SMS, specific scenery objectives are allocated to every portion of the Shoshone National Forest. If drilling were allowed to occur along Chief Joseph Highway, the operation and physical activity would have to meet the allocated scenery objective for that area, thus maintaining the desired future scenic characteristic.

Public Concern #803

The Forest Service should adopt lower short-term scenery objectives in order to achieve long- term scenic diversity that is consistent with historic fire patterns on the landscape and to promote restoration treatments that increase ecosystem resiliency and forest health.

Response

Scenery Guideline 6 allows for lower short-term scenery objectives. Temporary drops of more than one scenic integrity objective may be made during and following project implementation with deciding officer approval, provided the original scenic integrity objective is met within three years of project completion

Public Concern #804

CDNST is not discussed under scenery resources. Add a CDNST discussion to this section. DEIS, Page 558.

Response

Scenery and the Continental Divide National Scenic Trail are discussed in the recreation section of the FEIS.

Public Concern #805

The Forest Service should maintain the natural beauty of the Shoshone National Forest because the local economy depends on scenic, recreation and wildlife values.

Response

The Forest Service has adopted and implemented the Scenery Management System to maintain and protect scenery resources on the Shoshone National Forest.

Subject: 2373 - Scenery Resources - Objectives

Public Concern #806

The Forest Service should change the wording of the second issue/indicator on page 555 to the following because the way it is currently written implies Scenic Integrity Objectives are allocations as in management area allocations: "…proposed scenic integrity guidelines…."

Response

Scenic integrity objective is a standard term and is an integral component of the Scenery Management System.

Subject: 2374 - Scenery Resources - Standards

Public Concern #807

The Forest Service should retain Scenery Standard 1 in the draft plan because it is appropriate.

Response

The Forest Service will retain Scenery Standard 1 as recommended.

Subject: 2375 - Scenery Resources- Guidelines

Public Concern #808

The Forest Service should limit Scenery Guideline 4 to the Travel Corridor Management Area rather than a generic travel corridor where it could overemphasize middle-ground and background views from travel routes.

Response

Guideline 4 is consistent with the desired condition for scenery on the Shoshone. It is intended to mitigate the scenic impact of large facilities by blending them into the landscape in terms of scale, color, texture, form, etc.

Public Concern #809

The Forest Service should follow Forest Service Manual 2380 scenery management direction instead of Scenery Guideline 5 in the draft plan because it is not in compliance with the Scenery Management System and is not supportive of the desired condition.

Response

We agree, Guideline 5 “Scenic Integrity Objectives for management areas apply only to the area within the management area boundary” is redundant and is implied in all Forest-wide SIO allocations. Guideline 5 will be removed.

Public Concern #810

The Forest Service should reconsider Scenery Guideline 6 in the draft plan because it may not fulfill all the requirements of the National Trails System Act that requires a reduction of Scenic Integrity along a National Scenic and Historic Trail corridor to be addressed through a substantial interference determination before another use can be allowed.

Response

Scenery Guideline 6 will allow for reduction of SIOs from minor adjustments, to temporary drops of more than one SIO during and following project implementation. Each project and potential change of SIO allocation will be considered on a case-by-case basis and will be allowed only by a deciding officer’s approval.

Public Concern #811

The Forest Service should make the Scenery direction in Guideline 4 on page 174 of the draft plan consistent with the 2009 Continental Divide National Scenic Trail Comprehensive Plan Chapter III €, and Forest Service Manual 2353.42 and 2353.44(b), and address it as a standard instead of a guideline

Response

Guideline 4 in conjunction with Standard 5 reflects direction in the Comprehensive Plan and Policy.

Subject: 2400 - Heritage Resources – General

Public Concern #812

The Forest Service should update the Infrastructure (INFRA) Database with heritage data for better project and resource management.

Response

The heritage program for the Shoshone National Forest is recorded, maintained, and tracked via the INFRA Database. Every project, event, or historic property is placed into the INFRA database.

Yearly heritage reports to the Washington Office are pulled from INFRA databases for all forests. The maintenance of the INFRA database is a normal part of operations for the Shoshone heritage program and every heritage program in the Forest Service. This is mentioned in the management approach section on page 99, top paragraph, second sentence.

Public Concern #813

The Forest Service should increase the number of historic properties available for public rental use.

Response

The Shoshone National Forest does and will consider the use of historic properties for rental use. The Forest’s first and foremost priority is to protect and preserve these resources, while assuring that a re-classification of use will not cause an adverse effect to a historic property eligible for or potentially eligible for listing in the National Register of Historic Places.

Other issues that arise when considering a switched use of historic structures is updating facilities to conform with current building codes, safety standards, and accessibility requirements. These can be cost-prohibitive activities given the current budget shortfalls. Partnerships with local historic interest groups, in the form of Challenge Cost Share Agreements, are a viable route for the maintenance and management of a property.

Public Concern #814

The Forest Service should better define the Heritage Program plan on the Shoshone National Forest by updating the heritage resource overview of heritage resources on the forest, consistently update historic property plans, address in plan long term goal of monitoring and maintaining structures such as Anderson Lodge and Clay Butte Tower, change funding to add more staff to the forest, make sure all forest personal and permittees have Archaeological Resources Protection Act of 1979 (ARPA) training with refreshers to know consequences of damage to heritage sites, and make an emphasis in plan for Priority Heritage Assets., and specify how it will meet its desired conditions and goals especially concerning livestock grazing.

Response

Forest Service objectives related to planning for heritage programs are defined in FSM 2362-Planning. The Shoshone National Forest does not yet have a comprehensive Heritage Program Plan (HPP). The Forest's HPP is in development as a result of Heritage Program Managed to Standard Program implemented in 2012.

The seven elements of a National Forest HPP are delineated in FSM 2362.3-Heritage Program Planning. Development of the specific elements of the Forest's HPP will be in consultation with tribal, state historic preservation office, local governments, and interested parties per direction from FSM2361.03-Policy.

The development of an HPP for the Shoshone is a part of the heritage program, in general, and will be conducted in accordance with Federal legislation and agency policy in collaborative partnerships with appropriate State, tribal, and local organizations. The development of an HPP is a program-level project, and is outside and beyond the scope of the revised Forest Plan analysis. ||

Public Concern #815

The Forest Service should clarify how it produces the Priority Heritage Asset list and increase that list in order to know criteria is used, determine timeframes from completing plans, make the list more available, include more non-listed but eligible to National Register of Historic Places (NRHP) sites, include forest administrative facilities to plan, include State Historic Preservation Office (SHPO) and Native American Tribes, local preservation organizations, and other interested parties in producing the list, and include more associated cabins and mines within the Kirwin potential district.

Response

The USDA Forest Service is steward to over 300,000 heritage assets. To aid in managing these assets, the Forest Service has further defined priority heritage assets (PHAs) using criteria outlined in Forest Service Manual 2360 and using guidance for identifying heritage asset major categories as described in the Technical Release 9: Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land.

PHAs are those heritage assets of distinct public value, recognized for research potential to yield scientific information or management decisions, interpretation, education, or economic benefits, and are thus actively maintained within the program for maintenance and other assessment activities. There is no limit

to the number of priority assets a forest may have and the list of priority heritage assets can change over time; however, PHAs must meet one or more of the following criteria:

- The significance and management priority of the historic property is recognized through official designation, such as the Listing on the National Register of Historic Places (NRHP) or State Register;
- The significance and management priority of the property is recognized through prior financial investment in preservation, protection, interpretation, or use;
- The significance and management priority of the property is recognized in an agency approved management plan; or
- The property exhibits critical maintenance or protection needs that have been clearly documented.

While no heritage asset has more intrinsic value than another, some offer greater potential for use as interpretive sites, while others may meet additional management purposes, such as cabin rentals, while others hold great research potential, and some must be recognized for their value to specific communities. With a limited funding base, PHAs help the unit identify where to direct planning efforts and resources.

All historic properties, cultural materials, and features within the Shoshone National Forest are protected and managed under Federal laws, regulations and agency policies listed in the Other Guidance section of the revised Forest Plan pages 99 through 100. The Shoshone will share the list of PHAs with the appropriate Federal, State, and Native American tribes upon request and readily consider suggestions to the PHA list.

Public Concern #816

The Forest Service should create Heritage Interest and Research areas to protect archaeological assets such as those on Wood River and Bear Creek, amongst other locations

Response

All historic properties, cultural materials and features within the Shoshone National Forest are protected and managed under the Federal laws, regulations, and agency policies listed in the “Other Guidance” section of the revised Forest Plan on pages 99 through 100. The Forest will consider the designation of areas of importance

The Kirwin Special Interest Area (SIA) has been expanded and the Double D Ranch has become an SIA in response to comments received concerning these resources.

Public Concern #817

The Forest Service should note the designation of the Beartooth Highway to the National Register of Historic Places since it is being processed by the State Historic Preservation Office.

Response

When the Beartooth Highway is listed in the National Register of Historic Places, the new designation will be noted in the forest plan with an amendment.

Public Concern #819

The Forest Service should revise The Land Management Plan to include management of non-PHA sites. There is a concern that the current plan focuses on only a small number of Priority Heritage Asset (PHA) sites, neglecting hundreds of other significant historic and prehistoric resources.

Response

All historic properties, cultural materials and features within the Shoshone National Forest are protected and managed under the Federal laws, regulations and agency policies listed in the Other Guidance section of the revised Forest Plan on pages 99 through 100. These laws and regulations direct how the Forest protects and preserves archaeological materials and sites, not the forest plan.

Subject: 2421 - Heritage Resources - Desired Condition

Public Concern #820

The Forest Service should document the archeological sites on Bald Ridge and should be documented in cooperation with BLM.

Response

Any information concerning unrecorded archaeological sites will be investigated. This is not information or direction to be placed in the forest plan.

Subject: 2423 - Heritage Resources - Objectives

Public Concern #821

The Forest Service should consider the following changes to the objectives in this section: (1) Revising Objective 4 so that it identifies priority historic properties and completes a historic property plan for at least one National Register eligible or listed property every three years; (2) Add an additional objective that a Heritage Resource Overview will be written within 5 years of the Forest Plan implementation; and (3) Delete Objective 5 as the requirement lacks sufficient reason to keep.

Response

(1) It was determined, based on current staffing and budget projections that three Historic Property Plans (HPPs) was an achievable goal. As time and budget allow, as a part of the Shoshone National Forest Heritage Program, more historic property plans will be developed. Three HPPs over the life of the forest plan is the achievable goal determined by the interdisciplinary team.

(2) While this is a desirable objective for the Shoshone National Forest Heritage Program, we are not certain if we will have funding to implement within the timeframe suggested.

(3) The development of an historic overview is within the Heritage Program Managed to Standard Program implemented in 2012, as a part of the performance standards established by the agency. The Forest will be looking for ways to develop and fund an historic overview, but timing is uncertain at this point.

(4) As a part of the Forest's responsibilities as a steward of historic properties and resources, after a natural catastrophic event such as a forest fire an inventory of the effects on cultural resources is mandated by the Federal laws and regulations that direct agencies on the stewardship of these resources. Objective #5 will not be deleted.

Subject: 2424 - Heritage Resources - Standards

Public Concern #822

The Forest Service should consider revising Standard 3 to include potential effects on unevaluated sites in this area and incorporate guideline 8 into this standard so that potential sites that are unevaluated must be evaluated for eligibility in the National Register of Historic Places, and if eligible, prohibit outfitter and guide camps from the areas.

Response

Guideline 8 was dropped and a new standard was added to address this comment.

Subject: 2425 - Heritage Resources - Guidelines

Public Concern #823

The Forest Service should consider adding the following guidelines for heritage resources in regards to livestock grazing: (1) Managing livestock post-fire environments to avoid impacts to heritage resources; (2) Avoiding grazing and activities such as feeding, salting, herding, or placing water developments in areas where heritage resources have become exposed to wildfire; (3) Not allowing water, mineral, supplement/salting stations to overlap or occur within the boundaries of resources eligible for or listed on the National Register of Historic Places; (4) Ensuring that when cultural resources are identified, they are recorded, evaluated, and consultation of their eligibility with the SHPO will occur; and (5) Heritage personnel are consulted prior to making improvements or changes to historic grazing related structures.

Response

Standards and guidelines are typically located in the relevant activity section of the plan. Where the standards or guidelines pertain to multiple activities, they are usually located in the applicable resource section.

The IDT determined that

(1) This practice is mentioned in Range/Commercial Livestock Grazing – Guidelines 2 and 3, page 73.
(2) This practice is mentioned in Range/Commercial Livestock Grazing – Guidelines #2 and 3, page 73.
(3) This is a normal practice within the Range Management Plan and Section 106 review for Allotment Permit Renewals and part of the evaluation of and cultural resource survey work concerning Range Allotments for NEPA purposes.
(4) This suggestion is already required under Section 106 of the National Historic Preservation Act.
(5) This practice is mentioned in Range/Commercial Livestock Grazing – Guideline 2, page 73, a part of the Shoshone National Forest Range Management Plan and also required under Section 106 of the National Historic Preservation Act.

Public Concern #824

The Forest Service should consider adding a section on heritage resources to the guidelines in Management Area 4.2 as some of them are historic properties.

Response

The guidance is provided elsewhere in the heritage and facilities sections of the revised Forest Plan.

Subject: 2427 - Heritage Resources - Public Involvement - General

Public Concern #825

The Forest Service should consider if the Priority Heritage Asset List becomes a component of Forest heritage resource management, then the County Historic Preservation Commission, the Historic Preservation Commission in Fremont County, and other groups with strong interests, local expertise, and archival information are included in the process.

Response

See PC #815 response concerning the Shoshone National Forest PHA list.

Subject: 2450 - Social and Economic - Resource – general

Public Concern #826

The Forest Service should take into consideration tourism and how it will be impacted from Forest policy changes since tourism is major source of the local economy.

Response

The economic impacts of tourism were considered and analyzed in the EIS (pages 576 through 604).

Some comments highlight the role of the tourism sector within the study area as a stable economic force. The revised Forest Plan analysis shows the tourism sector within the study area to be very cyclical in nature, particularly on an annual basis. For example, the SFRED (Sportsmen for Responsible Energy Development) report for Park County indicates there were 40 lodging places open in Cody during the summer, but only 18 open during the off-season. The report also indicates the occupancy rate for lodging in Cody is 90 percent during the summer, but 33 percent during the off-season. Such statistics do no support a stable economic sector on an annual basis.

Others suggested in their comments that the tourism industry had grown faster than other resource industries and such information should be highlighted in the EIS. However, in recent years (2001 through 2011) mining employment in Fremont County has increased by 157 percent and agricultural employment has increased by 23 percent, while accommodation and food service employment (associated with tourism activity) has decreased by 0.5 percent. In Park County, mining employment has increased by 99 percent, accommodation and food service employment has increased by 6 percent, and agricultural employment decreased by 2 percent. The comment of higher tourism growth cannot be supported by data, and thus, was not included in the EIS analysis.

Public Concern #827

The Forest Service should consider a plan that helps and not hinders the local economy with many rural communities main source of revenue dome with businesses that rely on the use of the forest like outfitters, motorsports sales and rentals, fishing, tour, and fishing. Additionally the Forest should look for ways to work together with businesses to better address needs of both.

Response

Desired conditions in the revised Forest Plan recreation section include benefits to local communities from recreation opportunities: “A diversity of year round recreation opportunities attracts increasing numbers of visitors to the Shoshone, thereby providing economic and social benefits to local communities.” and “Partnerships are a significant tool to help provide public use and year round recreation opportunities.” (page 89, revised Forest Plan – Shoshone National Forest). Goals for recreation also address the benefits of recreation for local economies: “Goal 1. Seek increased tourism that will enhance local economies by providing information and a broad spectrum of high quality outdoor recreation opportunities for visitors.”

Many comments requested the analysis recognize the economic importance of public lands to local economies. The EIS does include a contribution analysis of forest outputs to the study area. Some comments refer to the benefits of “protected” public lands to local economies, but these studies are conflicting with other analyses. A more complete review is included in the literature review section.

Many comments reflected the idea that people are moving into the study area only because of the quality of life provided by, in part, the Shoshone National Forest. While quality of life is certainly a factor, it is not a primary motivator factor that can be attributed to the Forest. For example, Wyoming Community

Development Authority data on individuals obtaining new drivers licenses in Park County in 2012 indicate that "better quality of life" was the reason for moving to Wyoming for 11.3 percent of individuals, less than "friends or relatives in Wyoming" (27.8 percent), "new job" (23.7 percent), or "job transfer for self or spouse" (16.5 percent). Quality of life, while an important value to people, it is likely more complicated than just access to natural resources.

Specific comments highlight the importance of the economic contribution of the National Outdoor Leadership School (NOLS). While NOLS operates in a number of jurisdictions in addition to the Shoshone National Forest, to the extent possible, the economic activity of NOLS within the Forest has been included in the EIS analysis.

Several comments refer to tourism income/employment data sources that are defined/used inconsistently. The EPS/HDT report highlights a 'travel and tourism' sector, however this estimate is based on the assumption that all activity within the Retail Trade, Passenger Transport, Arts/Entertainment/ Recreation, and Accommodation and Food Services employment is based on travel and tourism, no services are provided to local residents. Since most of these sectors provide at least some and, in many cases, most of their goods and services to the local population rather than visitors, this assumption in not appropriate and results in an overestimate of the relative importance of travel and tourism.

In contrast, Dean Runyan Associates estimated for the Wyoming Division of Travel and Tourism 1,560 direct jobs for travel and tourism in Fremont County for 2011, about 6.3 percent of the total county employment. In comparison, the Bureau of Economic Analysis estimated 1,514 agricultural sector jobs and 1,246 mining sector jobs within Fremont County during the same 2011 period.

Public Concern #828

The Forest Service should consider protecting wilderness, roadless areas, and wildlife because these aspects of the forest help drive the local economies.

Response

The revised Forest Plan contains goals consistent with protecting wilderness, roadless areas and wildlife: wilderness: "Goal 2. Preserve and improve the characteristics of wilderness areas"; roadless: the revised Forest Plan is consistent with the protective measures of the 2001 Roadless Rule; and wildlife: "Goal 1. Provide well-distributed habitat capable of contributing to the survival and recovery of species listed under the Endangered Species Act."

The contribution analysis in the EIS includes the contribution of employment and income from forest outputs from outfitters and guides and other activities in roadless and wilderness to the study area. With 56 percent of the Shoshone National Forest currently designated as wilderness and another 28 percent is inventoried roadless areas, the magnitude of difference among alternatives will be small with minor acreage changes.

Public Concern #829

The Forest Service should consider maintaining the present level of timber industry or even expanding it to include niche products since the Counties and Conservation Districts believe that we owe it to their constituents to look for creative ways to expand the wood products industry.

Response

Alternative A, the current plan, considers 86,300 acres to be suitable for timber production, with an allowable sale quantity of 19,800 hundred cubic feet per year. Alternatives B and G consider 127,000 acres to be suitable for timber production with an allowable sale quantity of 22,800 hundred

cubic feet per year. Alternative F considers 251,200 acres to be suitable for timber production, with an allowable sale quantity of 30,500 hundred cubic feet per year. The revised Forest Plan does not restrict the type of forest products that are produced or sold. And no alternative creates guarantees for any commercial industry. Forest outputs are offered for commercial use and it is up to individuals within an industry to create a viable business.

Public Concern #830

The Forest Service should consider the economic impact of banning pack goats since it would cause the people in that business to leave the area and decreasing some of the economic dollars for the surrounding communities.

Response

Pack goats are being banned only from core native bighorn sheep ranges to protect bighorn sheep populations from diseases carried by domestic goats. Hunting of bighorn sheep and wildlife viewing of bighorn sheep have positive economic impacts for local communities. Currently, no permitted outfitters use pack goats on the Shoshone National Forest.

Public Concern #831

The Forest Service should consider taking into account the desires of the general public locals that were surveyed such as those from survey of "Study of Preferences and Values on the Shoshone National Forest" dated January 16, 2008 and the Cody 2020 survey that received replies from over 1,700 citizens.

Response

Information from the Study of Preferences and Values on the Shoshone National Forest (2008) was considered, included, and included in the social and economic section of the EIS. Individually funded community efforts such as Cody 2020 are very beneficial to the local communities they focus on and serve, but for a planning effort encompassing a larger landscape, it is important to use consistent data available throughout the study area.

Public Concern #832

The Forest Service should consider not closing any areas to snowmobiles as that would negatively impact the local communities and businesses that rely on snowmobile access for their economy.

Response

The intent of the revised Forest Plan is to leave open for winter motorized use all of the areas currently being used by snowmobilers. Generally, areas are closed to winter motorized use for reasons of compliance with wilderness regulations or the protection of crucial winter range for wildlife, or both. Specific closure information is included in the recreation section of the EIS. The contribution of snowmobile use on the Forest to the study area is included in the economic analysis.

Public Concern #833

The Forest Service should consider requiring businesses such as outfitters and lodges to serve different market segments and not just certain groups to better maintain sustainable regional economy.

Response

Special uses desired conditions direction provides that recreation authorizations should meet demonstrated public needs when consistent with the desired conditions for a specific area, and that authorizations should provide opportunities for those needing outfitting and guiding services to participate in the recreational opportunities provided on the Shoshone.

Public Concern #834

The Forest Service should consider better protecting mule deer since hunting is a big revenue source for the area.

Response

The management of mule deer on the Shoshone falls under the purview of the Wyoming Game and Fish Department. The Shoshone is responsible for managing the habitat for mule deer. The revised Forest Plan would put in place special considerations for mule deer by protecting big game crucial winter range. Human disturbance is minimized in big game crucial winter range. The contribution of hunting on the Forest to the study area is included in the economic analysis

Public Concern #835

The Forest Service should consider adding more oil and gas leasing on the forest because of its socio-economic support it can bring to the local communities.

Response

The Shoshone has identified lands available for oil and gas leasing. Current industry demand for oil and gas leases on the Forest is minimal. A recent survey of industry indicated that demand for oil and gas leases on the Forest is expected to remain very low into the foreseeable future. Economic impact to the study area from oil and gas leases would only occur if a private company determined resources on the Shoshone were profitable to develop. Currently, there is no activity with no interest, so the economic analysis does not include any oil or gas impact under any of the alternatives.

Public Concern #836

The Forest Service should consider that 70% of Forest Service projects lose money.

Response

The Forest Service is not required to be profitable. Many of the projects completed on National Forest System lands are done to benefit elements of the ecosystem—improve habitat and forest health, reduce wildfire hazard, or to improve recreational opportunities for a variety of users or protect resources while allowing those uses to occur. These resource projects produce a variety of benefits for society, but those benefits are not valued in terms of dollars—but that does not make the benefits any less important

Public Concern #837

The Forest Service should consider expanding and clarifying the Socio-Economic Impact section as it does not give enough detail for forest managers to adequate information and to identify and quantify the impacts of the proposed Shoshone Forest Management Plan on all aspects of human society in nearby communities since DEIS, Plan and material by Dr. Taylor have not met that purpose.

Response

Community-level analysis is not completed for forest plan-level analysis because of the data available for outputs. It would also require a great deal of speculation to predict which communities would likely receive resource outputs over another community. For a variety of reasons, Forest Service analysis is not prepared for selecting “winners or losers” but to show the relative difference among alternatives for forest plan analysis. When implementing the revised Forest Plan, project-level NEPA analysis will continue to include social and economic analysis to address these issues if they are raised and are more likely to be addressed at a more local scale.

Public Concern #838

The Forest Service should consider how do changes in the structure and function of protected ecosystems and the surrounding landscape feedback to change human attitudes and trajectories of development?

Response

The Forest has considered the amenity values of protecting ecosystems and wildlands and their importance to local communities and as a national resource. The Forest has similarly considered the trade-offs to resource extractive industries from special area designations within National Forest System lands.

Public Concern #839

The Forest Service should consider that if more wilderness is added that some local business will be hurt.

Response

The decision maker will consider this along with other input in making the decision.

Public Concern #840

The Forest Service should consider allowing its research to extend to northern Minnesota tourism by contacting business organizations sponsoring tourism in that State.

Response

The revised Forest Plan is a programmatic land management strategic document that does not prescribe actions at the level of contacting the tourism department of a particular state. Available visitor information and census information, along with other available data, were considered during the analysis as described under methodology in the recreation and social and economic sections of the EIS.

Public Concern #841

The Forest Service should consider incorporating aspects of the America's Great Outdoors Initiative in having trans-agency and external partnerships with non-profits and local communities

Response

Partnerships are promoted in the recreation section of the revised Forest Plan: "Through recreation special use authorizations, commercial and non-commercial partners provide a variety of opportunities to the public." And "Partnerships are a significant tool to help provide public use and year round recreation opportunities."

Subject: 2452 - Social and Economic - Methodology

Public Concern #842

The Forest Service needs to reexamine the discussion of environmental justice in the DEIS in that by closing the Shoshone to pack goats, elderly or disabled individuals who rely on pack goats to carry gear will effectively make access to the trails and the backcountry of the Shoshone for these individuals impossible.

Response

Please see response to PC #830 concerning the extent of pack goat use or limitation. While pack goats will not be available for anyone to use within core bighorn sheep areas, other types of pack animals are available for use throughout the Forest. The decision to limit domestic goats and sheep from specific bighorn sheep areas was done to protect the health of the bighorn. An unfortunate trade-off of this

protection is the limited access within these specific areas. But, there are other areas on the Forest open to pack goats, and the bighorn core areas are accessible by other means (e.g., horse, llama).

Environmental Justice, as defined by E.O. 12898, relates specifically to minority and low- income populations. Limiting use of pack goats from a specific area that has concerns for elderly and disabled would not fall into the considered populations under Environmental Justice.

In this case, no one is allowed to enter the area with pack goats, so that specific access type has been equally closed off to all persons, and no individual class has been treated differently.

Public Concern #843

The Forest Service should examine their mineral, recreation, grazing, timber, and forest management data in greater detail in order to better convey impacts to local comminutes or net public benefits across alternatives. The Forest Service needs to calculate the maximum Present Net Value (PNV) benchmark to develop a maximum PNV for those resources that have a market or non-market value and are relevant to the plan revision issues. The Forest should provide sound data from individual resource specialists to provide a viable analysis of PNV and net public benefits.

Response

Please see response to PC #837 – data in greater detail are not available for analysis at the forest plan level. Specific to the PNV analysis; the final analysis for the revised Forest Plan includes a maximum PNV analysis that was inadvertently not included in the draft. The FEIS and appendix B PNV analysis has been updated to better account for relevant PNV values.

Public Concern #844

The Forest Service should provide more detail in accurately estimation the economic value of outdoor recreation. Within the DEIS, the estimation states that there are no changes in recreation employment and labor income for recreation around all six alternatives. It is recommended that a stronger review of the viable economic contribution toward the sustainability of surrounding forest communities be made to ensure representation of the local economies.

Response

A comment expressed concern that there is no change in the economic impacts of recreation among alternatives. This occurs because the Forest has been unable to estimate the change in recreational use across the alternatives. Without changes in recreational outputs or use, the estimates of economic impact will remain the same among alternatives.

Public Concern #881

The Forest Service should not rely on the IMPLAN modeling software and the underlying economic base theory to provide a picture of what is the "total economic contribution [of the SNF] to the local economy (DEIS pp 577-8)." IMPLAN, while useful for appraising the total economic impacts of a forest plan, is insufficient for evaluating impacts on communities. IMPLAN has an additional shortcoming for assessing community impacts in that the economic data used to construct IMPLAN do not provide comparable details for all resource-based sectors of the economy.

Response

The standard terminology for input-output analysis refers to total economic contribution as the sum of direct and secondary effects. In this sense, total refers to the sum of direct and secondary impacts, not the sum of all conceivable economic contributions.

Perhaps total economic contributions in terms of jobs and income would be more definitive. However, this seems to primarily be a matter of semantics.

Public Concern #883

The Forest Service should not use input-output models like IMPLAN since they do not estimate the total economic contribution to the economy. The main way input-output models specifically and economic base models generally adjust to a decrease in supply or demand, for example, is through unemployment and the idling of production plants. As a result, input-output analysis is well known to predict higher multiplier effects than are actually experienced

Response

The contribution analysis completed for the EIS describes those resource outputs provided by Forest Service programs and budgets that individuals within the study area used to produce jobs and income. The IMPLAN model was the tool used to complete this analysis.

Subject: 2453 - Social and Economic - Affected environment

Public Concern #845

The Forest Service needs to re-examine the grazing scenario employment numbers as they are considerably lower than the number on Table 3, page 20 of the Shoshone Cooperating Agency Coalition (SCAC) comment letter, which minimizes the impacts of grazing across alternatives and in relation to other resources uses. The current impact analysis does not provide enough information on the differences among alternatives to conclude that Alternative B provides the highest net public benefits (Table 4, page 24, of the SCAC comment letter), the

Forest should clarify these differences as well as discuss the impacts to the communities of the impact area instead of just the impacts to the Forest or Forest resources. The DEIS economic analyses should include some of the impacts of the Shoshone on nearby communities as income is generated from the use of backcountry and snowmobile use as well as nearby residences that were established to take advantage of living in a wild and scenic environment and the local businesses that support recreation and the local community .

Response

The livestock grazing analysis completed for the FEIS used the more robust level of grazing impact from the University of Wyoming study. In addition, some general information concerning the ranching industry has been included in the analysis.

Public Concern #846

The Forest Service should ensure the sustainability of the economic diversity through conservation of the region's natural resources. Fishing, hunting, and wildlife related activities are a sustainable part of the economy and must be considered in the process of the Shoshone National Forest planning process.

Response

Fishing, hunting, and wildlife-related activities were included and considered in the social and economic analysis of the FEIS for the Shoshone National Forest Land Management Plan. The comment suggested that "sustaining the economic diversity will depend on the conservation of the regions natural resources." But conservation of the region's natural resources represents economic specialization rather than economic diversity. A balance between conservation and development represents economic diversity, which is what the different alternatives attempt to do in the revised Forest Plan.

Subject: 2454 - Social and Economic - Desired condition

Public Concern #847

The Forest Service should proceed with active logging since it will contribute to forest health and positively affect local businesses including the construction industry and create additional employment opportunities. The Forest should ensure that there is no loss of wildlife in that it negatively impact local businesses.

Response

The revised Forest Plan directs the continuation of the Forest's timber management program at a level similar to that of the 1986 Plan. The revised Forest Plan provides direction for protecting habitat for listed species, sensitive species, management indicator species, and species of local concern. The contribution of commercial timber use from the Forest to the study area is included in the economic analysis.

Subject: 2455 - Social and Economic - Direct and indirect effects include general effects

Public Concern #848

The Forest Service should promote snowmobiling on the Shoshone, not close any additional lands to snowmobiling since 80% of the forest is already closed. Areas of the Shoshone up for closure to snowmobiling such as Togwotee Pass are world famous in the snowmobile community, if closed tourism to the region would decline, greatly impacting many of the lodging and other businesses in the area which provide substantial revenue for the state of Wyoming. The Forest Service should focus more on the tourism and recreation of the Shoshone rather than the mineral development in that the tourism industry provides stability and employment for the people of Dubois and other parts of the state. The Forest should not close any areas to mountain cycling, as this too provides a positive economic benefit to local business.

Response

"A diversity of year round recreation opportunities attracts increasing numbers of visitors to the Shoshone, thereby providing economic and social benefits to local communities."

The intent of the revised Forest Plan is to leave open for winter motorized use all of the areas currently being used by snowmobilers. Areas closed to winter motorized use are generally for reasons of compliance with wilderness regulations or the protection of crucial winter range for wildlife, or both. Specific closure information is included in the recreation section of the EIS. The contribution of snowmobile use on the Forest to the study area is included in the economic analysis.

See also, PCs #826 and #827 concerning tourism as a stable industry.

Public Concern #849

The Forest Service should not allow any drilling rigs and associated roads and increased vehicle traffic as it will be detrimental to businesses that depend on the unspoiled beauty for tourism.

Response

Please see response to PC #835. Oil and gas drilling on National Forest System lands is an appropriate use where an oil and gas leasing decision has been made. All management decisions of the Shoshone National Forest are a balance between different types of users and different types of industries, all with different needs and values of public resources.

For study area social and economic impacts, the EIS includes the potential impacts of tourism.

Public Concern #880

The Forest Service should consider the full range of economic values of the SNF. Inclusion of the non-labor income of amenity residents (measured in the DEIS as the excess of non-labor income of SNF region residents over the state average) is incomplete. People migrate to areas during their working years and in a wide range of occupations and industries. To provide a complete picture of the contribution of the SNF to the regional economy, the EIS should include a portion of the jobs and incomes of all residents as dependent on or related to the attractive amenities of the SNF. There is likely to be significant labor income of amenity residents that depends on the SNF's scenic, recreational and other amenities.

Response

While some portion of labor income within the study area may be due to amenities of the Shoshone National Forest, the actual amount is difficult to quantify and is beyond the scope of the EIS. First, this may not apply to all residents; some residents may have little or no appreciation for the Forest's amenities. Second, there are a number of natural resource amenities in the region, so it would be difficult to determine the specific contribution of the Shoshone National Forest versus the others (Yellowstone National Park, Teton National Park, etc.). Lastly, the Shoshone and other amenities in the region may actually reduce labor income in the region because individuals may be willing to forego higher wages somewhere else to live near the amenities.

See also responses related to oil and gas PC #681 regarding potential harm and impacts to water resources and PC #682 regarding potential for development.

Public Concern #882

The Forest Service mis-states that "the economic and social impacts [of SNF management] are considered indirect as they are the result of a direct resource action taking place on NFS lands (timber sale, outfitter/guide permit, grazing permit, etc.) (p. 578)." But these actions do produce direct effects, such as the processing of timber, the sale of guiding services or the production of livestock. Indirect effects, by contrast, would include the purchase of goods and services by timber processors, guides and livestock producers from other firms. (Input-output analysis also estimates induced effects, which is the economic activity that results when the employees of the firms responsible for the direct and indirect effects spend their wages on goods and services locally.)

Response

The commenters are confusing direct and indirect in an economic base sense with direct and indirect in the sense of cause and effect. Again, this seems mostly a matter of semantics.

Public Concern #884

The Forest Service should present a full picture of the importance of the economic contributions of the wild, backcountry forest of the Shoshone National Forest to the economy of local area economic health and vitality of the three county region. The natural assets support the following the economic contributions:

- A strong travel and tourism based sector, bolstered by world-class hunting, fishing and outdoor recreation opportunities;

- A diverse recreational sector, including small businesses, guiding and commercial outfitting businesses;

- A world-recognized educational institution and a growing outdoor education sector;

- A local small business and retiree investment sector attracted by high quality of life;

- A thriving farm and ranch sector; and

- World class opportunities for hunting, fishing and outdoor recreation for residents and visitors.

Response

The DEIS does include a contribution analysis of current activity by forest sector (recreation/tourism, livestock grazing, wood products, and mineral/oil/gas) for the study area. There is also an analysis by sector for each alternative for the study area. Local-level analysis is not completed for forest plan-level analysis due to the data available for outputs. It would also require a great deal of speculation to predict which communities would likely receive resource outputs over another community. For a variety of reasons, Forest Service analysis is not prepared for selectiing "winners or losers" but to show the relative difference among alternatives for forest plan analysis. When implementing the revised Forest Plan, project-level NEPA analysis will continue to include social and economic analysis to address these issues if they are raised, and are more likely to be addressed at a local scale.

Public Concern #885

The Forest Service should evaluate the economic impacts of harmful effects to wildlife, undeveloped backcountry character, and other resources (e.g., air and water quality) from differing levels of oil and gas activity, particularly from surface development.

Response

The Shoshone has identified lands available for oil and gas leasing. Current industry demand for oil and gas leases on the Forest is minimal. A recent survey of industry indicated that demand for oil and gas leases on the Forest is expected to remain very low into the foreseeable future. Economic impact to the study area from oil and gas leases would only occur if a private company determined resources on the Shoshone were profitable to develop. Currently, there is no activity, with no interest, so the economic analysis does not include any oil or gas impact under any of the alternatives.

Public Concern #886

The Forest Service should to take into account the economic contributions of outdoor educational institutions, such as the National Outdoor Leadership School (NOLS), The Wyoming Catholic College, Central Wyoming Community College and others that are dependent on the recreational and backcountry classroom opportunities provided on the SNF.

Response

To the extent that NOLS activities occur on the Shoshone National Forest, its economic contribution is considered through the commercial recreation analysis. However, since NOLS uses a number of areas in the region in addition to the Forest, it is not appropriate to attribute the entire NOLS operation to the Shoshone NF.

Public Concern #887

The Forest Service should consider the contributions of other businesses that due to the growth of the information and technical global economy and the ability to work remotely, businesses and professional can increasingly locate where they choose to live for lifestyle, and bring their businesses and work with them

Response

Between 2001 and 2011, the percent of total employment from the private service sector declined from 56.1 percent to 55.1 percent in Fremont County. The percent of total labor earnings from the private service sector declined from 48.6 percent to 43.9 percent in Fremont County and average earnings per job

declined from 86.7 percent of the Fremont County average to 79.6 percent of the county average. So, it does not appear that private service sector in Fremont County was the fastest growing sector in the county during the last 10 years, and that labor earnings in the private service sector in Fremont County were increasing relative to other sectors in the county during the last 10 years.

Public Concern #888

The Forest Service should use the job figures developed by the US Department of Commerce about actual timber jobs to correct the over-representation of the timber/wood products industry job information used in the DEIS since there are no active mills in the three county region.

Response

Although there are no active sawmills in the region, there are other timber-related jobs in the study area, such as logging or independent workers. The numbers referenced in this comment in the Bureau of Economic Analysis Regional Economic Information System were not available for consideration.

In recent years, neither the Bureau of Economic Analysis nor Bureau of Labor Statistics has reported timber employment or earnings for Wyoming. The EIS relied on the University of Montana survey data for the intermountain region to estimate the economic impact of timber harvest activity on the Shoshone National Forest study area.

Subject: 2456 - Social and Economic - Cumulative effects

Public Concern #850

The Forest Service should provide detailed information of where and to whom the considerable impacts will occur and not just an analysis of the negligible impacts across the planning area.

Response

Community-level analysis is not completed for forest plan-level analysis due to the data available for outputs. It would also require a great deal of speculation to predict which communities would likely receive resource outputs over another community. For a variety of reasons, Forest Service analysis is not prepared for selecting“winners or losers” but to show the relative difference among alternatives. When implementing the revised Forest Plan, project-level NEPA analysis will continue to include social and economic analysis to address these issues if they are raised, and are more likely to be addressed at a local scale.

Subject: 2458 - Social and Economic - Incomplete and unavailable information

Public Concern #851

The Forest Service should provide enough information on the differences among the alternatives to conclude that Alternative B provides the highest net public benefits and to provide detailed information of where and to whom the considerable impacts will occur and not just an analysis of the negligible impacts across the planning area. The Forest should provide a more detailed analysis of the economic contributions of the various components of outdoor recreation and incorporated into the final plan to break down the economic impact differences between motorized and non-motorized recreation.

Response

Community-level analysis is not completed for forest plan-level analysis due to the data available for outputs. It would also require a great deal of speculation to predict which communities would likely

receive resource outputs over another community. For a variety of reasons, Forest Service analysis is not prepared for selecting “winners or losers” but to show the relative difference among alternatives.

Specifically, accurate spending data (that meets Data Quality Act requirements) are not available to complete an analysis to compare differences between motorized and non-motorized use on the Shoshone National Forest. When implementing the revised Forest Plan, project-level NEPA analysis will continue to include social and economic analysis to address these issues if they are raised, and are more likely to be addressed at a local scale.

Subject: 2459 - Social and Economic - Monitoring

Public Concern #661

The Forest Service should consider incorporating social indicators into the plan and addressing indicators such as quantity of off road, Christmas tree and firewood permits issued to local residents as well as utilization of campgrounds within the forest.

Response

Though not gathered through the revised Forest Plan, many of these types of items are gathered in a form that does not differentiate between local residents and others. The social and economic analysis includes discussions of Fremont, Hot Springs, and Park counties using available data. Collecting information to differentiate the data would take additional resources that are already limited. We will review the data already collected to determine if it can differentiate between local and non-local residents and consider including those.

Subject: 2477 - Social and Economic - Public Involvement - General

Public Concern #852

The Forest Service should work cooperatively with various funding sources to leverage additional federal or state grants.

Response

The Forest will continue to pursue partnerships and cooperative agreements with the State and other Federal agencies under the direction of the revised Forest Plan.

Public Concern #853

The Forest Service should notify the public and allow public comment on energy development projects involving all public lands and resources along with all information regarding modifications to the current development plans and allow sufficient time for public comment and ensure that all meetings are part of the public record. Up to date information regarding energy development projects should be provided through a range of media and informational outlets to the public. The Forest Service should ensure that coordination is maintained between all stakeholders and experts that manage fish and wildlife at the local, state, and national levels to ensure that fish and wildlife are properly managed during energy project planning, implementation, and after development to ensure sustainability.

Response

The Forest Service follows all National Environmental Policy Act regulations including public involvement and notification when proposing, analyzing effects on affected resources, and implementing energy development projects. The Schedule of Proposed Actions (SOPA) contains a list of proposed actions that will begin or are currently undergoing environmental analysis and documentation. See

http://www.fs.usda.gov/projects/shoshone/landmanagement/projects. Interested individuals may direct questions and comments regarding projects listed in the SOPA to the project contact shown in the SOPA.

Public Concern #854

Direct and manage leasing and development using complete and up-to-date baseline information on fish and wildlife resources.

Response

The Forest Service follows all National Environmental Policy Act regulations and the Endangered Species Act when proposing, analyzing, and implementing energy development projects. The best available information is considered during environmental analyses.

Subject: 2501 - Other Required Disclosures - Environmental Justice

Public Concern #855

The Forest Service should consider the issue of restricting access to the elderly and disabled to the forest.

Response

While not all portions of the Forest are accessible, any developed sites are engineered or upgraded to proper Americans with Disabilities Act (ADA) standards to allow access where improvements to forest resources have been made. In undeveloped or dispersed areas of the Forest, access is varied by travel management decisions and by resource or terrain.

Pack animals that do not pose disease transference issues including llamas, horses, donkeys, and assistance dogs are not restricted for use by elderly forest visitors. See also PC #228 pertaining to use of pack goats and transmission of disease to native bighorn sheep.

Subject: 2503 - Other Required Disclosures -Potential Conflicts with Goals and Objectives of Other Agencies

Public Concern #856

The Forest Service needs to address the following potential conflicts with local agencies: (1) Inconsistencies between the Forest Plan and DEIS with the County and Conservation District Land Use Plans and the Forest is not in agreement with CEQ Section 1506.2 – Elimination of Duplication with State and Local Procedures. (2) In areas where the Forest Service's preferred alternative is inconsistent with adjacent BLM, state, private, or tribal land management, which includes the Absaroka Front, Wood River, Franc's Peak, Dunoir, and Dubois area, the Forest should take action to keep fish and wildlife and protections and land management practices consistent and contiguous, especially regarding oil and mineral leasing and no surface occupancy

Response

We reviewed adjacent land use plans and met with BLM and State agencies to address differences along boundaries. The revised Forest Plan has been edited to reflect changes for management approaches to be consistent across boundaries. We edited the other required disclosure section of the FEIS to clarify the potential conflicts with goals and objectives of other agencies.

Subject: 2600 - Appendix A – Public Involvement

Public Concern #858

The Forest Service should address the following in the draft process: (1) Problems and obstacles in the planning process when measured against the requirements of the 1982 Planning Rue (219.12) and the CEQ regulation for implementing NEPA. (2) The DEIS and Draft plan are confusing and not consistent with many of the maps, tables, and narratives not in agreement and should be corrected.

Response

(1) The DEIS summary (p. viii) and chapter 1 (p.5), explained the use of some of the information from public involvement efforts conducted in 2005 through 2009, and the development of the revision topics. The notice of intent (NOI) to prepare an environmental impact statement was published in the Federal Register on September 24, 2010. The comments in response to the NOI were considered (see also DEIS appendix A). The revision topics were identified repeatedly in public meetings held across the Forest and by the Government Cooperators Work Group from 2005 through 2010, and validated during the scoping period in late 2010.

- CEQ regulations at 1501.6 note the purpose of that section is to emphasize agency cooperation early in the NEPA process. FSH 1909.15, 11.31a and 11.31b note the roles of Lead and Cooperating Agencies. Agencies are encouraged to document the cooperating agency agreements; however, this is not a requirement. The Forest involved the Government Cooperators Work Group from 2005 through 2010, in developing revision topics and has continued with cooperator meetings from February through December 2011, to clarify and refine the revision topics, and to refine the proposed draft of the revised Shoshone National Forest Land and Resource Management Plan (proposed draft revised Plan). On January 4, 2012, the proposed draft revised Plan was sent out for public comment. The Forest has continued to meet with the Government Cooperators Work Group to clarify comments received on the DEIS and adjustments in response to comments.
- The “proposed action” or preferred alternative, was developed in response to the purpose and need and incorporated public comments from 2005 through 2009 in preparing the proposed draft revised Plan, released for comment January 4, 2012.
- Available data were used in the analysis. Databases are continually refined and updated. For the analysis in support of the DEIS the Forest database was ”frozen” to have a point in time database for analysis of effects.
- The Analysis of the Management Situation was made available on the Forest website. Baseline and benchmark data are not completed until the PDEIS is released

(2) Lack of data prevents consideration of a full range of alternatives. The Forest database was made available to interested parties upon request.

- Maps and tables have been reviewed between the Draft Plan and the DEIS and will be corrected in the final documents.

Public Concern #859

The Forest Service should notify the public and allow public comment on energy development projects involving public lands or resources and provide the public with information regarding modifications to current development plans. The Forest should also establish partnerships with public groups and reach out to members to for assistance to any management challenges or opportunities.

Response

The forest plan revision effort provides direction for the National Forest System lands. Each energy development proposal involving National Forest System lands would be analyzed when received in a site-specific analysis, including public notice and comment periods.

As opportunities arise, the Forest encourages partnerships with public groups for various management challenges and opportunities. Site-specific project analyses and partnership opportunities are outside the scope of the forest plan revision effort, and will be considered when proposed.

Subject: 2800 - Appendix C Evaluated Areas for Potential Wilderness

Public Concern #860

The Forest Service should consider recommending to the United States Congress the creation of the following areas as new roadless and wilderness areas as outlined in Alternative D (and all of the priority one areas) for the scenic qualities, important wildlife habitat, winter range and migration corridors, the non-motorized recreation opportunities, and the proximity to Yellowstone National Park. The Forest Service should consider protection and preservation of the proposed wilderness areas for future generations. (North Absaroka Wilderness, Dead Indian Creek, Warm Springs Creek, Wiggins Fork, Rock Creek Area, Sunlight Basin, Blackwater Creek, Little Popo Agie Canyon, Sulphur Creek, Double Canyon, Jojo Mountain, Middle Fork, South Fork Shoshone, Wapiti Valley South, Elk Creek, Line Creek Research Natural Area, Deep Lake).

Response

See PC #27.

Public Concern #861

The Forest Service should consider broadening the assessment in the DEIS to include a perspective of the National distribution and availability of wilderness and clarifying pages 105-106 of Appendix C for no wilderness recommended. The Forest Service should clarify how the ratings for wilderness recommendation were used in the alternatives and raise the rating to High and change the management direction to adapt accordingly.

Response

The wilderness needs assessment in appendix C of the EIS follows Forest Service Handbook Direction (1909.12 Chap 72.3). The factor that is to be applied nationally is tied to landform types and ecosystems represented in the National Wilderness System. We will review the assessment between draft and final to improve the clarity of the presentation. Though some factors in the assessment come out as low others come out as high.

Three wilderness recommendation scenarios are represented in the alternatives. Alternatives B, E, F and G recommend no new wilderness. Alternative D recommends seven wilderness evaluation areas for wilderness designation. These seven areas represent the areas that based upon public input had the highest level of public support. Alternative C recommends 23 wilderness evaluation areas for wilderness designation. Two screens were used in combination to decide what areas to include in this alternative. The need criteria related to providing habitat for species that use primitive habitat and for providing representative landforms was one screen. The second was whether there was some public support stated for the specific area based upon public input. As a result of these two screens, 14 of the 15 wilderness evaluation areas that rated high for the two need criteria are included in alternative C.

The decision maker will consider the public comments requesting more wilderness in addition to other public comments in making the final decision.

Subject: 2806 - Appendix C Evaluated Areas for Potential Wilderness Trout Creek 02044

Public Concern #862

The Forest Service should consider recommending to the United States Congress the creation of Trout Creek roadless area as a new wilderness area as outlined in Alternative D because of its value in backcountry non-motorized/non-mechanized recreation, wildlife conservation, watershed for production and delivery of clean water, native fisheries, and the crucial habitat for big game and winter range for bighorn sheep and elk, and Grizzly Bear primary conservation area. The areas historic, economic, cultural values as well as scenic landscapes should be preserved for future generations without an option for oil and gas exploration and removal.

Response

See PC #27.

Subject: 2813 - Appendix C Evaluated Areas for Potential Wilderness Franc's Peak 02051

Public Concern #863

The Forest Service should consider recommending to the United States Congress the designation of Franc's Peak roadless area as a new wilderness area as outlined in Alternative D because of its value in backcountry non-motorized/non-mechanized recreation, wildlife conservation, watershed, native fisheries and protection for the crucial habitat for grizzly bear, pronghorn, a lynx analysis unit big game and winter range for bighorn sheep and elk. The areas historic, economic, cultural values as well as scenic landscapes should be preserved for future generations without an option for oil and gas exploration and removal, and without the addition of new roads or trails.

Response

See PC #27.

Subject: 2814 - Appendix C Evaluated Areas for Potential Wilderness Wood River 02052

Public Concern #864

The Forest Service should consider recommending to the United States Congress the designation of Franc's Peak roadless area as a new wilderness area as outlined in Alternative D because of its value in backcountry non-motorized/non-mechanized recreation, hunting, wildlife conservation, watershed, native fisheries and protection for all mammals, and for the crucial habitat for grizzly bear, pronghorn, a lynx analysis unit big game and winter range for bighorn sheep and elk. The areas historic, economic, cultural values as well as scenic landscapes, and unique geographic features should be preserved for future generations without an option for oil and gas exploration and removal, and without the addition of new roads or trails. The Forest Service should consider expanding the opportunities for commercial guiding and ecotourism in the backcountry.

Response

See PC #27.

Subject: 2819 - Appendix C Evaluated Areas for Potential Wilderness Dunoir 02058

Public Concern #865

The Forest Service should consider recommending to the United States Congress the designation of Franc's Peak roadless area as a new wilderness area as outlined in Alternative D because of its value in backcountry non-motorized/non-mechanized recreation, hunting, wildlife conservation, watersheds for production and delivery of clean water, native fisheries and protection for all mammals, and for the crucial habitat for grizzly bear, wolves, a lynx analysis unit big game and winter range for bighorn sheep and elk. The areas historic, economic, cultural values as well as scenic landscapes, and unique geographic features should be preserved for future generations without an option for oil and gas exploration and removal, and without the addition of new roads or trails. The Forest Service should consider expanding the opportunities for ecotourism in the backcountry.

Response

See PC #27.

Subject: 2829 - Appendix C Evaluated Areas for Potential Wilderness Togwotee Pass 02903

Public Concern #866

The Forest Service should consider recommending to the United States Congress the creation of Togwotee Pass as a new wilderness area as outlined in Alternative D because of its value in backcountry winter non-motorized/non-mechanized recreation. Motorized use is incompatible with the quiet and clean recreation experience of the high elevation and diverse mountain terrain.

Response

See PC #27.

Public Concern #867

The Forest Service should not consider adding any more wilderness areas in the Togwotee Pass area.

Response

See PC #27.

Public Concern #868

The Forest Service should keep Togwotee Pass, especially the Two Ocean area, as backcountry recreation summer motorized with winter non-motorized to create a peaceful, enjoyable, and safe recreation area for non-motorized winter use as outlined in Alternative D.

Response

See PC #399.

Subject: 2833 - Appendix C Evaluated Areas for Potential Wilderness High Lakes 02915

Public Concern #869

The Forest Service should consider recommending to Congress the designation of the High Lakes as a wilderness area because it deserves wilderness protection.

Response

See PC #27.

Public Concern #870

The Forest Service should not consider recommending to Congress the designation of the High Lakes as a wilderness area because I am against any more wildernesses in the High Lakes area.

Response

See PC #27.

Subject: 2900 - Appendix D Wild and Scenic River Eligibility Evaluation – General

Public Concern #871

The Forest Service should consider not recommending any rivers at this time for Wild and Scenic designation, until the recommendation is initiated by proposed impacts or conservation efforts.

Response

The revised Forest Plan does not designate or recommend wild and scenic rivers; only eligibility determinations are made in a forest plan.

Public Concern #872

The Forest Service should consider ensuring that the Wild and Scenic Eligibility Inventory is kept up to date at all times, in order to provide detailed clarification on how rivers and streams are, or are not, selected. Information on selection, or non-selection, for all rivers and streams that were analyzed should be included in the final Forest Plan.

Response

Wild and Scenic River eligibility determinations are done on an as-needed basis typically in association with forest plan revisions.

See PC #773 items 2 through 5.

Public Concern #873

The Forest Service should go forth with recommending the 13 river segments for Wild and Scenic River Eligibility, with some modification, and evaluate more areas for this designation. Please see comment 9 from contact number 879 for detailed table of suggested modifications.

Response

See PC #871.

Public Concern #874

The Forest Service should consider recommending the following rivers and/or streams to the Wild and Scenic category. (1) Sunlight Creek, for its scenic and recreational paddling ORVs; (2) Crandall Creek; (3) North Fork Popo Agie; (4) Grinnell Creek; (5) Warm Springs Creek (recreational paddling ORV); (6) Wiggins Fork (recreational paddling ORV); (7) Clark's Fork (scenic, recreational ORV, moose and grizzly habitat); (8) North Fork Shoshone (grizzly habitat and large big-horn sheep population); (9) South Fork Shoshone (grizzly and big-horn sheep habitat, cutthroat trout fisheries, recreation); (10) West Fork Dunoir (grizzly and potential wilderness designation); (11) Wood River (wilderness, scenic, pure strain

Yellowstone cutthroat trout population). If these additional requests are not found suitable for recommendation, please provide detailed analysis for decision.

Response

See PC #871 and PC #773 items 2 through 5.

Subject: 3000 - Appendix E - Maps General

Public Concern #875

The Forest Service should consider adding a map for the Class 1, Class 2 and Class 3 watersheds on pages 65 and 71.

Response

A map of Class 1, 2, and 3 watersheds will be added to the FEIS.

Public Concern #876

The Forest Service should consider adding a map that shows land capable of supporting grazing, with attention to the areas found suitable for grazing for each alternative. The slope criteria that should be used is that slopes greater than 60% do not support grazing; slopes between 40-60% support sheep grazing, and slopes less than 40% support sheep and cattle grazing.

Response

Appendix E maps for grazing will be modified to show suitable areas for sheep grazing and livestock grazing.

Subject: 3100 - Commercial Livestock Allotment Capable and Suitable Acres and AUMS - General

Public Concern #877

The Forest Service should not recommend Alternative C as it reduces the Animal Unit Months (AUM) and this lowers the ability to manage livestock grazing. AUMs should be allowed to be increased when necessary and vacant grazing lots should be able to be utilized on a temporary or long term permit basis.

Response

The decision maker will consider public comments that oppose the livestock grazing in alternative C along with other public comments that are in favor of those reductions in making the final decision.

Public Concern #878

The Forest Service should consider reevaluating the capability and suitability analysis using the Rocky Mountain Region 2 Process Paper, because what was presented in the plan is inaccurate. Slopes greater than 40% should not have been removed from analysis, as these lands are potentially capable for grazing by sheep. All capable land should be included in the analysis, with the suitability analysis determining the variations by alternatives.

Response

See response to PC #876.

Prepared by

Interdisciplinary Team Members:

Name	Position
Joseph Alexander	Forest Supervisor
Bryan Armel	Resource Staff Officer
Carrie Christman	Planning Staff Officer
Mark Giacoletto	Forest Fire Management Officer
Joe Harper	Forest Wildlife Biologist
Joe Hicks	Rangeland Management Specialist
Kent Houston	Forest Soil Scientist/Botany/Weeds
Ben Lara	Recreation Specialist
Karin Lovgren	Engineering Staff Officer
Lois Pfeffer	Environmental Coordinator
Kelsey Pike	Editorial Assistant
Loren Poppert	Recreation Staff Officer
Randy Spiering	Timber Management Officer
Paul Valcarce	Landscape Architect
Kyle Wright	Archaeologist
Ray Zubik	Forest Fisheries Biologist

Content Analysis Team

Name	Position
Bill Overland	Content Analysis Lead
Ann Braun	Program Support
Nicole Dougherty	Program Support
Seth Steadman	Archaeological Technician
Chad Hovis	Archaeological Technician
Katherine Malengo	Wildlife Biologist
Katherine Carsey	Botanist
Steve Overton	Forester
Frank Yurczyk	Forester

Comments from Federal, State and Local Agencies, and Elected Officials

We received letters from the following Federal, State and local agencies, and elected officials. Letters are reproduced on the following pages.

Department of Environmental Quality

Hot Springs County Planner

Meeteetse Conservation District

Office of The Governor

Park County Historic Preservation Commission

Shoshone Cooperating Agency Coalition

State Historic Preservation Office

United States Department of Interior

United States Environmental Protection Agency Region 8

Wyoming Department Of Agriculture

Wyoming Department of State Parks And Cultural Resources-
State Trails Program

Wyoming Game and Fish Department

Wyoming Legislative Service Office

Wyoming State Forestry Division

Ltr#1041

From: Christman, Carrie -FS
To: FS-shoshone forestplan
Subject: FW: Scanned comment letters
Date: Tuesday, November 27, 2012 4:13:51 PM
Attachments: OrmeD.pdf
LeeJ.pdf
CrutcherJ.pdf
BlandL.pdf
WilkamsT.pdf
BrockS.pdf
InbergJ.pdf
BoyhanC.pdf
DarbyM.pdf
FentonJ.pdf
OsgoodJ.pdf
WagnerJ.pdf

Carrie Christman
Planning Staff
Shoshone National Forest
808 Meadowlane
Cody, WY 82414
307.578.5118
A good plan is like a road map:
it shows the final destination and
usually the best way to get there.
- H. Stanley Judd

From: Pike, Kelsey B -FS
Sent: Tuesday, November 27, 2012 12:06 PM
To: FS-shoshone forestplan
Subject: Scanned comment letters

Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Matthew H. Mead, Governor

Todd Parfitt, Director

November 20, 2012

Mr. Joe Alexander, Forest Supervisor
Shoshone National Forest
808 Meadow Lane
Cody, WY 82414

FOREST PLAN COMMENTS

Dear Joe,

The Department of Environmental Quality – Water Quality Division (WQD) appreciates the opportunity to participate as a cooperating agency in the development of the Shoshone Forest Plan. During the cooperator workshops, the majority of our issues were discussed and addressed, strengthening the DEIS and Draft Forest Plan in regards to protection of water quality. Although Alternatives C and D will result in the least surface disturbance and potential to impact water quality, the WQD is not taking a strong position on the selection of alternatives; our expectation is that regardless of the land use allocations, the Forest Service will minimize water quality impacts though project design and planning, appropriate BMP implementation and scientifically defensible monitoring, as outlined in the DEIS and the Draft Forest Plan. However, we would like the EIS and Forest Plan to better describe the actions the Forest service is, or will be, taking to address those areas on the Shoshone with historic watershed degradation.

DEIS Comments

Chapter 3, page 65 states 3% of the watersheds on the Shoshone are "functioning at risk" (Watershed Condition Framework class 2), yet Table 22 and the text on page 71 state that 11% of the watersheds (16 out of 147) are functioning at risk. The text on page 65 should be corrected. Additionally, it may be helpful to clarify there are no watersheds in an "impaired function" condition.

Without knowing specifically what is being done to improve watershed condition in areas of historic impacts, we are unable to comment on how these areas are being prioritized for improvement. We request that the EIS does a better job of describing what is being done to address each of these "functioning at risk" watersheds. For example, if a watershed was impacted in the past by poorly designed roads, but the Forest Service has relocated the roads as part of a timber sale contract to address the problems, it would be helpful to both the WQD and the public to know. Table 22 should be expanded to include the cause(s) of watershed degradation for each watershed, along with the actions that are being taken to address the problem(s) in each watershed.

Table 149: Based on Map 56, the segment descriptions for both the Middle Popo Agie River and the Wiggins Fork should be "Headwaters to Shoshone boundary". The lower (wild) segment of Sunlight Creek is not listed in Table 149.

Herschler Building · 122 West 25th Street · Cheyenne, WY 82002 · http://deq.state.wy.us

ADMIN/OUTREACH	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALITY	SOLID & HAZ. WASTE	WATER QUALITY
(307) 777-7758	(307) 777-6145	(307) 777-7391	(307) 777-7369	(307) 777-7756	(307) 777-7752	(307) 777-7781
FAX 777-7682	FAX 777-6462	FAX 777-5616	FAX 777-5973	FAX 777-5864	FAX 777-5973	FAX 777-5973

Ltr#1041

Draft Land Management Plan Comments

Waters and soil:
Page 23 defines objectives: "Objectives are concise, time specific statements of measurable, planned results that respond to pre-established goals. Objectives form the basis for further planning to define the precise steps to be taken and the resources to be used in achieving the identified goals. The timeframe for objectives, unless otherwise stated, is generally considered the planning period, or the next 10 to 15 years." Although the Draft Plan has objectives for many resources, there are no objectives for water and soil. The WQD believes an objective to address the "functioning at risk" watersheds should be included in the water and soil section of the Forest Plan to ensure degraded watersheds are restored. Please consider creating the following objective: "Implement watershed restoration measures to improve all 'functioning at risk' watersheds to a 'functioning properly' condition." If the extent or type of degradation in certain watersheds is such that full restoration cannot occur during the life of the Forest Plan, that should be noted in the EIS, and the objective should be modified.

Eligible wild and scenic rivers:
This section should include discussion of the existing Wild and Scenic River on the Shoshone – the "lower" segment of the Clarks Fork River, or at least refer readers to the discussion of the Clarks Fork under Management Area 1.5A.

Table 19: Based on Map 56, the segment descriptions for both the Middle Popo Agie River and the Wiggins Fork should be "Headwaters to Shoshone boundary".

Thank you for the opportunity to provide comments. The WQD appreciates the measures the Forest Service will take to protect water quality in new projects; however we would like to see the Forest Plan specifically address the 16 historically degraded watersheds on the Shoshone National Forest.

Sincerely,

John Wagner
Water Quality Division Administrator
Department of Environmental Quality

JFW/MAC/rm/12-1076

cc: Rebekah Fitzgerald, Office of Governor Matthew H. Mead, Herschler Bldg 2-E
Todd Parfitt, Director
Brian Lovett, ADM
David Waterstreet, WQD

Ltr#0678

From: Pike, Kelsey B.-FS
To: FS-shoshone forestplan
Subject: Scanned letters
Date: Wednesday, November 21, 2012 12:43:34 PM
Attachments: HogartyK.pdf
FCATVAJohnsonJ.pdf
BenefieldK.pdf
OConnorM.pdf
LeeT.pdf
OByrneJ.pdf
KeownJ.pdf
PatrickJ.pdf
InbergR.pdf
Isabelle.pdf
SmithC.pdf
SmithK.pdf
SandbergA.pdf
HSCBowmanB.pdf
MacFarlaneD.pdf
LascolaJ.pdf
WolfD.pdf
HilliardM.pdf
PersonsW.pdf
SteeleP.pdf
VukmancP.pdf
WiezbenslieS.pdf
SmithB.pdf
FarfallaJ.pdf

Ltr#0678

Hot Springs County Planning Office
415 Arapahoe, Thermopolis WY 82443
307-864-2961
hscplanner@hscounty.com

PM 3:04 NOV20'12

Carrie Christman, Forest Planner
Shoshone National Forest
808 Meadowlark Lane
Cody, WY 82414-4516

November 19, 2012

Re: **Public Comments: Shoshone Forest Plan**
Socio-Economic Impacts

Dear

I have reviewed the following documents, which were prepared to address the socio-economic impacts of the Draft Shoshone Forest Management Plan:

- The draft Socio-Economic support data prepared by Dr. David "Tex" Taylor and his associates;
- The section of the DEIR labeled *"People and Communities – Goods and Services."*

At 113 pages long, or roughly one-sixth of the entire draft EIS and Draft Management Plan, the latter is not an easy read. This letter contains my comments pertaining to both documents.

I wish to make one statement before I begin. Hot Springs County has a very small population, and our county contains a relatively small amount of Forest land. Consequently we may appear to have little standing to question a forest planning process, when other counties may appear to have much more of a stake in that process. However, I must note that a remarkably high percentage of Hot Springs County's residents are *users* of the Shoshone National Forest. They hunt, fish, graze cattle, mine, cut timber, seek oil and gas, gather firewood and Christmas trees, gather shed antlers, etc., on the Shoshone Forest. Perhaps few counties in the United States, in terms of *percentage of its population*, are so thoroughly connected to national forest lands.

My comments are as follows:

1. **Much Data, little Analysis.** The text of the DEIS, and the Tex Taylor research, contain a great deal of excellent data. However, there appears to be very little *analysis* of that data. Trends should be identified, and if necessary assumptions made about the future, but this does not appear to have been done.

1

Ltr#0678

2. **Failure to Identify Potential Impacts.** The purpose of a Socio-Economic Impact section is to quantify the potential of each proposed forest management policy to impact the economies of nearby counties and communities. This has not been done with the level of detail that is necessary to allow forest managers to make informed decisions regarding forest policy, nor to inform local communities of the extent to which proposed management practices may impact them.

3. **Wrong Focus.** The impacts listed in the DEIS under Environmental Consequences ("effects from recreation," "effects from timber harvesting," etc.) are focused in the wrong direction. Instead of impacts to the *forest* from these activities, or any impacts to the activity itself, the socio-economic discussion should assess impacts to the local communities supported by those activities as a consequence of this Plan. In fact, the terminology used can be misleading: instead of "environmental consequences" or "effects," these should be identified as "potential adverse impacts," which is more in keeping with the intent of NEPA.

4. **Failure to Address Cumulative Impacts.** I have found no reference to the ongoing Big Horn Basin Resource Management Plan (RMP) planning effort, now being finalized by the BLM. It is important that this Forest Management Plan and DEIS include that document in its consideration of cumulative impacts to nearby communities. It would also be beneficial to mention other state and federal planning and management efforts cumulatively affecting the region. These could include the Big Horn River TMDL Study, wildlife management programs for large predators such as grizzlies and wolves, as well as evolving current Administration policy regarding permits for oil and natural gas exploration and production on public lands.

5. **Acronyms.** Throughout the entire document, there is a confusing over-reliance on "alphabet soup." While a wide array of programs and systems identified by their initials is a fact of life in government today, the inevitable confusion can best be avoided by periodically reminding the reader of the List of Acronyms at the front of the DEIS, as well as spelling out each acronym when it first occurs in each chapter or section.

6. **DEIS Format.** The *"People and Communities – Goods and Services"* portion of the DEIS is difficult to follow, and it is difficult to separate the various topics, subheadings, and – most importantly – its conclusions. Ideally, the headings should stand out more from the text. A numbering system would have been extremely helpful. Chapter 3 is also far too lengthy, and should perhaps be divided into several chapters.

Consequently, while the text of the Plan and DEIS, and the supplemental material prepared by Dr. Taylor, contain an impressive amount of data they have failed in their

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Ltr#0678

primary purpose: to identify and quantify the impacts of the proposed Shoshone Forest Management Plan on all aspects of human society in nearby communities.

This identification and analysis of socio-economic impacts is required by NEPA, and has been affirmed by subsequent case law. Any language addressing socio-economic impacts must clearly and succinctly identify potential adverse impacts to the local communities which derive a portion of their economic benefit from activities based all, or in part, on forest lands. If such language exists in the Draft Shoshone Forest Management Plan and the Draft EIS, or in conclusions based on Dr. Taylor's work, I have been unable to find it.

Thank you for the opportunity to comment on this Plan and its supporting documents. It is my wish that the final Plan will be a document we can all be pleased with, to ensure sound forest management throughout its practical life. Should anyone have questions concerning my comments, or require clarification, I can be reached at (307)-864-2961.

Sincerely,

Bruce N. "Bo" Bowman
Hot Springs County Planner

CC: County Commissioners
Jerry Williams, County Attorney
Hans Odde, County Clerk
Gregory Kennett, ERG
Rebekah Fitzgerald, WY Governor's Policy Staff

HOT SPRINGS COUNTY
PLANNING OFFICE
Bo Bowman
County Planner
307.864.2961 • hscplanner@hscounty.com
415 Arapahoe • Thermopolis, Wyoming 82443

3

Ltr#0524

From: Overland, Bill -FS
To: Braun, Ann B -FS
Subject: FW: Meeteetse Conservation District comments on the Shoshone National Forest Draft Land Management Plan and DEIS
Date: Wednesday, November 28, 2012 11:24:31 AM
Attachments: MCD Comments Draft SNF Plan electronic 20121126.pdf

Ann,

Please add this to our comment letters and give it a number.

Thanks,

Bill

From: Christman, Carrie -FS
Sent: Wednesday, November 28, 2012 8:22 AM
To: Overland, Bill -FS
Cc: Pike, Kelsey B -FS; Armel, Bryan -FS; FS-shoshone forestplan
Subject: FW: Meeteetse Conservation District comments on the Shoshone National Forest Draft Land Management Plan and DEIS

Steve brought these in by hard copy on Monday

Carrie Christman
Planning Staff
Shoshone National Forest
808 Meadowlane
Cody, WY 82414
307.578.5118
A good plan is like a road map:
it shows the final destination and
usually the best way to get there.
- H. Stanley Judd

From: MCD [mailto:mcd@tctwest.net]
Sent: Tuesday, November 27, 2012 5:20 PM
To: Christman, Carrie -FS
Cc: regs.phillips@dteworld.com; randy@tetonconservation.org; 'Pat Hickerson'; 'Loren Grosskopf'; 'Peggy Ruble'; 'Gregory Kennett'
Subject: Meeteetse Conservation District comments on the Shoshone National Forest Draft Land Management Plan and DEIS

Carrie,

Here is an electronic version of the Meeteetse Conservation District comments on the Shoshone National Forest Draft Land Management Plan and Draft Environmental Impact Statement.

Steve

Ltr#0524

Steve Jones
Resource Management Coordinator
Meeteetse Conservation District
(307) 868-2484 Fax (307) 868-2489

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2013.0.2793 / Virus Database: 2629/5898 - Release Date: 11/16/12
Internal Virus Database is out of date.

Ltr#0524

Meeteetse Conservation District

P.O. Box 237 • Meeteetse, WY 82433

(307) 868-2484 • mcd@tctwest.net

Date: November 26, 2012

To: Shoshone National Forest Plan Revision
808 Meadow Lane Avenue
Cody, Wyoming 82414

Re: Comments on the Shoshone National Forest Draft Land Management Plan and Draft Environmental Impact Statement.

Dear Madam/Sir:

The Meeteetse Conservation District, as a recognized Cooperating Agency, is pleased to submit the following written comments on the Shoshone National Forest Draft Land Management Plan (SNF Draft Plan) and Draft Environmental Impact Statement (DEIS).

Summary:

The Meeteetse Conservation District (MCD) contains a diverse and important portion of the Shoshone National Forest (SNF). Most of the Shoshone NF within the MCD is either congressionally designated Wilderness or is considered roadless based on the Roadless Area Review and Evaluation (RARE II). **It is MCD's desire that the SNF be managed for continued multiple use, sustained yield, long-term forest health, and water yield, despite the limitations on manageability imposed on the SNF within Wilderness and RARE II areas.**

The MCD hereby informs the SNF and asserts that:

- The MCD is an active member of the Shoshone Cooperating Agency Coalition;
- The MCD has been an active contributor to SCAC comments submitted throughout the planning process;
- **Comments on the Shoshone National Forest Draft Land Management Plan and Draft Environmental Impact Statement submitted by the SCAC on November 26**

Ltr#0524

(SCAC comments), 2012 are indeed comments of the Meeteetse Conservation District and are hereby incorporated by reference.

Through the public planning process mandated by Wyoming statutes, the MCD has developed, publicly reviewed, approved, and filed with the Park County Clerk the ***MCD Land Use Management and Resource Conservation Plan, 2011*** (MCD Plan), which is hereby incorporated by reference. The MCD's Natural Resources Management and Planning General policy states that:

The MCD will endeavor to protect its custom and culture and its economic stability and to serve its people through natural resources management and planning efforts, including public lands planning, watershed planning, and USDA conservation program planning and implementation.

The section of the MCD Plan directly related to natural resources management and planning, public lands, multiple use of public lands, minerals, planning & agency interaction, and the agricultural use of public lands has been attached to these comments as Appendix A. Use of Appendix A is recommended in order to help reviewers better factually and contextually understand the MCD comments, as well as the SCAC comments.

- **In order to help the U.S. Department of Agriculture Forest Service and the SNF comply with federal laws regarding coordination of federal planning with planning of local governments, a complete copy of the MCD Plan has been previously provided to the SNF.**

The MCD also hereby incorporates by reference the Meeteetse Local Planning Area Land Use Plan and Policy Statement of May 21, 1996 (MLPALUP) as amended, adopted by the Board of Park County Commissioners May 21, 1996. The MCD's Natural Resources Management and Planning General Policy states that:

The MCD will recognize and support the land use and resource conservation plans as well as related resolutions and policies of other local governments to the extent that those actions are consistent with this Plan and other actions of the MCD so as to protect the custom, culture and economic stability of the MCD. (MCD, January 12, 2011)

Specific Comments:

The MCD has been asked by the SNF early in the planning process: "What areas of the Forest should have roaded access to fulfill the needs of Forest users and managers?"

The MCD has previously responded and still believes that roaded access has been described adequately. It remains the belief of the MCD that terrain, the SNF Plan desired conditions, and objectives for multiple use will continue to define the road system.

- The MCD **views "no net loss of transportation system infrastructure" as a desired condition.** That statement should be added to SNF desired condition for roads and trails

MCD_Comments_Draft_SNF_Plan(electronic)_20121126.doc

on page 106 of the Draft Plan and reflected in goals, objectives, guidelines, and management approach on subsequent pages.

- **The MCD believes that the SNF Plan should provide direction for future system design beyond what can be developed and maintained within current economic constraints.** The MCD does not see that direction in the Draft Plan. In fact, Table 19 in the DEIS even minimizes changes across alternatives, with projected budgets for roads at $720,000 for all alternatives and for trails capital improvements at $420,000 for all alternatives except Alternative F for which the projected budget is $840,000. That statement should be added to SNF desired condition for roads and trails on page 106 of the Draft Plan and reflected in goals, objectives, guidelines, and management approach on subsequent pages.

The MCD recognizes comments made by the public at plan revision meetings alleging unnecessary closures of access within the SNF. The MCD believes that this is the belief of a considerable portion of the MCD's constituency that actively uses the forest. The SNF has repeatedly stated that deferred maintenance and resource concerns are large contributors to declines in the transportation system infrastructure.

- **The SNF plan should provide direction encouraging and enabling non-SNF entities to participate physically and financially in the maintenance and improvement of SNF transportation infrastructure.** That statement should be added to SNF desired condition for roads and trails on page 106 of the Draft Plan and reflected in goals, objectives, guidelines, and management approach on subsequent pages. Critical is the management approach criteria stated on page 108 that the SNF close or decommission routes if financing "or partnerships are not available to perform critical maintenance".

The MCD has been asked by the SNF early in the planning process: "What management direction is appropriate for roadless areas and other special areas?"

- **The MCD asserts under the MCD Plan, as well as the Park County Meeteetse Local Planning Area Land Use Plan, that multiple use is appropriate management direction for the current roadless and special areas.**

The MCD has also been asked by the SNF early in the planning process: "what roadless areas should be recommended for wilderness designation?"

- **The MCD believes that management direction from the Wyoming Wilderness Act of 1984 should be incorporated into the SNF Plan,** to wit:

"TITLE IV-RELEASE OF LANDS FOR MULTIPLE USE MANAGEMENT ADMINISTRATIVE AND CONGRESSIONAL REVIEW OF ROADLESS AREAS SEC. 401 (b) On the basis of such review, the Congress hereby determines

(3) areas in the State of Wyoming reviewed in such final environmental statement or referred to in subsection (d) and not designated wilderness or wilderness study upon

enactment of this Act shall be managed for multiple use in accordance with land management plans pursuant to section 6 of the Forest and Rangeland Renewable Resources Planning Act of 1974 as amended by the National Forest Management Act of 1976 ... "

- The MCD believes that with 57% of the Forest designated as Wilderness, with a combined roadless and Wilderness area of 85%, and with only 15% of the Forest allowed to be roaded, **the need for any additional wilderness is not justified.** This is reflected in MCD Plan policy stating ***"The MCD opposes management initiatives which restrict or limit existing and potential uses. This includes designation of "special areas", including wilderness, and the overlap of multiple "special areas".***

- **The MCD supports the SNF Plan Alternative B decision not to add additional recommendations for Wilderness.**

In addition to multiple use policy cited previously with regard to additional Wilderness, the MCD Plan multiple use policy also states that:

The MCD will support traditional multiple land uses as a means to maintain continuity in the local economy, and assure the sustainability of existing agricultural, recreational, and industrial interests while maintaining or improving the present environmental quality of life. By supporting traditional multiple uses, the County intends local custom and culture will be maintained and given continuity thereby mitigating potential negative social and economic impacts on the community in the process.

The MCD opposes management initiatives which restrict or limit existing and potential uses. This includes designation of "special areas ", including wilderness, and the overlap of multiple "special areas". The MCD shall inform public land managers of any negative impacts on the livelihoods and/or quality of life of the people of the MCD which may arise from public land management mandates, regulations and laws. The MCD shall strive to work with recreational users to prevent resource damage to the lands within and affecting the general environment of the MCD.

Recreational uses that have been established in the multiple use lands continue with sound and reasonable controls to prevent damage, erosion and water waste.

The MCD strive[s] to work with federal and state agencies and with local citizens and organizations to assure that the multiple uses are compatible with private land rights and with sound private land production on those lands that adjoin, are near, or are affected by the federal and state and other public lands within and affecting the District.

As discussed during interdisciplinary team (IDT) meetings, No Surface Occupancy (NSO) can be a huge disincentive to the petroleum industry that provides so much to the state and local governments in jobs and tax base. That industry also gives additional direct financial

support to Wyoming and its communities, and non-governmental organizations for State and local conservation needs.

There is potential for oil and gas occurrence on much of the 15% of the SNF that is outside designated Wilderness and RARE II. We do not presently know the relative valuation of the various SNF resources, tangible and intangible, even five years from now.

- ***Based on the MCD Plan policies, which preceded the development of Alternative B, the MCD is on record as opposing the proposed Alternative B NSO stipulations applied to Management areas outside designated Wilderness and RARE II (essentially backcountry non-motorized recreation areas). The administrative record of relevant SNF meetings involving the local governments should bear witness to that opposition and its basis. Except as discussed in the following two comments, Surface Occupancy should be allowed as provided for in Alternative A wherever there is potential for oil and gas occurrence as determined by the U.S. Geological Survey. Surface use restrictions and stipulations should be addressed prior to leasing and specific resource concerns should be addressed at the project level on a case-by-case basis.***

The MCD recognizes that there is a need to ensure protection of the State's elk herds. The WG&FD recommends NSO as a means to protect elk from disturbance on Crucial Winter Range and in certain other areas. As previously discussed and for reasons stated in the SCAC comments, requiring NSO across large tracts of land is in conflict with the MCD plan. However, the MCD's Natural Resources Management and Planning General Policy also contains the following policy that provides for limited regulatory flexibility in the absence of other protections:

The MCD will join with local landowners, government agencies, and organizations in maintaining, improving, and enhancing wildlife populations and habitat, complementary to and in conjunction with the other resources of the District.

Therefore, the MCD can support limited use of NSO where there is no other apparent means to address WG&FD concerns regarding elk on Crucial Winter Range.

- ***The MCD insists that, wherever possible within its political jurisdiction, leasing stipulations other than NSO be used to protect elk on Crucial Winter Range or similar areas of concern, and that NSO be used only as a last resort. The MCD intends to support similar management prioritization by other affected Wyoming governmental entities.***

- ***Furthermore, the MCD requests that planning level details regarding application of NSO be reviewed in the interim between Draft and Final Plan by a joint interdisciplinary team consisting of SNF, local government, and WG&FD representatives.***

And, finally, should SNF comment reviewers perceive any material inconsistency between the SCAC comments and the MCD comments as stated herein, it is incumbent upon the SNF comment reviewers to contact the MCD at the earliest possible time to resolve the perceived inconsistency.

.

Respectfully submitted,

ss/ Clara Mae Yetter
Clara Mae Yetter, authorized Supervisor

ss/ Steve Jones
Steve Jones, Resource Management Coordinator
Meeteetse Conservation District

APPENDIX A - EXCERPT FROM THE MCD PLAN

NATURAL RESOURCES MANAGEMENT & PLANNING (NRM&P)

NRM&P in General

Natural Resources Management and Planning is a category of MCD Operations in which the MCD engages in land use management, the conservation of natural resources, and the planning thereof, at all levels that may affect the MCD, beginning with the people of the MCD (the grassroots community), participating with interested and affected parties not of the MCD, and including local, regional, State, and federal entities (governmental and non-governmental), as authorized by state statute and federal law.

"Conservation" means development, improvement, maintenance, preservation, protection and use of natural resources, and the control and prevention of floodwater and sediment damages, and the disposal of excess waters. (W.S. 11-16-102, Wyoming Conservation Districts Law)

"Renewable natural resources," "natural resources" or "resources," means land, soil, water, vegetation, trees, wild rivers, wilderness, natural beauty, scenery and open space; (W.S. 11-16-102, Wyoming Conservation Districts Law)

Land use management, the conservation of natural resources, and the planning related to both combine to be a primary activity of the MCD, providing the foundation for much of the MCD's effectiveness. The MCD takes an active role in promoting proper and responsible use (stewardship) of natural resources. At all levels, management of natural resources and the associated planning are key components of stewardship. This includes:

- promoting the use of renewable resources to help stimulate the local economy (including but not limited to grazing, timber, and biomass products).
- strategic watershed planning (a stakeholder-driven overarching multi-discipline natural resource assessment and management plan tied to EPA and WDEQ water quality issues).
- improving or enhancing wildlife habitat to support viable and healthy wildlife populations (recognizing the complexity of management and planning related to wildlife and habitat in concert with agricultural activities, including livestock grazing).

Management and planning are often controlled by governmental entities that lack local connections, are unresponsive to local needs, or that do not desire local input. Local input may have improved stature when provided by a locally elected board. The MCD strives to be a governmental entity that provides a means of local involvement. The MCD, as an elected governmental entity, should provide a way for cooperators to express themselves in a forum that is otherwise inaccessible to them. Local landowners can be impacted by planning decisions at the local, State, and federal level. It is a reality that many landowners do not have the time or finances to review relevant documents, rules, and regulations or voice their concerns/opinions or attend meetings on a regular basis.

***Natural Resources Management and Planning Goal* - It shall be a Goal of the MCD that:**

The custom, culture, and economic stability of the MCD and its people are protected and served by appropriate and effective natural resources management and planning.

***Natural Resources Management and Planning General Objectives* - It is an objective of the MCD that:**

The Meeteetse Conservation District represents local interests in the natural resources management and planning, policy formation and implementation efforts of local, State, and federal government agencies that affect the custom, culture, and economic stability of the MCD or its people.

The full range of management tools, including but not limited to grazing, prescribed fire, timber harvest, mechanical treatment, and integrated pest management, are available to land and resource managers in order to minimize the costs and maximize the benefits and efficiencies of resource management efforts.

***Natural Resources Management and Planning General Policy* - It shall be the policy of the MCD that:**

i. The MCD will strive to improve the mineral cycle, water cycle, and energy flow of the public and private lands within the District through improved natural resources management and planning.

ii. The MCD will endeavor to protect its custom and culture and its economic stability and to serve its people through natural resources management and planning efforts, including public lands planning, watershed planning, and USDA conservation program planning and implementation.

iii. MCD will continue to support the partnership between the District's Cooperators and landowners, and local, State, and federal governmental agencies in creating and implementing programs and policies that pertain to the conservation of natural resources and to the economic stability of the Meeteetse Conservation District in order to protect the MCD's custom, culture and economic stability; and, furthermore, these efforts shall not be limited by political jurisdictional boundaries. (MCD, January 12, 2011)

iv. The MCD will recognize and support the land use and resource conservation plans as well as related resolutions and policies of other local governments to the extent that those actions are consistent with this Plan and other actions of the MCD so as to protect the custom, culture and economic stability of the MCD. (MCD, January 12, 2011)

v. The MCD will join with local landowners, government agencies, and organizations in maintaining, improving, and enhancing wildlife populations and habitat, complementary to and in conjunction with the other resources of the District.

vi. The MCD will strive to involve and inform District Cooperators on changes in federal, State, and local natural resource management laws and regulatory procedures.

vii. The MCD shall seek to gain public input from, provide a forum for its people, and represent its people regarding land use management, the conservation of natural resources, and the planning process thereof.

viii. The MCD, as authorized by statute, will review subdivision proposals within its jurisdiction and affecting its people, in whatever manner may be appropriate.

Public Lands in General

"Public land" as used in this section is real property owned or controlled by an agency or bureau of either the State or federal government. Nearly 70% of the land which makes up the MCD is "public land". This section is not intended, nor should be interpreted, as a position(s) on private property issues, or rights of private property owners with respect to County regulations. The County's custom and culture has been significantly influenced by the relationship of the citizenry to public land, and the economic benefits that derive from public land. Notwithstanding the PILT program (devised to offset negative effects of so much land being in public hands and not included in the tax base) has never been fully funded. The MCD believes that Park County is a necessary and valuable partner in many NRM&P activities involving the MCD.

The public lands and the rights and privileges residents have come to rely on in all of the public lands, are central to the custom and culture of the MCD. The MCD finds public land and natural resources management practices are both relevant and substantive to its custom and culture, its economy, its environment, its quality of life, and its ability to protect and enhance local resources in spite of potentially detrimental outside influences.

Lands that have been identified under Federal Resource Management Plans as multiple use lands are subject to land uses that are critical to the performance of the District's duties regarding grazing, water and erosion conservation.

Recognizing the importance of public land to the quality of life in the community, the MCD intends that policies and practices established pursuant to this Plan endeavor to maximize the MCD's influence on decisions made by State and federal land managers regarding public land for local public benefit. Planning and implementation regarding land management, natural resources use, minerals production, infrastructure development, nearly all environmental issues, wildlife protection, plant and animal damage control, roading, water and irrigation projects, flood control, all affect the quality of life in the MCD.

Through community assessments, workshops, surveys, reports, public meetings, and especially the day-to-day engagement of its Supervisors and staff with the people of the MCD, the MCD has determined what makes it unique - its custom and culture. The history of the County and the MCD is set forth elsewhere; however, it was the historical events affecting people which brought the farmers, ranchers, miners, loggers, and the energy companies that molded and formed the custom and culture the community enjoys today.

For instance, the boom and bust cycles common to the western states have impacted the MCD, both positively and negatively.

The greatest outside influence on the County and the MCD has been and will likely continue to be the State and federal governments. State and federal government agencies jurisdiction over public lands and irrigation water sources is fundamental to the MCD's economic structure. The Federal government's program of "payments in lieu of taxes" (PILT), farm subsidies, social security benefits, and other such programs cannot be relied on as consistent revenue sources. In spite of the precarious nature of these programs, State and federal policies resonate at every level and reach even the remote corners of the MCD. Finally, the presence of State and federal employees and offices represents a major sub-culture, and economic stimulus.

MCD citizens traditionally used federal or State lands and waters according to the land use and land disposal acts of both government entities. Subsistence hunting, fishing, and trapping from the earliest occupation of man, have evolved into continued subsistence and sport hunting and trapping, sport fishing and major recreational activities such as trail riding, camping, nature appreciation activities and vehicular recreation on public and private lands in the MCD and Park County, providing support for the commerce base of the MCD as well as Park County.

Access is a means of approach, entrance, or passage; ingress and egress. Activities linked to local culture and custom, and which need access include:

- Agriculture. (farming, irrigation, livestock grazing, etc.)
- Recreation and related tourist activities. (motorized and non-motorized transport and activities, including but not limited to hunting, fishing, water and land sports, hiking, wildlife viewing, etc.)
- Industry. (mining, power production, utility corridors, oil and gas production/exploration, and timbering)
- Water. (agricultural uses, industrial uses, recreational uses, power, domestic uses, and general water resource development and conservation)
- Intangible Values. (historical and cultural sites, open space values and access to open space, aesthetic values, conservation, entrepreneurial values)
- Weed, pest and predator control.

Local culture and custom is closely tied to access of public land. It is important to the sustainability of the livestock industry in the MCD that grazing areas, and the stock trails that connect them, be open and accessible. For instance, livestock "trailed" from one grazing area to another must access not only the grazing areas on either end of that process, but also those lands in between. Historical use of stock trails and grazing areas has fluctuated over the years, depending on market prices, weather conditions, etc., but the need for access availability has remained constant, and continues to be relied upon by the People of the MCD.

The MCD, on information and belief, asserts that some public lands management agencies and officials have engaged in a continuing effort to limit, restrict or otherwise curtail

access, which negatively impacts resource use. This effort may have been done informally, or through a bureaucratic incremental process that did not give due consideration to local interests. Even when technically "proper" notice was given, local officials were not provided enough information to form a good understanding of the implications and consequences, which could result in loss of access. Additionally, the time frame allowed for local analysis of implications and consequences of agency actions has often been insufficient.

The MCD has also relied on, and will continue to rely upon, the protections for existing roads and trails contained in the Wyoming Wilderness Act.

Access, and the ability to utilize the full spectrum of resources originally provided by multiple use management, has been systematically limited by the incremental implementation of restrictions on a wide variety of individual uses. These restrictions have typically been imposed with intent to provide some form of protective measure. The MCD asserts that cumulative effects of incrementally imposed restrictions has led to the systematic reduction in the ability of the community as a whole to prosper through utilization of resources previously available from the public lands.

***Public Lands Goals* - It shall be a goal of the MCD that:**

i. Public lands affecting the MCD and its people provide resources, tangible and intangible, in order to enhance economic opportunity and the quality of life in keeping with the custom and culture of the MCD.

ii. Public lands are managed for sustainability on a landscape scale in order to maintain economic stability for the MCD and its people and to provide for future social needs in accordance with the MCD's custom and culture.

iii. That MCD's contributions to management and regulatory decisions be accounted for and recognized as intended by public land and natural resource management entities.

***Public Lands Objectives* - It is an objective of the MCD that:**

i. The people of the MCD are provided access to the public lands in accordance with their custom and culture in order to provide for their continued economic and social stability.

ii. The MCD shall continue to promote and encourage the optimum production of resources, tangible and intangible, from the public lands affecting the MCD and its people in order to enhance economic opportunity and the quality of life for our community in keeping with the custom and culture of its community.

iii. The MCD shall continue to promote and encourage recognition of the need to manage for sustainability on a landscape scale in order to maintain economic stability for the MCD and its people and to provide for future social needs in accordance with the MCD's custom and culture.

iv. State and federal authorities provide appropriate and timely notice of anticipated changes to policies or management and provide information, expertise, and financial resources for the MCD to make an informed decision regarding public land issues.

v. State and federal land management agencies respect access to public land as contributing to economic viability, as well as to the sustainability of local custom and culture. Access to public lands and access infrastructure within the public lands is maintained in order that use of public lands continues to provide for continued economic and social stability in accordance with the MCD's custom and culture.

vi. The MCD expects State and federal authorities to comply with existing management policies and processes. Upon information and belief, the MCD has concluded past management practices may have strayed from or otherwise ignored written management policies and processes. It is the MCD's objective to review any deviations coming to its attention.

***Public Lands Policy* - It shall be the policy of the MCD that:**

i. In recognition that the productivity of the public lands affecting the MCD is directly related to the MCD's social and economic well being, the MCD will directly participate in land use planning activities intended to enhance the productivity of the public lands.

ii. The MCD shall, as is appropriate for the MCD's purposes, seek to become a member of land use planning projects for State lands in order to effectively protect the County's custom, culture and general welfare.

iii. The MCD shall provide comment(s), seek Coordination Status, or seek to become a Cooperating Agency, as is appropriate for the MCD's purposes, for federal land use planning affecting the MCD in order to effectively represent and protect the MCD's custom, culture, economy and general welfare.

iv. The MCD shall require that land and natural resource use, management, and conservation plans developed for public lands conform to this Land Use Management and Resource Conservation Plan to the fullest extent provided by law.

v. The MCD shall require that land and natural resource use, management, and conservation plans developed for public lands, as well as the implementation of those plans, protect the MCD's custom, culture, economy, social stability, and general welfare to the fullest extent provided by law, including federal statutes regarding historical uses that have existed in excess of 50 years.

vi. The MCD may, at its discretion, join with other governmental and non-governmental entities to combine efforts to provide that land and natural resource use, management, and conservation planning for public lands protects the MCD's custom, culture, economy, social stability, and general welfare to the fullest extent provided by law.

vii. The MCD will endeavor to forge cooperative agreements and maintain existing cooperative agreements with various agencies, bureaus, and administrations to assure the greatest possible communication and exchange between and among stakeholders to public land. The MCD intends that cooperative agreements will be relied on and acted on regularly with consistency.

viii. The MCD may, at its discretion, join with other governmental and non-governmental entities to combine efforts to provide that land and natural resource use, management, and conservation plans developed for public lands protect the MCD's custom, culture, economy, social stability, and general welfare to the fullest extent provided by law.

ix. Regulatory action will cite the impacts to the local economy, local custom and culture, the human environment and provide how such proposed action is consistent with new, revised or supplements to the this Plan.

x. The MCD may, at its discretion, seek to enforce mandates on State and federal authorities to consider the social, cultural, and economic needs of the local human environment in any regulatory action impacting local custom and culture.

xi. The MCD shall strive for implementation of actions that improve the productivity of the public lands affecting its people, including not only the existing industries of agriculture, mineral production, timbering, and tourism but also activities improving productivity of the wildlife and plant communities on the public lands.

xii. The MCD supports retention of existing access and legal rights for access to public land, and will oppose management initiatives, which restrict or limit access or might negatively impact the livelihoods and/or quality of life of the people of the MCD. The MCD may rely on cooperative agreements, the Wyoming Wilderness Act, NEPA, FLPMA, and broad-based legal precedent, which all assure continued access of public land, and place the burden on public land management agencies and officials to prove by sound scientific means why access must be curtailed.

xiii. The MCD will utilize cooperative agreements, NEPA, the Wyoming Wilderness Act, broad-based legal precedent, and other available means to obtain appropriate and timely notice of anticipated changes in land use management of public land and to provide essential information and exert the maximum amount of influence on land use management decisions, including multiple use and access.

xiv. The MCD shall support opportunities for improvement of land stewardship on public lands to assure that public land continues to be productive for generations to come, recognizing that it has sustained the MCD's custom, culture, economy, social stability for many generations already.

xv. The MCD will endeavor to continue gathering public input as public lands management issues arise, change, and evolve with time.

Multiple Use of Public Lands

"Multiple use" means the sustained simultaneous use of public natural resources, both renewable and non-renewable, for the grazing of domestic livestock, wood harvesting, minerals extraction, hunting, fishing, commercial outfitting, motorized and non-motorized vehicle use, camping, hiking, horseback riding, shooting firearms, and/or other use that is customarily practiced and is integral to the economy and/or culture of the local citizenry.

Multiple use management of the public lands and their various resource values provides that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic rest adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balance and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. Multiple use is, over time, the highest and best use of public lands and recognizes the custom and culture of the local community, as well as its economic needs.

The District is aware that irresponsible activities under multiple use management can damage resources including grazing lands and can result in serious erosion and water waste problems.

There is a direct tie between multiple use and the custom and culture of the MCD. Multiple use concepts are integral to its custom and culture. Exclusive use of a disproportionate share of the public landscape for purposes of limited diversity is generally detrimental to social and economic stability. The people of the MCD are directly and indirectly dependent upon public land and the land's intrinsic resources for their livelihoods and their quality of life. It follows that the viability and sustainability of the local economy is dependent upon management for multiple use.

Multiple use management is the paradigm of both the USDA Forest Service and the USDI Bureau of Land Management. PL 86-517 (16 U.S.C. 528-531), the Multiple-Use and Sustained Yield act, 1960 authorizes and directs that the national forests to be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes.

Congress has made it clear, as the constitutional manager of the federal lands, that in the context of multiple use the general public must have the opportunity to be engaged in reasonable recreation on the federal lands. The BLM has recognized this direction of Congress and has issued regulations regarding motorized and non-motorized means of recreation.

Wilderness and other one use management systems do not result in sound management of grazing, water conservation, prevention of soil erosion and prevention of waste water. When a federal agency declares federal land as de facto wilderness, or attempts to manage multiple use lands within wilderness study areas or other types of one-use restrictions, the result is damaging to the sound performance of the District's duties, and is damaging to the watershed within the District.

De facto wilderness is not managed. Lack of grazing and other vegetation management leads to build up of fuels to a dangerous point; lack of forage management leads to wildfire, wildfire leads to soil erosion and water waste. Elimination of recreation uses reduces the human on-site observations of environmental dangers such as wildlife damage, erosion of roads and trails, and the commencement of fire and floods. The District has not the funding level sufficient to hire enough personnel to regularly patrol the lands within the District and affecting the District. Ranchers, hikers, motorized vehicle operators, equestrians, fishermen, and hunters serve as eyes and ears for the District as well as for state and federal agencies as to dangers to the resources that must be addressed.

De facto wilderness does not benefit wildlife. Water resources sufficient for a sound wildlife population are not produced naturally at all times. Most times, the watering technique for watering livestock and for irrigating forage provide water meccas for wildlife. Every citizen who uses the lands regularly knows that water ponds, water tanks, developed springs provide a great wildlife show in the early mornings and early evenings. These water sources are not maintained and kept in good order in de facto wilderness.

De facto wilderness harms the productivity of private and other public lands that adjoin, are near or are affected by the non-use wilderness areas. There is insufficient control of noxious weeds in wilderness, and noxious weeds do not recognize the boundary line between the de facto wilderness and private and productive lands. There is no control of wildfire that allows it to be stopped at the line between de facto wilderness and the productive lands that adjoin, are near or affected by such wilderness. Soil erosion and water waste within the de facto wilderness does not stop at the line between it and productive lands that adjoin, are near or affected by such de facto wilderness.

With an increasing emphasis, federal land planning is creating new and specially designated areas with priority uses or protections that employ new restrictions which can negatively impact resource use. These include, but are not limited to wilderness, wilderness study areas, designation of areas with wilderness or "wilderness-like" characteristics, areas having specific environmental concerns, protection areas for specific classes or species of wildlife, wildlife seasonal use areas, and wildlife habitat. These areas can comprise thousands of acres on an individual basis and there is no area within the MCD without special land use restrictions on its public lands. There is increasing overlap of layer upon layer of "special areas". The management of these areas through time has resulted in incrementally imposed additional restrictions on use which is in direct conflict with multiple use principles. These "special areas" have been promulgated through repeated plan

revisions through time, abetted by the loss of applicable agency, Cooperating Agency, and participating entity institutional knowledge in the intervening years between management plans, and the loss of key individuals who were active in a prior plan development. As stated elsewhere in this Plan, the MCD asserts that cumulative effects of incrementally imposed restrictions has led to the systematic reduction in the ability of the community as a whole to prosper through utilization of resources previously available from the public lands.

MCD policy favors the use of the multiple use inventory focus on all land, whether the inventory is performed by a federal, state agency or the District itself. It is the duty of the District to inventory the lands within the District and that affect the District. Inventory is necessary to do the planning that is required of the District. Title 11, Chapter 16 also requires that the District avoid repetition and duplication of efforts. So, it is the critical policy of the District that all planning and inventory work performed by federal agencies, state agencies and the District be conducted together and in coordination. (MCD, 2/9/2011)

Congress has mandated that the BLM inventory all lands within its jurisdiction. (FLPMA, section 43 USC 1711). That inventory contains lands both within and affecting the MCD. A copy of the Inventory provisions and requirements is reprinted here as a major portion of the District's policy (MCD, 2/9/2011):

a) *The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values. The preparation and maintenance of such inventory or the identification of such areas shall not, of itself, change or prevent change of the management or use of public lands.*

b) *As funds and manpower are made available, the Secretary shall ascertain the boundaries of the public lands; provide means of public identification thereof including, where appropriate, signs and maps; and provide State and local governments with data from the inventory for the purpose of planning and regulating the uses of non-Federal lands in proximity of such public lands.*

The federal government, the BLM, is also charged with providing information and data to the MCD for the purpose of planning, particularly to plan for the impact of federal land use on adjoining, near and affected lands.

One of the purposes of inventorying the land is to provide the information for federal land planning that must be coordinated with the District as a unit of local government. The section of FLPMA that immediately follows the inventory section provides as follows:

In the development and revision of land use plans, the Secretary shall—

(1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law; (This requirement, stated as "shall," focuses any inventory of lands on the "principles of multiple use," not on one or non-use.)

(2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; (This mandate requires that economics will be part of any inventory for planning purposes.)

(3) give priority to the designation and protection of areas of critical environmental concern; (This mandate does not focus the inventory on acres, but requires priority when a multiple use focused inventory finds such areas to exist.

(4) rely, to the extent it is available, on the inventory of the public lands, their resources, and other values;

(5) consider present and potential uses of the public lands; (This mandate does not focus on potential wildland or wilderness uses, but on all uses)

(6) consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values;

(7) weigh long-term benefits to the public against short-term benefits; (This mandate requires consideration of water conservation, soil erosion protection and other conservation practices that result from multiple use rather than from non-use)

(8) provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans; and

(9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under the Act of September 3, 1964 (78 Stat. 897), as amended [16 U.S.C. 460l–4 et seq.], and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

***Multiple Use Goals* - It shall be a goal of the MCD that:**

i. Multiple use is the primary management method for public lands within and affecting the MCD and its people so as to provide resources, tangible and intangible, to enhance economic opportunity and quality of life in keeping with the MCD's custom and culture.

***Multiple Use Objectives* - It is an objective of the MCD that:**

i. The public land management agencies employ multiple use management to the fullest extent practicable under the law.

ii. Local government, including the MCD, assist public land management agencies in providing for multiple use of the various resources without permanent impairment of the productivity of the land and the quality of the environment, with consideration being given to the relative values of the resources.

***Multiple Use Policy* - It shall be the policy of the MCD that:**

i. Multiple use management is supported by the MCD to the highest degree practicable under the law.

ii. The MCD will support traditional multiple land uses as a means to maintain continuity in the local economy, and assure the sustainability of existing agricultural, recreational, and industrial interests while maintaining or improving the present environmental quality of life. By supporting traditional multiple uses, the County intends local custom and culture will be maintained and given continuity thereby mitigating potential negative social and economic impacts on the community in the process.

iii. The MCD opposes management initiatives which restrict or limit existing and potential uses. This includes designation of "special areas", including wilderness, and the overlap of multiple "special areas". The MCD shall inform public land managers of any negative impacts on the livelihoods and/or quality of life of the people of the MCD which may arise from public land management mandates, regulations and laws.

iv. The MCD will oppose material changes in land uses which hamper or otherwise negatively impact traditional land uses in order to avoid undue social distress, dislocation, and hardship brought on the community by such changes.

v. Multiple use lands should not be changed into de facto wilderness, should not be changed into non or one-use category, should not be changed from multiple use without the specific and definite act of Congress. The district operates with a policy that does not favor change of multiple use lands at all, but strongly opposes any such change without the express authorization of Congress.

vi. The Congressional direction as to recreational use of the federal lands be continued, and that the MCD work with local citizens and organizations of citizens in developing recreation means and sites that will not be harmful to continued sound grazing management, water conservation, and prevention of soil erosion.

vii. The MCD shall strive to work with recreational users to prevent resource damage to the lands within and affecting the general environment of the MCD.

viii. Recreational uses that have been established in the multiple use lands continue with sound and reasonable controls to prevent damage, erosion and water waste.

ix. The MCD strive to work with federal and state agencies and with local citizens and organizations to assure that the multiple uses are compatible with private land rights and with sound private land production on those lands that adjoin, are near, or are affected by the federal and state and other public lands within and affecting the District.

x. That all planning and inventory work performed by federal agencies, state agencies and the District be conducted together and in coordination.

xi. All inventories of land within and affecting the District be conducted in accord with the Congressional mandate: an inventory "on a continuing basis" of lands "and their resources and other values." The mandate is that the land be inventoried for all resources and values, not just for one use, not to be focused on just one use.

xii. The BLM inventories comply with FLPMA, section 43 USC 1711 and that the MCD engage the BLM in coordination to see that information is provided to the MCD for planning purposes, that the inventory be conducted in coordination with the MCD and that the MCD's inventory information be considered by the federal agency in line with the coordination requirements of FLPMA, the BLM regulations as to coordination, and NEPA and the Council on Environmental Quality's regulations as to coordination, and coordination at the earliest possible moment in the inventory and planning process.

xiii. Inventory data submitted to the MCD must be suitable for their purpose in terms of quality, accuracy, and completeness.

xiv. The multiple use focus of both 43 USC 1711 and 43 USC 1712 be followed and adhered to by federal agencies, including the coordination of inventory and planning with the MCD (see subsection (ix) above).

Agricultural Use of Public Lands

Agriculture is the science, art, or occupation concerned with cultivating land, raising crops, and feeding, breeding, and raising animals; it is the commercial production of food or fiber.

Livestock grazing and other agricultural uses of public lands are integral to this community's ability to remain viable with a diverse, sustainable economy. The acceptance of this tenet is central to a strategy for the protection and preservation of local agricultural lands. Productive farmland has been developed only after a great deal of work, money and commitment. Just as each acre of ground in production contributes to the profitability of a single farm or ranch, so too does each acre contribute to the economic viability of the community as a whole. The steady decline in the number of self-sustainable farms and

ranches is a response to social and economic forces beyond local control. The community needs to be aware of the consequences, direct and indirect, should these trends continue.

Agricultural lands contribute to landscape and scenic beauty, available wildlife habitat, and provide recreational opportunities for residents and visitors alike for hunting, fishing, snowmobiling and other tourist related activities. Agriculture is invaluable as an employer, as a source of affordable food and raw materials, as a provider of open space, as an environmental steward benefiting associated ecosystems, and as a component to a sustainable economy within the MCD.

The MCD is determined to preserve and protect its range and other agricultural resources on public lands in accordance with Wyoming Conservation Districts Law. This Plan seeks to amplify that policy through various supportive goals and policies related to public lands. If ag families are to make the investment, and take the risks necessary to keep agricultural business viable, government policies must support and create a climate of confidence for the future of the agricultural industry.

Agriculture is the productive use of land. Recent studies show that agriculture contributes much more in taxes than it demands in services. When good husbandry is practiced it also contributes to the preservation of valuable open space, critical wildlife habitat, and protection of natural resources for multiple use.

It is clear that the livestock industry is vital to the local economy. Historically, the reduction of permitted grazing on public lands, unless for misuse or overgrazing, has had and will continue to have disastrous economic impact on individual ranches, and collectively on the both the MCD, Park County, and, for that matter, can be extended to the Big Horn Basin and the interrelated ranching community (Taylor *et al*, 2005; Taylor *et al*, 2004). Continued grazing use of federally managed land is vital if the livestock industry is to survive. The expectation for continuation of the livestock industry in the MCD is essential to support economic stability and to preserve the custom and culture of the citizens.

The Taylor Grazing Act of 1934, 43 USC § 315, was passed primarily to provide for stabilization of the western livestock industry; and the Act is still sound law. The Act authorizes the Secretary of Interior to establish grazing districts in those federally managed lands, which were "chiefly valuable for grazing and raising forage crops." The Secretary is authorized to act in a way that would "promote the highest use of the public lands" (43 USC § 315). The Act authorizes the Secretary to issue grazing permits on a preferential basis with preference to those "land owners engaged in the livestock business," bonafide occupants or settlers," or "owners of water or water rights," 43 USC § 315(b). The Secretary was authorized to take action to stabilize the livestock industry, which is recognized, as necessary to the national well-being.

The Act also recognizes the property interests of a permittee in the form of an investment-backed expectation in § 315(b). That Section provides that no preference would be given to any person whose rights were acquired during the year 1934 except that the Secretary could not deny the renewal of any such permit "if such denial will impair the value of the grazing unit of the permittee, when such unit is pledged as security for any bonafide loan."

The Federal Land Policy and Management Act of 1973, 43 USC § 1701 et seq., did not limit, restrict or amend the purposes and provisions stated in the Taylor Grazing Act, Section 1071 stated the policy of Congress as follows:

"The Congress declares that it is the policy of the United States that …

(2) the national interest will be best realized if the pubic lands and their resources are periodically inventoried and their present and future use is projected through a land use planning process coordinated with other federal and State planning efforts;…

(8) The public lands will be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural conditions; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use;…

(12) The public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining Minerals Policy Act of 1970…….as it pertains to public lands".

The Public Rangelands Improvement Act of 1978, 43 USC § 1901-1908, once again revitalized the purposes of the Taylor Grazing Act, providing that the Secretary of the Interior "shall manage the public rangelands in accordance with the Taylor Grazing Act, the Federal Land Policy and Management Act of 1976 and pursuant to this Act." See 43 USC § 1903 which also provides that:

"the goal of such management shall be to improve the range conditions of the public rangelands so that they become as productive as feasible in accordance with the rangeland management objectives established through the land use planning process, and consistent with the values and objectives listed in { Section 1901 }."

The values and objectives listed in Section 1901 by which the Secretary was to be guided include a finding and declaration by the Congress:

"to prevent economic disruption and harm to the western livestock industry. It is in the public interest to charge a fee for livestock grazing permits and leases on the public lands which is based on a formula reflecting annual changes in the costs of production." 43 USC § 1901 (a) (5)

The Congress further found and declared that one of the reasons the Public Rangelands Improvement Act was necessary was that segments of the public rangelands were producing less "than their potential for livestock" and that unsatisfactory conditions on some public rangelands prevented "expansion of the forage resource and resulting benefits to livestock and wildlife production." 43USC § 1901 (a) (3) The Act mandates improvements to prevent economic harm to the "western livestock industry."

In accordance with these Federal acts--- The Taylor Grazing Act, The Federal Land Policy and Management Act and The Public Rangelands Improvement Act---- the Bureau of Land Management is required to preserve the stability of the western livestock industry and to provide for multiple use management including necessary range improvements for the benefit of livestock production, wildlife habitat, watershed protection, and recreation. These federal mandates can be met only by management of all federally managed lands within the MCD (and the entire Big Horn Basin, as well) in such a way as to provide for continued use of allocated forage by permitted livestock and to work toward the restoration of forages to recover suspended AUMs. Range improvements necessary to achieve maximum levels of livestock production, wildlife habitat, watershed protection, and recreation opportunity must be identified by the Bureau of Land Management. The Secretary of Interior, and therefore the Bureau of Land Management, is committed by statute to preserving the stability of the livestock industry. The stability of the industry as a whole is directly related to the stability of the individual ranches that make up the industry, including those in the MCD and the Big Horn Basin. The stability of the livestock industry in the MCD and the Big Horn Basin requires that the statutory mandates be followed.

The quality of economic life for the people of the MCD, as well as the scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values (which are part of life in the MCD) protected by the Federal Land Policy and Management Act, require that the statutory mandates for stabilizing the livestock industry be followed.

Irrigated and intensive agriculture also provide a major contribution to the economic base of the MCD and are of critical importance to the economic stability of the county. Productive watersheds on public lands must be well maintained within the MCD as essential factors for preservation of irrigated agriculture.

The majority of crops produced in the MCD are alfalfa, grass, and other hay, silage, and feed grains. These products are an integral part of the livestock industry which relies heavily on public lands for livestock grazing. Row crops, including but not limited to beans, corn, cereal grains and sugar beets, also form an important base of the agricultural economy of the MCD, directly or through economic diversity of the farm or ranch, and thus are important to the livestock industry and wildlife, as well.

Agriculture is critical to the economic life of the MCD, and its importance cannot be overstated. Wyoming Statute § 9-12-109 provides that:

"*The council shall encourage and promote the development of agriculture in the State including horticulture, apiculture, livestock, poultry, dairying, and the kindred industries and including the development of new value-added agribusiness and product uses and markets for Wyoming agricultural products.*"

Thus, even in a comprehensive planning and zoning statute which permits reclassification and re-zoning of all lands, the legislature recognized that established agriculture must continue unabated.

***Public Lands Agricultural Use Goals* - It shall be a goal of the MCD that:**

i. Agricultural use of public lands affecting the MCD and its people is protected and maintained in order to enhance economic opportunity and the quality of life in keeping with the custom and culture of the MCD.

ii. Public lands suitable for agricultural use are managed for sustainability on a landscape scale, as well as on the individual ranch scale, in order to maintain economic stability for the MCD and its people and to provide for future social needs in accordance with the MCD's custom and culture.

iii. The contributions of the MCD to management and regulatory decisions are accounted for and recognized as intended by public land and natural resource management entities.

iv. Holistic management is a recognized management method for agricultural use of public lands.

***Public Lands Agricultural Use Objectives* - It is an objective of the MCD that:**

i. The people of the MCD are provided continued agricultural use of the public lands in accordance with their custom and culture in order to sustain their continued economic and social stability.

ii. Agricultural use of public lands will not be subordinate to any other uses of public lands, yet should be managed to allow for production of all resources, tangible and intangible, on public lands affecting the MCD and its people, in order to enhance economic opportunity and the quality of life for our community in keeping with the custom and culture of the community.

iii. The MCD shall continue to promote and encourage recognition of the need to manage for sustainability on a landscape scale in order to maintain economic stability for the MCD and its people and to provide for future social needs in accordance with the MCD's custom and culture.

iv. State and federal authorities provide appropriate and timely notice of anticipated changes to policies or management and provide information, expertise, and financial resources for the MCD to make an informed decision regarding agricultural use of public lands.

v. State and federal land management agencies respect access for agricultural use of public land as contributing to the sustainability of local custom and culture.

vi. Access to public lands and access infrastructure within the public lands is maintained in order that use of public lands continues to provide for continued economic and social stability in accordance with the MCD's custom and culture.

***Public Lands Agricultural Use Policy* - It shall be the policy of the MCD that:**

i. The MCD shall support continued agricultural use of the public lands in accordance with its custom and culture in order to sustain its continued economic and social stability.

ii. In recognition that the productivity of the public lands affecting the MCD is directly related to the MCD's social and economic well being, the MCD will directly participate in land use planning activities related to agricultural use of the public lands.

iii. The MCD shall provide comment(s), seek Coordination Status, or seek to become a Cooperating Agency, as is appropriate for the MCD's purposes, for federal land use planning affecting the agricultural use of public lands by the people of the MCD in order to effectively represent and protect the MCD's custom, culture, economy and general welfare.

iv. The MCD shall require that land and natural resource use, management, and conservation planning, the plans developed for public lands, as well as the implementation of those plans, protect the agricultural use of public lands used by the people of the MCD to the fullest extent provided by law in order to protect the custom, culture, economic viability, social stability, and general welfare of the MCD.

v. The MCD may, at its discretion, join with other governmental and non-governmental entities to combine efforts to provide that agricultural use of public land is protected to the fullest extent provided by law in order to preserve the MCD's custom, culture, economy, social stability, and general welfare of its people.

vi. Each federal and state agency with oversight, management or jurisdiction over lands, water, and natural resources in the District or affecting the District continue the grazing use that has been established in the District, and that the agencies work with the District in assisting landowners and grazers in achieving sound management. (MCD policy, 2/9/2011)

vii. Regulatory action pertaining to agricultural use of public lands will cite the impacts to the local economy, local custom and culture, the human environment and provide how such proposed action is consistent with new, revised or supplements to this Plan.

viii. The MCD insists that any changes and/or restrictions on agricultural use of public lands proposed by federal or State agencies must be based on objective and sound scientific data and in cooperation with the County.

ix. The MCD may, at its discretion, seek to enforce mandates on State and federal authorities to consider the social, cultural, and economic needs of the local human environment in any regulatory action impacting agricultural use of public lands.

x. The MCD has determined that agriculture makes a substantive contribution to environmental and recreational uses of public land; for that reason, public purposes such as protection of endangered species, wildlife habitat, open space, and

augmentation of water resources are all enhanced by continued agricultural use of public lands.

xi. The MCD will strive to bring affected agricultural stakeholders into the processes affecting their agricultural use of public lands and facilitate their participation in addressing issues affecting agricultural use of public land in order to protect the custom and culture and economic stability of the MCD.

Planning & Agency Interaction

It is a goal of the MCD that agencies and other entities involved with natural resource management and planning will address the fast-changing economics and scientific developments confronting agriculture and related industries.

It is an objective of the MCD that individual agricultural producers, agricultural communities and other agricultural entities, and other stakeholders are involved with governmental agencies in the process of natural resource management and planning from an agribusiness and agricultural science perspective in order to provide for the economic and social stability of the MCD, the region, and the State of Wyoming.

It is the policy of the MCD to facilitate efforts to bring together individual agricultural producers, agricultural communities and other agricultural entities, other stakeholders, and governmental agencies to view natural resource management and planning from an agribusiness and agricultural science perspective in order to provide for the economic and social stability of the MCD, the region, and the State of Wyoming.

Minerals

Minerals are naturally occurring substances formed by organic or inorganic processes. The MCD relies on legal precedent and statutory designations of what are minerals as established by the State.

Mineral production has and continues to play one of the most significant roles in the culture and economy of the MCD. It started with the discovery of gold, silver and coal in the late 1800's and of crude oil in the early 1900's.

Although the production of minerals, and associated economic and cultural activity, have waxed and waned with demand and pricing over the past; it has been, and remains the most significant portion of Park County's, and the MCD's tax base. Oil and gas assessed valuation in 2008 was 53% of the County's total valuation and a whopping 92% of the MCD's total valuation.

It is paramount that Park County support production of minerals in an environmentally safe way to the best of its ability through the political process as well as physically, by providing the infrastructure of roads, bridges, health and law enforcement. To the extent of the jurisdiction of the MCD allows, it is within the established custom and culture of the MCD to act in support of environmentally responsible mineral production as well.

Ltr#0965

From: Melissa Martinez
To: FS-shoshone forestplan
Cc: Alexander, Joseph G -FS; Christman, Carrie -FS
Subject: Governor Mead's comments re: Shoshone National Forest DEIS
Date: Tuesday, November 27, 2012 8:16:24 PM
Attachments: 20121126 LTR Shoshone Nat'l Forest DEIS comments.pdf

Attached please find Governor Mead's letter, comments and attachments. Please contact me if you have problems opening the attachment.

The original will follow by U.S. Mail to Forest Supervisor Alenxander.

--
Melissa Martinez
Executive Assistant to the Governor
Office of Governor Matthew H. Mead
State Capitol
Cheyenne, Wyoming 82002
307-777-7434

E-Mail to and from me, in connection with the transaction of public business ,is subject to the Wyoming Public Records Act, and may be disclosed to third parties.

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Ltr#0965

MATTHEW H. MEAD
GOVERNOR

THE STATE OF WYOMING

STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

November 26, 2012

Joe Alexander, Forest Supervisor
U.S. Department of Agriculture
National Forest Service
808 Meadow Lane Avenue
Cody, WY 82414

Re: Shoshone National Forest Draft Land Management Plan/
Draft Environmental Impact Statement

Dear Forest Supervisor Alexander,

Thank you for the opportunity to comment on the National Forest Service (Forest Service) Draft Land Management Plan (LMP) and Draft Environmental Impact Statement (DEIS) for the Shoshone National Forest (Shoshone Forest or Shoshone). The Shoshone Forest was first set aside in the 1891 Yellowstone Timberland Reserve Act and later designated the first National Forest in 1905. The Shoshone Forest consists of approximately 2.4 million acres of land in Fremont, Hot Springs, Park, Sublette, and Teton counties. The Shoshone's cultural history is as varied as its terrain; it provided a way of life for indigenous Americans, mountain men, gold miners and tie hackers who inhabited it and it is equally important to current-day industries and recreationalists who rely on its bounty. The history of the Shoshone has shaped the communities in and around its borders and will continue to do so in the future. The Shoshone is host to ice climbers, wildlife viewers, hunters and backcountry recreationists. There are also an increasing number of motorized users. This LMP is expected to guide management of Forest Service lands throughout the Shoshone Forest for the next 15 years. A balanced plan, one that respects multiple use and sustained yield principles, is essential in providing diverse opportunities.

Preferred Alternative B best advances a multiple use balance for this primarily backcountry forest. With over 56% (1.4 million acres) of the Shoshone designated wilderness and an additional 28% (684,800 acres) designated Inventoried Roadless, approximately 84% (2,016,000 acres) of the Shoshone Forest has some type of management limitation. Alternative B is a reasonable approach to managing the remaining 16% (384,000 acres) for the full range of multiple uses while still protecting the backcountry nature of this Forest. I support Alternative B

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as clarified by the attached comments. State agencies will also provide individual comments and I reference and incorporate those comments here.

Thank you for including me and all those impacted in the Shoshone Forest LMP revision. I ask for an opportunity to meet with the Shoshone Cooperating Agency Coalition and Forrest Service in the near future to discuss my concerns and recommendations related to oil and gas.

Sincerely,

Matthew H. Mead
Governor

Encls: Attachment A Comments on Shoshone National Forest Draft Land Management Plan/
Draft Environmental Impact Statement
Attachment B Oil and Gas Surface Occupancy Maps

cc: The Honorable Michael Enzi, U.S. Senate
The Honorable John Barrasso, U.S. Senate
The Honorable Cynthia Lummis, U.S. House of Representatives
Regional Forester Dan Jiron, Region 2
Shoshone Cooperating Agency Coalition

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Governor Mead's Comments on the Comments on the Shoshone National Forest Draft Land Management Plan/Draft Environmental Impact Statement
Attachment A

Summer Motorized Recreation

Motorized use is a growing recreation activity in the Shoshone Forest. Wyoming State Trails Program data shows Fremont County consistently ranks first or second in ORV permits sales within Wyoming. While the DEIS does increase the motorized trail target to 52 miles of trails, an increase of 20 miles over the life of a 15 year plan is not enough to provide a quality trail system. I ask that you coordinate with Wyoming State Trails Program to obtain data on where there may be opportunity for additional connector trails to create loops and where illegal and duplicative routes can be eliminated.

While I appreciate the Forest Service designation of additional areas for summer motorized opportunities I question the addition of one 3.3C Management Area – the smaller polygon west of the Shoshone Lake that abuts the Popo Agie Wilderness Area boundary – this area should be designated as a MA 1.3 (non-motorized) the same as it is designated in Alternative A. The area is sandwiched between Shoshone Lake and the Popo Agie Wilderness Area and it is not necessary because there is currently motorized access to both Shoshone Lake and the Popo Agie Wilderness Area just south of the lake.

Illegal off-trail motorized use on the Shoshone Forest and other public lands is not a new challenge, but it is one that demands more attention from the Shoshone and users. The State, through the Wyoming State Trails Program, is committed to working with you and others in identifying solutions to this issue. I do not believe that declining budgets or illegal activities necessitate a reduction in access in this LMP. Rather, these issues and potential solutions are best addressed through a public process, such as the development of a travel management plan.

Winter Motorized Recreation

I am concerned by the lack of a snowmobile map with trail level detail within the DEIS. Proposed management of snowmobiling on the Shoshone is considerably changed from current management prescriptions, including snowmobiling limited to existing trails and play areas. This change represents a substantial decrease with little explanation of what went into the Forest Service's decision to make only 480,000 acres available for snowmobiling. A detailed explanation would be helpful. I ask that the Service work with Wyoming State Trails Program staff and other snowmobile groups to develop a map for users to understand where snowmobile

opportunities exist and to help reduce conflicts between snowmobilers and other user groups. For example, a number of constituents have raised concerns that the snowmobile trail near Lava Mountain currently used to access private residences and businesses will be closed. The limited maps appear to support this conclusion despite assurances within the LMP that existing trails will remain open.

Tables and language in the draft LMP and DEIS referring to snowmobile use are not consistent. Consistent language throughout the Draft LMP and DEIS confirms existing groomed, un-groomed, and play areas are open for winter motorized use across all management areas, including 5.4 winter crucial range (where the Wyoming Game and Fish Department (WGFD) has determined adverse effects to wildlife will not occur).

Two Ocean Mountain is a high use area for multiple user groups. I do not believe closing this area to one user group or another at the LMP level is the solution. There are multiple individuals who have proposed compromises and I encourage the Forest Service to convene user groups to explore these suggestions.

I have specific concerns with the Ramshorn Basin/Deacon Meadows and the area west of Sinks Canyon (MA 3.3) traditionally open and accessible to snowmobiling and request the following changes:

(1) Ramshorn Basin/Deacon Meadows should not be managed as MA 1.3 but instead as MA 3.3B – the Game and Fish has determined no wildlife concerns exist in this area if winter use is allowed.

(2) A large area west of Sinks Canyon and North of Cyclone Pass is designated MA 3.3C. Both snowmobilers and mountain lion hunters have traditionally used this area in the winter and it should be designated as MA 3.3B.

Non-motorized Recreation

The word "party" in Table 18 on Page 91 is not defined. The recreation use capacity spectrum is vague and little direction is provided about its application. I am also concerned that the Forest Service intends to set group size limits and restrict the number of users as outlined in the *Guidelines for recreation* and *Management approach* (LMP p. 91) without first considering other management actions, such as education. For example, the National Outdoor Leadership School (NOLS) uses the Shoshone as a classroom and often travels to primitive areas in large groups. NOLS has a proven history of respectful use of the Shoshone Forest. If the Forest Service pursues group size limits and restrictions on the number of users as currently planned, NOLS and other outfitters may no longer be able to operate in the Shoshone. This is

unacceptable. Limits to access should only be established if all other management strategies are ineffective.

Wilderness

I recognize the DuNoir Special Management Unit (SMU) remains primarily in a natural state with little human impact to the area as a whole. Two oil and gas wells in the area have been plugged, abandoned, and reclaimed and while there is a Forest Service cabin within the SMU it is rarely used. This area is remote, mostly without roads, and densely treed with no motorized trails. I do not support designation of additional wilderness by administrative action, such as the Shoshone Forest LMP. In recognition of the DuNoir's opportunities for solitude, its primitive nature, and other values, I advocate more conversation between stakeholders, including wilderness advocates and other Shoshone users, to determine the highest and best management strategy for the DuNoir Special Management Unit.

Research Natural Areas

I do not oppose the creation of proposed Research Natural Areas (RNA) outlined in Alternative B, but remain concerned about RNA boundaries. The Beartooth Butte RNA should follow the wilderness boundary line and the RNA designation outside the wilderness boundary should be removed. If this change would compromise the integrity of the proposed RNA – then the plan should explicitly allow traditional snowmobile use in this area. I also believe that the Pat O'Hara and Arrow Mountain RNAs be limited to wilderness boundaries to avoid conflicts with other management designations.

Vegetation Management

As mentioned in both the Draft LMP and DEIS Wyoming is experiencing sweeping effects from various forms of insect epidemics, the most notable being the mountain pine beetle epidemic. These infestations have drastically changed the landscape of the Shoshone creating management challenges. I appreciate the identification of additional acres suitable for timber production as well as expanding areas available for other forms of vegetation management. These additions provide flexibility to address areas of high management concern. I believe it is also necessary to consider how the Forest Service intends to interpret the expansion. The Draft LMP should address other possible timber product industries and I ask for additional language on page 15: "Less traditional markets for wood products, such as commercial firewood are becoming established. The potential for new wood products –biofuels and biochar among others is strong." A large percentage of trees in the Shoshone are now dead and dying and it strengthens the Forest LMP to support the possibility of non-traditional wood uses. Traditional timber harvests may

not be viable in most of the Shoshone Forest for decades to come and we should adapt to this reality by paving the way for other industrial uses.

Another management challenge is increased fire risk. The DEIS suggests a decrease in estimated wildfire acres by 2,300 acres. This is counterintuitive to ground conditions and what they suggest. There is no explanation on the source of the number. Throughout the document references to wildfire and insect activity increases are made. (DEIS p. 62). Explanation should be provided in the DEIS about the lower anticipated wildfire acreage in the face of the comments that wildfire is likely to increase. Associated suppression costs have not been calculated for the estimated wildfire acres. While cost analysis is not required, wildfire suppression is part of Forest Service management. (DEIS p. 344). I believe fire suppression costs are significant figures that should be represented in the DEIS especially for comparison across alternatives.

Wildlife Management

The statement, "Livestock grazing on State and private land is an identified potential threat to gray wolf conservation that contributes to cumulative adverse effects, due primarily to control actions when wolf/livestock conflicts occur" is found on page 151 of the DEIS. This section implies livestock producers are causing wolves to be killed. Under Wyoming's wolf management plan, Wyoming has addressed the gray wolf and established an integrated long-term plan. This section is not based on any scientific or empirical evidence and does not accurately reflect the Forest Service's or Wyoming's role in wolf management. This section should be revised and at minimum this language should be removed.

I am troubled by the use of the ruffed grouse as a management indicator species. According to the DEIS, "No trend data are available that are specific to the Shoshone or Wyoming. " (DEIS p. 24). WGFD does not track this species' populations. This species cannot be used as a reliable indicator species without trend data. I recommend removing this species unless a reliable monitoring plan is created with WGFD and included in the Final EIS.

Elk of the Greater Yellowstone Area are carriers of brucellosis. This has been an ongoing wildlife and domestic livestock issue for Wyoming. Wyoming has a task force devoted to monitoring progress and working initiatives to minimize the impacts of the disease. Both the WGFD and Wyoming Department of Agriculture have submitted comments that should be included in the Final EIS.

Livestock Management

Livestock grazing economic impacts are not accurately captured within the current DEIS. A University of Wyoming study on the economic profile of the Shoshone found the total forest-

wide economic impact per AUM range from $95.54 to $298.50. These numbers should be reflected in the Final EIS.

The capability analysis in the DEIS should include all lands potentially capable of supporting grazing. Suitability should vary by alternative. This language should be clarified in the Final EIS. The development of a map would help demonstrate this point and a map should be included in the Final EIS.

Socioeconomic

The economic analysis in the DEIS was confusing and lacked information. While the DEIS attempts to describe the determination of the Present Net Value (PNV), it is difficult to understand the application of PNV to each alternative. When studying Table 172, the PNV appears to decrease slightly when applied to Preferred Alternative B. This number is hard to interpret given the limited data provided in the DEIS. For example, the livestock economic data is questionable; recreation data (including both non-motorized and motorized recreation) is lacking and an oil and gas analysis was not included.

Many people, businesses and communities are economically reliant on the Shoshone Forest. Business owners, citizens and others want to understand the proposed Forest Plan changes and the impact on them. PNV needs to be explained in this document and the data incorporated so the economic impact of the Proposed Action can be clearly and completely understood.

Monitoring

Monitoring is an important part of Forest Plan implementation. Many forests have steering committees to track monitoring and to assist in identifying priorities. Pages 4 and 5 of the Bighorn National Forest LMP speak to the creation of a steering committee.

> *"Bi-annual monitoring and evaluation meetings with the forest plan revision cooperating agencies (State of Wyoming, County Commissioners, and Conservation District Board members) will be offered. The meetings will be open to the public, with ground rules similar to those used in the plan revision meetings.*
>
> *Steering Committee members can help Forest personnel in monitoring forest plan and project implementation, in evaluating biological, social, and economic impacts; and by identifying amendment needs and proposed solutions. Maintaining the knowledge base and relationship with state agencies and elected officials will provide continuity in the adaptive management cycle, from development to the Revised Plan to plan*

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> *implementation, monitoring, evaluation, and amendment through to the next plan revision."*

This language would be a good addition to the current plan.

Oil and Gas

According to the DEIS, "The Shoshone borders on oil- and gas-producing basins in Wyoming. Approximately 255,000 acres of the 2.4 million acres on the Shoshone have a high potential for oil and gas occurrence. (USDI 2010 and USDI 2009). Though there is potential for oil and gas in those areas that does not mean it will be developed... Overall, lands on the Shoshone have a low or very low potential for development (USDI 2010 and USDI 2009)." (DEIS p. 18). The Shoshone has designated 402,700 acres suitable for surface occupancy in Alternative B a decrease of 395,400 acres from Alternative A. While our oil and gas resource development is valuable to Wyoming, other important resources such as wildlife habitat, recreational opportunities and adjacent management scenarios must be weighed when there is overlap.

Based on these concerns, I request that a no surface occupancy stipulation for oil and gas development be applied according to the maps in Attachment B.

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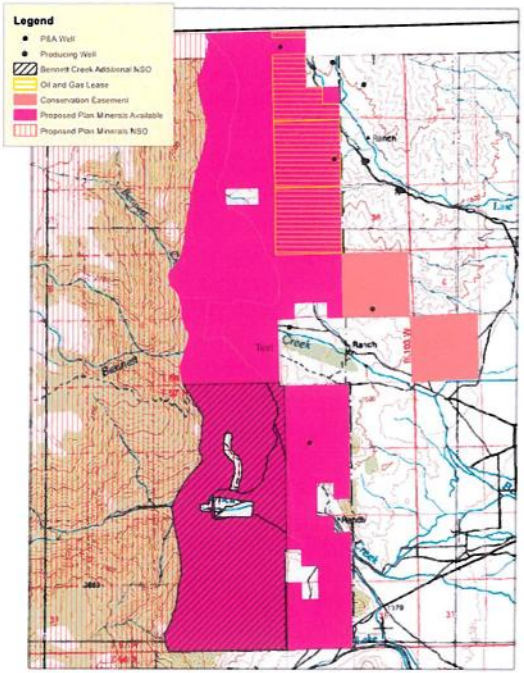
Oil and Gas Surface Occupancy Maps
Attachment B

Map A - Bennett Creek



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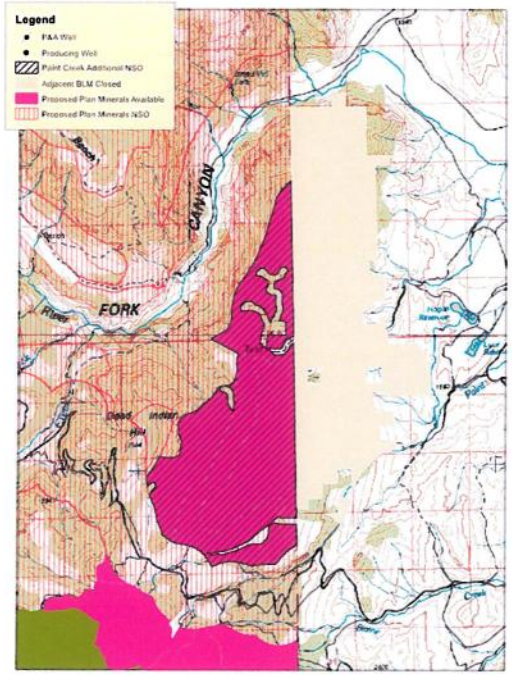
Map B - Paint Creek



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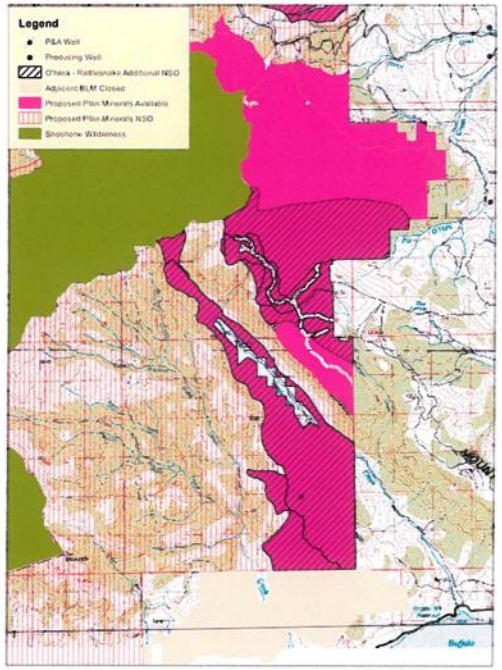
Map C - O'hara Mountain and Rattlesnake Mountain



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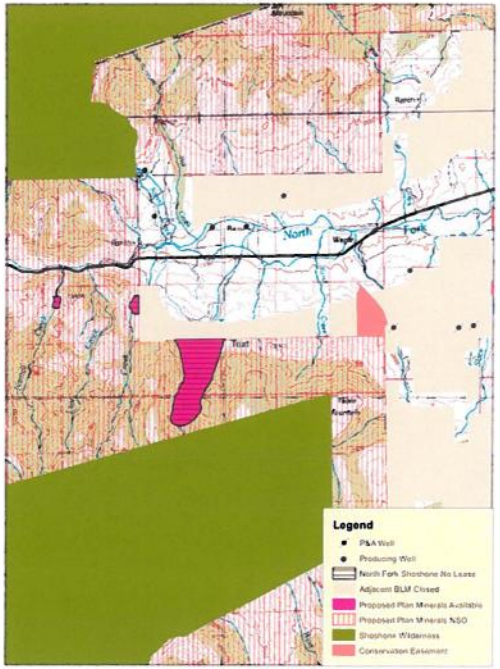
Map D - North Fork Shoshone River
NO LEASE



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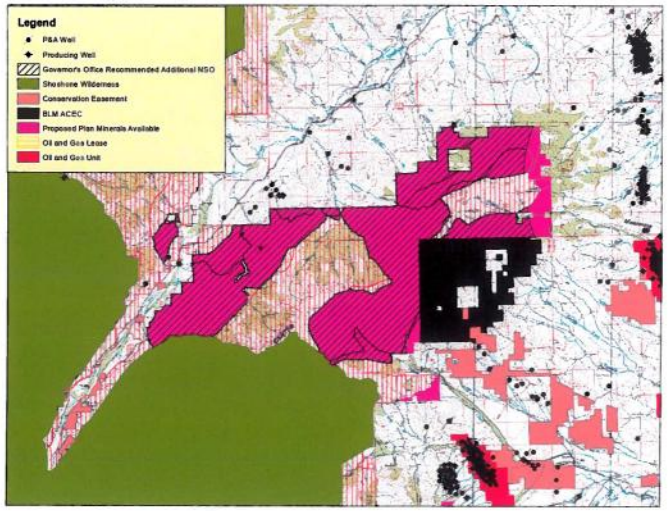
Map E - Carter Mountain



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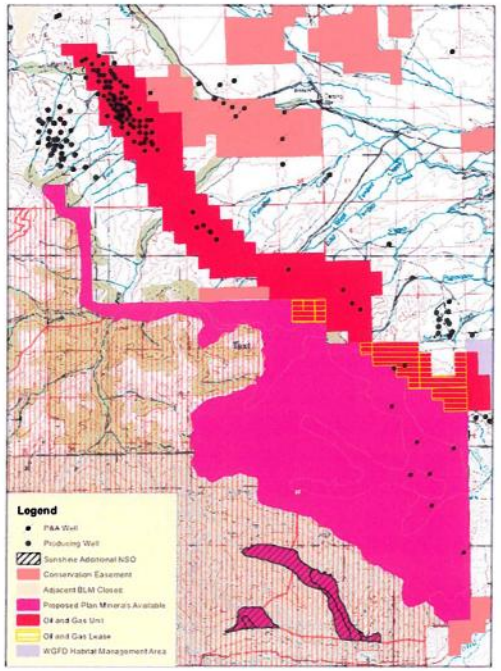
Map F - Sunshine



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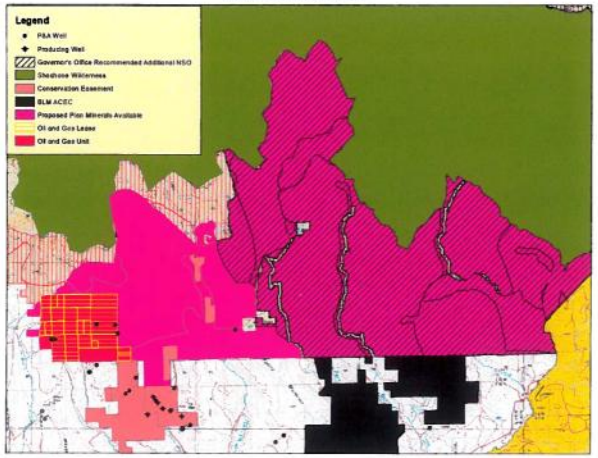
Map G - North Dubois



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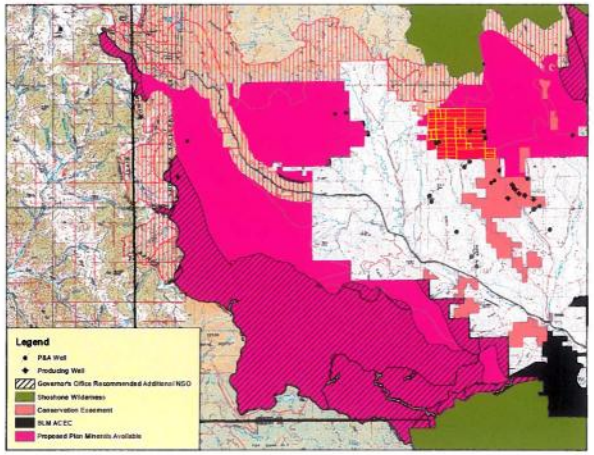
Map H - West Dubois



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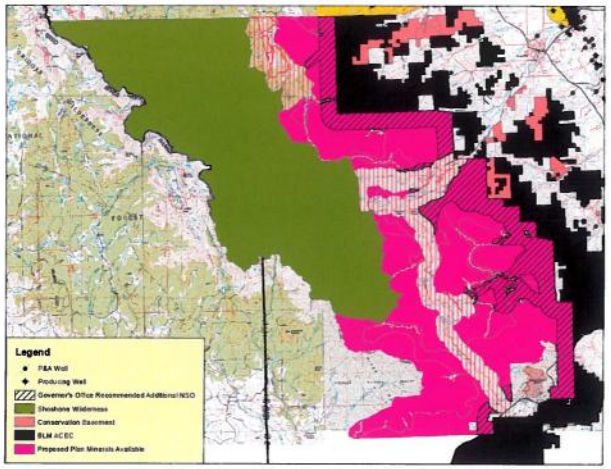
Map I - Lander Front



Ltr#1050

From: Christman, Carrie -FS
To: FS-shoshone forestplan
Subject: FW: Scanned comment letters
Date: Tuesday, November 27, 2012 4:14:07 PM
Attachments: GallegosJ.pdf
BartleD.pdf
EndersbyH.pdf
FinleyV.pdf
CornellS.pdf
ZenzolaT.pdf
RumseyC.pdf
MooreT.pdf
KoppeR.pdf
GistaroN.pdf
ShelleyM.pdf
HallM.pdf
AllenK.pdf
RobertsS.pdf

Carrie Christman
Planning Staff
Shoshone National Forest
808 Meadowlane
Cody, WY 82414
307.578.5118
A good plan is like a road map:
it shows the final destination and
usually the best way to get there.
- H. Stanley Judd

From: Pike, Kelsey B -FS
Sent: Tuesday, November 27, 2012 11:59 AM
To: FS-shoshone forestplan
Subject: Scanned comment letters

Ltr#1050

PM 12:44 NOV 26 '12

November 21, 2012

Shoshone National Forest
Forest Plan Comments
808 Meadow Lane Avenue
Cody, WY 82414

Forest Plan Committee,

On November 15th a representative of the Meeteetse Museum Trustees presented the Park County Historical Commission with information on the Museum Trustee's comments on the Draft Shoshone Forest Plan. We would like to state our support of the Meeteetse Museum's comments about both the Double D Ranch and the Kirwin Historical District. This commission included both of these properties on our registry of seven highest priority heritage sites for National Register of Historic Places nomination in the County, which we updated and submitted to the County Commissioners in 2010. Two other Forest sites were also included in our highest priority list, Stockade Lake (48PA258) and the Gold Reef Mining District (48PA253, 48PA2871, 48PA2872, 48PA2873) and we have concerns that sites such as these, which are locally recognized as significant, as well as many other NRHP eligible sites on the Forest may not receive the protection they need under the Priority Heritage Assets focused management direction presented in the Draft Plan.

In terms of Double D and Kirwin, we agree with the Meeteetse Museum that:

1. The Double D should be included as a Historic Management area aud its continued stabilization and repurposing should be a Forest priority.
2. The boundaries of the Kirwin Historic Management area should be increased to include not only the town, but also more of the back country mining record.

We understand that budgets are tight and there an overwhelming number of resources issues facing the Forest as you finalize your Plan, but we consider these two historic properties as having exceptional value to the Meeteetse Community and our County. We are also concerned of the hundreds of other historic and prehistoric sites, which the current plan seems to minimize with a focus on systematically monitoring only the few Priority Heritage Asset sites. We request that, if the Priority Heritage Asset list approach does becomes a basic component of Forest heritage resource management, then our County Historic Preservation Commission, as well as the Historic Preservation Commission in Fremont County, and other groups with strong interests, local expertise, and important archives (such as the Meeteetse Museums) be included in the process. Thank you for consideration of our comments, we hope to be able to develop a stronger partnership with the Forest over the next several decades.

Sincerely,

Matt Hall
President, Park County Historic Preservation Commission
Park County Courthouse
1002 Sheridan Avenue
Cody, WY 82414

Ltr 0306

COMMENTS ON THE SHOSHONE NATIONAL FOREST DRAFT LAND MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

Prepared by

Shoshone Cooperating Agency Coalition

November 26, 2012

Ltr 0306

EXECUTIVE SUMMARY

How do we best allocate and balance the use of our public lands? As our society expands, population increases, and nature changes, we need to continue to re-evaluate how to best protect our inheritance and investments in our natural resources—while at the same time making use of those resources in a sensible and sustainable manner. As local governments we have given a great deal of thought to the multitude of competing interests in public land management. We cherish our outdoor heritage, wildlife, and wild places. We also recognize the need for some level of commerce; be it with wood products, recreation, or other resource-based or ecological businesses, as someone has to pay the bill for national forest management. Due to large scale predator expansions, insect epidemics, related tree mortality and changes to forested habitats, and increased fire risk along with a warmer, drier climate, there is a biological need to rethink the management of our public lands. We must also engage with the regulatory landscape along with these physical changes occurring on our public lands. The National Forest Management Act (NFMA) requires that U.S. Forest Service (USFS) Forest Plans must be updated at periodic intervals. As elected representatives, we understand what resources it takes to govern at the local level, and where funding comes from to finance public services. In order to wisely allocate and balance the use of public lands, we offer the following comments regarding the multiple uses for the Shoshone National Forest (SNF). We have prepared our comments to be compatible with the purposes and principles (219.1) of the NFMA Planning Rule, which states:

> These regulations prescribe how land and resource management planning is to be conducted on National Forest System lands. The resulting plans shall provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term net public benefits in an environmentally sound manner.

The SNF began the Forest Plan revision process in 2006, prior to many of the extensive environmental changes we are seeing today. This combination of biological shifts with the administrative requirement to update the Forest Plan gives us stakeholders an unprecedented opportunity to provide input and assistance to the Forest Service in their public land management. The National Environmental Policy Act (NEPA) and NFMA require the SNF to work with Cooperating Agencies on Forest Plan revision and the accompanying Environmental Impact Statement. The Shoshone Cooperating Agency Coalition is composed of three County Commissions and seven Conservation Districts representing all of the resident stakeholders. Local government representatives have a wealth of information regarding the physical, biological, and socioeconomic issues facing our public land management. We offer these comments with the goal of finding solutions.

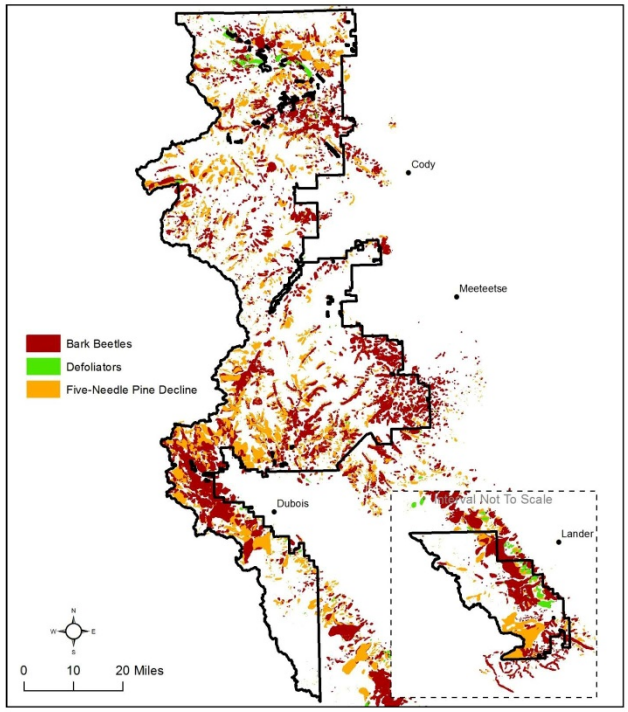


Figure ES-1 Insect activity from 2006 to 2011

KEY FINDINGS

The SCAC has identified the following key findings and issues during review of the Draft Forest Plan and Draft Environmental Impact Statement (DEIS).

SOCIAL AND ECONOMIC RESOURCES

- In small communities, the loss of a single job may be important, even if considered "negligible" across the analysis area on the SNF. The SCAC feels that the Forest Service has strived to produce just an analysis of the "negligible" impacts across the planning area, without providing the detail required to determine where and to whom the "considerable" impacts may occur.
- The impact analysis as completed does not provide the SCAC enough information on the differences among alternatives to conclude that Alternative B provides the highest net public benefits.
- A viable analysis of present net value and net public benefits requires sound data from individual resource specialists and requires resource specialists to utilize social and economic data correctly within their projections. The current Draft Plan and DEIS accomplish neither of these. The SCAC requests that the SNF examines their mineral, recreation, grazing, timber, and forest management data in greater detail in order to better convey impacts to local communities or net public benefits across alternatives.

FOREST HEALTH

- Key impacts related to the amount of forest fire anticipated, and associated direct and indirect wildfire costs have not been given appropriate attention in the DEIS.
- The uses of resources for timber and wildlife and future uses have not been discussed in relation to disturbance vulnerability. Disturbance from insects and fire are likely to increase with climate change and there is a clear risk to areas designated under Management Area 5.1 – Managed Forests and Rangelands and Management Area 5.4 – Managed Big Game and Crucial Winter Range in the Preferred Alternative.

TIMBER

- It is important to create dependable and stable supplies of timber if local industry is to remain viable and continue to be an available vegetative management tool.
- Increase the use of temporary roads to allow for the use of mechanical treatments to improve forest health and restoration activities.
- Provide more opportunities for mechanical treatments to reduce fire risk across the Forest.
- Embrace Stewardship Contracting Authority

WATER AND SOIL

- Fire and fuels management strategies are designed to approximate the Historic Range of Variation for the watershed. Active vegetation management, as well as prescribe fire, is a tool preferred over indiscriminate wildfire until natural fire regimes can be restored.

COMMERCIAL LIVESTOCK GRAZING

- The grazing capability needs to be corrected to reflect actual and documented distribution by livestock. Failure to correct this may attract challenges by anti-grazing organizations.
- Continue to work with permittees to limit additional restrictions on working ranches due to predator expansion.

WILDLIFE

- The SCAC requests flexibility for oil and gas development activities on elk crucial winter range with associated constraints to ensure winter range functionality and viability of elk populations.
- The SCAC requests flexibility and loosening of restrictions outside the Primary Conservation Area (PCA) for grizzly bear management in response to Greater Yellowstone Ecosystem population being biologically recovered according to official stances of the US Fish & Wildlife Service (USFWS), Montana Fish, Wildlife & Parks (MFWP), and Wyoming Game and Fish Department (WGFD).
- The SCAC questions validity of Canada lynx critical habitat occurrence on SNF as mapped in the DEIS and asks for potential remapping effort with re-tooled habitat model developed by the USFWS.

MINERALS

- The SCAC supports designating lands with high oil and gas occurrence potential as available for leasing with surface occupancy to the maximum extent possible while supporting other resource objectives.
- The SCAC believes that there should be flexibility in the Plan to allow for opportunities created by advances in exploration and extraction technologies.
- The SCAC agrees that consistency should be provided across jurisdictional boundaries to protect important wildlife habitats. However, No Surface Occupancy restrictions should not be broadly applied to all big game crucial winter range since the expected level of development (projected as very low to low in the reasonably foreseeable development (USDI 2009)) can be successfully mitigated at the project level.
- Areas designated as No Surface Occupancy should not preclude exploration activities.

RECREATION

- The SNF is majority wilderness or non-motorized. This leaves a small disproportionate amount for multiple-use. Therefore, the SCAC does not support the addition of designated Wilderness.
- No winter use trails or play areas designated but referenced throughout document as open.
- Management areas changed to eliminate winter motorized use despite Alternative B claim that winter motorized use will not change from existing condition (Alternative A).
- There is an increasing need for more motorized use.

SPECIAL AREAS

- Although there is no specific management area direction for the management of the Morrison Road within the Proposed Sawtooth Peatbed Special Interest Area, we suggest that the Morrison Road be designated as Management Area 4.3 – Back Country Access Corridor and that the area immediately north and east of the road as Management Area 3.3B – Back Country Winter Motorized.

VISUAL MANAGEMENT

- The SCAC understands the need for restoration treatments and supports the Forest-wide direction on the need for lower short-term visual conditions in order to increase ecosystem resiliency and forest health.

The SCAC looks forward to working with the SNF between the Draft and Final Plan to craft modifications to the Plan and EIS including the Desired Conditions, Goals, Objectives, Standards and Guidelines. We believe it is our responsibility to work productively with the SNF on behalf of our constituents to provide for multiple uses and the increase of net public benefits on the SNF.

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APPENDICES

Appendix A – SNF Forest Plan Revision Notice of Intent Comments Submitted by the SCAC

Appendix B – Wiggins Fork allotment overlain with slope, confirmed cattle use, and capability on slopes up to 60%

Ltr 0306

1. INTRODUCTION

The Shoshone Cooperating Agency Coalition (SCAC) would like to thank you for this opportunity to provide written comments on the Shoshone National Forest (SNF) planning effort. The SCAC is comprised of three County Commissions (representing Fremont, Hot Springs, and Park Counties) and seven Conservation Districts (Cody, Dubois-Crowheart, Hot Springs, Lower Wind River, Meeteetse, Popo Agie, and Teton Conservation Districts) adjacent to the SNF. As a consistently engaged Cooperating Agency, the SCAC has been active in the public process for the Forest Plan revision and diligent in providing comment and supplemental analysis.

The SCAC has been involved with the SNF planning effort from the start. We have provided comments as requested in the Notice of Intent (NOI)[1], participated in planning meetings as Cooperating Agencies (40 CFR 1501.6 and 40 CFR 1508.5), and prepared these formal comments on the Draft Forest Plan (Plan) and Draft Environmental Impact Statement (DEIS). Prior to this planning effort under the National Forest Management Act (NFMA) 1982 Planning Rule, the SCAC was involved in the Forest planning under the 2005 and 2008 NFMA Planning Rule. We believe that the SNF is compelled to review, understand, and incorporate the full range of comments previously provided and the new comments contained in this document.[2] We look forward to continue working with the SNF on this important Plan.

Our overarching comment on the Plan is that the SCAC would like to see the SNF maintain a strong measure of flexibility in this especially challenging environment for public lands management. Budgets are likely to decrease, while the cost of fire suppression will surely increase in the coming years. Disturbance to the Forest, whether caused by fire, insects, or mechanical treatment, will be unavoidable. Public sentiment is increasingly responding to these conditions. Wyoming's Senators recognize this situation as well and recently wrote to the U.S. Secretary of Agriculture to request more treatments to reduce fire risk.

It is also crucially important to the SCAC that economic opportunities on the SNF are expanded or at least maintained at present levels. As we have suggested in scoping comments, meeting comments, and the review of portions of previous planning documents, the Counties and Conservation Districts believe that we owe it to our constituents to look for creative ways to expand the wood products industry. Instead of only supporting the future of already well-established forest products, we would like to have the SNF Plan provide the opportunity for value-added and niche product manufacture. House logs, aspen panels,

[1] *Federal Register Vol. 75, No. 185 (Friday, September 24, 2010).*
[2] Federal direction stipulates that lead agencies "[u]se the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency." (Council on Environmental Quality, Sec 1501.6)

Ltr 0306

biochar, biomass, chips and other such products should be encouraged in goals and objectives for many management areas, especially when they can be integrated into forest health and restoration needs. Overall management goals and objectives should include expansion of the working forest portion of the SNF, including into some roadless areas.

We understand that in order to provide for forest restoration and wildlife habitat, as well as to decrease the chances of catastrophic wildfires and to address the mountain pine beetle (MPB) infestations—to keep the SNF as the treasure that it is—the option of treatments on forest lands must remain available as a management strategy. Out of 2.5 million acres, only 14% is open to any general forestry treatments—regardless of the reason. The citizens we represent support increasing the flexibility of the Plan, to respond better to future needs and conditions. The Plan and DEIS would best incorporate these concerns about forest health by allowing for the possibility of treatments in appropriate roadless areas.

Stewardship analysts at the Colorado Forest Restoration Institute of Colorado State University recently published a study of how the majority of citizens of communities adjacent to three western National Forests weighed in on management issues. One of these is the SNF. These researchers conducted statistically significant social surveys from 2004 through 2008 and worked directly with the SNF and Cooperating Agencies. Questions were designed in cooperation with USFS planners and Cooperating Agencies to the SNF Forest Plan Revision, and were sent to a random sample of home-owner residents. These finding may be the best source of information on the preferences of the citizens of Park, Teton, Fremont, and Hot Springs Counties.[3]

While Wyoming stakeholders may or may not generally support the 2001 Roadless Area Conservation Rule, this same public is sympathetic towards the needs of local communities–those who work and live near the SNF. But our communities are not just "located adjacent" to the SNF. The SNF is part of what makes our part of Wyoming the place that it is. Mountains and forests for wildlife habitat and for hunting, trails and roads for skiing, snowmobiling, and access, and lakes and rivers for fishing, are the heritage and the future for the people who call this place home. Enjoyment and use of the SNF makes these places what they are today.

We agree with the researchers from the Colorado Forest Restoration Institute that western resource management decisions "are not so easily dichotomous choices between ecosystem protection and national resource use. For example, tens of millions acres of national forest lands in the Western United States are in need of active management in the form of mechanical tree removal (i.e., logging), prescribed burning, or both, in order to reduce the risk of ecologically uncharacteristic and/or socially undesirable wildfires."[4]

[3] Jessica M. Clement and Antony S. Cheng, "Using analyses of public value orientations, attitudes and preferences to inform national forest planning in Colorado and Wyoming," *Applied Geography* 31 (2011) 393 – 400.
[4] Clement and Cheng, 394.

Residents of our four Counties strongly support (76%) logging for fire mitigation on the SNF in general, and 63% favor logging for fire mitigation in roadless areas on the SNF as well. More than half of the survey respondents favor logging for wood products on the SNF in general, and almost as many (46%) would also like to see this forest use extended to areas currently managed as roadless. These uses are compatible with fish and wildlife habitat preservation (96%) and all kinds of recreation–from snowmobiling to ATVs to hiking and canoeing, all of which are also supported by locals.[5]

It is the nature of this document to point out deficiencies and omissions in the Draft Plan and EIS. Our comments necessarily focus on changes and suggestions, rather than on aspects of the Draft with which we are in agreement. We point out, for example, that there exist peer reviewed papers (Hahn and Curnutt 2012; Hessburg et al. 2005; Westerling et al. 2011) on vegetation changes on the SNF or similar ecosystems, not only to highlight other scientific perspectives not considered in DEIS preparation, but more importantly, to bring in the science and analysis that shows compelling need for forest treatments. The information for accepted and predicted changes to vegetation is not presented well in the current Draft, and is not documented as required by the 1982 Planning Rule "Inventory data and information requirements [219.12 (d)] and the requirements for the preparation of the Analysis of the Management Situation [219.12 (e)]."

Our other major comments on the Forest Plan are as follows:

- Motorized use opportunities should be expanded. Motorized use is one of the only visitor use categories increasing on the SNF, so trails and access should be increased.
- Forest health treatments should be increased. A great deal of dead and dying timber on the SNF could be utilized for economic benefit, which would also reduce the risk from catastrophic fire.
- Allow for the possibility of oil and gas development that maintains biological integrity.
- We support keeping all current winter motorized recreation accessible.

Ultimately, our proposed changes are motivated by the same goals as those of the Plan's authors: to create a better Forest Plan for northwest Wyoming. We ask that you take our comments seriously and with this in mind.

[5] Jessica Clement, Ph.D. and Antony Cheng, Ph.D. Results of the Survey of Public Values and Preferences in Counties bordering the Shoshone National Forest, Wyoming. Department of Forest, Rangeland and Watershed Stewardship, Colorado State University, Fort Collins, CO. January 16, 2008.

2. PUBLIC PROCESS AND NEPA

In order to prioritize the issues in 2006, the SCAC sent Issue Comment Forms to all of its members. Some members responded individually; some members responded as representatives of their county or conservation district, and some did not respond at all. If there were one or two respondents from a group, we used their issue ranking (or an average of their issue ranking) to represent their group. In the end, a total of eight out of the eleven groups represented by the SCAC responded. Each group's ranking was weighted equally.

After all the averaging was completed within each group, the points were totaled across the board, and issues with the highest point score received the highest priority rating. A total of 20 out of the 23 issues were given some level of rating. Economics was the top rated issue, with a score of 42.6. Historic Range of Variability, Mining, and Pristine Plant Communities had the lowest rating of all issues. Results are shown in the Priority Issue Score graphic below.

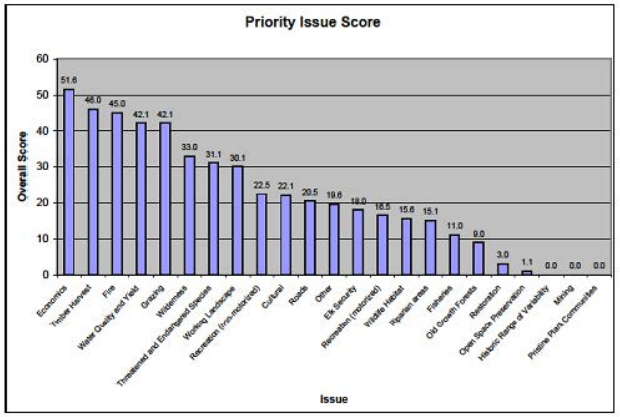

Figure 1 Public comment issue rankings

The SNF did not integrate this information into their 2006 planning process, nor is it to be found in the current Draft Plan. In the 2010 SCAC NOI comments, we noted that there were significant changes on the Forest from the 2005/2006 initiation of the planning process, and that new information should be considered (Appendix A). An extensive outbreak of MPB with a corresponding massive die off and increasing fire risk has changed the landscape, and indicates more treatment opportunities. The SCAC has often brought up this important issue to local governments as well as to the SNF. In sum, the current Draft Plan should have included more topics than the original ones proposed by the SNF back in 2006, which were already inadequate. In a March 9, 2011 e-mail from the Forest Supervisor to the SCAC, he agreed that the additional issues, which were discussed in public meetings included economics, water quality and yield, motorized and non-motorized travel ways should be included. These, however, were never added. Only the original six from the 2006 scoping effort are included in the current Draft Plan.

With all the current attention to fire risk, economics, and motorized travel issues, as evidenced by the Senators from Wyoming asking Secretary Vilsack to get more fuels treatment work done to reduce fire risk, it is clear that the additional revision topics suggested by the SCAC are timely and appropriate.

NEPA

The SCAC wants to remind the SNF of the 1982 Planning Rule requirement to coordinate with local governments [219.7 (d) & (e)]. In conjunction with the Council on Environmental Quality (CEQ) regulations for working with Cooperating Agencies, we request that the Forest Service, review, and where applicable, recognize and be consistent with our individual County and Conservation District plans. The 1982 planning rule (219.12 (b) requires that b) "The interdisciplinary team shall identify and evaluate public issues, management concerns, and resource use and development opportunities, including those identified throughout the planning process during public participation activities and coordination with other Federal agencies, State and local governments, and Indian tribes."

There are persistent problems and obstacles in the planning process when measured against the requirements of the 1982 Planning Rule (219.12), and the CEQ regulations for implementing the NEPA. Our early and continuing objections are the SNF's practice of taking the information from the 2005/2008 planning effort and using that information in the current planning process. The SCAC believes the following items did not follow CEQ regulations or the Planning Rule requirements:

- No Cooperating Agency MOUs, even after verbal agreement on SCAC supplied Draft MOU
- Developed preferred alternative prior to scoping and developing other alternatives
- Out of date data sets e.g. fire
- Lack of consistency in Draft Plan and DEIS between narrative and maps

- Incomplete Analysis of the Management Situation. Baseline and benchmark data was not completed until the PDEIS was released. Lack of data prevents consideration of full range of alternatives.

The Analysis of the Management Situation (AMS) is required and defined under CFR 219.12. The purpose of the AMS is to "explain in detail the current condition of the economic development." The SCAC has provided extensive verbal comments in meeting and written comments regarding our interest in the AMS being prepared to help develop alternatives and to provide the cooperating agencies with the best understanding of forest conditions. The SNF did not and has not followed the requirements in CFR 219.12(e), and as expressed in detail in the Forest Service Bulletin *Economic Analysis to meet 1982 Rule Procedural Requirements*. In order to effectively construct a full range of alternatives as required by the CEQ and in response to major resource issues, the SNF was required to develop "monetary benchmarks which estimated the maximum present net value of those resources having an established market value or assigned value (CFR 219.12 (e)(1)(iii). The SCAC requested this information consistently throughout the planning process both in written and verbal form.

The SCAC is disappointed that the SNF withdrew the cooperating agency preliminary comment period for this Preliminary Draft Plan (PDP) promised in earlier meetings. Rescinding our comment period reduces our ability to participate as a Cooperating Agency and diminishes the Cooperating Agency relationship as described in the Forest Service National Environment Policy Act Handbook (1909.15_10). The AMS as described in the January 11, 2012 meeting in Cody was still incomplete at this time. We had looked forward to reviewing a completed version, with benchmarks and forecasting included, in order to help construct a full range of alternatives. Unfortunately, the benchmarks, including some Present Net Value and timber spectrum analysis was not completed until just prior to the release of the DEIS and Draft Plan. The SCAC could not provide the comment detail we would have wanted to, since we do not have the maps regarding the suitable and capable range and timber. These maps (both for the no action and all action alternatives) were not included in the PDF for us to understand the spatial relationship between resources and comment appropriately.

The DEIS and Draft Plan are confusing and not consistent. Maps, tables, and narratives are not in agreement. Many of the SCAC members have provided similar comments. While we recognize the procedural problems noted in particular resource sections, the SCAC does indeed want to focus on solutions, not on the process problems. We would like to work with the SNF between the draft and final EIS and Forest Plan to ensure that as many of the local governments' interests can be incorporated.

In the Proposed Action on page 4 of the DEIS it states that the designation of "routes and trails for specific uses is not considered during plan revision". This statement contradicts Planning Rule 219.1 (b) which states that "Plans guide *all* [emphasis ours] natural resource management activities and establish management standards and guidelines for the National Forest System." In addition, the local governments requested (in writing) early in the planning process to include information and direction on

routes and trails. The local governments are very interested in travel route planning, especially on the Shoshone as 86% is classified as Roadless or Wilderness. Delaying travel planning we believe is a mistake, costly, inefficient and an additional waste of forest staff resources and as such should be included in the Forest Plan revision.

3. COUNTY AND CONSERVATION DISTRICT LAND USE PLANS

The SCAC members each have County and Conservation District Land Use Plans that address goals, objectives, and policies for lands within the counties. Policies and goals that are directly related to the issues associated with management of public land within these counties and conservation districts are summarized below by plan. CEQ mandates that the SNF identify and discuss areas in which the proposed action is inconsistent with local land use plans. Furthermore, where inconsistencies do exist, the USFS shall discuss the extent to which the USFS will reconcile these differences. CEQ Section 1506.2 – Elimination of Duplication with State and Local Procedures Part D states:

> (d) To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.

3.1 FREMONT COUNTY LAND USE PLAN

The Fremont County Land Use Plan (FCLUP) has important stated guidelines, goals, objectives, and policies which have been expressly written to address important land use decisions implemented by federal agencies that will impact the custom, culture, economic, and social stability of the County's citizenry (Fremont County Natural Resources Planning Committee 2004).

REGULATORY GUIDANCE

According to CEQ regulations for NEPA, federal agencies are required to consider the impact of their actions on the human environment (Section 1500.2 Policy):

> (d) Encourage and facilitate public involvement in decisions which affect the quality of the human environment.
>
> (e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.
>
> (f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.

Recognizing the importance of the preceding, authors of the FCLUP constructed the following narrative (Section 3.02 (b) Coordination Requirements, page 12):

> Thus, by definition, the National Environmental Policy Act requires federal agencies to consider the impact of their actions on the custom of the people as shown by their beliefs, social forms, and "material traits." It is reasonable to read this provision of the National Environmental Policy Act

> as requiring federal agencies to consider the impact of their actions on rural, range-oriented, agricultural counties such as Fremont County where, for generations, families have depended upon the "material traits" of ranching, farming, mining, timber production, wood products, and other agricultural lines of work for their economic livelihoods.

The SNF should discuss any inconsistencies of proposed actions with approved state or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the Agency will reconcile its proposed action with the plan or law.

CONTENTS OF THE FREMONT COUNTY LAND USE PLAN

The FCLUP details the historic background of the County including guidelines, goals, objectives, and policies as it relates to its people, land, endangered species, fire management, grazing, law enforcement, minerals and mining, outdoor recreation, predatory animals, timber, transportation and rights of way, water, wilderness, and wildlife. The FCLUP was written specifically to coordinate with the federal and Wyoming government, which manage approximately 54 percent of the County. In the past, the federal agencies have not fully coordinated with local governments and implemented ideology and land use decisions in their documents which are consistent with local viewpoints. The FCLUP and states (page 2):

> It is a goal of the planning process that federal and State management actions in Fremont County will be more cooperative and less confrontational than in the past. Fremont County is well aware of the statutes requiring federal agencies to give consideration to local land use plans, resolve inconsistencies in federal plans, and provide for meaningful involvement of local officials in the management processes. It is the intent of this planning process that those mandates are complied with, and that the Fremont County's Plan is fully recognized.

The FCLUP carefully describes the physical environment of the County and the important relationship this environment plays in the history of the people of Fremont County and their opportunities to work and recreate on federal lands. All of the resources provided from federal lands are intimately interconnected with the daily lives (socially and economically) of citizens in Fremont County.

3.2 HOT SPRINGS COUNTY LAND USE PLAN

It is requested that the SNF fully evaluate and consider the information contained within the Hot Springs County Land Use Plan, particularly with regard to the following topics (Hot Springs County 2002).

Local Controls, Local Benefits (page 26):

> Hot Springs County will oppose material changes in land uses, which hamper or otherwise negatively impact traditional land uses. The County intends to avoid undue social distress, dislocation, and hardship brought on the community by such changes.
>
> The County will insist regulatory action cite the impacts to the local economy, local custom and culture, the human environment and provide how such action is consistent with new, revised or supplements to the County's land use plans (as required by the National Environmental Policy Act).

Multiple Use (page 27):

> It shall be the policy of Hot Springs County to support multiple use of public land. The County opposes management initiatives which restrict or limit existing and potential uses. The County will inform public land managers of any negative impacts on the livelihoods and/or quality of life of Hot Springs County residents which arise from public land management mandates, regulations and laws.

Access (pages 28 and 29):

> It shall be the policy of Hot Springs County that the County supports retention of existing access to public land, and will oppose management initiatives, which restrict or limit access or might impact the livelihoods and/or quality of life of Hot Springs County residents. Hot Springs County relies on its cooperative agreements, RS 2477, the Wyoming Wilderness Act, NEPA, ANILCA, and broad-based legal precedent, which all assure continued access of public land, and place the burden on State and Federal officials to prove by sound scientific means why access must be curtailed. As required by Federal statute, Hot Springs County expects and relies on State and Federal agencies to provide appropriate and timely notice of anticipated changes to access or management of public land that impacts access. This will allow the County the time to make an informed decision on any proposed change. Hot Springs County intends to exert such influence allowed by law to maximize access to public land.

Agriculture (page 33):

> Hot Springs County supports opportunities for enhancement of land stewardship. Good land stewardship assures public land continues to be productive for generations to come, as it has sustained the County's economy for several generations already. Any changes and/or restrictions proposed by Federal or State agencies must be based on objective and sound scientific data and in cooperation with the County as required by Federal Data Quality Act. As far as required by Federal statute, the County asserts State and Federal land use and management plans must comply with the County Land Use Plan and incorporate standards and objectives that maintain the health, safety and general welfare of agricultural interests culturally, historically, and economically.
>
> Special Land Designations (pp. 49 and 50): Hot Springs County opposes attempts to create new *de facto* wilderness areas by using "roadless areas" or other restrictive management designations in and of themselves. Instead, the County supports the intent of the Wyoming Wilderness Act, which discourages efforts to promote additional roadless areas, and wilderness-like areas. The County opposes creation of the Cedar Mountain Wilderness Area and/or any other new wilderness area in the County. Hot Springs County acknowledges and opposes the existing ACEC designation and opposes new designations of ACEC and/or WSA areas on the Federals lands within the County. The County opposes restrictions placed on existing uses of the public lands due to wolf, grizzly bear, sage grouse or other species of wildlife.

3.3 PARK COUNTY LAND USE PLAN

The Park County Land Use Plan does not specifically address how federal agencies should manage land under federal control but does include goals to retain the multiple uses of public lands and to sustain agricultural business (Park County 1998). In addition, the Plan includes the goal that "local officials level of coordination with state and federal agencies should be increased with respect to the management and use of public lands to help meet the needs of county residents." The Plan also encouraged the use of

economic statistics and indicators to document the effects of land management changes on county residents.

The Public Lands section of the Plan also states: "These lands must be managed in a manner that will continue to produce grass, forest products, oil and gas, minerals, and wildlife, and continue to provide recreation and tourist-oriented activities.

The Park County Land Use Plan goes on to lists action items for public lands. The key items are excerpted and bulleted below.

- The County will raise important issues during the scoping process.
- Park County will develop regular meetings between local governments and public land managers.
- Encourage public land managers to include local officials in field work and field trips.
- Develop and maintain and economic model for Park County to assist decision makers.
- The Board of County Commissioner decisions should consider non-commodity values.
- The Board of County Commissioner shall work to improve the availability of information concerning public lands decisions.

3.4 MEETEETSE CONSERVATION DISTRICT LAND USE MANAGEMENT AND RESOURCE CONSERVATION PLAN

The Meeteetse Conservation District (MCD) recently completed their Land Use Management and Resource Conservation Plan. This Plan is intended to be a guide for the citizens of the MCD, and others, for identifying and respecting the customs, culture, economic viability, social stability and quality of life found in this unique area, and then applying those values to resource conservation, planning, growth, development, and such changes as may occur in the MCD through time (Meeteetse Conservation District 2011). One of the purposes of the MCD Land Use Plan is to "establish a more consistent and defensible position with regards to state and federal decision-making processes." To that end, one of the goals of the plan is to:

> support an agribusiness and agricultural science perspective for individual agricultural producers, agricultural communities and other agricultural entities, and other stakeholders involved with governmental agencies in the process of natural resource management and planning in order to provide for the economic and social stability of the MCD, the region, and the State of Wyoming.

One of the policies of the MCD Land Use Plan is to:

> facilitate efforts to bring together individual agricultural producers, agricultural communities and other agricultural entities, other stakeholders, and governmental agencies to view natural resource management and planning from an agribusiness and agricultural science perspective in order to provide for the economic and social stability of the MCD, the region, and the State of Wyoming.

With respect to more regional planning efforts, the MCD Plan also states that:

> Management and planning are often controlled by governmental entities that lack local connections, are unresponsive to local needs, or that do not desire local input. Local input may have improved stature when provided by a locally elected board. The MCD strives to be a governmental entity that provides a means of local involvement. The MCD, as an elected governmental entity, should provide a way for cooperators to express themselves in a forum that is otherwise inaccessible to them. Local landowners can be impacted by planning decisions at the local, State, and federal level. It is a reality that many landowners do not have the time or finances to review relevant documents, rules, and regulations or voice their concerns/opinions or attend meetings on a regular basis.

As such, the MCD is very interested in providing input and comment on the Draft Forest Plan and DEIS to ensure its goal that "The custom, culture, and economic stability of the MCD and its people are protected and served by appropriate and effective natural resources management and planning." This is especially important because nearly 70% of the land that makes up the MCD is public land. As such:

> The public lands and the rights and privileges residents have come to rely on in all of the public lands, are central to the custom and culture of the MCD. The MCD finds public land and natural resources management practices are both relevant and substantive to its custom and culture, its economy, its environment, its quality of life, and its ability to protect and enhance local resources in spite of potentially detrimental outside influences.
>
> Lands that have been identified under Federal Resource Management Plans as multiple use lands are subject to land uses that are critical to the performance of the District's duties regarding grazing, water and erosion conservation.

3.5 CODY CONSERVATION DISTRICT LAND USE PLAN

The Cody Conservation District's (CCD) Long Range Plan 2001–2005 does not directly address how federal agencies should manage land within their district, but the Plan does have one goal related to this issue (Cody Conservation District 2001). Goal E in the Plan is that the:

> CCD will represent local interests in the planning and implementation efforts of local, state, and federal government agencies within the boundaries of the CCD.

Actions under this goal include working with government agencies to protect property and water rights, address SNF water quality concerns.

3.6 HOT SPRINGS CONSERVATION DISTRICT LAND USE PLAN

The Mission Statement of the Hot Springs Conservation District Long Range Plan is to (Hot Springs Conservation District 2010):

> Help stabilize the local economy and resolve conflicts in land use. Provide leadership for the conservation of Hot Springs County soil and water, protect the agriculture resource base, promote wise use of water and all other natural resources, preserve and enhance wildlife habitat, protect the tax base and promote the health, safety and general welfare of the citizens of this state and Hot Springs county through "a responsible conservation ethic.

One of the goals and strategies of the Plan is to "continue to be an active participant in the revision of the … SNF Draft Forest Plan/DEIS." In addition, the District will "support the sustainable use of natural resources on private and public lands in Hot Springs County."

3.7 POPO AGIE CONSERVATION DISTRICT LONG RANGE PLAN 2008–2012

The Popo Agie Long Range Plan provides (Popo Agie Conservation District 2008):

> Popo Agie Conservation District supports proper conservation measures and multiple use activities on public lands. The district will develop a Memorandum of Understanding (MOU) with federal agencies to assist with federal land management planning and decisionmaking.

3.8 DUBOIS-CROWHEART CONSERVATION DISTRICT LAND USE AND NATURAL RESOURCE MANAGEMENT PLAN 2011–2015

The Dubois-Crowheart Conservation District Land Use and Natural Resource Management Plan states (Teton Conservation District 2010):

> [Objectives:] "Remain actively involved in the Shoshone National Forest Plan Revisions. Seek out all opportunities and communications available to stay informed of proposed and ongoing developments on the Shoshone National Forest within District Boundaries. Remain actively involved in the Bureau of Land Management Lander Area Resource Management Plan revision. Seek out all opportunities and communication available to stay informed of proposed and ongoing developments on BLM lands within the District boundaries.

3.9 TETON CONSERVATION DISTRICT LONG RANGE PLAN 2010–2012

The Teton Conservation District Long Range Plan includes (Teton Conservation District 2010):

> Teton Conservation District's partnership with the United States Forest Service (USFS) will continue at a local level within District boundaries. USFS lands and private property are intertwined within the Teton Conservation District. These federal lands are an important economic and natural resource for the area continuous throughout political boundaries. TCD strives to improve partnerships and management of our forest/urban interfaces and the growing demands put on these lands.

3.10 LOWER WIND RIVER CONSERVATION DISTRICT LAND USE AND NATURAL RESOURCE MANAGEMENT PLAN 2011–2015

The Plan states that the Lower Wind River Conservation District will (Lower Wind River Conservation District 2011):

1) Review, study and comment when possible on all local, state and federal legislation, rules and regulations that may have an effect on the Conservation District and its cooperators.
2) Coordinate with cooperators, residents of the District, public institutions and government agencies in the conservation of the water, soil, vegetative and wildlife resources.

3) Cooperate and coordinate with the private individuals and groups along with local, state and federal governmental agencies to pursue continued resource management and enhancement in the district.

3.11 SUMMARY OF ISSUES WITH DRAFT FOREST PLAN AND DEIS COMPATIBILITY

SCAC members believe that the USFS has not included in the numerous stated policies and goals included in the Hot Springs, Fremont, and Park County Land Use Plans and Meeteetse, Cody, Hot Springs, Dubois-Crowheart, Lower Wind River, Popo Agie, and Teton Conservation District Land Use Plans. In not addressing inconsistencies between the Forest Plan and DEIS and County and Conservation District Land Use Plans, the SNF is not in agreement with CEQ Section 1506.2 – Elimination of Duplication with State and Local Procedures. The SCAC has consistently stated that they favored continued multiple use and are not in favor of reducing access to public lands for a variety of purposes.

The SCAC fully supports the goals of multiple use and sustained yield, balancing increasing and competing demands for resources on public lands while serving the best interests of the residents of the counties surrounding the SNF.

4. SOCIAL AND ECONOMIC RESOURCES

The SCAC concern with the socio-economic analysis of the AMS, Shoshone Forest Plan, and DEIS are centered on the lack of relatable analysis and consistency of data within the social and economic analysis. The socio-economic sections provide the opportunity to weigh the costs and benefits of the alternatives to competing publics. In addition, the People and Communities – Goods and Services section should focus on the impacts of the alternatives on local communities, whom are the portion of the public that bear the largest portion of those impacts. The SCAC feels that the analysis focuses on the impacts to the Forest and other resources, rather than the impacts to the communities. The summary of the Plan states that, "the economic differences among the alternatives in many cases are relatively small; the impacts may be considerable to individuals, families, or businesses. In small communities, the loss of a single job may be important, yet negligible across the analysis area on the Shoshone National Forest." The SCAC feels as if the Forest Service has strived to produce just an analysis of the "negligible" impacts across the planning area, without providing the detail required for determining where and to whom the "considerable" impacts may occur.

The AMS failed to produce financial benchmarks against which to measure the alternatives, making it difficult to measure missed opportunity costs for specific resources uses. The Plan contains many references to social and economic sustainability, but little substantial thought. In addition, some of the goals specific to economics are not carried through into the DEIS analysis.

Within the DEIS there are issues with the data utilized by specific resources, which produces meaningless present net value (PNV) numbers across all alternatives. While the economic impacts produced through IMPLAN is methodologically sound, there are issues with both the input data and the application of the results in the PNV. Furthermore, the discussion of the impacts to the four value groups does not provide sufficient basis for choosing Alternative B in the Record of Decision as the alternative with the highest net public benefit.

4.1 ANALYSIS OF THE MANAGEMENT SITUATION

The AMS is one of the tasks in the general planning process. One of the steps within AMS is benchmark analysis, which should be used to guide the formulation of alternatives. Benchmark analysis should assume that there is no budget constraint. There are three benchmarks:

- Minimum Level Benchmark (219.12e(1)(i))
- Maximum Physical and Biological Production Benchmark (219.12e(1)(ii))
- Maximum Present Net Value Benchmark (219.12e(1)(iii))

The SNF completed the maximum physical and biological production benchmark for resources, by calculating the available acres for each type of resource use. These acres are listed below:

- Maximum timber = 399,817 acres
- Maximum commercial livestock =725,578 acres
- Maximum oil and gas leasing = 1,021,847 acres
- Maximum summer motorized recreation = 638,760 acres
- Maximum winter motorized recreation = 204,936 acres
- Maximum non-motorized recreation = 2,287,452 acres

However, the SNF failed to take the next step and calculate the maximum PNV benchmark. The Maximum Present Net Value Benchmark [219.12e(1)[iii]] should, "develop a maximum PNV for those resources that have a market or non-market value and are relevant to the plan revision issues."

4.2 DRAFT LAND MANAGEMENT PLAN

The Plan should contain the outline for implementing the preferred alternative. The Plan contains countless references to social and economic sustainability within the written text; however, there are inconsistencies between the preferred alternative, the written narrative of the Plan, and the information regarding social and economic conditions in the DEIS. Table 1 lists the desired conditions, individual goals, objectives, guidelines, and management approaches that pertain to social and economic resources. The bold sections are the only sections listed within the social and economic section of the Plan. Several are of particular interest to the SCAC.

Table 1 Social and Economic References in the Shoshone Forest Plan

Section	Description	Page Number
Livestock Grazing - Goal	Provide a sustainable supply of forage that helps achieve other resource desired conditions on National Forest System lands and supports ranching in local communities.	72
Livestock Grazing - Objective	Average annual permitted animal unit months will range between plus or minus 10 percent of 60,000 animal unit months.	73
Forest Products - Goal	Provide a reliable supply of forest products over time that 1) is consistent with achieving desired conditions on National Forest System lands, and 2) helps maintain or create processing capacity and infrastructure in local communities.	75
Forest Products - Goal	Suitable timber lands are managed to produce a sustainable supply of commercial timber products.	75
Special Uses - Goal	Special use authorizations benefit local economies through associated employment opportunities, services, and visitations.	84
Minerals - Goal	Help meet energy resource needs.	85
Minerals - Goal	Provide for mineral resource development.	85

Section	Description	Page Number
Recreation - Desired Conditions	Partnerships are a significant tool to help provide public use and year round recreation opportunities.	89
Recreation - Goal	Seek increased tourism that will enhance local economies by providing information and a broad spectrum of high quality outdoor recreation opportunities for visitors.	90
Management Area 5.1 (Managed Forest and Rangelands) - Guidelines	On lands suitable for timber production, commercially valuable timber products are produced by maintaining acceptable stocking levels and rates of growth, as well as favoring commercial tree species.	188
Management Area 5.1 (Managed Forest and Rangelands) - Guidelines	Manage for an adopted Recreation Opportunity Spectrum class of semi-primitive motorized to roaded natural.	188
Management Area 8.2 (Ski-based Resorts) - Desired Conditions	This management area provides intensive winter recreational use and moderate summer use as needed to support the primary purpose of maintaining a viable ski resort.	197
Management Area 8.2 (Ski-based Resorts) - Management Approach	The Forest Service will provide summer recreation opportunities that help sustain local economies during the shoulder and off seasons.	199

Our first concern is the forest products goal to "help maintain or create processing capacity and infrastructure in local communities." There is no discussion of this in the DEIS. In fact, when comparing alternatives it is emphasized that mills have shut down in the area and that impacts from processing would not occur in the area. The SCAC would appreciate an analysis of how this listed goal impacts local communities. Does Alternative B produce a reliable source of product to support a local mill or two? Does Alternative F? If the supply supports at least one mill, what is the impact on the three-county region? This information is not contained in the DEIS.

The desired conditions for recreation state that "partnerships are a significant tool to help provide public use and year round recreation alternatives." This appears to more of a statement that a desired condition. Would the forest service like to increase partnerships? Would they just like to maintain current partnerships? Where partnerships analyzed in the DEIS? How are the different in preferred alternative?

Also of relevance for recreation, the goal for recreation seeks to increase tourism. The DEIS on the other hand states that recreation visitor days will remain the same across alternatives and throughout the life of

the Plan. We find this contradictory. Why and how does the preferred alternative best support this? The SCAC believes that the Plan should better reflect the information analyzed in the DEIS. However, first the analysis in the DEIS needs to be complete. For example, if motorized recreation visitation is restricted or reduced across alternatives, will wilderness visitation increase or remain the same? Motorized recreation has a higher economic impact, but which has the higher public benefit? Will the increased public benefit outweigh the economic and public benefit lost if motorized recreation is restricted or reduced? This is the type of analysis that is necessary for long term planning.

As important as the economics are to the local areas, the social aspects of forest use are also of great importance. Many of our constituents live close to the Shoshone in order to maintain a certain lifestyle. While the Plan talks generally about social and economic sustainability, there are little to no references to the social implications in any of the desired conditions, goals, objectives, guidelines, or management approaches.

This is highlighted in the monitoring section. The monitoring chapter of the Plan contains a section for social and economic sustainability, yet the four questions pertain only to economic measurements:

1. How many animal unit months are permitted?
2. How many hundred cubic feet (CCF) were produced?
3. What type and how many recreation special use authorizations are authorized?
4. How many acres of mineral leases?

After reviewing these monitoring questions the SCAC requests that social indicators be incorporated into the Plan. Example indicators that could be used include:

- How many Christmas tree permits were issued to local residents?
- How many firewood permits were issued to local residents?
- What was the level of utilization of campgrounds within the forest by local residents?
- How many off-road permits were issued to local residents?

4.3 DRAFT ENVIRONMENTAL IMPACT STATEMENT

While the AMS should guide the formulation of alternatives and the Plan should provide the information to implement the preferred alternative, the DEIS should provide all of the information to justify that the preferred alternative maximizes net public benefit. Section 219.1 of the 1982 Planning Rule notes that, "plans shall provide for multiple use and sustained yield of goods and services…in a way that maximizes long term net public benefits…" In order for this to occur, the DEIS must make clear why and how the preferred alternative maximizes net public benefits. The current effects analysis contains net present value calculations for uses with monetary values and contains discussions of four value groups, but it fails to provide the net public benefit justifications needed for the Final EIS and Record of Decision.

The sections below discuss the inconsistencies of the data used in the effects analysis and provide an examination of three types of analysis that should be completed by the SNF to determine the differences in net public benefits among alternatives.

Net Public Benefit versus Present Net Value

Section 219.3 defines net public benefits as the "…long term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or not. Net public benefits are measured by both quantitative and qualitative criteria rather than a single measure or index."

Present Net Value, on the other hand, is the measure of "financial efficiency." Estimating PNV is required by 219.12(g); however, the decisionmaker is not required by 219.12(j) to select the alternative that maximizes PNV (Economic Analysis to meet 1982 Rule Procedural Requirements). Furthermore, the direct and indirect benefits and costs should be analyzed in sufficient detail to estimate:

- (i) the expected real-dollar costs (discounted when appropriate), including investment, administrative, and operating costs of the agency and all other public and private costs required to manage the forest up to the point where the outputs are valued and the environmental consequences are realized;
- (ii) the expected real-dollar value (discounted when appropriate) of all outputs attributable to each alternative to the extent that monetary values can be assigned to nonmarket goods and services, using quantitative and qualitative criteria when monetary values may not reasonably be assigned;
- (iii) the economic effects of alternatives, including impacts on present net value, total receipts to the Federal Government, direct benefits to users that are not measured in receipts to the Federal Government, receipt shares to state and local governments, income, and employment in affected areas; and
- (iv) the monetary opportunity costs (changes in present net value) associated with those management standards and resource outputs in each alternative that were not assigned monetary values but were provided at specified levels, compared with the maximum present net value benchmarks developed in Sec. 219.12(e)(1)(iii).

The DEIS contains the economic methodology. Below tells us how the PNV was calculated (page 33 and 578.

> Economic efficiency is defined as how well the dollars invested in each alternative produce benefits to society. Present net value was used as an indicator of economic efficiency. To calculate present net value, a spreadsheet was used which tracks revenues, costs, and benefits for a 50 year time period…A 4 percent discount rate was used." (DEIS page 33, Appendix B)
>
> Present net value was calculated using QuickSilver (2012), and estimated costs and values for goods and services for each alternative. Present net value combines benefits and costs that occur

> at different times and discounts them into an amount that is equivalent to all economic activity in a single year. Costs and values for anticipated activities, goods, and services over the next 50 years for each alternative were derived by resource specialists. (DEIS, page 578)

The impact analysis then provides the PNV numbers for each alternative listed in Table 2. The SCAC would appreciate more of the "sufficient" detail by individual resources included in this table. There does not appear to be adequate detail within the resource areas to reproduce the PNV or "economic efficiency" of the alternatives. If the details are in the document we were not able to find them. It is difficult to reproduce these numbers from the individual resources sections. Resources areas provided differences in jobs and earnings among alternatives, but did not always provide the output data needed to produce these PNV numbers.

Table 2 Economic Efficiency by Alternative (in millions of dollars)[6]

	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Present Net Value	378,060	378,015	368,273	378,008	381,772	382,839

Affected Environment and Environmental Consequences

The current impact of the SNF on the three-county region of Freemont, Hot Springs, and Park Counties is listed below in Table 3. There are two numbers in this table that are important for consistency with the DEIS. First, according to this table the employment from livestock grazing on the Shoshone is 200 jobs. Secondly, the total forest related jobs within the three-county region is 9,373, which includes recreation and livestock grazing.

Table 3 Current Economic Impact of SNF on the Three-County Region[7]

	Region Employment (Jobs)	Region Earnings (000$)	Average Earnings per Job
Livestock Grazing	200.7	$6,467.00	$32,220.00
Timber	82.6	$1,893.00	$22,918.00
Forest Visitors	388.4	$10,234.00	$26,350.00
Commercial Recreation	353.0	$7,539.00	$21,358.00
Shoshone National Forest	235.7	$10,578.00	$44,879.00

[6] DEIS, Table 172, p. 603
[7] Taylor et al., 2012

	Region Employment (Jobs)	Region Earnings (000$)	Average Earnings per Job
Total Attributable to SNF	1,260.4	$36,711.00	$29,127.00
Total Forest Related Industries(1)	9,373.0	$170,477.00	$18,188.00
Total Region	48,754.0	$1,844,240.00	$35,776.00

When the impact analysis is completed the SNF utilizes the lowest of three grazing scenario employment numbers. This number is substantially lower than the number from the table above and minimizes the impacts of grazing across alternatives and in relation to other resource uses. Please see the section below on grazing for additional details.

The total forest related employment data is misused within the forest products sections and exacerbates the confusion of the forest section. Please see the section below on the forest products analysis for further detail.

The impact analysis as completed does not provide the SCAC enough information on the differences among alternatives to conclude that Alternative B provides the highest net public benefits (Table 4). Additionally, the analysis is focused on the impacts to the Forest or to other resources of the Forest, and misses the opportunity to relate the impacts to the communities of the impact area.

In recreation there is a lack of analysis as evidenced by the lack of change across all alternatives. The DEIS itself states that there will be a shift in the way in which people to choose to recreate on the SNF and additional analysis of winter snowmobiling highlight that just this one activity may change substantially between Alternatives A and B. There exists a high probability that other uses will change as well. SCAC would appreciate additional analysis on the economic and the social impacts to the various forms of recreation on the SNF. Table 4 details the resource units that were utilized in the impact analysis and highlights the lack of analysis completed on potential impacts to recreation type across alternatives.

Table 4 Economic Section of Summary Comparison of Alternatives by Revision Topics[8]

Economics	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Recreation: forest visitors (average annual labor income thousands of dollars)	6,467	6,467	6,467	6,467	6,467	6,467

[8] DEIS, Table 3, p.xix

Economics	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Recreation: commercial (average annual labor income thousands of dollars)	1,893	1,893	1,893	1,900	2,280	2,397
Livestock grazing (average annual labor income thousands of dollars)	1,900	1,900	1,064	1,135	1,185	1,241
Timber harvest (average annual labor income thousands of dollars)	2,487	2,422	2,119	2,324	3,239	44,463

The impact analysis discussion of the four indicator groups does not contain enough information of the impacts among alternatives and some of the analysis is contradictory. There is not information provided on sufficient areas in order for those who belong to that value group to determine the impacts. As an example, the recreation non-motorized impact analysis says that, "neither alternative recommends additional wilderness, but Alternative B extends motorized opportunities beyond the current situation." The recreation motorized analysis then states, "motorized opportunities in the future are not likely to expand significantly under Alternative B." This analysis is contradictory and needs to contain more specific information in order to substantiate Alternative B as the alternative with the highest net public benefits.

The livestock grazing earnings are underestimated in the above table. While this may be negligible across alternatives, it is important to the economic comparison with other resources uses and for the social well-being of the population. For these reasons, the SCAC requests that the SNF reexamine their utilization of the data provided by their specialists and adjust their analysis accordingly. The SCAC also believes that the impact of recreational use is underestimated because the data that was used in the calculations is out of date and not consistent with present day costs.

Table 5 Resource Data Utilized in Impact Analysis[9]

Activity	Units	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Saw timber	Mcf	14,634	14,211	12,543	13,574	18,782	25,848
Products other than logs (POL)	Mcf	804	764	715	735	1,030	1,400

[9] DEIS, Appendix B, p.33

Activity	Units	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Salvage	Mcf	1,564	1,578	1,631	447	2,328	3,264
Livestock grazing	AUMs	55,881	55,881	31,309	55,881	67,257	70,212
Non-local day trips	Trips	96,909	96,909	96,909	96,909	96,909	96,909
Non-local overnight on Forest	Trips	32,303	32,303	32,303	32,303	32,303	32,303
Non-local overnight off Forest	Trips	96,909	96,909	96,909	96,909	96,909	96,909
Local day trips	Trips	284,266	284,266	284,266	284,266	284,266	284,266
Local overnight on Forest	Trips	25,842	25,842	25,842	25,842	25,842	25,842
Local overnight off Forest	Trips	19,382	19,382	19,382	19,382	19,382	19,382
Non Primary trips	Trips	90,448	90,448	90,448	90,448	90,448	90,448

The sections below highlight data inconsistencies and additional needed analysis within individual resource areas.

Minerals

The oil and gas analysis was omitted from the social and economic analysis because there has not been activity in the past several years. However, there are differences in surface occupancy constraints among alternatives that impact future net public benefits in terms of lost opportunity costs. The SCAC believes that this discussion needs to be included in the net public benefit analysis. What are the benefits of additional no surface occupancy constraints and what is the lost opportunity cost?

Commercial Livestock Grazing

Grazing impacts were underestimated in the impact analysis completed by the SNF. Table 6 provides the economic impact analysis provided to the SNF by their economic specialist. The range in output, jobs, and earnings are based on the level of dependency of home ranches on the public AUMs. If they are highly dependent on public AUMs, meaning there are no substitutes, then the high end of the value

should be used in measuring changes. In examining the current impact of the SNF, there are 200 jobs attributable to the SNF in the region. For this reason, the SCAC would request that the SNF utilize the higher value in the PNV calculations and the other impact analyses. While the differences among alternatives for grazing will remain relative, we would like the contribution of grazing relative to other resources to be accurately reflected.

Table 6 Economic Impact of Livestock Grazing by Alternative[10]

	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
AUMs	55,881	55,881	31,309	55,881	67,057	70,212
Direct Output	$3.0-$9.2 MM	$3.0-$9.2 MM	$1.7-$5.1 MM	$3.0-$9.2 MM	$3.6-$11.0 MM	$3.8-$11.5 MM
Total Output	$5.4-$16.5 MM	$5.4-$16.5 MM	$3.0-$9.3 MM	$5.4-$16.5 MM	$6.5-$19.8 MM	$6.8-$20.8 MM
Total Jobs	59-179	59-179	33-100	59-179	70-215	74-225
Total Earnings	$1.9-$5.8 MM	$1.9-$5.8 MM	$1.1-$3.2 MM	$1.9-$5.8 MM	$2.3-$7.0 MM	$2.4-$7.3 MM

Recreation

The impact analysis for recreation is both confusing and frustrating for the SCAC. Forest recreation is very important to the population of the three-county region, for both economic and social reasons. However, groups are not able to determine how the changes in Alternative B will impact recreational uses on the SNF. The DEIS states that there will be shifts in the types of recreation, but overall use numbers will remain the same. The Plan then has a goal to increase visitation. In addition, there is monetary data on the economic impact of the various types of use. So, if the goal is to increase usage and there will be shifts in the types of usage and these types of use have different monetary values—where is the analysis?

Additionally, the local populations derive public benefit from various types of recreation. While there may be competing usage and disagreement the information on how these types of recreation are impacted

[10] Source: Economic Impact Analysis of the Shoshone NF: Round 2 (Taylor and Foulke 2012)

should be explained. This type of analysis is necessary for other recreation types as well in order to assess changes in net public benefits.

Forest Related Products

The forest related analysis is extremely difficult to follow or reproduce due to different measurement scales utilized in various tables. In *An Economic Profile of the Shoshone National Forest* timber volume is expressed in MMBF (Table 7), while in the DEIS predicted volume sold and allowable sale quantity calculations Mcf and Ccf measurements are utilized (Table 8). It is virtually impossible for the non-timber layman to understand or reproduce the calculations. The SCAC requests that all analysis is made in the same measurement in order for the calculations to be understood and verified.

Table 7 Economic Impact of SNF Timber Harvest (2009$)[11]

	Per Unit	Sawtimber	POL	Total
Timber Volume (MMBF)	1	4.5	2.5	7.0
Direct Employment (1)	5.4	24.3	13.5	37.8
Multiplier (2)	2.184	2.184	2.184	2.184
Total Employment	11.8	53.1	29.5	82.6
AEPJ - Direct (3)	$28,585	$28,585	$28,585	$28,585
Direct Earnings	$154,359	$694,616	$385,898	$1,080,513
Multiplier (2)	1.752	1.752	1.752	1.752
Total Earnings	$270,437	$1,216,966	$676,092	$1,893,059
Ave. Earnings Per Job	$22,931	$22,931	$22,931	$22,931

Table 8 Predicted Volume Sold and Allowable Sale Quantity for Each Alternative (in Mcf and Ccf per year)[12]

Timber Volume (Mcf)	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Saw Timber	14,600	14,200	12,500	13,600	18,800	25,800

[11] Taylor 2012, p.79
[12] DEIS, Table 103, p.425

Timber Volume (Mcf)	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
POL	800	760	720	740	1,030	1,400
Salvage	1,560	1,580	1,630	450	2,330	3,260
Total	17,000	16,550	14,900	15,900	22,100	30,500
Allowable sale quantity Ccf per year	19,800	22,800	21,900	22,400	32,800	46,600

Additionally, there are inconsistencies in the use of *An Economic Profile of the Shoshone National Forest* within the forest products section. Of particular note, the DEIS claims (page 423), "for the three-county region, the economic impact of the combined timber harvest is estimated (per IMPLAN model) at 9,083 jobs and $21.9 million in labor earnings, including direct logging jobs and additional jobs that are generated as a result of the direct jobs." However, these 9,000 jobs are for all forest related industries and include travel, grazing and non-labor income

Reduction in Forest Service Budgets and Wildfire Suppression Costs

The analysis fails to incorporate reductions in forest service budgets and wildfire suppression costs. If Forest Service budgets are reduced as anticipated by 10%–20% in the next decade, which programs will be impacted and how do these impacts affect local communities? It is also anticipated that wildfire suppression costs will increase as budgets are reduced. This information needs to be included in the analysis. Table 9 contains analysis numbers for wildfire costs to the public by alternative. It is important for this information to be included in both the NPV calculation and the net public benefits calculation. Additional detail on this information can be found in the Forest Health section of this comment document.

Table 9 Wildfire Costs by Alternative per Decade

Measurement	Measurements by Alternative (thousands)					
	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Managed Management Areas (acres)	377	423	313	346	460	635

Measurement	Measurements by Alternative (thousands)					
	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Anticipated wildfire (acres)	185	183	184	184	175	161
Min Cost suppression ($165/acre)	$30,558	$30,179	$30,377	$30,311	$28,875	$26,631
Max Cost suppression ($456/acre)	$84,451	$83,402	$83,950	$83,767	$79,800	$73,598
Total min cost	$57,657	$56,941	$57,314	$57,190	$54,481	$50,247
Total max cost	$1,689,024	$1,668,048	$1,678,992	$1,675,344	$1,596,000	$1,471,968

REQUESTS FOR CORRECTIVE ACTIONS

A viable analysis of PNV and net public benefits requires sound data from individual resource specialist and requires resource specialist to utilize social and economic data correctly within their projections. The current DEIS and Plan accomplishes neither of these. The SCAC requests that the SNF examines their mineral, recreation, grazing, timber, and forest management data in greater detail in order to better convey impacts to net public benefits across alternatives.

5. FOREST HEALTH

Forest health is only briefly mentioned a few times throughout the entire DEIS (page 12, 71, glossary) but it is not addressed anywhere within the alternative analysis. The SNF verbally and in e-mail communications appeared to agree to supplement the older 2006 revision topics. The SCAC suggested the topics be updated to reflect massive forest changes between 2006 and 2010. The discussion of revision topics extended to alternative development where the SCAC strongly supported a "Forest Health" alternative. Given that vegetation management and forest health have been listed as a revision topic, the forest health issue gets very little comparative analysis in the DEIS. For example the DEIS states that both aspen and whitebark pine restoration are stressed for all alternatives. Therefore there is not any type of meaningful comparison of varying the amount of restoration effort. More effort needs to be place on the appropriate level of forest cover for whitebark pine, aspen and limber pine and related topics such as fuel loading, forest cover, accumulating mortality and tree density.

Fire and fuels treatments are central to the SCAC's concerns about forest health and socioeconomics. The preferred alternative puts a greater emphasis on passive versus active management of resources. The episodic and unpredictable nature of wildfires and a wildfire-based management approach will not create the jobs and sustainable economic activity that would most benefit local counties. By providing only minimal direction for active management opportunities for preemptive treatments to lessen direct and indirect wildfire costs and insect susceptibility, the preferred alternative will have substantial impacts to local economies.

5.1 WILDFIRE COSTS

The SNF has failed to adequately estimate costs associated with wildfires. While the amount of anticipated wildfire has been modeled for each alternative, associated suppression and indirect costs have not been analyzed. These are substantial costs that would be realized by taxpayers and especially local people relying on forest resources. It is important that the SNF consider not only direct suppression costs but also indirect costs. Indirect costs to be considered include:

- Rehabilitation
- Impacts to recreation opportunities and experience
- Loss of private property
- Loss of timber values
- Wildlife habitat
- Air quality impacts
- Loss in property values
- Losses of tax revenues from all the above

One study found that suppression costs account for only 5%–53% of total wildfire costs (Western Forestry Leadership Coalition 2010). Gebert et al (2004) estimated typical normal wildfire suppression costs to be approximately $120–$330 per acre. The $120–$330 per acre cost is an estimate of typical costs and exceptional costs can climb substantially higher—approaching $600 per acre (Gebert et al. 2004). Adjusting for inflation to 2017 (mid-point of the planning period) and assuming firefighting costs are indexed to normal inflation, typical suppression costs will be $165–$456 per acre. There are also indications that future tree mortality from insects will lead to higher wildfire suppression costs (Rasker 2009).

The DEIS makes the assumption that in the next 10 years the Shoshone will experience wildfire (unplanned ignitions) on about 183,000 acres (page xviii). This is about the same amount that occurred in the previous 10 years, and we think that estimate is an underestimate given warming climate trends and anticipated shifts in fire regimes in the Greater Yellowstone Area (Westerling et al. 2011). Further discussion and explanation should be included in the analysis because it is mentioned elsewhere in the DEIS that wildfire and insect activity is expected to increase with a warming climate.

We believe this analysis can use anticipated direct and indirect costs and may also be able to rely on examples for specific areas where resources may be compromised by forest health. For example, if the south side of the north fork highway were to experience wildfire, what are the anticipated economic and ecological costs given recent beetle attacks? We are particularly concerned about events such as the Gunbarrel fire and want to have the Plan and EIS include a discussion of such catastrophic events and their likely impacts under the analyzed alternatives.

For the sake of illustration, we have provided an analysis of estimated wildfire costs in Table 10. Using the 183,000-acres figure for anticipated wildfire and the estimates for costs of $165–$456 per acre for firefighting costs, the Shoshone will be spending $30,179,000 to $83,402,000 in suppression costs alone over a ten-year period. If we consider other indirect expenditure the total economic impacts from wildfires are $56,941,000 to $1,668,000,000 assuming suppression costs are 5% to 53% of total wildfire costs (Western Forestry Leadership Coalition 2010). While we understand that fire budgeting is handled under separate accounts and controlled by larger overarching policies, it is still the responsibility of the SNF to calculate anticipated costs as the lead office and agency for the planning process. Table 10 shows an anticipated difference in total minimum and maximum costs between the preferred alternative and Alternative F to range from 6.7 to almost 200 million dollars, respectively. The SCAC is troubled at the prospect of incurring up to an extra 200 million dollars without extensive discussion, analysis, and justification. When indirect wildfire costs make up the majority of wildfire expenditures and losses it is likely the local governments and residents that will experience the greatest impacts. It falls on the responsibility of the SNF, as required by NFMA, to provide a substantive comparison and justification for choosing an alternative that does not maximize present net value (CFR 219.12 (j)).

> "(j) Plan approval. The Regional Forester shall review the proposed plan and final environmental impact statement and either approve or disapprove the plan in accordance with Sec. 219.10(c). The

> record of decision for approval of a plan shall include, in addition to the requirements of NEPA procedures (40 CFR 1505.2), a summarized comparison of the selected alternative with:
>
> (1) Any other alternative considered which is environmentally preferable to the selected alternative; and
>
> (2) Any other alternative considered which comes nearer to maximizing present net value." (219.12)

While we understand that this information does not necessarily need to be included in the DEIS, it is required in the Record of Decision. However we think open discussion upfront in the DEIS will allow meaningful public consideration and education of funding issues. The cost estimates that we have presented here are undoubtedly debatable, and the SNF will surely be able to provide an accurate cost analysis based on real costs they have incurred in the past. The important point that has been stressed by the Wildland Fire Leadership Council (2004), is that wildfire suppression cost analysis be included and analyzed by alternative when assembling land management plans.

Table 10 Comparison of Direct and Indirect Wildfire Costs Under Three Alternatives

Measurement	Measurements by Alternative (thousands)					
	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Managed MAs (acres)	377	423	313	346	460	635
Anticipated wildfire (acres)	185	183	184	184	175	161
Min Cost suppression ($165/acre)	$30,558	$30,179	$30,377	$30,311	$28,875	$26,631
Max Cost suppression ($456/acre)	$84,451	$83,402	$83,950	$83,767	$79,800	$73,598
Total min cost	$57,657	$56,941	$57,314	$57,190	$54,481	$50,247
Total max cost	$1,689,024	$1,668,048	$1,678,992	$1,675,344	$1,596,000	$1,471,968

It is also worthy of note that wildfires are expected to increase across the Greater Yellowstone Ecosystem (Westerling et al. 2011) and particularly within areas outside designated Wilderness on the SNF (DEIS page 345). The SNF needs to disclose the opportunity costs and associated economic impacts to local communities for timber harvest foregone, particularly because these opportunity costs have long-term consequences if timber is removed from the resource base by wildfire or insects. These costs also need to be included in costs of net present value. In this sense we do not believe that the SNF has adequately considered local government's main interests.

5.2 DESIGNATED MANAGEMENT AREA HEALTH AND CURRENT AND FUTURE FUNCTIONALITY

The SCAC is concerned that with recent insect activity and the near-term forest fire risk, some of the management areas will not be able to function under their designation as is assigned in the Draft Plan. Timber Management Areas are designated to provide managed lands for the production and harvesting of wood products. With recent insect activity and the large risk of stand replacing forest fire, the SCAC questions if the limited number of acres that have been designated as Management Area 5.1 will be enough to provide forest products. Similarly, with habitat potentially changing so rapidly under lands designated as Management Area 5.4, will the intended purpose for the lands be fulfilled? It appears that much of the forest data in the DEIS (including age-class distribution) is based on out-of-date information from 1999. Given the timing of data collection and the large amount of recent disturbance activity, the management area designation and desired conditions are both seriously flawed.

Figure 2 and Figure 3 illustrate current and potential future changes to Alternative B's Management Areas 5.1 and 5.4. The data from the insect activity and five needle pine decline is from the USDA Forest Service Aerial Detection Survey. Information on fire risk is from the use of the USFS-designed SIMPPLLE model in the first decade. We do not believe that the USFS has taken recent and potential future changes in account during the planning process.

Ltr 0306

SHOSHONE COOPERATING AGENCY COALITION
SHOSHONE NATIONAL FOREST DRAFT PLAN AND DEIS COMMENTS
FINAL

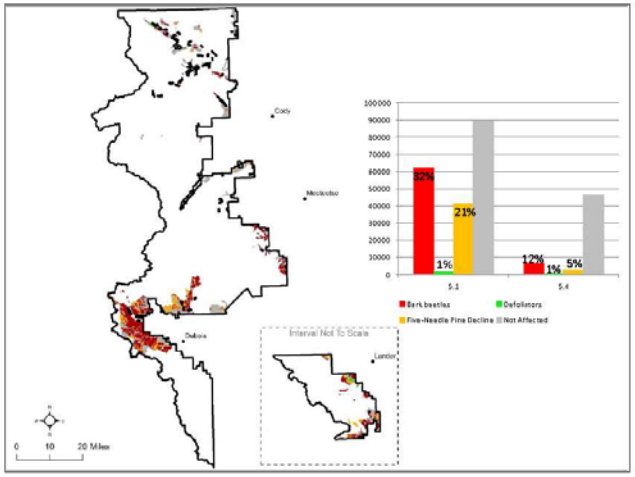

Figure 2 Past insect damage in Alternative B Management Areas 5.1 and 5.4

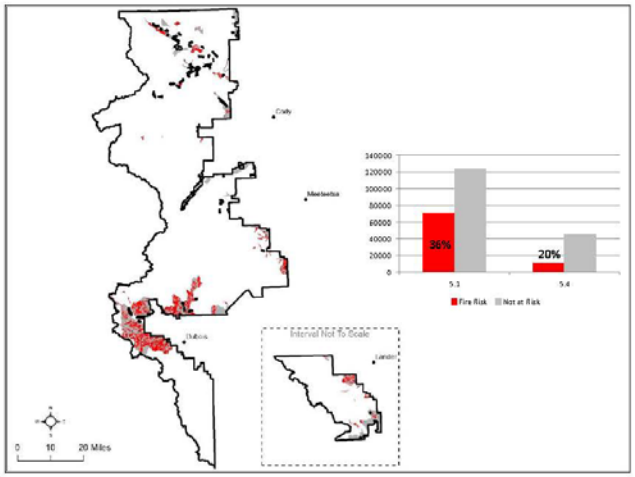

Figure 3 Fire risk in Alternative B Management Areas 5.1 and 5.4

5.3 RESTORATION OBJECTIVES QUESTIONABLE

The Plan fails to address linking restoration opportunities (e.g., aspen restoration) with fire and fuels reduction. The Shoshone acknowledges (AMS page 28) that aspen is at a low end or probably below Historic Range of Variation (HRV). It is also acknowledged (DEIS page 15) that fuels have increased as conifers have encroached and taken over aspen stands. The goal of restoring aspen stands is well-founded, particularly on the southern end of the Forest. Yet no alternatives proposed to mechanically treat aspen on more than 2,500 acres. We suspect that 2,500 acres over the planning period may not be enough to keep up with a changing landscape when more and more aspen will likely be declining. Also, the Plan relies on wildlife to restore many other acres of aspen. The results of aspen restoration by wildfire in stressed aspen stands is highly questionable (Rickman pers. comm.). Indeed, damage may be inflicted to shallow rooted aspen stands when fuel loadings are uncharacteristically high.

5.4 CLIMATE CHANGE

The DEIS states that a roadmap and scorecard have been developed to respond to climate change (page 21), a link to the scorecard is given at the website referenced in the DEIS (http://www.fs.fed.us/climatechange/roadmap.shtml) but the score card linked on that page is blank and no examples are given as to how climate change is being addressed. Particularly item number 7 on the scorecard that asks, "Is an adaptation strategy in place that helps incorporate the vulnerability of resources and places in priority setting and management actions? How are threats to vegetation communities, timber resources, and wildlife habitat from climate change being addressed?"

According to Westerling et al. (2011), fire regimes will be dramatically changing as a result of a warming climate. Yet the DEIS and Plan only give lip service to the prospect of a warmer climate. In order to mitigate some of the effects of a warming climate, the Plan needs to emphasize vegetation and economic resiliency. By emphasizing fuels reduction projects, timber harvest and aspen restoration, some of the potential impacts of climate change can be mitigated. The Plan appears to be moving in the opposite direction and the preferred alternative is one that contains thousands more acres of anticipated fire than others, and very few acres of timber harvest (less than 250 acres per year).

5.5 ANALYSIS OF THE MANAGEMENT SITUATION

The following deficiencies identified in the SNF AMS (USDA 2012) have been carried over into the Plan and DEIS:

- The AMS did not recognize the impacts of blister rust on limber pine, though it is having a severe impact (page 25).
- The AMS indicates a change in density of low elevation stands dominated by Douglas-fir. There is an opportunity for timber harvest to address stand density, age class, and forest health of these areas. This does not appear to be recognized or embraced subsequently in the DEIS or Plan (page 27).
- The AMS states that the largest change in forest vegetation is from fire and insects. With over 200,000 acres of whitebark pine, the non-native white pine blister rust disease will have significant impact on whitebark pine and limber pine and should be included in the list (page 34).
- The AMS states that it is unknown what the final impact from blister rust will be. With current whitebark and limber infections across the region, it is absolutely known what the likely trends will be—impacts on other infected national forests indicates that large devastating mortality is likely to occur (page 46).

5.6 DRAFT LAND MANAGEMENT PLAN

VEGETATION

Desired Conditions

Desired percentage on Table 1 of page 31 of the Plan appears to be limiting and not science-based. This figure needs to be justified and explained (CEQ 1502.24). We feel that this figure is quite low. Other areas of the Greater Yellowstone Area have experienced declines of aspen of 95% (Kay and Wagner 1996). Though the SNF may not have experienced this same decline we see little scientific basis for the numbers provided here in this section.

Goals

Goal 2 on page 33 states, "Manage and restore aspen, willow, and sagebrush cover types to reduce or halt the decline of acres due to succession to conifer." Please delete "due to succession to conifer" in this goal; the reason being, whether it is from succession or wildfire is unimportant. The biggest issue is that decline be slowed or stopped. This goal should reflect both aspen seral and persistent seral or climax—not just aspen growing with conifers.

Objectives

Objective 3 states (page 33), "Increase aspen cover type by at least 10,000 acres, including 2,500 acres accomplished with mechanical treatments." These figures are not justified anywhere; we suggest justifying them then leaving language open so more acres can be treated through mechanical treatments. Also, there is the need to set an objective of increasing age class diversity since the majority of stands are mature. Another objective needs to be added limiting aspen mortality within conifer types.

We request that Objective 4 on page 34 be modified as, "Increase the amount of restoration of whitebark pine to reflect tens of thousands of acres." This objective requires greater emphasis due to the unprecedented and probable mortality from white pine blister rust. If the low goal of 750 acres as currently stated in the Plan is used, it needs to be justified. It is doubtful that treating only 750 acres would stabilize, let alone reverse the trend in the decline of whitebark pine. This objective makes it appear as though opportunity is limited by seedling availability; though the great majority of science out there supports the idea that disturbance may help to promote blister rust resistant seedlings.

Guidelines

We request that Guideline 1(page 34) be rewritten as, "Whitebark pine plantings shall only utilize genetic rust-resistant seedlings. Until rust-resistant seedling become available, to insure natural selection against rust and maintain important cone production for animal species, emphasize natural regeneration through restoration strategies." It is a huge economic waste to collect seed, raise, and plant non-resistant seedlings.

FIRE AND FUELS

Goals

We request that the following goals be added on page 67:

1. "Use mechanical fuels treatments where practically feasible to maximize forest health by minimizing susceptibility to insects and pathogens and forest fire."
2. "Provide opportunities for fuels treatments to maintain local infrastructure to maintain SNF's ability to perform future fuels and forest health treatments."

Standards

We suggest adding a standard on page 68 stating, "Identify areas where commercial treatments are feasible and prioritize high-risk areas for mechanical commercial fuels reduction."

5.7 DRAFT ENVIRONMENTAL IMPACT STATEMENT

Descriptions of Alternatives Considered in Detail

On page 35 aspen and whitebark pine restoration is tied to "suitable" and accessible lands. We are confused by this. Is this referring to suitable timber lands? We would like to see an emphasis on aspen restoration on aspen clones within conifer types. Conifer cover types having decadent aspen with opportunities to remove conifers and expand declining aspen clones are significant in the restoration and maintenance goals.

Affected Environment and Environmental Consequences

On page 119 of the DEIS, it states, "Old-growth forests certainly could be lost in the future if suitable lands are harvested." At the same time in just sentences just prior the document points out problems associated with historic harvesting and fire suppression where stands now need thinning to reach larger sizes. Thinning or burning needs to be identified as a vector to restoring more old growth. The SNF needs to look beyond suitable lands for restoration and maintenance of these old-growth stands and otherwise low elevation stands. While harvest could reduce old growth stands, why does the forest hint at a threat of total loss if stands are harvested? This hints at a bias or resistance to use silviculture as a management tool. A much larger threat to loss of old growth than harvesting is overly dense forests that are susceptible to high mortality insect attacks, pathogen infections, or severe wildfire. Old growth can be maintained with proper prescriptions to achieve density and size objectives. Harvesting can be very specific to ensure maintenance of old growth, proper age class diversity, density, and size characteristics. The DEIS also did not recognize the impacts of blister rust on limber pine, though it is having a severe impact.

Expected acreage of fire is probably way too low given the amount of fire in the last 10 years and anticipated global warming. Also, an economic analysis of wildfire costs needs to be completed to give

an accurate representation of present net value of each alternative. The DEIS minimally addresses the prospect of a warmer climate. Further, fire occurrence is anticipated to go unchanged, page 345 of the DEIS states:

> In the last 10 years, nearly 183,000 acres of the Shoshone have burned because of wildfire; most of these acres were in designated wilderness. A similar amount of wildfire is anticipated on the Shoshone over the next 10 to 15 years, but the distribution of those fires could change. More areas outside wilderness areas are likely to burn.

That gives an average of approximately 18,300 acres per year. We estimate this is a gross under estimate. The Ecosystem Diversity Report (USDA 2007c) estimated over 25,000 acres per year. Further, Westerling et al. (2011) claims that fire regimes will change dramatically in coming decades as a result of a warming climate. In forested types, they note that fire intervals will decrease to less <30 years from 100–300 years by mid-century *(ibid.)*. This could result in 3 to 10 times the amount of fire that has occurred historically in forested types. Facing such potential dramatic change in vegetation, it is appropriate to adjust management strategy. It also calls into question the predicted fire acres presented on Table 88 (page 354).

On page 131 the rationale in the paragraph regarding aspen is very confusing. The DEIS states the following:

> The alternatives that have higher acres of active management and roaded areas would have increased mechanical treatments for aspen, but they would also result in less wildfire, which would limit aspen expansion resulting from wildfire.

We are not sure what the point is here since there seems to be no distinction between the benefits of restoration through fire versus active management. We would argue that restoration through active management is generally a safer method of restoration since you can more easily regulate the intensity of disturbance. Extreme disturbance in overly stressed and suppressed aspen stands can have negative impacts on aspen clones (Rickman pers. comm.). We are also confused by the language of "commercial" use on page 131. Implying a conflict of non-commercial land and commercial species does not help to recognize the importance of restoring aspen, the compatibility of aspen and conifers growing together, and the NFMA requirement for appropriate forest cover. Aspen need not be pitted against commercial species. Single use of commercial lands is a sure way to continually perpetuate conflict.

On page 131, the DEIS says,

> Alternative F would have the greatest increase, given the larger amount of whitebark cover type that would be within suitable timber lands. This increase would be partially tempered by the fact that the commercial opportunity provided by whitebark pine is limited and commercial timber would be emphasized on those lands. The opportunity for restoration of whitebark pine will be limited in the short term until a suitable supply of whitebark seedlings that are resistant to blister rust are available for planting.

This is confusing as lands do not need to be suitable to perform restoration treatments. Unsuitable acres provide significant percentage of good habitat for whitebark pine. Prescribed fire is one of the methods of restoration and regeneration sites would promote natural selection for blister rust and age class diversity for reduced bark beetle impact. Natural regeneration is important for genetic selection as well as planting resistant seedlings.

The trend of aspen decline has been identified however the SNF has not provided thorough data on the extent of aspen occurrence or historic occurrence. Also the amount of aspen lost per year or decade has not been identified. While the SNF Plan has set standards for increasing aspen in the next planning cycle, the majority of aspen restoration relies on wildfire for restoration. Unfortunately, the success rates of wildfire for restoration are not always realized. Many of the areas in northern Yellowstone Park showed poor response from wildfires after the 1988 season (Kay and Wagner 1996). Given the lack of information on aspen and the unpredictability of aspen response from wildfires, we find it odd that one of the indicator species selected for the forest was ruffed grouse. Ruffed grouse are highly associated with aspen stands. Without providing better science-based direction for the extent of aspen decline and the goals set for restoration, we feel the selection of ruffed grouse as an indicator species may prove to be a trap.

6. TIMBER

The comments below reflect the desire for more management flexibility, more appropriate treatments and the continuation and expansion of remaining infrastructure on the Forest. The loss of the remaining infrastructure will ultimately increase treatment and restoration costs in the future. The SCAC believes that there are treatment opportunities on the SNF to help restore the Forest to be more resilient from impacts of catastrophic mortality from fire and insects. These opportunities were recently highlighted as the Senators from Wyoming, Colorado, and South Dakota sent a letter encouraging the Secretary of Agriculture to perform more forest treatments.

We hope that silviculture is specified as a primary scientific approach to managing timber vegetation and should be applied where legally and topographically feasible. In addition to resource goals, social and economic considerations are part of the equation and should have consideration when deciding how, where, and to what degree timber is managed. It is important to create dependable and stable supplies of timber if local industry is to remain viable and continue to be an available vegetative management tool.

6.1 DRAFT LAND MANAGEMENT PLAN

6.1.1 Preface

VISION FOR THE SHOSHONE

On page 12 include the following underlined changes: The Shoshone provides contributions of natural resources necessary to sustain and grow components of local economies. Diverse ~~and~~, sustainable, and predicable supplies of goods and services—from wood products and commercial livestock grazing to tourism-related businesses—enhance community resiliency and contribute to livelihoods.

VEGETATION MANAGEMENT

On page 14 include the following changes: The greatest need for change is to ensure the revised forest plan contains adequate direction for managing forest vegetation, given the large-scale changes resulting from recent insect epidemics and large fires. A stable and local forest product industry is vital to supporting cost effective vegetation treatments.

WILDLIFE HABITAT MANAGEMENT

On page 15 include the following changes: The demand for forest products is expected to remain relatively stable. The only large sawmill in the area that remains in production is R-Y Timber in Livingston, Montana. Local wood conversion facilities are preferable to support cost effective vegetation treatments. Less traditional markets for wood products, such as commercial firewood, have become established. The potential for new wood products—biofuels, biochar, etc.—is strong. The demand for vegetation with regard to commercial livestock grazing and wildlife is considered under those topics.

FOREST HEALTH

Vegetation Goals and Objectives

On page 18 include the following changes: Restore and maintain a diverse range of ecosystems. Restore and maintain declining cover types such as aspen and whitebark pine. Manage patch size of lodgepole pine types to historic range of variability. Manage sagebrush and willow to provide a diversity of conditions. Maintain riparian areas in properly functioning conditions. Manage rangelands to favor native species and resist invasive species.

6.1.2 Forest-wide Direction

VEGETATION

Background

On page 29 include the following changes: Future vegetation distributions are likely to change in response to precipitation changes, temperature changes, and disturbance regime changes that are driven by past fire suppression and climate change. Vegetation on the Shoshone provides diverse habitat for a variety of native plant and animal species, attractive settings for outdoor recreation, and resources for grazing and timber production. Impacts from insects and wildfire have dramatically changed vegetation conditions since 2000. Fuel loads have increased due to past fire suppression and management. Stand replacement fuel loading is contributing to historically larger fires burning with more intensity.

Desired Conditions

Under Desired Conditions, include the following: Documentation (mapping and stratifying) of recent historic patch sizes in more discrete groupings is needed to guide future. We suggest patch size groups of 250 acres to start.

On page 30 include the following changes: Forest vegetation exists in a diversity of age classes and variable patch size across the Shoshone. In areas that receive no or infrequent vegetation management actions (management area categories 1, 2, and 3), natural process such as fire and insects are the predominant disturbances that influence stand structure and landscape patterns and patch size.

It is desirable to move the vegetation of management category 3 (backcountry and Inventoried Roadless Areas) into stand structures and landscape patterns similar to management categories 4, 5, and 8. This can be accomplished through prescribed fire as well as mechanical treatment utilizing temporary roads.

Age class distributions should not be maintained using a "preservation" strategy such as presented in the Guidelines for Vegetation #7. Instead, age class distributions should be managed for through stand growth projections and designation of stands and acres to meet specific age classes, i.e. old growth.

Goals

On page 33 add the following: Manage stand size of lodgepole types to historic range of variability in management categories 3, 4, 5 and 8.

Forested watersheds managed to Historic Range of Variation in terms of stand size and distribution in order to compliment the desired condition for water production in terms of production quantity and timing.

Objectives

On page 34 add the following: Restore fuel loading and landscape patterns and stand age classes in Management Areas 3, 4, 5, and 8.

Standards

On page 34 add the following: Use prescribed fire and suppression techniques in tandem with mechanical treatment to manage fire severity and size.

FOREST PRODUCTS

Desired Conditions

In order to acknowledge a changing market include the following on page 75: A sustainable mix of timber products responsive to traditional, non-traditional, and new market demand, including that of local industry, is provided.

Standards

In Table 14 of the Plan we request the following changes for lodgepole pine cover type: 1) add clearcut with reserve trees and seed tree under the even-aged column and, 2) add clearcut with reserve trees under the two-aged column.

Guidelines

The SCAC requests that the SNF consider modifying and or adding the following guidelines (page 78):

- To Guideline 4 add: Meet vegetation desired conditions of stand size.
- Add new guideline: Uneven-aged systems are not appropriate for the stands with an historic fire regime II, IV, V (stand replacement burn severity.) Clearcutting with reserve trees is the most appropriate prescription.
- Modify Guideline 8: Harvest activities for the purposes of timber production should be used when there is reasonable assurance the harvested lands can be restocked within five years after final regeneration harvest. Otherwise, the expense of restocking should be considered as a cost to the greater vegetation objective.

- Add new guideline: Utilizing the Stewardship end results contracting is the preferred instrument for conducting forest product activities. Retained receipts can fund, above and beyond annual budgets, for additional stewardship treatments. Also very important, these instruments, because they allow for project proposals and are awarded on a "best value" criteria, provide the potential for innovative solutions. There is also the potential for cost savings through economy of scale by bundling multiple activities/treatments into a single contract. Finally, there are incentives, through agreements, for non-profit organizations with mutual interest to assist with additional resources.
- Add new guideline: Inventoried Roadless Area acres that are "generally suitable for harvest" can be accessed using temporary roads (if feasible) and logging systems, such as cut-to-length, forwarders, and/or excalines that afford treatment to meet vegetation desired conditions.
- Modify Guideline 10 to include: Overtime, however, the application of timber harvesting to obtain vegetation desired conditions should lessen the threat to suitable timber lands from unmanageable wildfire.

Management Approach

The SCAC believes that offering stewardship end results contracts for up to 10 years can assist with allowing a contractor or partner to harvest at more economically optimum times. One way to encourage new products is the use of the stewardship end results contracts/agreements that allows contractors/partners to submit proposals focusing on end results and affording the Forest Service to award based on "best value." The specific advantages afforded by the stewardship end result contracting include longer contract terms, retained receipts to the Forest for funding more service work, innovation by allowing project proposals and awarding based on "best value," and additional resources (including dollars) from partners.

ROADS AND TRAILS

Background

The SNF should include background information regarding the use of temporary roads for treatment activities.

Desired Conditions

We request that the following information be incorporated under Desired Conditions on page 106.

Temporary roads provide short-term access to areas of the Shoshone for meeting desired conditions and objectives for resource management. Temporary roads can afford economically efficient access for mineral activity and treatments designed to meet vegetation desired conditions. They can be designed and constructed to be of low-impact and reclaimed, "rolled up", within one year or after a pre-specified number of years. They are not for public use and designed to only the minimum standards necessary to

access the project and for the period of time to complete the project. However, they are not an option for unstable soils. Temporary roads would be suitable to facilitate mechanical treatment of Inventoried Roadless Areas as per Federal Register / Vol. 66, No. 9 / Friday, January 12, 2001 / Rules and Regulations page 3258.

Goals

The SCAC appreciates that the goals section provides that roads and trails not needed for long-term objectives will be decommissioned, stabilized, and restored to a more natural state. In addition, we request that the SNF add a goal that states temporary roads, properly designed and constructed, will afford economically and environmentally efficient access to Inventoried Roadless Areas and non-Inventoried Roadless Areas suitable timber acres.

MANAGEMENT AREA 3.3A– BACK COUNTRY RECREATION YEAR-ROUND MOTORIZED

Theme

On page 163 include the following changes: Back country motorized recreation areas are managed to provide recreation opportunities on trails in a natural-appearing landscape while emphasizing the use of vegetation management activities to enhance vegetation diversity.

MANAGEMENT AREA 3.3B– BACK COUNTRY RECREATION SUMMER NON-MOTORIZED WITH WINTER MOTORIZED

Theme

On page 165 include the following changes: Back country recreation areas are managed to provide recreation opportunities in a natural appearing landscape while emphasizing the use of vegetation management activities to enhance vegetation diversity.

MANAGEMENT AREA 3.3C– BACK COUNTRY RECREATION SUMMER MOTORIZED WITH WINTER NON-MOTORIZED

Theme

On page 167 include the following changes: Back country recreation areas are managed to provide back country recreation opportunities in a natural appearing landscape while emphasizing the use of vegetation management activities to enhance vegetation diversity.

7. WATER AND SOIL

7.1 DRAFT LAND MANAGEMENT PLAN

Background

On page 24 include the following changes: Watershed condition is integral to all aspects of resource management and use. Good watershed management maintains the productive capacity of soils, protects water quality and quantity and timing, sustains native species, provides beneficial uses, and reduces the threat of flood damage to Forest Service infrastructure and downstream values.

Desired Conditions

On page 24 include the following changes: Productive soils and sustainable ecosystems are maintained when soil impacts, such as erosion, displacement, compaction, burning, and nutrient drains, are managed by best management practices and within historic range.

Goals

On page 24 include the following changes:

All groundwater and surface waters meet State of Wyoming water quality standards to fully support State of Wyoming designated uses and are of sufficient quality and timing to support surrounding communities, municipal water supplies, and natural resources.

Groundwater and surface water quantity, quality, and timing are consistent with landscapes that are managed for stand size and composition consistent with Historic Range of Variation (HRV).

Guidelines

On page 26 add a new paragraph 4 under "Fire and Fuels":

Fire and fuels management strategies are designed to approximate the HRV for the watershed. Active vegetation management, as well as prescribe fire, is a tool preferred over indiscriminate wildfire until natural fire regimes can be restored.

On page 26 create a section entitled Roads and include a new paragraph: Road management includes the use of temporary roads and road "roll up" potential for temporary roads.

Management Approach

On page 26 include the following changes: Watershed improvement/restoration projects include activities focused on water quality, quantity, and timing, riparian and stream ecosystem function, soil productivity, and maintaining or restoring resilient vegetation conditions. Five examples include 1) implementing best management practices to filter sediment from runoff from roads and trails before it enters water courses

and riparian areas, 2) eliminating cheatgrass to restore soil productivity, 3) stabilizing stream banks adjacent to infrastructure, 4) active vegetation management and fire management that approximate HRV, and 5) restoring vegetation conditions impacted by intense wildfire or severe insect epidemics.

8. COMMERCIAL LIVESTOCK GRAZING

Grazing is critically important on the SNF, as it helps support the adjacent ranches which in turn provide a wide array of related ecological benefits and ecosystem services to public lands. The more the SNF does to ensure that these working ranches remain functional the better the ecological benefits will accrue to public lands. Wildlife habitat, aesthetics, open space, and noxious weed management on private land are amplified on public land by adjacent ranches. We know that ecosystem functions and a broader biodiversity are well served by including large working agricultural landscapes with public lands. Knight (1999), a conservation biologist, perhaps best characterizes the public land/private land association.

> We are entering a time when we in the United States value not only our national parks and wildlands, but increasingly appreciate the value of our middle lands, those working landscapes that in addition to providing essential commodities, capture a rural ambiance that we miss more with the demise of every additional family farm and ranch. We can no longer assume these working landscapes will always remain intact and will serve as pleasing interfaces we drive through when going from town to city or city to wilderness.

Knight (1999) argues in *The Geographical Review* that threats to biodiversity in the western United States are becoming more pervasive and are directly attributable to the conversion of productive private ranch lands to exurban developments (Maestas et al. 2002). On many levels we know this to be true. One of the most economical ways of preserving biodiversity is to keep ranchers on the land and promote those working landscapes. Researchers in Colorado (Maestas et al. 2002) analyzed the differences in native plant communities between working ranches, ranchettes, and public land (reserves). The data showed biodiversity is better served on working ranches than on reserves and exurban development property. Furthermore, the data did not support the notion that nature reserves are the best way to maintain rangeland ecosystems (Maestas et al. 2002).

8.1 DRAFT LAND MANAGEMENT PLAN

Desired Condition

Please add the following:

As Endangered Species Act (ESA) listed predators become biologically recovered, as is the case with both grizzly bears and wolves, and as ESA restrictions become relaxed during and after the delisting process, the SNF will actively work with ranchers/permittees to make every effort to minimize adverse predator impacts to livestock in order to help keep working ranches working.

Both non-forested and forested areas are suitable and capable of providing forage for herbivory by domestic livestock and wild ungulates. We recognize the value that private lands play and their relation to public lands. In order to support adjacent and nearby working landscapes and the amenities private ranches provide for public land management (open space, aesthetics, winter range, riparian health, etc.)

the SNF will maintain, support, and improve lands for domestic livestock grazing; and intends to provide forage through grazing permits at no less than 2012 levels of approved AUMs for cattle grazing. Domestic livestock grazing and grazing by wild ungulates will be compatible, with both classes of herbivores considered in management decisions.

Given the many attempts to remove public land grazing, we offer the following information for support and rationale. Vavra, Willis, and Sheehy (1999) note in their paper on wildlife/livestock conflicts that while competition between herbivores may appear obvious, "relationships between herbivores may not necessarily be competitive and may even be beneficial." Any required reduction in herbivory will be spread equitably between wild ungulates and domestic livestock. Recognizing conflicts between domestic sheep and wild sheep, the SNF will not provide permits for domestic sheep or goat outfitters in areas where there is occupied wild sheep habitat.

The benefits to having working ranches as part of the landscape scale ecosystem management are many. Adjacent private land winter range and its use by wildlife is an unsung hero of leveraged land use. The open space and aesthetics of private working landscapes is critically important to residents and visitors alike. Given the myriad benefits of public land/private land partnerships, the SNF should make every effort possible to advance local ranchers continued viability.

Additional Research Natural Areas (RNA) and other special use designations shall allow the continuation of historical grazing and is to be expected. No change in grazing capability and suitability is envisioned as a result of proposed RNA. Any fence building to preclude grazing mandated by the Forest Service for RNA or riparian area protections that are currently properly grazed shall be constructed by the USFS. Ranchers shall not be penalized for other resource degradation not directly linked to livestock use.

8.2 DRAFT ENVIRONMENTAL IMPACT STATEMENT

There are a few concerns with the Commercial Livestock Grazing section. The SCAC is primarily concerned that the DEIS capability and suitability analysis described in the AMS and DEIS is incorrect, and could attract challenges from anti grazing groups. Fixing this potential trap is important. The other major concern to ranchers and permittees is the continuing expansion of predators, both in absolute numbers and the increase in range. While the management of predators is currently confined by US Fish & Wildlife Service (USFWS) restrictions, we can envision the time, within the life of this Plan, that restrictions could be relaxed. Anticipating and allowing for flexibility on the Forest once the delisting processes is successful would make the ranching community more comfortable.

The DEIS states that only 16% of the SNF (398,615 acres) is "capable of supporting commercial livestock grazing on the Forest." This statement is factually incorrect and misleading. This figure contradicts Table 98 (page 408), which states there are 415,400 "capable acres as well as 375,000 "suitable" acres. The capability and suitability acreages are different for alternatives as shown in Table 98.

As we noted throughout the planning process, we are very concerned that this will attract challenges to limit livestock grazing to only those acres that are "capable". While the DEIS states that changes to rangeland capability and suitability may occur at the project scale, using site-specific data", the SCAC is concerned that project level analysis will still be required to be tiered to the overarching analysis in the Forest Plan—thus limiting our ability to change capability acreages. We believe this should be a simple matter to correct. When the SCAC discussed this with the range specialist, noting our concern, he agreed that capability should include lands with documented livestock use. Clearly, and by any definition if livestock use an area, it is obviously capable.

The Regional Desk Guide states the following.

> The definition of rangeland capability was found in 36 CFR 219.3 and is found in FSM 1905 as follows:
>
> *Capability:* The potential of an area of land to produce resources, supply goods and services, and allow resource uses under an assumed set of management practices and at a given level of management intensity. Capability depends upon current resource conditions and site conditions such as climate, slope, landform, soils, and geology, as well as the application of management practices, such as silviculture or protection from fire, insects, and disease.
>
> Capability is the initial step in the determination of suitability. It is portrayed as a separate step both for reasons of clarity and because the actual product of "capability" often has utility in planning beyond its role in the determination of suitability.
>
> For Forest Planning purposes, rangeland capability does not vary by alternative and is only determined once during the Land Management planning process.

The SCAC notes that the Desk Guide allows for flexibility in the Capability calculations as noted in step 8 b or the desk guide. It states "From the above (a) capability calculations, subtract slopes greater than 40% (slopes of 41%–60% are capable for sheep but not normally for cattle). The 40% figure can be modified for each specific Forest or Geographic area to fit with local situations (with documented rationale)." Several publications George et al. (2007) and texts (Holechek et al. 1998); *Range Management, Principles and Practices* note that livestock will utilize slopes up to 60%. This 60% figure is far more realistic than the preliminary 30% slope figure or the current 40% used by the Forest Service. The Wyoming Stock Growers Association (Magagna pers. comm.) and local ranchers on the SNF confirm that cattle use slopes between 40%–60%. Appendix B shows the distribution of cows on the Wiggins Fork allotment overlain with a slope map, confirming cattle use, and therefore capability on slopes up to 60%. We believe this specific data and citations address step 8b in the capability determination to provide documented rationale. The simple fix of identifying capable lands as those grounds less than 60% slope with documented grazing by domestic livestock would go a long way towards correcting this problem. The slope categories for the SNF are shown in Table 11, which should be considered for capability.

Table 11 Slope Classes for the SNF

Slope	Acres	% of SNF
0-39	1,306,116	53%
40-59	579,877	23%
60+	582,231	24%
	2,468,223	

Figure 4 and Figure 5 illustrate the steps used to determine capable range for the SNF. The first step for determining capable rangelands is to remove areas dominated by rock, soils incapable of producing 200 pounds of per acre of forage, water, and ice. Figure 4 presents the areas potentially capable after removing these lands. Figure 5 presents the potentially capable lands with the two key slope breaks (40% and 60%). Our analysis identified 1,516,974 acres of capable rangeland.

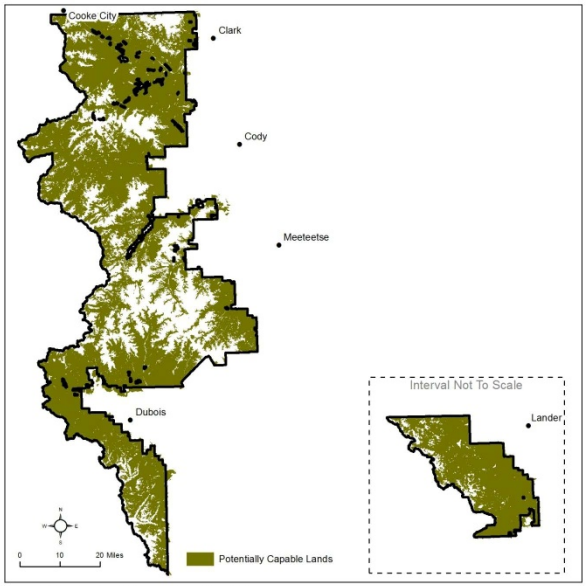

Figure 4 Lands potentially capable on the SNF

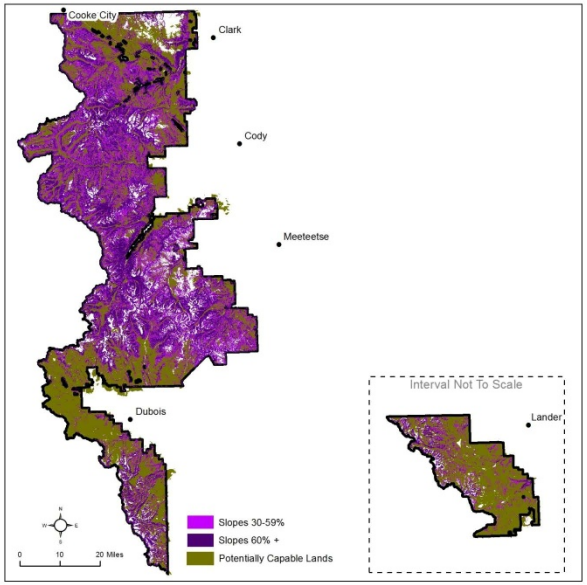

Figure 5 Slope breaks and potentially capable on the SNF

The SNF presents 375,400 acres suitable for commercial livestock grazing under Alternative B in Table 3 of the DEIS (page xvii). Our analysis for suitable range calculated 457,108 acres, resulting in an 81,708 acre discrepancy. The SNF informed us that they performed their suitability on a 30 meter Digital Elevation Model (DEM) while we used a 10 meter DEM. Using GIS we analyzed the SNF's grazing categories for Alternative B with the SNF's 2012 vegetation layer and the 10 meter DEM. Table 12 presents the results of this analysis for the areas considered not capable due to slope percent.

Table 12 Lands Not Capable Due to Slopes (Alternative B) by Cover Class and Slope

Alternative B Grazing Category	SNF Vegetation 2012 Cover Classes	Slopes			Total
		0-39%	40-59%	60% +	
Not Capable/Slope	Rock/Alpine/Water	16,518	60,105	64,403	141,026
	Forb	3,148	8,725	8,499	20,372
	Grasslands	**16,955**	**51,768**	54,032	122,755
	Shrublands	**1,724**	**4,327**	4,932	10,984
	Timber	66,354	214,615	218,942	499,912
Total Acres		**104,700**	**339,541**	**350,807**	**795,049**

There are 18,680 acres of grasslands and shrublands on less than 40% slopes (74,775 on less than 60% slopes) that were assigned not capable due to slopes for Alternative B. We ask the SNF to recalculate suitable and capable rangelands using the best available data, in this case a 10 meter DEM.

These concerns over the errors in the capability calculation are magnified in DEIS Table 97 on page 405, which provides calculations of the stocking rates in Acres/AUM. Any stocking rate less than 2.5 Acres/AUM would have to support an annual average primarily graminoid herbage yields in the range of 1500 lbs per acre (dry weight) to justify a 2.5 Acre/AUM rate. It is unlikely that these plant communities are that productive, again offering a target to the anti grazing groups.

9. WILDLIFE

The Draft Plan and DEIS separates terrestrial wildlife into four categories for the process of discussion. These categories include threatened, endangered, proposed, and candidate species, sensitive species, management indicator species and species of local concern. The following comments are organized into these four categories.

THREATENED, ENDANGERED, PROPOSED, AND CANDIDATE SPECIES

Comments are provided below for Canada lynx, grizzly bear, wolverine and gray wolf (the gray wolf is included as listed under the Plan and DEIS, however the gray wolf was recently removed from listed-non-essential/experimental status in Wyoming by USFWS as of Oct 1, 2012).

9.1 CANADA LYNX

9.1.1 Draft Land Management Plan

Desired Conditions

The Plan states (page 38), "Desired distribution and abundance of threatened, endangered, proposed and candidate species are maintained." Please modify this statement to include: "Desired distribution and abundance of threatened, endangered, proposed, and candidate species, reflective of effective habitats and confirmed historic distribution on the SNF are maintained."

Goals

Under Goal 4 (page 40), it is highly questionable due to the SNF's marginal habitat, lack of a reproducing population, and warming drying climate trend, that the SNF will be able to "conserve the Canada lynx" regardless of how much effort is made by SNF personnel. Instead, we recommend you replace the statement with "Adhere to the Northern Region Lynx Management Direction and actively participate in efforts to review the occupied status of the SNF as new information becomes available."

9.1.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

The Northern Rockies Lynx Management Direction (NRLMD) was incorporated into the amended Forest Plan as of 2007. Approximately 648,840 acres of Canada lynx critical habitat is designated on the SNF. While the entire forest is considered occupied lynx habitat, the SNF established Lynx Analysis Units (LAUs) across most of the Forest (Figure 6). Using the USFWS Lynx Conservation Assessment and Strategy (LCAS) criteria, the SNF mapped 597,000 acres of lynx habitat within the LAUs. The difference in acreage between critical lynx habitat and habitat mapped in the LAUs includes portions of

lynx acreage within Yellowstone National Park and a subtraction of habitats that exist as patches, or a 'habitat matrix' (Figure 7).

The SNF conducted extensive lynx track surveys in cooperation with Wyoming Game and Fish in recent years according to the DEIS. These surveys results included tracks of two different lynx in the Dubois/Togwotee Pass area during the winter of 2006/07. Tracks of a single lynx were observed in the Washakie Ranger District area, although no date was provided as to when this observation occurred. Also, it is not clear from the description in the DEIS (page 148) if the tracks observed in the Washakie

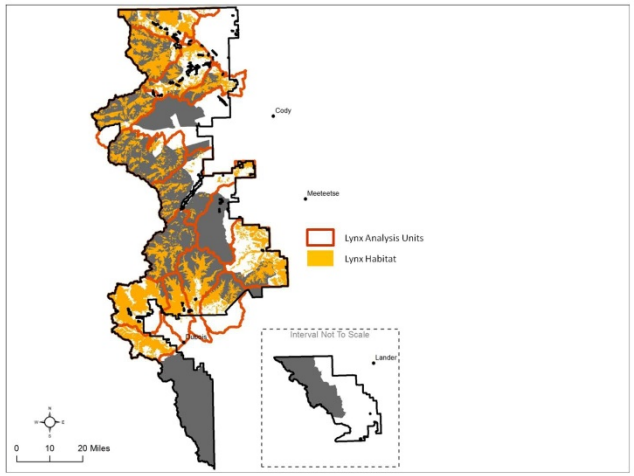

Figure 6 Lynx Analysis Units with lynx habitat according to the 2012 SNF DEIS

Ranger District and Dubois/Togwotee Pass areas were actually observed within the boundaries of the SNF. This is a piece of information that requires clarification. According to the USFWS Canada lynx recovery program, observations of two or more sets of lynx tracks or documentation of a breeding pair of lynx on any specific national forest, 'turns on' that forest as occupied lynx habitat. While the DEIS considers SNF occupied habitat, it is unclear if these criteria are met on the SNF.

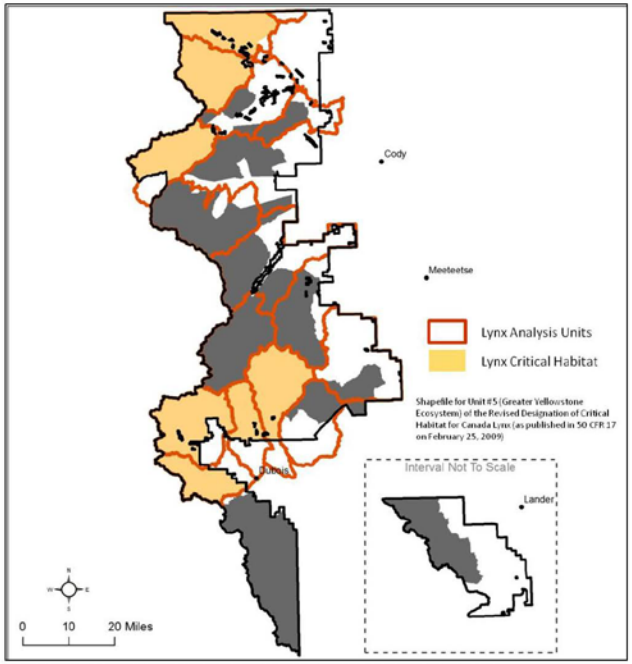

Figure 7 Critical lynx habitat on the SNF with Lynx Analysis Units as defined by SNF 2012 DEIS

Additionally, USFWS lead biologists with the lynx recovery effort realize that the initial habitat model over-estimated the amount of effective and functional lynx habitat. This realization has forced the recovery team to rebuild the habitat model. That effort is presently ongoing. However, other national forests such as the Bridger-Teton and Gallatin are remapping lynx habitat on the forest using the more

updated and science-based criteria. These re-mapping efforts are essential to the overall forest planning process.

These newer, more sensitive habitat criteria may prove that more of the SNF is not effective lynx habitat and may further the belief that much of the SNF is fringe or marginal lynx habitat at best. While the SNF needs to be sensitive to lynx recovery efforts, the new habitat criteria may prove that much of the SNF will never play an integral role in lynx recovery simply due to the lack of quality habitat on the forest. Furthermore, the official stance on lynx from the Wyoming Game and Fish is that native lynx are nearly extirpated in Wyoming, only those transients from a lynx-release effort in Colorado remain in the state.

The adoption of the 2007 NRLMD suggests any projects or activities occurring on the SNF have no adverse impacts to lynx habitat. However, much of the 316,000 acres designated as a spruce/fir cover type on the SNF is over 200 years old. These stands are setup for catastrophic or stand-replacing wildfire. These fire events would certainly have adverse impacts to lynx habitat over the short-term. The SNF may wish to consider, more closely, habitat treatments that assist in protecting portions of the SNF outside the wilderness boundaries from catastrophic wildfire events while providing employment opportunities to local communities. These habitat treatments may assist the SNF in maintaining some of the older spruce/fir stands that support effective lynx habitat.

The area is currently experiencing a warming trend that is expected to accelerate in the next century (Rice et al. in process). Climate change can have many effects on the functioning of the complex ecosystems of the forest. Climate change may be accompanied by rising temperatures, changes in the length of the growing season, changes in amounts and timing of precipitation, increases in water temperature, and other variations. The projected changes in climate will affect the availability, extent, and location of wildlife habitat, and may affect the species dependent on various vegetation types. Impacts to local residents, tourists, and local economies could include longer summer recreation seasons, shorter winter seasons, and changes in water runoff timing for agricultural, municipal, and recreation uses.

(Ruediger et al. 2000; Ruggiero et al. 1994; USDA 2007a) all acknowledge that the competitive advantage that lynx have over other predators (e.g. coyotes, bobcats) resulting from having "big feet" is only a competitive advantage when winters are long and snow is deep. This explains why lynx are much more abundant in the Yukon, than Montana, or why the SNF is at the southern periphery of habitat. The aforementioned statement (page 13) on climate change suggests that lynx recovery on the SNF may ultimately be a lost cause, regardless of well-intended, legally-mandated efforts. While the SCAC recognizes the legal mandates of the NRLMD, we feel that the DEIS should recognize and disclose that long-term recovery may be unlikely.

Lastly, the DEIS should acknowledge that currently, reproducing populations of lynx are limited to extensive, mesic spruce/fir forests in northwest Montana (Squires John R. and Ruggiero 2007; Squires et al. 2006). The SNF has little of that forest type, which likely explains why lodgepole pine-dominated

forests like the SNF, the Beaverhead Deerlodge NF, and Yellowstone NP have no documented reproducing populations, despite intensive searches.

9.2 GRIZZLY BEAR

9.2.1 Draft Land Management Plan

As grizzly populations expand and recovery is realized, there should be some level of management flexibility commensurate with this recovery that SNF officials can offer forest users, especially commercial users. SNF officials should provide flexibility in the Forest Plan that reflects management direction more in line with a recovered grizzly population.

Desired Conditions

The DEIS states (page 38), "Desired distribution and abundance of threatened, endangered, proposed and candidate species are maintained." Please modify this statement to include: "Desired distribution and abundance of threatened, endangered, proposed, and candidate species, reflective of effective habitats and confirmed historic distribution on the SNF are maintained."

Standards

The DEIS states under Standards 7 (page 39), "Restrict permitted activities at moth sites until a comprehensive site management plan is developed." We ask SNF officials to change this statement to: "Allow permitted activities to occur at moth sites until a comprehensive site management plan assists the Forest in developing decisions regarding potential restrictions based on best available science."

Guidelines

The Plan states in Guideline 8 (page 41), "Inside and outside the Primary Conservation Area, cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices may be placed under long-term non-use agreements or retired as opportunities arise with willing permittees." Removing 'outside' from this guideline will still allow management direction to employ more restrictive measures within the Primary Conservation Area (PCA), yet provide more flexibility to livestock operators outside the PCA.

9.2.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

The official stance of the US Fish & Wildlife Service (USFWS), Montana Fish, Wildlife & Parks (MFWP) and Wyoming Game and Fish Department (WGFD) is that grizzly bear populations in the Greater Yellowstone Ecosystem (GYE) are biologically recovered. The original delisting of the grizzly in the GYE was vacated in 2009. However, the USFWS, WGFD and MFWP are currently working toward a second attempt toward delisting within the next two years. The SNF incorporated the Grizzly

Conservation Strategy into the Forest Plan through the amendment process in 2006. The amendment was conditional upon delisting. The SNF rescinded the amendment when the USFWS vacated the delisting in 2009. Grizzly management on the SNF is currently driven by consultation with the USFWS on a project by project basis.

Presently, the grizzly is most intensively managed within the PCA (Figure 8). The SNF supports 36% of the PCA that occurs on USFS lands. Human activities, special use permits and grazing allotments are severely restricted or regulated within the PCA.

There are several points of evidence that strengthen the current belief that grizzly populations are increasing according to the data included in the DEIS:

1. Two hundred and ninety-five human/grizzly conflicts occurred in the GYE in 2010. This is the most incidences reported since grizzly management officials began documenting these occurrences in 1992. Seventy-one percent of these encounters occurred outside the PCA.
2. Twenty-nine percent of the SNF grazing allotments outside the PCA have a consistent presence of grizzly bears.
3. State and federal grizzly bear experts explain that the current mortality allowance model used to manage the grizzly bear population within the GYE, 9% independent females and 15% independent males, ensures a population increase 95% of the time.

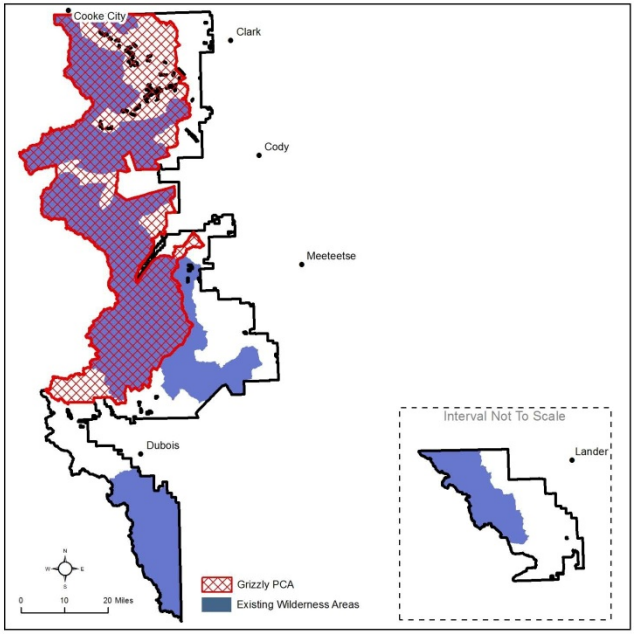

Figure 8 Grizzly Bear Primary Conservation Area on the SNF

It is important to evaluate the increasing grizzly population in the face of current management direction on the SNF. As the grizzly population saturates the PCA and expands into surrounding areas on the SNF, grizzly managers may experience a downward shift in juvenile grizzly survival due to increased mortalities caused by adult grizzlies, especially adult males. This mortality source has no relation to

human activities, recreational or commercial. This natural occurrence is important for Wyoming citizens to realize and consider as they assist SNF officials in the forest planning process.

Also, this increase in the GYE grizzly population is occurring with the present levels of secure habitat, public land grazing, human conflict, and grizzly mortalities. Efforts to educate and inform forest users about recreating and working in grizzly are efforts critical to conserving grizzly bears, as are many of the land-use regulations and measures currently in place. However, as grizzly populations expand and recovery is realized, there should be some level of management flexibility commensurate with this recovery that SNF officials can offer forest users, especially commercial users.

In addition, page 171 of the DEIS states, "Developed sites in grizzly bear habitat increase the potential for conflict with humans primarily due to the potential availability of human foods." This statement is true. However, an increasing grizzly population also contributes to increased conflicts with humans as substantiated in the information above. An important element for consideration is that potential for human/grizzly encounters will most certainly increase by no fault of people using areas of the SNF not formerly occupied by grizzly bear. As grizzlies expand into areas formerly unoccupied, forest users are increasingly faced with potential conflicts with grizzly bear. Again, this highlights the importance of effective education and information programs to assist forest users in minimizing potential conflicts and attractants; at the same time, not penalizing forest users in areas of expanding grizzly bear populations.

The grizzly bear cumulative effects section provides (page 171):

> Working ranches are an important part of the landscape as they provide large expanses of habitat essential to the conservation of grizzly bears. The importance of working landscapes should not be minimized as they are not only vital to grizzly bear, but many wide-ranging species. Should there be a loss of our working landscapes; the fragmentation of wildlife habitat would have long-term adverse impacts to grizzly bears.

The SCAC agrees that working ranches are an important part of the landscape and that working landscapes need to be maintained. For that reason, we request that the following information be incorporated in the cumulative effects section:

> Ranchers adjacent to the SNF provide critical wildlife habitat for species like grizzly bears. They provide these valuable landscapes at a tremendous financial cost to their ranching operations and to their personal safety. These working landscapes are critical to our nation's food supply. Many of these ranches rely on leased grazing and outfitting operations on SNF lands.

It seems highly reasonable, especially in the face of expanding grizzly populations, to provide users and lessees of the SNF lands some additional flexibility to operate on the SNF. Additional management flexibility will not have significant adverse impacts to a recovered grizzly population. The SNF has already created a precedent for considering increased restrictions to winter motorized recreation if wolverine denning habitat is located on the Forest (page 188, Conservation measures summarized). These conservation measures involve possible forest use restrictions for a species that is not listed. Certainly it is reasonable to consider and set a precedent for the reverse situation when listed species

reach recovery levels. Conservation measures for listed or management indicator species that meet or exceed recovery goals, if one follows similar protocol, should provide less restriction to forest users and more flexibility in management direction.

9.3 WOLVERINE

9.3.1 Draft Land Management Plan

SNF officials list conservation measures that they believe ought to be included in the forest plans goals, objectives standards and guidelines. These include:

1. "In general, implementation of the 2007 Northern Rockies Lynx Management Direction (NRLMD) would benefit wolverines as well. Especially standards and guidelines related to vegetation management and winter recreation."

   The SCAC believes a management direction intended specifically for lynx may have minimal impact in lynx recovery on the SNF. The suggestion of using this same management direction in application toward wolverine management, an intent that this management direction was never developed to accomplish, is perplexing. The SNF needs to bring the most accurate science forward that would substantiate and support such a statement (CEQ 1502.24).

2. "If important denning habitat is identified outside of wilderness (i.e. Beartooth Plateau) snowmobiling in these areas may need to be restricted."

   The leading experts on wolverine research in the GYE do not have convincing scientific evidence that snowmobiling impacts wolverine denning activities. That science does not presently exist. While we understand the importance of effective wolverine management, research and conservation, restrictions suggested for the SNF in regard to wolverine management should be driven by best available science. Also, if the SNF identified winter recreation as the primary risk factor for wolverine management. They did not address other winter recreation activities such as extreme cross-country skiing. Instead, they have singled out snowmobiling and do not show the accompanying science that would lead them to those conclusions and management direction.

   Also, if wolverine denning habitat is identified, or if actual wolverine denning occurs in areas open to winter recreation on the SNF, forest officials may wish to bring forward the appropriate science or evidence that indicates a conflict exists. If wolverine denning activity is occurring, SNF officials may want to determine if this denning activity has been occurring in past years. If wolverine denning activity occurred in the past, it is important to realize the level of winter recreation activity that occurred during that time as well.

3. "Actively patrol for snowmobiles that are trespassing in wilderness."

Local private snowmobile clubs should assume an active role in this activity. Also, the SNF may wish to include data in this DEIS that helps illustrate how significant the issue of wilderness trespass by snowmobiles is on the Forest.

9.3.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

The SNF AMS states, "Recent research has shown that wolverines do occur on the Forest but the amount of occupied habitat is unknown." SNF officials also state in the DEIS under Habitat Distribution and Condition on the Shoshone (page 187), "If wilderness areas represent optimum wolverine habitat, then the Shoshone contains about 1,365,154 acres of potential habitat." Also, "One large area of potential wolverine habitat that is not in wilderness is the Beartooth Plateau. Winter motorized recreational use of this area is high."

SNF officials state under Risk Factors in the DEIS (page 187), "The primary risk factor from forest management is winter recreational activities." Forest officials specifically list snowmobiling as a primary source of disturbance for denning wolverine. The SCAC has mapped all potential wolverine denning habitat using all non-forested habitat above 9500 feet elevation (Figure 9).

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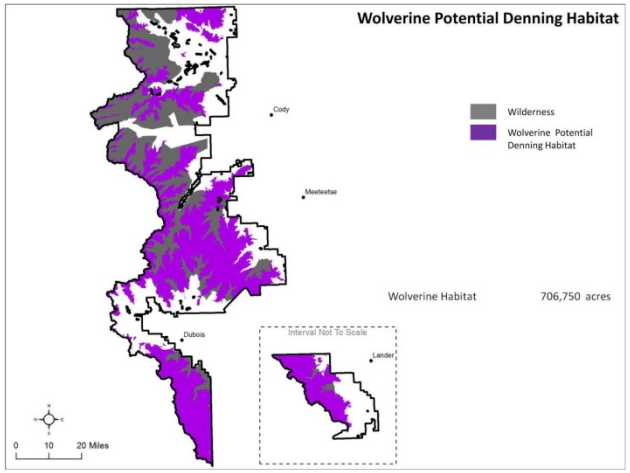

Figure 9 Wolverine potential denning habitat on the SNF

SCAC estimates potential wolverine denning habitat, unforested terrain above 9500 feet, on areas where winter motorized use occurs under Alternative B, includes 51,293 acres on the SNF (Figure 10). That acreage represents 7.3% of all estimated wolverine denning habitat on the SNF. This 7.3% includes the SNF administered area on the Beartooth Plateau. Wolverine conservation is occurring presently on the SNF with 1,365,154 acres of potential habitat inside wilderness and almost 93% of potential denning habitat protected from motorized winter recreation.

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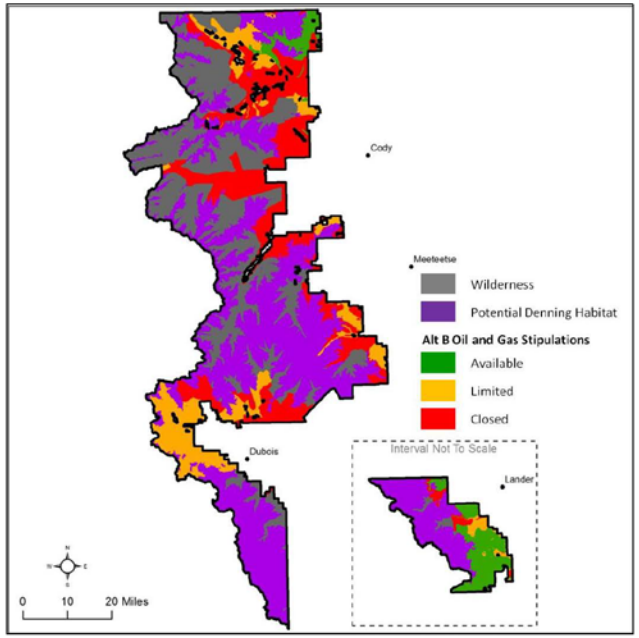


Figure 10 Potential wolverine denning habitat with winter motorized use under Alternative B in the SNF 2012 DEIS

9.4 GRAY WOLF

9.4.1 Draft Land Management Plan

Guidelines

Under Guideline 5 (page 43), the guideline recommending that "Management activities should avoid areas within one mile of an active gray wolf den site…" no longer reflects current best science, i.e. limiting factors are almost exclusively limited to public tolerance and prey availability. Furthermore, since the wolf if currently de-listed, the wolf should be reclassified as sensitive and moved to that category.

9.4.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

According to the DEIS under Cumulative Effects (page 147), "Livestock grazing on private and state lands is an identified potential threat to gray wolf conservation that contributes to adverse cumulative effects, primarily due to control actions when wolf/livestock conflicts occur."

The wolf population in Wyoming met the delisting or recovery goals in 2000. Confirmed livestock depredations by wolves in 2011, included 35 cattle and 30 sheep. An economic impact research paper authored by Joseph Ramler of the University of Montana in 2011 found that weaned beef calves on ranches in Western Montana that had experienced at least one Wildlife Service confirmed wolf depredation in a year gained twenty pounds less than if there had not been a Wildlife Service confirmed wolf kill (Ramler 2011).

With this documented indirect economic impact to domestic livestock producers by wolves, one could also make a reasonable argument that without federal intervention on private and state lands where wolf depredations occurred, public tolerance for wolves on the landscape would be severely compromised even beyond present attitudes. Therefore, control action on depredating wolves may actually create more tolerance for wolves on the landscape and serve as an asset to gray wolf conservation.

Gray wolves have remained above recovery goals in Wyoming over the last 12 years, even in the face of all wolf/livestock conflicts and wolf removals over the past several years. Wolf populations are highly resilient and able to absorb fairly high rates of annual mortality (30-50%).

Accordingly, the SNF should remove the statement that "livestock grazing on private and state lands is a potential threat to gray wolf conservation that contributes to adverse impacts." The trend over the last 12 years does not illustrate that such a statement is in step with present conditions.

9.5 GREATER SAGE-GROUSE

9.5.1 Draft Land Management Plan

Goal 7 states (page 47), "Maintain contiguous sagebrush communities…" We are unsure if the word "contiguous" was the intended word, but there is no scientific evidence that sagebrush was ever continuous under natural disturbances, or that continuous sagebrush can be sustained over time considering inevitable disturbances. Please add a "to the degree possible considering other resource values" to the sentence.

SENSITIVE SPECIES

9.6 BIGHORN SHEEP

9.6.1 Draft Land Management Plan

Goal 3 (page 47) states "Habitat conditions for bighorn sheep, particularly non-forested openings of various sizes and shapes that provide forage, access to winter range, escape terrain, and access to migration routes are improving." This goal is neither measurable nor realistically accomplishable over the life of the Plan (i.e. habitat cannot be improved indefinitely). Please add definitions and a time frame to the term "improvement", or delete altogether.

9.7 NORTHERN GOSHAWK

9.7.1 Draft Land Management Plan

Standard 1 for sensitive species states (page 48), "In known goshawk territories that provide nesting habitat, identify alternative and replacement nest stands of comparable habitat quality when it is determined that proposed vegetation management activities or disturbances from management activities are likely to impact the suitability of nesting habitat." Such protective measures were recommended by researchers (Reynolds et al. 1992) for landscapes where it was anticipated that most forest acres would be harvested repeatedly. Greater than 80% of the habitat on the SNF will never see any disturbance due to the existing mix of roadless and wilderness allocations. NFMA only requires that species viability be assured, not that every sensitive species be protected in every foreseeable situation. Northern goshawks are extremely difficult and expensive to locate, and budgets spent doing so could be invested in other species that are much more at risk. Please delete this standard.

Standard 8 for sensitive species states (page 48), "Maintain active goshawk nest stand canopy at existing levels, unless the proposed habitat modification is determined not to impact nest success." This standard assumes every nest is essential in a forest that is >80% roadless and wilderness. It further ignores the issue of stand sustainability. There is not much point in protecting high density nest habitat if it succumbs

to MPB or wildfire. A more logical approach is to balance short-term nest habitat quality with long-term sustainability. Either modify the standard to reflect sustainability, or habitat availability at the Forest scale, or delete altogether.

General Comments

Standard 7 for sensitive species states (page 48), "Design management actions in occupied sensitive species habitat to avoid actions that would adversely affect sensitive species." This is contrary to best science. First, because species have widely different niches, actions that are detrimental to one species will be beneficial to another. Secondly, an action adverse in the short run may be beneficial in the long-term. This kind of standard limits habitat restoration options, increases NEPA costs, and makes the SNF vulnerable to litigation. Please delete the standard.

MANAGEMENT INDICATOR SPECIES

9.8 RUFFED GROUSE

9.8.1 Draft Land Management Plan

The Plan states (page 269), "Use prescribed fire to regenerate aspen, reduce conifer and sagebrush encroachment, and to increase size and age class of aspen stands." We suggest the SNF included mechanical treatments as another tool to consider in aspen regeneration and treatments. Perhaps the SNF could change this Desired Condition to: "Use prescribed fire and mechanical treatments to regenerate aspen, reduce conifer and sagebrush encroachment, and to increase size and age class of aspen stands."

SPECIES OF LOCAL CONCERN

9.9 ELK

9.9.1 Draft Land Management Plan

Under Desired Conditions the Plan states (page 57), "Minimize human disturbance in big game crucial winter range." We suggest SNF officials consider changing that wording to: "Minimize human disturbance in big game crucial winter range to levels commensurate with maintaining big game populations within state designated population goals and objectives."

9.9.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

The SNF supports 754,400 acres of crucial winter range for elk according to the DEIS (page 277). According to WGFD data, there are five herd units connected with the SNF. These herd units represent about 22,100 elk based on the population trend table on page 277 of the DEIS (Figure 6). What is not

clear in the discussion regarding wintering elk is, during average or normal winter conditions, what percent of these elk typically winter on the SNF. This information would be highly valuable to help those commenting on this Forest Plan revision and DEIS to understand how significant SNF contributions to elk winter range compares with adjacent state, Bureau of Land Management (BLM), and private lands contributions to elk crucial winter.

Also, a new paradigm exists throughout many western states regarding elk and elk security habitat. Hillis et al. (1991) and Lyon and Christiansen (1992) have long been the standard for defining and managing for elk security habitat. These standards helped resource managers increase elk populations, evaluate timbered habitats, provide increased security for elk during the hunting season and offer longer, more liberal hunting seasons. However, elk population trends and distribution have changed significantly over the past two decades.

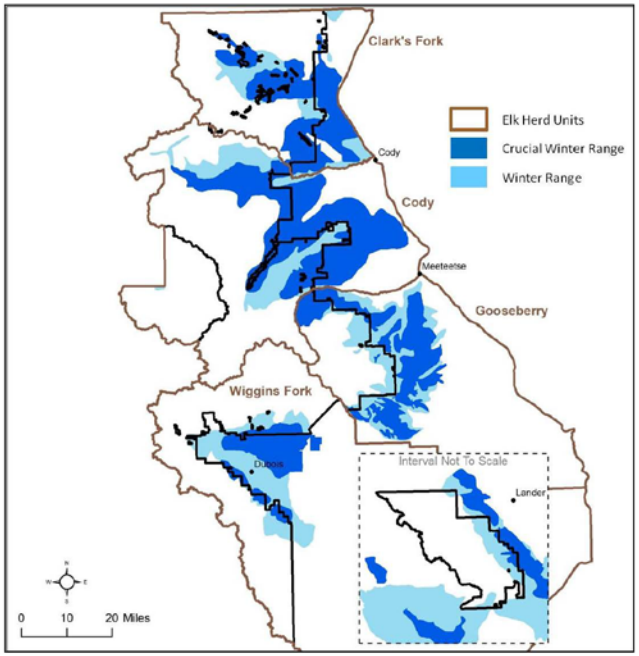


Figure 11 Elk winter as defined in the SNF 2012 DEIS with elk herd unit boundaries included

Elk distribution is being significantly altered by herds using new strategies for seeking out secure habitat. Instead of utilizing elk security habitat on public lands, elk may find more complete security during hunting seasons by moving to private lands that restrict hunter access or prohibit hunting (Burcham et al. 1999; Proffitt et al. 2010; Shamhart et al. 2012).

This change has significant impacts on hunter opportunity on public lands. The irony is that as elk populations have increased over the past 20 years, fewer elk are available to hunters on public lands. As Forests strive to maintain or improve secure habitat, these efforts are not able to compete with the new survival strategies elk are employing on private lands where reduced hunting pressure, irrigated and fertilized agricultural lands provide a more productive environment.

As a result, elk surviving primarily on private lands are typically more productive (higher calf/cow ratios) and more difficult to manage (more challenging to use hunter harvest to manage populations) compared to elk surviving primarily on public lands.

Recent elk research performed at the University of Wyoming suggests migratory elk in the Absaroka Range are less productive and exhibit poorer body condition than non-migratory surviving on adjacent private lands (Middleton 2012). A shrinking time period where nutritious green forage is available on high elevation summer range was a significant factor in differences in body condition and productivity between migratory and non-migratory elk. This research helps address the statement in the SNF AMS (page 68), "Elk herds along the Front country have higher recruitment rates, even with more liberal hunting seasons.'

Hunting is not a primary factor impacting elk recruitment rates. Maternal body condition of adult cow elk and predation are significant drivers of elk calf recruitment. In fact, hunters often select against the harvest of calf elk, selecting for adult cows during antlerless hunting seasons. As a result hunting, if the harvest of adult cows is substantial, may actually influence recruitment ratios artificially upward.

There is growing disparity in predation impacts to elk on public compared to private lands. A majority of wolf control actions due to wolf/livestock depredations occur on private lands. These wolf removals may reduce the predation impacts of wolves on elk surviving on private lands. Wolf packs operating primarily on public lands do not experience a similar control action mortality rate and may have a greater impact on elk surviving on public lands.

The SCAC does not question the importance of protecting quality winter range for elk. However, the SNF is not a sole source for elk winter range in this area (Figure 7). Elk winter range includes a diverse landownership of federal, state and private holdings. The SCAC appreciates the sensitivity some private landowners hold to wintering populations of elk on private lands. Flexibility in balancing potential oil and gas development and timber harvest on public land elk winter ranges requires acknowledgement of the need to encourage elk to use public land winter ranges.

The SCAC supports consistency across administrative boundaries and supports the regions where NSO or closed restrictions occur across administrative boundaries. However, there is the opportunity to utilize timing limited and controlled surface use restrictions on winter range where these more restrictive consistencies do not occur.

Obviously, during harsh winters elk are driven into core winter range areas. We agree that these areas on the SNF should have the most restrictive regulations regarding human activities. However, during average or mild winters there are areas within the 754,400 acres the SNF identified as crucial elk winter range that operate as marginal winter range. As a result, we see no adverse impacts to wintering elk, maintaining present elk populations or hunting opportunities if these fringe or marginal winter range areas are managed with timing limited or seasonally restricted criteria to protect wintering elk.

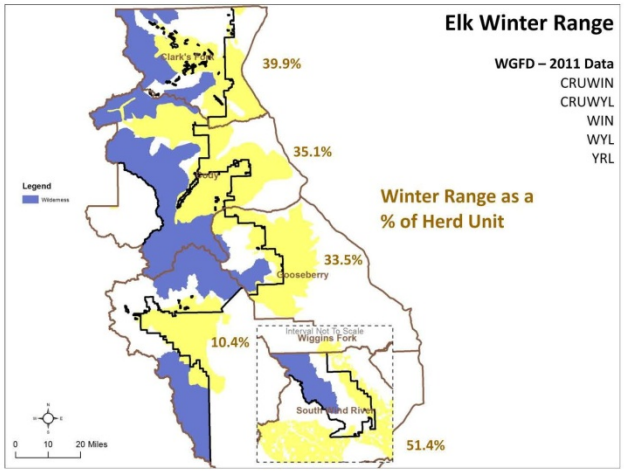
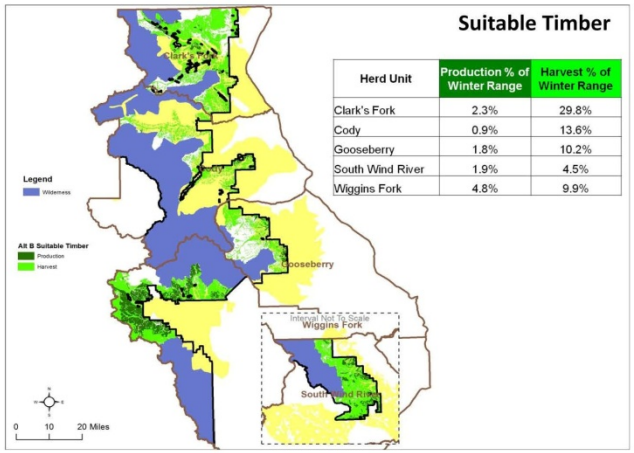


Figure 12 Elk winter range on SNF and adjacent lands with herd unit boundaries according to WGFD

According to the data within the DEIS, suitable timber varies significantly between herd units ranging from 29.8% of the winter range for the Clark's Fork Herd Unit to 4.5% for the South Wind River Herd Unit (Figure 13). Available timber is a subset of those figures ranging from 0.9% of the winter range for the Cody Herd Unit to 4.8% for the Wiggins Herd Unit. As a result, the SCAC believes it is biologically feasible to consider limited timber harvest opportunities on portions of designated winter ranges on the SNF. These opportunities could be configured to include timing and winter severity constraints that add specific protections to wintering big game. In fact, the DEIS refers to timing restrictions for timber

harvests on elk winter range. However, references to these restrictions are vague. Specific restrictions vary with each alternative regarding dates and the classification of winter range (winter range versus crucial winter range).

The SNF states under Direct and Indirect Effects of the DEIS on page 284, "Livestock removes forage for use by elk." Livestock grazing, under proper management, also contributes to improving forage quality for elk. Early season grazing, or grazing when soil moisture conditions allow for vegetative re-growth after livestock grazing increases forage palatability and nutrition for elk. Therefore, livestock, under properly managed grazing systems, are a tool that may improve forage conditions for elk. We ask SNF officials to include this fact in this section of the DEIS.



Herd Unit	Production % of Winter Range	Harvest % of Winter Range
Clark's Fork	2.3%	29.8%
Cody	0.9%	13.6%
Gooseberry	1.8%	10.2%
South Wind River	1.9%	4.5%
Wiggins Fork	4.8%	9.9%

Figure 13 Available and suitable timber base on SNF with elk winter range and elk herd units[13]

[13] **Production=Available, Harvest = Suitable**

10. MINERALS

Given that a majority of the SNF is legally withdrawn or designated as NSO, the SCAC supports designating lands with high oil and gas occurrence potential as available for leasing with surface occupancy to the maximum extent possible while supporting other resource objectives. This includes areas that are currently leased (Figure 14).

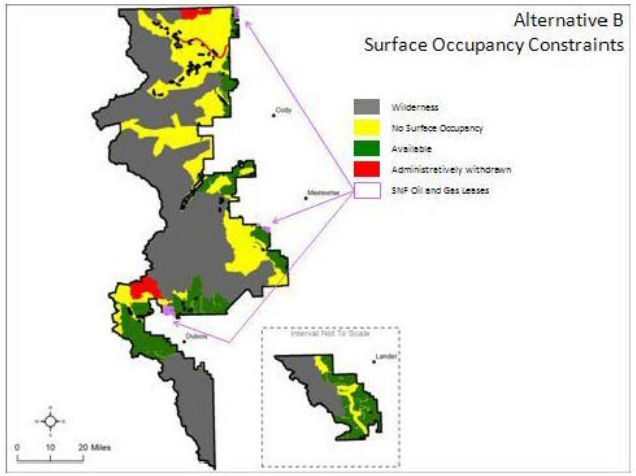


Figure 14 Areas with high oil and gas occurrence potential that are currently leased

According to the 1995 USGS assessment (Fox and Dolton 1995), the Sub-Absaroka is a "demonstrated" oil play located along the western side of the basin beneath Eocene-age volcanic rocks. That study stated that the potential for significant new field discoveries was considered to be "good". Oil was predicted to be trapped in Laramide-age anticlines and domes, similar to producing structures successfully developed elsewhere in the basin. In the reasonably foreseeable development (RFD), this area is considered to have low or no potential (USDI 2009).

Exploration of the Sub-Absaroka play has been limited because of the difficulty of exploring beneath the volcanic rocks, especially the challenge of predicting the depth range of the drilling objectives due to the rugged topography of the Absaroka Mountains. However, industry has recognized structures beneath the volcanic rock and six small fields (Aspen Creek, Baird Peak, Dickie, Prospect Creek, Prospect Creek South and Skelton Dome) have been developed in this play. Production has been from the Permian Phosphoria and the Triassic Curtis (Crow Mountain) Formations. With recent advances in exploration technology (for example 3-D seismic) and with access to public lands for exploration, it should be possible to look beneath the volcanic cover at the underlying structures and evaluate what could be significant hydrocarbon reserves (Fidelity Exploration and Production Company 2010). The SCAC requests that if significant reserves are discovered that some flexibility be provided to allow for development.

The SCAC agrees that consistency should be provided across jurisdictional boundaries to protect important wildlife habitats. However, NSO restrictions should not be broadly applied to all big game crucial winter range since the expected level of development (projected as very low to low in the RFD) can be successfully mitigated at the project level. After careful consideration, we propose that NSO restrictions be added to four areas (Paint Creek, O'Hara Mountain, Carter Mountain, and Upper Dubois) that are allocated as available under the DEIS preferred alternative (Figure 15). In the O'Hara Mountain area we support restrictions that are comparable in acreage to those designated on adjacent BLM lands (Figure 15). In the Carter Mountain area we support a NSO designation for most of the area, but do request that a 5-mile buffer be applied to existing oil and gas fields located to the east and south. We request that the eastern and southern portions of the Carter Mountain area that are within this 5-mile buffer are available with timing limited and controlled surface use restrictions (Figure 16). This will allow for reasonable development surrounding existing oil and gas fields. We also request a NSO constraint for the area north of Dubois that is not considered to have high oil and gas occurrence potential (Figure 17).

The SCAC believes that all other areas disclosed as available under the preferred alternative should remain so, but we are willing to discuss additional resource protections as part of a Governor-sponsored Interdisciplinary Team meeting.

It should be noted that if the preferred alternatives for the BLM Bighorn Basin and Lander Planning Areas change between draft and final, restrictions will need to be reevaluated for consistency.

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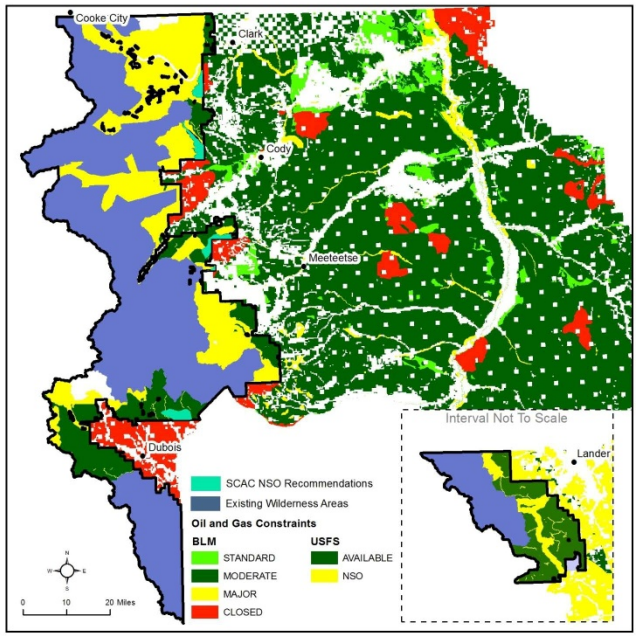

Figure 15 SCAC proposed oil and gas constraints

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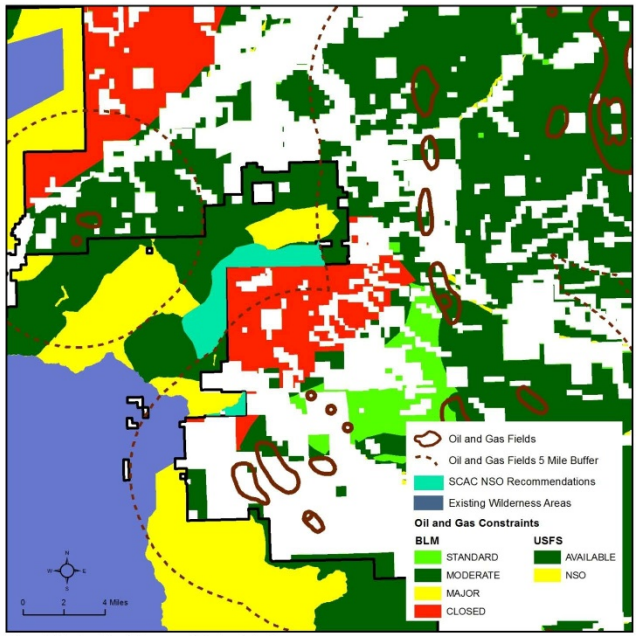

Figure 16 Carter Mountain areas within 5-mile buffer

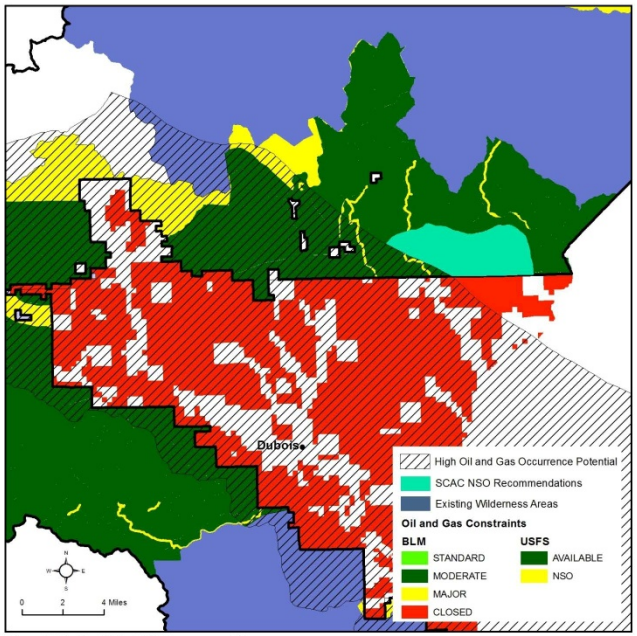

Figure 17 North of Dubois NSO recommendation

10.1 DRAFT LAND MANAGEMENT

The SCAC requests that the goals, standards, and guidelines for other resource areas within the Plan be modified, as necessary, to allow for responsible mineral development. Our concern is that activities will be prohibited merely because clear direction was not provided upfront within the Plan.

MINERALS

Goals

Please modify Goal 2 (page 85) to include: provide for mineral resource development, especially in high oil and gas occurrence potential areas.

Management Approach

The Plan states (page 124), "Mineral development is generally suitable on the Shoshone outside areas that have been withdrawn from minerals development, special areas, and proposed special areas." Since an NSO designation within large tracts of land is essentially the same as no leasing, the Plan should list in the Minerals section where surface occupancy associated with mineral development is suitable on the Forest or where there is a NSO restriction.

Due to the limited exploration that has been conducted on the SNF, and the large land tracts that are designated as NSO, the SCAC believes that in areas designated as NSO geophysical exploration activities should be evaluated on a case-by-case basis and requests that this modification be included under Management Approach.

10.2 DRAFT ENVIRONMENTAL IMPACT STATEMENT

Affected Environment and Environmental Consequences

The DEIS needs to provide a clear statement that exceeding the projected new-well provided in DEIS Map 34 (Oil and Gas Development Potential) will not result in the need for a Plan Amendment. Given the concern that the projected new well numbers disclosed in the DEIS could be perceived as a limit, the SCAC requests the following language be added: "The RFD projections (USDI 2009) for oil and gas does not limit or cap the number of wells that can be drilled, nor the amount of surface disturbance that will be allowed during the period covered by the Final Plan/EIS. This RFD is intended for analysis purposes only. Individual implementation level project proposals will be subject to site-specific NEPA analysis to ensure compliance with the Final SNF Plan."

The DEIS states with regard to Alternative B (page 35), "surface occupancy is allowed on approximately 402,700 acres with various stipulations." However, Table 117 on page 455 provides that surface occupancy is allowed on 402,700 acres and that an additional 89,200 acres are designated as NSO because of steep slopes and riparian areas. DEIS page 35 should be corrected to state that surface occupancy is allowed on approximately 313,500 acres. The column in Table 117 (page 455) for areas

allowing surface occupancy currently states 313,600 acres and this should be corrected to state 313,500 acres.

Mineral materials are important for local road development and maintenance. With regard to mineral materials the DEIS states on page 545:

> The availability of mineral materials would vary by alternative in that some management area designations are not suitable with the development of mineral materials. The acreages impacted are the same as those described under locatable minerals above and the reduction in area available would be the same. The one difference is that the areas would not have to be formally withdrawn. The areas will be unavailable strictly upon forest plan direction for each management area.

While the locatable minerals section referenced in the abovementioned excerpt provides acreages for areas that may be withdrawn under each alternative, acreages available for locatable mineral activities is not provided. Thus it is difficult to determine the acreages for mineral material sites and where collection would be approved. It is requested that the acreages available for locatable mineral activities and mineral materials development be disclosed and evaluated by alternative.

In areas where there are overlapping timing limited and controlled surface use restrictions these overlapping restrictions could limit the operating timeframe to the point that development is precluded. It is requested that the DEIS disclose and evaluate the impacts of overlapping timing and controlled surface use restrictions in areas with high oil and gas occurrence potential.

The DEIS states on page 453:

> Under all alternatives, areas administratively open to oil and gas leasing would be open to geophysical exploration. Requiring geophysical exploration to be performed within the constraints necessary to protect other resources may impact oil and gas exploration, but could benefit other resources. Impacts to exploration would include increased costs to the operator from the use of more expensive, but less surface-disturbing techniques (e.g., small, portable foot or helicopter-transported surveying equipment in areas with surface use restrictions). If surface use restrictions prevent an operator from effectively surveying/exploring oil and gas resources, development could be sited based on incomplete information, affecting the potential success of a future well. This also could result in increased costs to the operator and in nonproductive disturbances to land and surface resources.
>
> Under all alternatives, the extent of impacts to oil and gas development from constraints and limitations on exploration and development relates directly to oil and gas development potential in an area. Management action that constrains development of oil and gas areas with a high potential for oil and gas occurrence generally would result in more impacts to development than similar management action that constrains development in areas with a low potential for oil and gas occurrence.

It is correctly acknowledged in the DEIS that allowing geophysical exploration in areas closed to leasing or identified as NSO could provide additional insights into the interpretation of data collected in other areas that are open to development. Due to the limited exploration that has been conducted on the SNF, and the large land tracts that are designated as NSO, including on adjacent BLM jurisdictional

boundaries, the SCAC believes that in areas designated as NSO geophysical exploration activities should be evaluated on a case-by-case basis and requests that this modification be included under Alternative B.

The SCAC also requests that temporary road construction and reconstruction be waived from the NSO restriction in high oil and gas occurrence potential areas so that exploration activities are not unnecessarily precluded.

In addition, the DEIS should state that controlled surface use, timing, and no surface occupancy restrictions resulting from the Plan revision cannot be applied to existing leases.

11. RECREATION

The SNF is majority wilderness or non-motorized. This leaves a small disproportionate amount for multiple-use. Therefore, the SCAC does not support the designation of additional wilderness.

The Draft Plan and DEIS are inconsistent, contradictory, and confusing as to what is open or closed to winter motorized use. Thus the following topics and issues should be clarified or modified in the Draft Plan.

11.1 DRAFT LAND MANAGEMENT PLAN

- The Recreation Opportunity Spectrum (ROS) is an important part of the alternative analysis and subsequent Forest Plan direction. ROS tables are included in several sections of the AMS, DEIS, and Draft Forest Plan. There are inconsistencies in some of those tables. We understand the differences in Table 2 because of the remapping in 2008. The AMS Table 2 (1986), the DEIS Table 4 (existing 1986 Plan), and the DEIS Table 11 (Alternative A) are different. The Primitive ROS Class in Table 2 is 834,999 acres; Table 4 is 1,056,342; Table 11 is 1,334,000. Please review and correct or explain inconsistencies between Tables 2, 4, 11, 12, and 129.
- All big game crucial winter range will remain open to winter motorized use on existing snowmobile routes and in existing play areas.
- There is no over-snow vehicle use map used to designate where and when over-snow vehicle use is allowed. The Plan and accompanying DEIS state multiple times that over-the-snow use will be limited to existing trails and play areas yet there is no map. Therefore we request that no areas that are currently open to snowmobiling be closed until there is an accurate over-snow vehicle use map available that can be used to understand the impacts of the plan.
- The Dunoir Special Management unit is proposed to be closed to snowmobiling.
- Beartooth Butte RNA will remain open to winter motorized use as it currently exists.

11.1.1 Forest-wide Direction

RECREATION

Goals

Since the Plan states established recreation opportunities are maintained where not in conflict with other resources, we request that the following goal be added to those stated on page 90, "Retain all existing dispersed camping sites unless environmental degradation is occurring."

Standards

Please clarify what a "party" would consist of in terms of recreation and include a definition in the glossary (Table 18 on page 91). Our understanding is that a party could consist of one person or several persons in one group. As stated in the guidelines below Table 18, group size limits "should be established where needed to meet management goals." Clarify how the group size decision would be made and if the decision is subject to NEPA.

The National Outdoor Leadership School (NOLS) has large groups that require access to the forest. We acknowledge the importance of the outdoor classroom and request that the SNF work with the SCAC and organizations such as NOLS to make accommodations for large groups.

Management Approach

The SCAC believes that remediation and or enforcement are not viable alternatives and that this should be stated under management approach.

THREATENED, ENDANGERED, PROPOSED, AND CANDIDATE SPECIES

Define management actions and management activities as used in this section of the Plan (for example on page 38 and 41). Is there a difference?

Guidelines

Rewrite guideline #1 as follows (page 42): Management actions <u>that have documented adverse effects</u> to listed species and their habitats should be avoided or designed to minimize adverse effects.

The lynx management guideline (page 44) that deals with over-the-snow routes and designated play areas states the "designated over-the-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." Yet there is no map which designates these areas therefore it is unclear what the impacts to snowmobiling will be. Please provide a map of over-the-snow routes and designated play areas, the acres of these areas, and season of use to assist with the understanding of impacts from this guideline.

Management Approach

Remove paragraph two under management approach for Canada lynx which states (page 45):

> "During any travel planning involving over-the-snow motorized recreation within lynx analysis units, consideration will be given to managing snow play areas to not expand the amount of the area that becomes compacted and contributes to conflicts with lynx by allowing access to the area by other predators."

Please remove the reference throughout the document to reflect the best scientific information (Kolbe et al. 2007) that there is no evidence that compacted snow routes increase competition from other species to levels that adversely affect lynx populations.

SENSITIVE SPECIES

Guidelines

Is snowmobiling considered a management activity under Guideline #3? If so, please provide the best available science that documents that snowmobiles are having adverse effects on the sheep. Current snowmobile users in the area have not documented any sheep occurrence.

Under Guideline # 11 (page 50), please provide seasonal restrictions and which routes are "motorized use of travelways" to allow cooperators to fully understand the implications of this guideline to winter over-the-snow use.

SPECIES OF LOCAL CONCERN

Goals

Please modify Goal 1 to include (page 59): "Minimize human disturbance in big game crucial winter range to levels commensurate with maintaining big game populations within state designated population goals and objectives." Without this information this goal can be misinterpreted and wrongly applied.

Guidelines

We request that Guideline 5 be modified to include: "Exceptions are allowed for identified existing snowmobile routes and play areas."

11.1.2 Management Area Direction

SUITABLE USES

If restoration treatment is allowed in Management Area 3.5 as stated in Table 128 on page 128, why are temporary roads not allowed?

In Table 23 on page 129 please change the over-snow motorized to yes for MA 5.4 with the restriction language. As the table currently reads it could be mistaken that no use is allowed.

MANAGEMENT AREA 1.3 – BACK COUNTRY RECREATION YEAR-ROUND NON-MOTORIZED

In the area of Deacon Meadows and Ramshorn Basin change the management area from this category to 3.3A to be consistent with the 1986 Forest Plan designation of 2A Semi-primitive – Motorized and language in the Preferred Alternative B of the current DEIS which states, "This alternative would maintain existing miles of open roads and motorized trails. Areas with existing winter motorized use, such as Togwotee Pass (referring to Two Ocean Mountain area) is retained."

MANAGEMENT AREA 2.3 – PROPOSED RESEARCH NATURAL AREAS

The Theme states that six research natural areas will be reviewed for designation but the Setting states that eight will be proposed (page 154). Please clarify this discrepancy.

MANAGEMENT AREA 3.1B – POPO AGIE GEOLOGICAL AREA

Under Guideline 8 (page 161), please change "semi-primitive" to "semi-primitive motorized" to be consist with general suitability identified in Table 23 on page 126.

MANAGEMENT AREA 3.3A – BACK COUNTRY RECREATION YEAR-ROUND MOTORIZED

The acres allocated to this management area changed from 185,936 acres to 64,243 a significant difference of 121,693 acres. Did these 121,693 acres remain in motorized use?

Goals

We request that the SNF support changes in commercial and educational group sizes and stress flexibility based on size, purpose and impact upon resource. The Goals listed on page 164 should be expanded to include this information.

We suggest clarifying Goal 2 by adding the following, "…such as trail loop opportunities."

Standards

Add "…existing System road reconstruction…" to Standard 2 (page 164) to clarify that if a non-system road exists in this management area that is within the 1 mile guideline, it could be reconstructed as long as it was restored upon completion of the project.

MANAGEMENT AREA 3.3B – BACK COUNTRY RECREATION SUMMER NON-MOTORIZED WITH WINTER MOTORIZED

Based on increased demand for winter motorized recreation, please consider increasing the acres allocated to Management Area 3.3B.

Standards

Add "…existing System road reconstruction…" to Standard 2 (page 166) to clarify that if a non-system road exists in this management area that is within the 1 mile guideline, it could be reconstructed as long as it was restored upon completion of the project.

MANAGEMENT AREA 3.3C – BACK COUNTRY RECREATION SUMMER MOTORIZED WITH WINTER NON-MOTORIZED

Standards

Add "…existing System road reconstruction…" to Standard 2 (page 168) to clarify that if a non-system road exists in this management area that is within the 1 mile guideline, it could be reconstructed as long as it was restored upon completion of the project.

MANAGEMENT AREA 3.5 – BACK COUNTRY RECREATION AND FOREST

Desired Condition

Include the following language (underlined) in the second and fourth paragraphs of the desired condition.

> Summer motorized use occurs on designated routes and snowmobiling opportunities are provided on groomed trails and in areas open to off-trail snow play. Snowmobiling is not allowed in big game winter range areas except in areas of existing snowmobile routes and play areas. Access is provided by motorized and non-motorized trails. Concentrations of users are low and recreationists experience a degree of solitude. Evidence of past human uses, such as dispersed campsites, exists. Evidence of current and past resource management activities, such as timber harvest and prescribed fire, exists but is visually subordinate.
>
> Improvements to enhance recreation opportunities may include parking areas and informational, interpretive, motorized trail construction, motorized trail development, motorized trail maintenance, and directional signs, but improvements are minimal.

Standards

Standard 2 is in conflict with Management Area 5.4 - Managed Big Game Crucial Winter Range which states "over-the-snow vehicles may be restricted in big game crucial winter range with exceptions for existing snowmobile routes and play areas". Yet under Standard 2 for this management area it states that "Over-the-snow winter activities are not permitted in big game winter range areas". Update this management area to state that there is an exception for over-the-snow vehicles as stated in Management Area 5.4. Also update the management approach (paragraph 2) to reflect consistency with Management 5.4.

Since a goal for this management area is to provide year round recreation opportunities, please add the following Standard: Allows new system motorized trail construction, development, and existing trail reconstruction.

Add "…existing System road reconstruction…" to Standard 4 (page 170) to clarify that if a non-system road exists in this management area that is within the 1 mile guideline, it could be reconstructed as long as it was restored upon completion of the project.

MANAGEMENT AREA 3.6A – CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL

This management area, as well as Management Area 3.6B is not shown on the alternative management area maps. The Plan explains that these management areas are covered by others on the alternative maps; however; it is not clear which management area is given priority.

In addition, the standard and guidelines for this management area are different then what is displayed in Table 23 on page 126 for over-snow motorized. Update Table 23 to be consistent with the standards and guidelines for this management area, specifically remove the "may be restricted in big game crucial winter range" because over-the-snow vehicles are an exception in crucial winter range.

MANAGEMENT AREA 3.6B – NEZ PERCE NATIONAL HISTORIC TRAIL

The standard and guidelines for this Management Area are different then what is displayed in Table 23 on page 126 for over-snow motorized. Update the table to be consistent with the standards and guidelines for this management area, specifically remove the "may be restricted in big game crucial winter range" because over-the-snow vehicles are an exception in crucial winter range.

MANAGEMENT AREA 4.2 – SCENIC BYWAYS, SCENIC AREAS, VISTAS, AND TRAVEL CORRIDORS

Under Theme and Setting, where ever deemed appropriate, include the following: These corridors allow the Forest to address the fastest growing use on the SNF; which is OHV use. Increased OHV use coupled with the very popular use of site seeing and driving for pleasure make it vital that existing travel corridors, both road and trail, remain open for travel management. These corridors will also reduce conflicts and improve safety by providing loop trails for OHV users separate from vehicles. In addition, travel corridors reduce the number of unauthorized user made trails which are often used to reestablish an old existing loop route.

The paragraph at the bottom of page 180 describing the scenic byways is confusing. It could be clarified by adding the following at the beginning of the last sentence on the page. "In addition to the eight travel corridors mentioned above, four other travel routes…."

MANAGEMENT AREA 8.1 – DEVELOPED RECREATION AREAS

Goals

Include the following as goals for Management Area 8.1:

- All established campgrounds, picnic grounds, and other facilities on the SNF will remain open.
- Increase the campground reconstruction goals for the North Fork of the Shoshone River.

Objectives

We suggest doubling the campground reconstruction objective from one to two in order to meet the demand for larger recreation vehicle campsites and to encourage additional tourism activities. At least one campground reconstruction should occur in the North Fork of the Shoshone River.

In addition, the SNF should consider adding another objective such as, "Reconstruct one campground and/or trailhead to accommodate summer access to motorized loop trails"

11.2 ANALYSIS OF THE MANAGEMENT SITUATION

The following excerpt from the AMS was not carried forward to the DEIS. However, it is clear that off-highway vehicle use is very important use on the forest and providing opportunities for this use is vital for the local economies. Please include the following information from the AMS in the Final EIS and Final Plan to support increased off-highway vehicle use on the Forest.

Off-highway vehicle use is one of the fastest growing forms of outdoor recreation. From 1982 to 2000, the number of people driving motor vehicles off road in the United States increased over 109 percent (Cordell et al. 2004). Off-highway vehicle users now account for 5 percent of the total number of visitors to national forests; on the Shoshone, off-highway vehicle use is following this national increase. Available State of Wyoming off-highway vehicle permit registration numbers mirror this trend. In 2002, the State instituted a mandatory off-highway vehicle permit program. Since then, the number of permits sold has climbed from 6,767 to 55,060 in 2009, the last year data are available. Sales of permits in the Shoshone's three-county area4 ranged from 1,196 in 2002 to 6,970 in 2005. Counties with the highest permit sales are gateways to desirable public land recreation areas, such as Fremont County.

A 2006 University of Wyoming Department of Agriculture and Applied Economics survey and economic assessment of off-road vehicle use in Wyoming estimated that 150,000 off-highway vehicles were owned by Wyoming residents and approximately 36 percent of residents used an off-highway vehicle for recreational purposes in the preceding 12 months, resulting in over 3.6 million household-use days. Illegal cross-country travel by off-highway vehicles has resulted in wildlife disturbance, soil erosion, and sedimentation in streams.

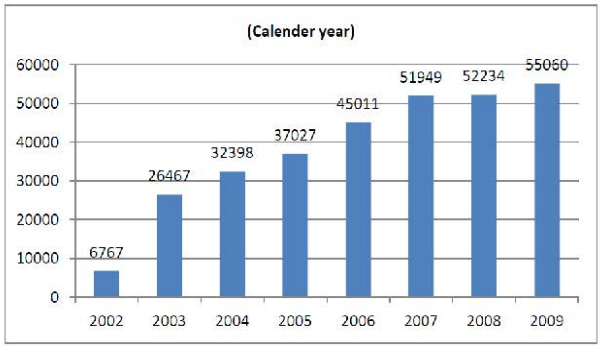

Figure 18 Off-highway vehicle permits sold in Wyoming per calendar year, 2002 through 2009[14]

[14] Modified from SNF 2012 Analysis of the Management Situation

11.3 DRAFT ENVIRONMENTAL IMPACT STATEMENT

11.3.1 Elements Common to all Alternatives

DEIS page 26 Table 10: Management Area (MA) 1.3 is noted as being MA 3A in the 1986 forest plan. However, under Alternative B there are areas designated as MA 1.3 that were designated as MA 2A in 1986. The difference is 2A is back country motorized and 1.3 is back country non-motorized (1.3). In Alternative B change all areas designated as MA 1.3 that were previously designated in 1986 as MA 2A to MA 3.3A to be consistent with the language in Alternative B (page 33) that states, "This alternative would maintain existing miles of open roads and motorized trails. Areas with existing winter motorized use, such as Togwotee Pass (referring to Two Ocean Mountain area) are retained." Figure 19, Figure 20, Figure 21, and Figure 22 demonstrate areas where management areas have changed to eliminate winter motorized use contrary to the claim that all current winter motorized use will be maintained. The DEIS should include that no areas that were previously open to winter motorized use will be closed.

Ltr 0306

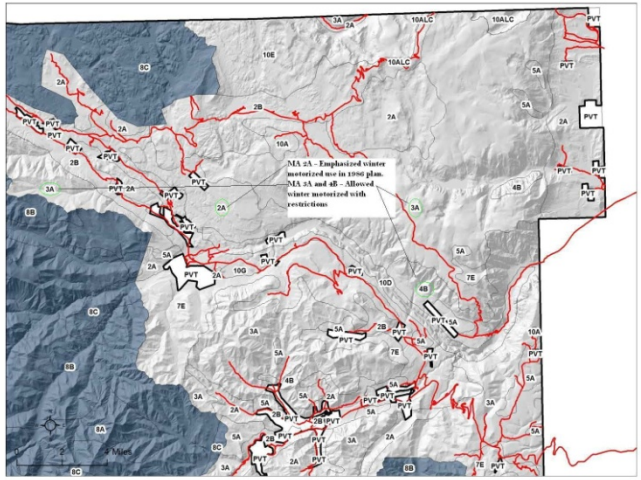

Figure 19 1986 Management areas allowing winter motorized use – north SNF[15]

[15] Modified from SNF 2012 Plan

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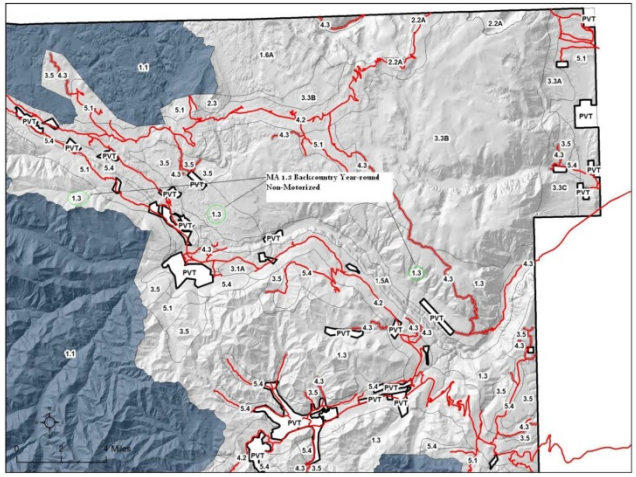

Figure 20 Alternative B Management Areas – closed to winter motorized use – north SNF[16]

[16] Modified from SNF 2012 Draft Plan

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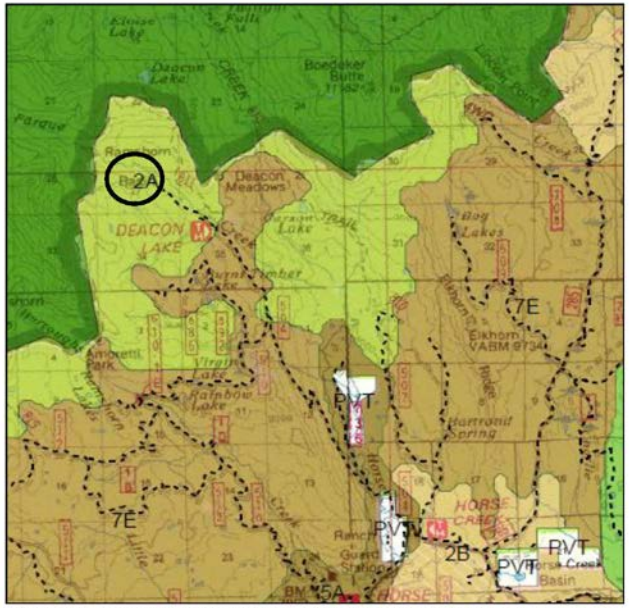

Figure 21 1986 Management Area 2A winter motorized use emphasized – central SNF (modified from SNF Draft Plan

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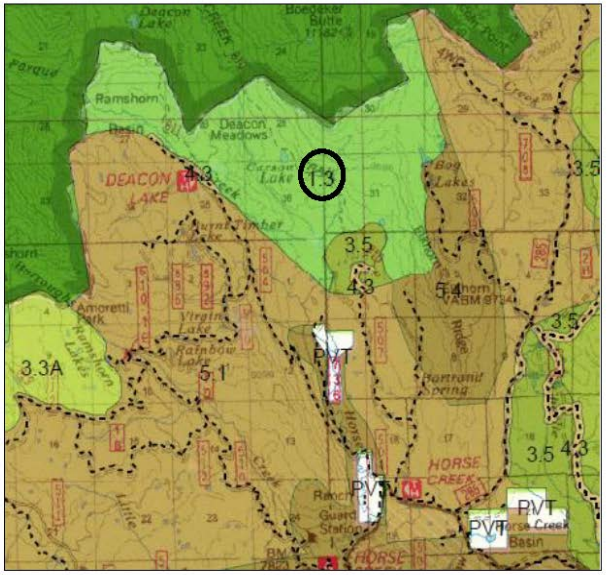

Figure 22 Alternative B Management Area 1.3 closed to over-snow motorized – central SNF[17]

11.3.2 Description of Alternatives Considered in Detail

Alternative B – The Proposed Action

The DEIS states (pages 33 and 34), "New summer motorized trails allowed in some inventoried roadless areas with existing winter motorized use are retained." However, inventoried roadless areas are allocated to various management areas that do not allow winter motorized use. Please update the management

[17] Modified from SNF 2012 Draft Plan

areas in roadless areas to management areas that allow winter motorized use and maintain historic areas used by snowmobiles.

11.3.3 Comparison of Alternatives

The DEIS states with regard to Alternative B (page 33) "This alternative would maintain existing miles of open roads and motorized trails. Areas with existing winter motorized use, such as Togwotee Pass (referring to Two Ocean Mountain area) are retained." Yet according to Table 18 on page 52 (Comparison of alternatives by revision topics) the Dunoir SMU is now being closed to over-snow motorized use. Additionally, DEIS Tables 2 and 3 indicate that the reduction in acres of possible snowmobile use was reduced from 46% from Alternative A to Alternative B. The SCAC is requesting that Alternative B be updated to be the same as Alternative A in order to consistently reflect that existing motorized use is retained.

11.3.4 Affected Environment and Environmental Consequences

If specific travel routes are not designated or analyzed in the Forest Plan, why is "miles of roads and motorized trails" an indicator (4th indicator on page 476)? How would this be measured?

It is suggested that the last paragraph of the affected environment section for the Continental Divide National Scenic Trail (CDNST) be changed to the following (page 480), "The management area emphasis for the CDNST corridor will determine the appropriate scenery objective and recreation opportunity spectrum class. Therefore alternatives will be analyzed using the Scenery Management and Recreation Opportunity Spectrum systems." The above edit is also suggested for the Nez Perce National Historic Trail (NPNHT) using only the Scenery Management System.

The DEIS states on page 492 that "Under Alternative B, over-snow motorized vehicle recreation would continue to be allowed in areas where it is currently occurring under the current Forest Plan (Alternative A), except within Management Area 1.6B, where use is not allowed." Table 133 on page 490 indicates a 16% decrease in acres allowed for over-snow motorized recreation. In addition, Maps 50 and 51 which show areas available for winter motorized use in Alternatives A and B are different; significantly less acres available in Alternative B. Please correct or explain this inconsistency.

Consider increasing the acres of Management Area 3.5 (Backcountry Recreation and Restoration) in Alternative B which would result in more acres in the Semi-primitive, motorized ROS Class (Table 143 on page 498). Also keep in mind that acres by ROS class are not a good indicator for motorized summer use because use off of existing designated routes is illegal. The more meaningful indicator would be miles of motorized trails.

OTHER RESOURCE IMPACTS

The following comments address recreation related effects to resource areas as stated in the DEIS.

AIR QUALITY

Page 99 of the DEIS states that "Acres permitting winter motorized access are greatest under Alternative A, followed by Alternatives F, E, B, D, and C." As stated previously under Alternative B on DEIS page 33 existing winter motorized use…is retained. Thus, the acres permitting winter motorized access under Alternative A and B should be the same. This section should be updated to reflect that winter motorized use has been retained in Alternative B.

THREATENED, ENDANGERED, PROPOSED, AND CANDIDATE SPECIES

Canada Lynx

The DEIS states (page 154 in paragraph one under Table 38) that, "The primary risk factors from forest management are timber harvest, winter recreation, and fire suppression." And "Groomed trails may allow access by lynx competitors (i.e., bobcat and coyote) into lynx habitat." Yet in the *Northern Rockies Lynx Management Record of Decision* it states "The best information available has not indicated compacted snow routes increase competition from other species to levels that adversely affect lynx populations…(USDA 2007b)."

As such, the groomed trail reference throughout the DEIS should be corrected to reflect the best scientific information (Kolbe et al. 2007) that there is no evidence that compacted snow routes increase competition from other species to levels that adversely affect lynx populations. In addition, the lynx surveys performed on the Forest were conducted at current levels of winter motorized use and it appears lynx are using areas despite winter motorized use, specifically in the Togwotee Pass area.

SENSITIVE SPECIES CONSIDERED

American Martin

On page 186 of the DEIS the following statement is used and this information is paraphrased throughout the document, "Greater winter travel via snowmobiles could theoretically alter snow conditions and allow low-elevation predators to access more winter habitat due to snow compaction." Studies on the effects of wildlife are few (Manley et al. 2004), however, it has been concluded that coyotes did not require compacted snow routes to access winter snowshoe hare habitat (Kolbe et al. 2007). The aforementioned DEIS statement should be removed or modified to include this information.

North American Wolverine

The DEIS states (page 191) "The primary risk factor from forest management is winter recreational activities." SCAC comments regarding this statement are provided in the threatened, endangered, and candidate species section of this comment document.

Rocky Mountain Bighorn Sheep

On DEIS page 213 please define the critical time period that human access would be limited in bighorn sheep wintering areas.

On DEIS page 214 please provide the justification and supporting science for closing crucial bighorn sheep winter range during critical times to motorized access. Has it been documented that winter motorized use has had an adverse impact on sheep populations on the SNF? In the conservation measures summary #2 (page 214) please provide the dates of seasonal closures for motorized access to crucial big horn sheep winter range.

Sheep population objectives in the Clarks Fork Bighorn Sheep head have been met, therefore reducing or eliminating winter motorized use in the area is unnecessary. Winter motorized use has been occurring in the area for many years and there is obviously no impact to sheep populations. For that reason, the SCAC requests that areas in the Beartooth Plateau that are currently open to winter motorized use are not closed as a result of big horn sheep seasonal closures.

SPECIES OF LOCAL CONCERN

Rocky Mountain Elk

Table 75 (page 288) was suppose to display timing restrictions for motorized use by alternative; however, timing restrictions are not provided. Therefore it is impossible to understand the impacts of this restriction to winter motorized use. Please provide the information and disclose the areas that will be impacted by these restrictions.

If population objectives have been at or above herd unit objectives, please provide the justification for closing crucial elk winter range during critical times.

Mule Deer

For mule deer and moose the conservation measures also include seasonally closing motorized access to crucial winter range during critical times; however, there is no science referenced or justification that details why this is necessary. Where data is available in the DEIS it can be concluded, for the most part, that ungulate populations are stable and have been under the current condition—which is less restrictive than the proposed preferred alternative.

RARE PLANTS

Effect of Recreation

On page 335 the last sentence states that snow compaction by heavy snowmobile use has been shown to have negative effects to fen habitats. Please provide the science or reference to support this claim and if none are available remove this statement.

INVASIVE SPECIES

Winter Recreation

The DEIS states (Page 387), "winter motorized activities can also compact the snow, forming barriers that may alter spring runoff patterns, which can result in soil erosion and gullies in certain situations." Please provide the science to support this statement, if none is available remove this statement.

PEOPLE AND COMMUNITIES – GOODS AND SERVICES

This section should include a section on Winter Motorized Use utilizing the data collected by the University of Wyoming.

ROADS

There is no mention of winter use of roads in this section. Please provide an analysis of roads that are open for winter use for over-snow vehicles.

RECREATION

Travel Management

Page 481 of the DEIS states, "There is no over-snow vehicle use map used to designate where and when over-snow vehicle use is allowed. Although the DEIS claims in multiple instances that over-the-snow use will be limited to existing trails and play areas, no map is offered illustrating these areas. Therefore we request that no areas that are currently open to snowmobiling be closed until there is an accurate over-snow vehicle use map available that can be used to understand the impacts of the Plan.

Please provide a travel corridor on historic trails that connect Crandall to the Sunlight area that allows winter and summer motorized use of this area. Although this area is in a Grizzly PCA the delisting process will likely occur during the life of the Plan and the expanded number and range of grizzly bears should allow flexibility in the current PCA. Therefore we request historic trails 602, 603, 605, 626 and 627 be available in the future for summer motorized use on existing trails.

Please maintain the summer motorized use on the historic loop trails from Franks Peak to Kirwin and Kirwin to South Wood River.

Please change the Jack Creek, Deer Creek, Trail Creek, Phelps Mountain and Kirwin areas to Management Area 3.5 to accommodate historic summer motorized use on the trails in these areas. Specifically trails 665.1, 656, 653 and 643 that have been historically designated for motorized trail vehicles.

INVENTORIED ROADLESS AREAS

The Roadless Area Conservation rule, unlike the establishment of wilderness areas, will allow a multitude of activities including motorized uses, grazing, and oil and gas development that does not require new roads to continue in inventoried roadless areas.

RESEARCH NATURAL AREAS

Effects from Roads and Trails Management

On page 540 it states that "Motorized use is not allowed in RNAs outside of wilderness unless deemed necessary for research or authorized administrative access." Please change the language to reflect that over-snow motorized use is allowed in areas where it currently exists.

Effects from Recreation

On page 542 it states "These areas are open to over the snow motorized recreation. To be consistent with the Draft Plan please change the language in this section to clearly communicate that over-snow motorized use is allowed.

The Beartooth Butte RNA is a very popular winter motorized recreation area with groomed and designated trails and play areas. Please clarify that this area will stay open to over-snow motorized use as it currently exists.

SPECIAL INTEREST AREAS

The DEIS fails to analyze the effects of Special Interest Areas on recreation. Please disclose the effects of designating Special Interest Areas on recreation, specifically winter motorized recreation. Accordingly, we request that no Special Interest Areas will be closed to winter motorized use as it currently exists without an effects analysis (CEQ1502.16 Environmental Consequences).

GLOSSARY

We request that the following terms in the recreation section be defined in the Plan and DEIS glossary.

Table 13 Recreation Glossary Table

Term	Comment
Management Activity	Not defined in glossary. Is this the same as management action?
Management Action	Not defined in glossary. Is this the same as management activity?
Parties	Not defined in Glossary. Does this apply for one person

Term	Comment
	or more?
Road	Not defined in glossary. Define road as used in the Plan for planning purposes.
Trail	Not defined in glossary. Define trail as used in the Plan for planning purposes.

12. SPECIAL AREAS

The comments provided below focus on wilderness and special interest areas.

12.1 DESIGNATED WILDERNESS AND RECOMMENDED WILDERNESS

The SNF is 79% wilderness or non-motorized. This leaves a small disproportionate amount for multiple-use. Therefore, the SCAC does not support the designation of additional wilderness.

12.1.1 Draft Management Plan

Under Management Approach for Management Area 1.1 (Wilderness) please clarify what a "party" would consist of in terms of party size and pack animals and include a definition in the glossary (Table 18 on page 91). Clarify how the group size limitation decision would be made and if the decision is subject to NEPA.

National Outdoor Leadership School (NOLS) has large groups that require access to the forest. We acknowledge the importance of the outdoor classroom and request that the SNF work with the SCAC and organizations such as NOLS to make accommodations for large groups.

12.1.2 Draft Environmental Impact Statement

Affected Environment and Environmental Consequences

Why is "Recreation Opportunity Spectrum (ROS)…within one mile of Wilderness Boundary" a key indicator (page 510)? This implies that ROS classes may be a "buffer" around wilderness. The SCAC is concerned that this could be misinterpreted and applied incorrectly, and therefore recommend deleting this key indicator. In addition, we suggest editing the second paragraph under methodology to be consistent with a "no-buffer" recommendation. The presence of motorized ROS classes adjacent to designated wilderness may affect the wilderness character; however, the Forest Plan accounts for that to a degree by including a Semi-primitive Non-motorized Wilderness ROS Class within designated wilderness. In addition, the controversy of buffers may not be worth dealing with given the relatively small difference between Alternative A and B (78,500 acres vs. 87,000 acres).

Similarly, Table 148 on page 516 should be edited to reflect the abovementioned ROS "buffer" concern. Please also review and modify the discussion that follows as necessary, including the Summary of Effects (page 517) and Effects from Resource Areas (page 518) sections.

12.2 SPECIAL INTEREST AREAS

General Comments

Although there is no specific management area direction for the management of the Morrison Road within the Proposed Sawtooth Peatbed Special Interest Area, we suggest that the Morrison Road be designated as Management Area 4.3 – Back Country Access Corridor and that the area immediately north and east of the road as Management Area 3.3B – Back Country Winter Motorized (Figure 23). This is appropriate since the peatbeds are located below the road. If driving off road within the proposed Special Interest Area is a concern, a standard could be included within Management Area 4.3 that would be specific to the corridor through the proposed area.

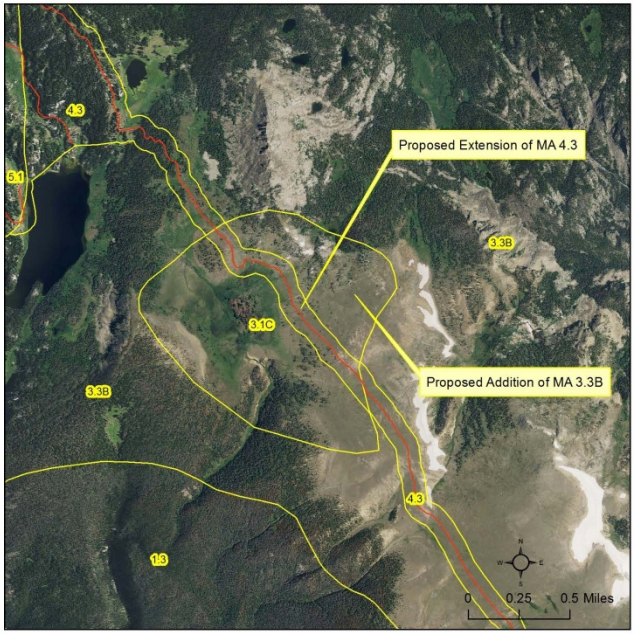

Figure 23 Proposed Morrison four wheel drive trail exclusion and extension of Management Area4.3[18]

[18] Modified from SNF 2012 Draft Plan

13. VISUAL MANAGEMENT

Did the assignment of scenic integrity objectives to the prescriptions reflect the need to work towards a long-term desired condition which in some situations may result in a lower scenic integrity objective in the short-term? An example might be the use of fire and/or vegetation removal on a scale that would mimic historic fire patterns, which may be larger than a proposed scenic integrity objective would allow. Alternative B allocates 66,427 acres to Management Area 3.5 (Backcountry Recreation and Restoration) which does allow for vegetative treatment; however, we encourage the Forest to continue to look for opportunities to expand these areas as well as allowing for minor amounts of a Low scenery objective in the short-term to allow achievement of long-term scenic diversity that is consistent with the historic fire patterns on the landscape. This will require balancing the public's expectation for the existing landscape character versus the desired, long-term character.

13.1 DRAFT LAND MANAGEMENT PLAN

13.1.1 Forest-wide Direction

SCENERY

The SCAC understands the need for restoration treatments and supports the Forest-wide direction on the need for lower short-term visual conditions in order to increase ecosystem resiliency and forest health (page 92).

Guidelines

It is requested that Guideline 4 (page 93) be limited to the Travel Corridor Management Area rather than a generic "travel corridor", which could overly include middle-ground and background views from travel routes.

13.1.2 Management Area Direction

MANAGEMENT AREA 3.5 – BACK COUNTRY RECREATION AND FOREST

Desired Conditions

Under Desired Conditions, we suggest increasing the acreage of Management Area 3.5 to be consistent with the need for additional ecosystem restoration.

MANAGEMENT AREA 3.6A – CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL

Guidelines

Under Guideline 4 (page 173), the Recreation Opportunity Spectrum areas do not seem to be a part of the management area allocations, so why identify the different scenery objectives within this guideline. We suggest using a range of objectives from Very High to Moderate without the tie to ROS classifications

13.2 DRAFT ENVIRONMENTAL IMPACT STATEMENT

Affected Environment and Environmental Consequences

Tables 140 and 141 do not seem to be consistent with the narrative provided on page 495. For example, the narrative states that some of the CDNST corridor is managed for High and Very High Scenic Integrity Objectives; however, Table 140 shows 0 acres for Very High. We request that this discrepancy be evaluated and that the narrative on page 495 be corrected as needed.

The second issue/indicator implies that Scenic Integrity Objectives are allocations as in management area allocations (page 555). We suggest changing the wording to "…proposed scenic integrity guidelines…." In addition, the last indicator for scenery is confusing (page 556). ("Alternative(s) disclosed with least potential impact to scenic resources."). This does not seem to be an indicator. Consider using "Acres of Low (modification in Alternative A) Scenic Integrity Objectives in each alternative.

Tables 156 and 157 (page 557-565) indicate a 12% increase in Retention in Alternative B as compared to Alternative A and a 14% decrease in Partial Retention. Although both Visual Quality Objectives are considered "natural appearing", there would be some differences in the amount and type of timber harvesting and other land management activities that could occur. This should be explained either in the Analysis section or in the Environmental Consequences section.

Although Alternatives A and B provide an equal amount of natural-appearing scenery (Issue Indicator), the proposed Alternative B almost doubles the amount of land (15 to 27%) managed with a High Scenic Integrity. Subsequently, the Moderate Scenic Integrity Objective in Alternative B is reduced by 50% from the 1986 Plan. The High Scenic Integrity Objective requires that management activities are not evident. The Moderate Scenic Integrity Objective allows for management activities to be noticeable but visually subordinate to the landscape character being viewed. Does this reflect increased concern from the public between 1986 and 2012, or does it reflect less development due to a variety of other issues such as wildlife and watershed? Please explain this in the Environmental Consequences section.

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APPENDIX A

SNF Forest Plan Revision Notice of Intent Comments Submitted by the SCAC

Ltr 0306

MEMORANDUM

To: Olga Troxel, Acting Team Leader, Shoshone National Forest

From: Shoshone Cooperating Agency Coalition (Freemont County Commission, Hot Springs County Commission, Park County Commission, Cody Conservation District, Dubois-Crowheart Conservation District, Hot Springs Conservation District, Lower Wind River Conservation District, Meeteetse Conservation District, Popo Agie Conservation District and Teton Conservation District)

Date: November 19, 2010

Re: Notice of Intent to revise the Shoshone National Forest Land and Resource Management Plan and prepare an Environmental Impact Statement.

The County Commissioners and Conservation District Supervisors and staff appreciate the opportunity to continue our participation in the Shoshone National Forest (SNF) Land and Resource Management Plan planning effort. We have been deeply involved in the previous planning process and look forward to continuing our comprehensive participation. The comments below are in response to the request for comments in the Notice of Intent (NOI) published in the *Federal Register* / Vol. 75, No. 185 / Friday, September 24, 2010 / Notices.

We have reviewed the requirements for the preparation of the SNF Land and Resource Management Plan under the National Forest Management Act (NFMA) and the associated regulations (planning rule) found at 36 CFR 219. The 1982 planning rule, coupled with the National Environmental Planning Act (NEPA) give us as duly elected representatives of local government an excellent opportunity to fully participate in the planning process and represent our constituents.

Much of the direction contained in 1982 planning rule (36 CFR 219) is considerably different than the regulations in the 2008 planning rule. Some of these changes are small, others are sufficiently different; so much so, that the proposed use of the previous information and documents prepared under the 2005 and 2008 planning rule should be reconsidered. The wholesale incorporation of previously collected and developed information as outlined in the NOI references to the Need for Change, Comprehensive Evaluation Report and others must be reevaluated due to; large scale forest mortality, significant national, regional and local economic changes, large increases in predators in the planning area, and public interest in more active forest management.

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Nature of Decision To Be Made

The NOI lists a selection of key items in the planning rule which will be used to develop the Forest Plan and Environmental Impact Statement (EIS). This section of the NOI also notes several decisions that will not be made as part of the forest plan revision; one of the items notes "the designation of routes and trails for specific uses is not considered during plan revision, but will be addressed through subsequent planning processes." Instead of splitting travel planning off into another process and delaying the analysis and decision for this important aspect of forest planning, the Shoshone Cooperating Agency Coalition (SCAC) would like to work with the United States Forest Service (USFS) to incorporate travel planning into the overall plan; our comment is supported by 36 CFR 219.1(b) which states "Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management."

This decision section also states that some "decisions and determinations, such as management direction, Canada lynx conservation…have been accomplished through separate forest plan amendment processes that occurred recently and will not be considered in revision." While the Canada lynx amendment may have been done recently we have biological concerns that this Conservation Strategy missed some key points, coupled with the fact that the vegetation on the SNF is undergoing dramatic changes, we would like to suggest that these key habitat issues not properly documented in the amendment be reconsidered during the forest plan revision process.

Prior Plan Revision Efforts

The NOI lists the public and cooperator meetings used in the prior planning process and many of the documents that were prepared, including the 1) *the Comprehensive Evaluation Report*, 2) *An Economic Profile of the Shoshone National Forest* (draft), 3) *Evaluation of Areas for Potential Wilderness*, 4) *Potential Research Natural Areas*, 5) *Wild and Scenic River Eligibility*, and 6) Report: *Study of Preference and Values on the Shoshone National Forest*.

The NOI states "As necessary or appropriate, the material listed above will be adjusted further as part of the planning process using the provision of the 1982 rule." While the SCAC has maintained that information developed during the 2005 – 2009 planning process should be aptly used; we believe this is only true if the information is not outdated. We understand that there have been several significant forest related changes since the 2005 start of the planning process and information should be vetted by the SNF in conjunction with the Cooperating Agencies (CAs), especially local governments. The local governments respectfully request the SNF to incorporate by reference all of the submittals and comment documents previously submitted to the SNF as part of the 2005-2009 planning process. The SCAC reserves the right to amend and update our previous submittals as necessary or appropriate.

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The far-reaching change to the landscape from the mountain pine beetle epidemic and concurrent increase in fire risk necessitates the updating of vegetation, recreation, wildlife and forestry baseline information, goals and objectives. Mountain pine beetle (MPB) has been on a constant increase since the forest planning effort was halted on the SNF. The USFS Region 2's Aerial Detection Survey mapped 74,000 acres of MPB damage in 2009 and over 60,000 acres in 2008 on the SNF (2010 Aerial Detection Survey data is not yet available). The SNF's vegetation layer (R2Veg) shows that there are 300,000 acres of lodgepole pine on the Forest, over half of which has been effected by MPB in the past five years (see map below). Management efforts need to focus on ways to lessen the future impacts while maximizing the appropriate salvage of recently killed stands.

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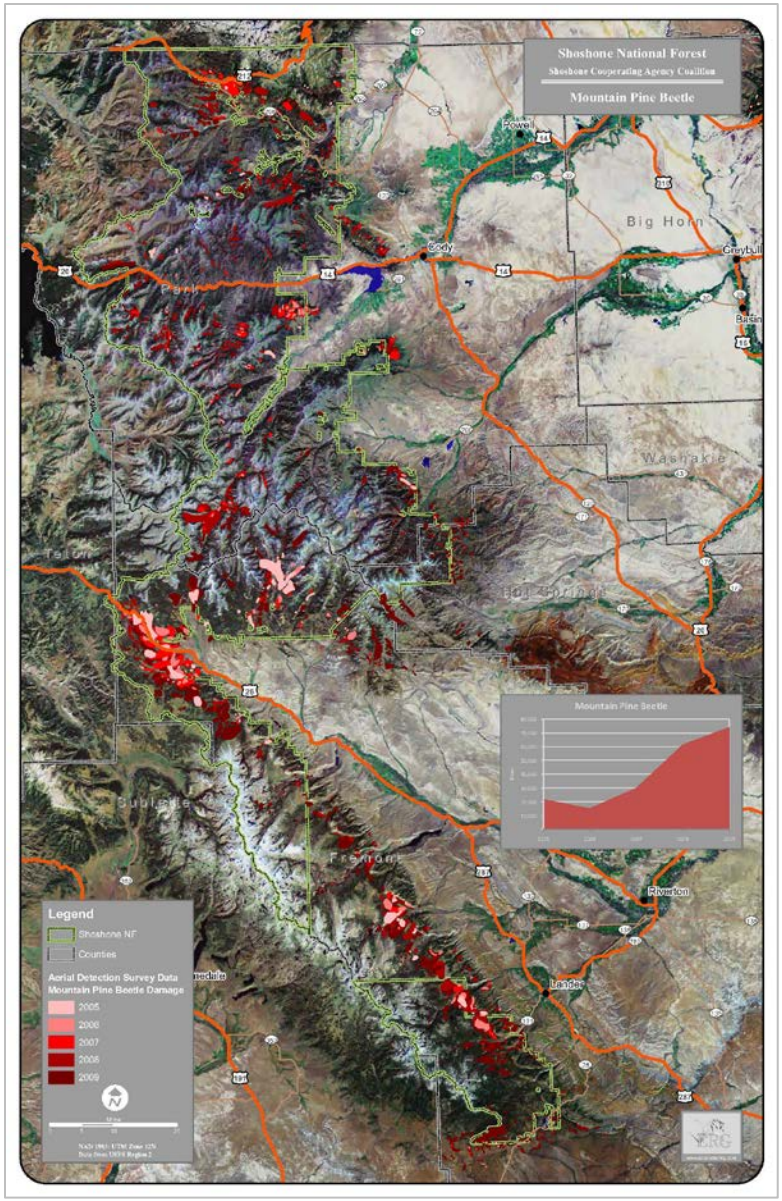

Planning Process and Cooperating Agency Status

The County Commissions and Conservation Districts within the planning area request continued CA status. County Commissioners, County staff, Conservation District Supervisors and staff, and their representatives have demonstrated expertise in forest planning. The SCACs unique position and previous five year planning investment in the SNF process suggests that the to-be-developed CA Memorandum of Understanding (MOU) for each unit of government should allow a more creative relationship than that is typically described and agreed to under previous standard MOUs. To that end the SCAC suggests that we work with the Forest Supervisor to address planning responsibilities. The last section of this memorandum notes suggestions we have for inclusion.

The planning process as defined in 36 CFR 219.12 must include CAs to fullest extent possible as noted in the Council on Environmental Quality (CEQ) regulations for implementing NEPA. The CEQ formally recognizes the lead agency responsibilities to CAs; CEQ 1501.6 states "The purpose of this section is to emphasize agency cooperation early in the NEPA process." Subsection (a)(2) states "Use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the *maximum extent possible* (emphasis ours) consistent with its responsibility as lead agency."

The SCAC believes the planning process will benefit having CAs on the Interdisciplinary (ID) Team. The SCAC especially is interested in development of the planning criteria as noted in 36 CFR 219.12 (c) "Criteria shall be prepared to guide the planning process. Criteria apply to collection and use of inventory data and information, Analysis of the Management Situation (AMS), and the design, formulation, and evaluation of alternatives. Criteria designed to achieve the objective of *maximizing net public benefits* (emphasis ours) shall be included." The SCAC wants the opportunity to be fully involved in the significant components of planning as described in 36 CFR 219.12, including the AMS and Alternative development. The SCAC would like to see the AMS not be constrained to traditional forest product use. The Planning Rule Sec. 219.11 Forest plan content requires that the forest plan shall contain the following:

> (a) A brief summary of the analysis of the management situation, including demand and supply conditions for resource commodities and services, production potentials, and use and development opportunities

Given the rapid change and technological advancements of using wood products, especially woody biomass, we would like the AMS to summarize opportunities, especially in light of the mortality associated with the MPB.

Revision Topics

The SCAC believes that original revision topics listed in the NOI should be amended to reflect more up to date issues; including those determined by local governments in 2006. The SCAC calculated topic priorities among the local government CAs. A total of nine out of the eleven local government groups represented by the SCAC responded (representing approximately 80% of respondents). The top six issues determined by the SCAC are:

1. Economics
2. Timber Harvest
3. Fire
4. Water quality and yield
5. Grazing
6. Threatened and Endangered species

The SCAC believes that our 2006 assessment still looks reasonable, but would be glad to re-poll local governments to see if these items have changed. Regardless, the new planning process should incorporate the list above and use these as analysis issues in the EIS.

Roadless

Since the start of the 2005 revision effort, the SCAC thinks there may be opportunities to better understand and manage roadless areas. The Wyoming Governor's state stance on roadless was to have roadless planning and decisions made at the local level, through the forest planning process. The SCAC believes that roadless decisions and management strongly benefit from local stakeholder input. The SCAC wants to ensure that any roadless areas not correctly or appropriately categorized are reassigned to a more flexible management area. The SCAC suggests that roadless areas with high fire risk and that are infected or likely to be infected with MPB should be considered for treatment.

As part of the SNF forest plan revision, we encourage the forest supervisor to consider options for roadless lands that allow for management options reflecting some of the historic and traditional uses of Wyoming landscapes. Wyoming is blessed with outstanding opportunities for primitive and unconfined recreation opportunities (87 % of the Shoshone NF is designated wilderness or inventoried roadless areas - see map below) and we recognize the economic and social benefits this use brings to our State. We also ask that you seriously consider the economic and social value of other uses for unroaded lands on the Shoshone NF.

Evidence exists for the active management of roadless lands for the purposes of wildlife habitat improvement and wild land fire management. Other uses that may not be as obvious include recreation use in a back-country area that allows for limited motorized use or perhaps non-motorized use that doesn't have the visibility, mystique, and sometimes crowded conditions of a designated wilderness. In addition, there may be options for management scenarios that would

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maintain historic uses of the ranching landscape. Management options that we encourage you to consider include Recreation Opportunity Spectrum (ROS) classifications such as Semi-primitive (motorized) and Semi-primitive (non-motorized) recreation. These classifications would maintain the large, mostly undeveloped character of the landscape while allowing for traditional uses such as grazing, vegetation management and oil & gas leasing. Another option that has not been used much but we believe has some merit is the designation of a cultural landscape that would reflect local cultural values such as wide-open spaces and ranching history. A final option to consider would be a scenery designation (Visual Quality Objective) such as Retention or Partial Retention that would maintain a natural appearing landscape but allow for limited development.

Each of these management options would maintain the social, economic, and cultural values that Wyoming residents have come to appreciate but at the same time would allow for continued historic uses and some economic return.

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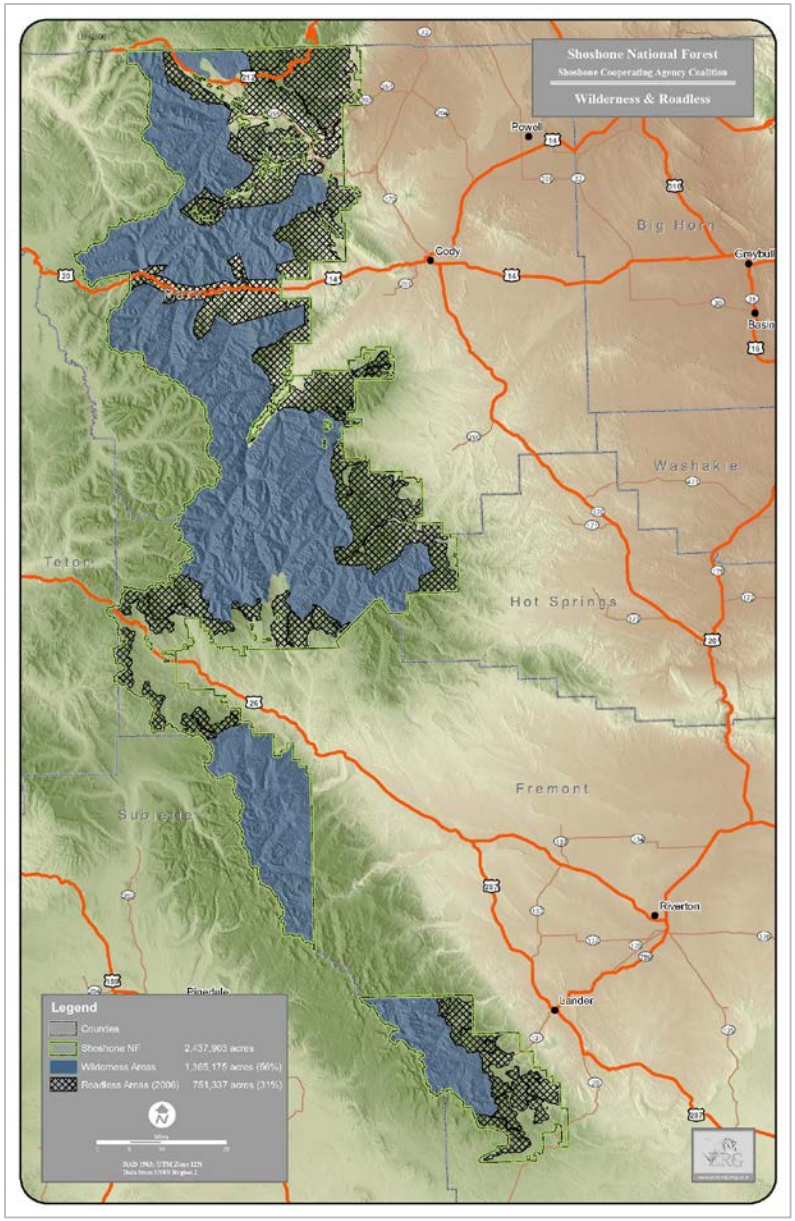

Wildlife issues

Substantial portions of the SNF are within domestic livestock grazing allotments. These allotments allow large blocks of adjacent private land to remain as economically viable working ranches which provide a majority of ungulate winter range, greater sage-grouse habitat, pronghorn habitat and other important wildlife resources. Substantial increases in grizzly bear and wolf densities have compromised the ability of ranchers to graze SNF lands. Although livestock depredation is modest for most permittees (but increasing), the largest tradeoffs to permittees is the increased cost of moving livestock to avoid depredation, or inability to effectively utilize SNF allotments. Another complication is that wild ungulates, in order to reduce their risk of predation, are spending more time grazing on private lands, which further compromises range condition, habitat for other wildlife, and the economic viability of ranchers. This changing relationship of increasing predators, SNF forage, and ranch viability (as a local economic contributor and important wildlife habitat) needs detailed analysis in the revised Forest Plan. Increased flexibility for permittees as a mitigative tool needs to be fully considered in the range of alternatives.

Past Forest Plan strategies have addressed wildlife species viability with highly prescriptive standards that, for instance, protect individual goshawk nests, or limit disturbances within individual stream reaches to protect amphibians. Such highly prescriptive standards failed to recognize the dynamic nature of western, interior forests. The volatility of lodgepole pine-dominated forests to MPB or severe wildfires makes such site-specific measures out-dated and ineffective. The revised Forest Plan needs to shift to targets that are measurable at the *forest scale* not at site-specific scales, and that recognize the range of outcomes from naturally-occurring disturbances like MPB.

The SNF needs to take a hard look at those species it considers "sensitive" and the measures taken to sustain those species over time. Using northern goshawks as an example, the increasing data base within interior forests regarding nest stand characteristics, and nest densities suggest that goshawks are far less sensitive than research from the last century would suggest. The revised Forest Plan needs to fully evaluate situations where regional data may "trump" older and more established research.

The current MPB will drastically re-shape age class distribution and patch sizes on the SNF. In terms of predicting effects upon wildlife, the Forest Plan will need to utilize the best spatially-explicit models (i.e. the SIMPPLLE model or comparable models) to develop comparative scenarios over time.

Current vegetative biological issues

The SNF has experienced 100 years of fire suppression and timber harvests that are less than growth and mortality. This has resulted in uncharacteristic vegetation densities and distribution which has created a significant departure of biophysical settings, conifer encroachment, larger contiguous late seral timber stands and a decline in aspen. The forested landscape has become less resilient. In addition to these factors climate change characterized by warmer, dryer weather patterns has severely stressed the Forest's timber stands. As a result of these factors the MPB populations have significantly increased to current epidemic proportions similar to what has been experienced in other regions.

Active forest management and treatment is needed in order to salvage a perishable resource as well as comply with NFMA requirements of multiple use and sustained yield. Additional benefits to be gained from the harvest of dying timber is the more rapid transformation of the landscape to a more resilient distribution of species with probable benefits to numerous wildlife species that benefit from a mosaic of forest cover types and structures. The protection of infrastructure like power lines, roads, electronic sites, job creation, and fiber production can be enhanced with vegetation treatments. Additionally, the dead lodgepole will rapidly begin falling down, creating a jack-strawed condition. This condition will produce several results including diminishing the big game hunting experience, complicate grazing and make fire fighting more difficult.

Active forest management that addresses the above issues needs to be conducted at a scale, including management in roadless areas, where beneficial changes to wildlife habitat will be achieved and risks of wildfire reduced.

Current Socioeconomic considerations

Because of decreasing availability of timber in the region over the last several decades local timber processing infrastructure has declined. Without a guaranteed steady supply of timber, future investment in log processing infrastructure is unlikely. The continued loss of infrastructure may reach a threshold whereby forest treatments become too expensive, as has happened in some areas of the southwest.

There is currently a strong movement in producing energy from biological sources because of energy security issues and recent legislation. Wood based bio-energy sources may make much more sense in the future as compared to food based bio-energy sources. Pellet manufacturing is a wood based market, currently enjoying strong pricing and involving relatively low capital investment which make a lot of sense in the utilization of small and dead round wood material.
Finally given the lack of local wood processing infrastructure, weak traditional markets for wood products, and uncertainty towards investment in forest product manufacture without stewardship

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contracting involving long time frames, should be highlighted and prioritized in the active management scenarios.

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SHOSHONE COOPERATING AGENCY COALITION
SHOSHONE NATIONAL FOREST DRAFT PLAN AND DEIS COMMENTS
FINAL

APPENDIX B

Wiggins Fork allotment overlain with slope, confirmed cattle use, and capability on slopes up to 60%

Ltr#0696

From: Christman, Carrie -FS
To: FS-shoshone forestplan
Subject: FW: Shoshone National Forest Plan Revision - SHPO Comments
Date: Wednesday, November 21, 2012 1:15:54 PM
Attachments: judy.pdf.pdf

Carrie Christman
Planning Staff
Shoshone National Forest
808 Meadowlane
Cody, WY 82414
307.578.5118
A good plan is like a road map:
it shows the final destination and
usually the best way to get there.
- H. Stanley Judd

From: Judy K Wolf [mailto:JKWolf@uwyo.edu]
Sent: Wednesday, November 21, 2012 10:23 AM
To: Christman, Carrie -FS; Wright, Kyle D -FS; Poppert, Loren P -FS; Alexander, Joseph G -FS
Cc: Chatham, Cheryl -FS; Rebekah Fitzgerald; Mary Hopkins (mary.hopkins@wyo.gov)
Subject: Shoshone National Forest Plan Revision - SHPO Comments

Dear Joe, Carrie, Kyle and Loren –

The SHPO comments on the Shoshone National Forest Plan revision are attached. Thank you for the opportunity to comment. Please do not hesitate to contact either Mary Hopkins or me if you have any questions concerning our review comments.

Judy

Judy K. Wolf
Chief, Planning and Historic Context Development Program
State Historic Preservation Office
Dept. 3431, 1000 E. University Avenue
Laramie, WY 82071
Phone 307-766-5366
FAX 307-766-4262

Ltr#0696

ARTS. PARKS. HISTORY.
Wyoming State Parks & Cultural Resources

State Historic Preservation Office
Department 3431
1000 E. University Avenue
Laramie, WY 82071

November 21, 2012

Shoshone National Forest
Forest Plan Revision
808 Meadow Lane Avenue
Cody, WY 82414

Re: Draft Land Management Plan Revision and Draft Environmental Impact Statement for the Shoshone National

Dear Forest Plan Revision Team,

We have received the draft land management plan revision and draft Environmental Impact Statement (EIS) for review. Thank you for the opportunity to comment. The comments we are providing are primarily specific to the Heritage Resource section of this document.

The desired conditions and goals for heritage resources listed on page 95 in the draft Land Management Plan are commendable; however, we have questions and concerns on how the Shoshone National Forest (SHO) intends to meet these goals as the plan lacks specificity in a number of areas. The attached table summarizes areas where we find the plan to be unclear and provides recommendations for language that is more specific regarding management of heritage resources – particularly with regard to guidelines to reduce effects to heritage resources by commercial livestock grazing.

Much of the Shoshone National Forest's management approach for heritage resources is tied to a heritage program plan; however, we are not aware that any such plan exists. The discussion of the heritage plan on page 98 is written in such a way that it will be hard for most readers to decipher if the SHO intends to create a heritage program plan in the future or if a plan currently exits. The following statement leads the reader to believe there is a heritage plan that includes the following management protocols:

The heritage program plan includes Shoshone-specific protocols for (including, but not limited to):

- Inadvertent discovery of heritage resources, including human remains and associated objects
- Prevention of and response to Archaeological Resources Protection Act violations
- Prevention of the effects from wildland fire and post-fire looting
- Identification of areas of high, moderate, and low probability for the presence of heritage resources

Matthew H. Mead, Governor
Milward Simpson, Director

Ltr#0696

- Monitoring to assess site conditions and measure the success of mitigation measures
- Reviewing categorically excluded National Environmental Policy Act projects to determine if National Historic Preservation Act review is required

Each of these items is important for the management of heritage resources on the SHO. Because a heritage resource plan does not exist and it is not clear that staff time and funding will be devoted to creating such a plan in the near future, we strongly encourage the SHO to include proactive language in the Forest plan that includes objectives and standards which specify how the SHO intends to address inadvertent discoveries of heritage resources – including human remains; how the SHO intends to prevent and respond to ARPA violations; how the SHO intends to prevent adverse effects to heritage resources from wildland fires and post-fire looting; what resources will be applied to creating models for identifying areas of high, moderate, and low probability for the presence of heritage resources; what the protocol is for monitoring and assessing site conditions and the success of mitigation measures.

The heritage resource staff has long been comprised of only one full-time specialist. This is not sufficient staffing to cover the over 2.4 million acres of lands managed by the Shoshone National Forest. We realize in times of budget cuts creating additional positions is nearly impossible; however, we urge consideration of alternatives for filling an additional full-time heritage position. We recommend the SHO identify as a goal staffing an additional full-time heritage resource professional on the South Zone of the Forest.

It is our understanding that a heritage resource overview has not been written for the SHO since the 1980s. These documents are invaluable for the understanding and management of heritage resources, especially when there is frequent heritage staff turnover as there has been on this forest. Due to the fact that the heritage program is extremely understaffed, we strongly encourage the SHO to commit funding to hiring a professional cultural resource consultant to write an overview of heritage resources on the SHO within five years of Forest Plan implementation.

On page 99 it is stated that "legacy data are entered as time and resources allow." We find this to be a major concern. Timely data entry is of fundamental importance since analysis of existing conditions and effects utilizes the Forest Service database that tracks infrastructure (INFRA) and the Forest GIS heritage layers to make decisions about a wide range of activities on the SHO (page 570 of the DEIS). In order for Guideline #4 on page 97 to be implemented, decisions need to be based on heritage data that are as close to 100% up-to-date as possible. We strongly recommend that INFRA data entry be given immediate and sufficient funding to make sure the backlog of legacy data is addressed as quickly as possible. We also recommend an additional monitoring category be added to the Heritage Resources Section of the Plan that evaluates whether or not the Forest-wide heritage data layers are current.

The discussion of a Priority Heritage Asset list is worrisome. We were not previously aware that such a list existed. On page 99 the statement is made that designation of a priority heritage asset is a local management decision that will be updated annually. There are many heritage resources on the SHO that have been determined to be eligible for listing in the National Register of Historic places but have not been formally listed and many resources that have not even been evaluated. Priority Heritage Assets comprise a very small percentage of the eligible and unevaluated sites recorded on the Forest, leaving the vast majority of historic properties with little or no attention. We realize with limited funding choices need to be made; however, these

Matthew H. Mead, Governor
Milward Simpson, Director

Ltr#0696

decisions should be made cooperatively in consultation with the State Historic Preservation Office, affected Native American tribes, local historic preservation groups, and other interested parties.

Thank you for consideration of our comments. If you have questions regarding our comments, please feel free to contact me at 307-777-6311 or Judy Wolf at 307-766-5366.

Sincerely,

Mary M. Hopkins
State Historic Preservation Officer

Matthew H. Mead, Governor
Milward Simpson, Director

REVIEW COMMENTS
Draft Land Management Plan
Shoshone National Forest
November 2012

COMMENTS PREPARED BY: State Historic Preservation Office

ITEM	Page #	COMMENT
1	96 – Objective 4	What is the time frame for completing the historic property plans? Suggested revision: Identify priority historic properties and every three years complete a historic property plan for at least one National Register eligible or listed property or property type.
2	96 - Objectives	Creation of a Heritage Program Plan is discussed in the Management Approach so it seems appropriate to include creation of the plan in the objectives also. Please consider including this objective: A Heritage Program Plan is created within 5 years of Forest Plan implementation.
3	96 - Objectives	Cultural or heritage resource overviews are invaluable for management of the resource, especially when there is staff turnover. We are not aware of the existence of an overview for the Shoshone NF. Please consider adding this objective: A Heritage Resource Overview will be written within 5 years of Forest Plan implementation.
4	96 – Standard 3	The implementing regulations of the National Historic Preservation Act require federal agencies to consider potential effects from federally authorized undertakings to all historic properties, not just those listed on the National Register. If these areas have not already been subjected to a cultural resource survey, this needs to be accomplished. Any cultural resources identified must be recorded and evaluated, and consultation on site eligibility and project effect with the SHPO must occur. The standard needs to be revised to address unevaluated sites in the area of potential effect.
5	96 – Guidelines – Commercial Livestock Grazing	Additional issues regarding impacts to heritage resources from livestock grazing need to be addressed in the Plan. We recommend the following guidelines be included in the plan: Manage livestock in post-fire environments to avoid impacts to heritage resources.
6	96 – Guidelines – Commercial Livestock Grazing	Add this guideline: Avoid grazing and activities such as feeding, salting, herding, or placing water developments in areas where heritage resources have become exposed due to wildfire.
7	96 – Guidelines – Commercial Livestock Grazing	Add this guideline: Water, mineral supplement/salting stations or other areas of livestock congregation do not overlap or occur within the boundaries of resources eligible for or listed on the National Register of Historic Places. If these areas have not already been subjected to a cultural resource survey, this needs to be accomplished. Any cultural resources identified must be recorded and evaluated, and consultation on site eligibility and project effect with the SHPO must occur.

Page 1 of 2

REVIEW COMMENTS
Draft Land Management Plan
Shoshone National Forest
November 2012

ITEM	Page #	COMMENT
8	96 – Guidelines – Commercial Livestock Grazing	Add this guideline: Heritage personnel are consulted prior to making improvements or changes to historic grazing-related structures (e.g., cow camp structures, cabins).
9	96 – Guideline 8	We recommend this be incorporated into Standard 3 (see comment above) and revised to read: If there are known unevaluated sites located within the boundaries of assigned outfitter and guide camps these sites must be evaluated for eligibility for listing in the National Register of Historic Places. If the sites are determined to be eligible for listing in the National Register, the camps will be moved from within the boundaries of these sites.
10	97, paragraph 3	Please specify that the list of priority heritage assets will be determined based on consultation with the WY SHPO, appropriate Native American Tribes, local historic preservation organizations, and other interested parties.
11	180	The SHPO is in the process of nominating the Beartooth Highway to the National Register of Historic Places. Formal listing is expected by Spring 2013. This designation should be noted in discussion of this road.
12	182, Guidelines	A section on Heritage resources needs to be included in the guidelines because some of these are historic properties.
13	201, Goals for Management Area 8.6	Goal 1 – Some administrative facilities have played significant roles in the development of national forests and therefore have the potential to be eligible for listing in the National Register of Historic Places (NRHP). Prior to disposal, and in accordance with Section 106 of the National Historic Preservation Act, these facilities must be evaluated for the National Register and any potential effects determined. Disposal of eligible properties will result in an adverse effect. The SNF will work with the Wyoming SHPO to develop a memorandum of agreement to mitigate the adverse effects.

Page 2 of 2

Ltr#0162

From:	Stewart, Robert F.
To:	FS-shoshone forestplan
Cc:	Christman, Carrie -FS; Rupe, John -FS
Subject:	Shoshone Plan Revision - DOI Comments
Date:	Wednesday, October 24, 2012 7:11:47 AM
Attachments:	Shoshone Plan Revision - DOI Comments.pdf

PLEASE ACKNOWLEDGE RECEIPT BY REPLY TO THIS MESSAGE

The Department of the Interior's commnents on the subject document are attached.

If you require paper-copy, please so advise.

Robert F. Stewart
Regional Environmental Officer
Office of Environmental Policy and Compliance
U.S. Department of the Interior
P.O. Box 25007 (D-108)
Denver, CO 80225-0007
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Ltr#0162

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

TAKE PRIDE IN AMERICA

October 24, 2012

9043.1
ER 12/560

Daniel Jiron, Regional Forester
Rocky Mountain Region
740 Simms Street
Lakewood, Colorado 80401

Dear Mr. Jiron:

The U.S. Department of the Interior (Interior) has reviewed the Draft Environmental Impact Statement for the Shoshone Land Management Plan Revision, Shoshone National Forest, Park, Fremont, Sublette, Teton, and Hot Springs Counties, WY, and has no comments on the document. The U.S. Fish and Wildlife Service advises that Endangered Species Act issues will be addressed though the Section 7 consultation process.

Sincerely,

Robert F. Stewart
Regional Environmental Officer

cc: Joe Alexander, Forest Supervisor
Carrie Christman, Forest Planning Staff
John Rupe, Regional Planner

Ltr#0902

From: Platt.Amy@epamail.epa.gov
To: FS-shoshone forestplan
Subject: EPA's 11-26-12 Comments on Shoshone LMP DEIS
Date: Monday, November 26, 2012 4:44:12 PM
Attachments: EPA 11-26-12 Comments Shoshone NF LMP DEIS.pdf

Hello: Please find attached the subject document. A hard copy of this letter was also placed in today's mail. If further explanation of our comments is desired, please don't hesitate to contact me. Thank you.
Amy Platt

(See attached file: EPA 11-26-12 Comments Shoshone NF LMP DEIS.pdf)

Amy Platt, Environmental Scientist, 8EPR-N
EPA Region 8, NEPA Compliance and Review Program
1595 Wynkoop Street
Denver, CO 80202

303-312-6449 (voice), 303-312-7203 (fax)
Platt.Amy@epa.gov

Ltr#0902

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
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http://www.epa.gov/region08

NOV 26 2012

Ref: 8EPR-N

Mr. Joseph G. Alexander, Forest Supervisor
Shoshone National Forest
Forest Plan Comments
c/o Carrie Christman
808 Meadow Lane
Cody, WY 82414-4516

RE: EPA Comments on Draft Environmental Impact Statement, Shoshone National Forest Draft Land Management Plan, CEQ #20120255

Dear Mr. Alexander:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the July 2012 Draft Environmental Impact Statement (DEIS) for the Shoshone National Forest Draft Land Management Plan (LMP). This DEIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Shoshone National Forest to analyze potential environmental impacts associated with the proposed action and alternatives to address aspects of the 1986 Shoshone National Forest LMP that have been determined to need adjustment in the following six topic areas: recreation uses and opportunities; special areas and designations; vegetation management; wildlife habitat management; oil and gas development; and commercial livestock grazing.

Background

The planning area encompasses the entire 2.4 million acre Shoshone National Forest and is in Fremont, Hot Springs, Park, Sublette and Teton Counties in northwestern Wyoming. The Forest extends more than 180 miles from the Montana state line to South Pass, Wyoming, near Lander. It is bordered by Yellowstone National Park and the Bridger-Teton National Forest on the west. The Shoshone National Forest is part of the Greater Yellowstone Area -- an area known for its high resource value.

The action alternatives propose varying degrees of adjustment to acreage allocated to management area prescription categories contained in the existing 1986 LMP. The alternatives analyzed in the DEIS are briefly summarized as follows, with more detail included for the Preferred Alternative:

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- Alternative A (No Action) – continuation of present management under the existing 1986 management plan with no change to management area allocations;
- Alternative B (Preferred Alternative) – adjusts management direction from 1986 plan to provide changes to management acreage allocations that include less acreage for over-snow motorized recreation but more for total miles of motorized trails; more acreage for new special area designations and eligible wild and scenic river segments; more acreage for vegetation management activities including timber production; less acreage for high potential oil and gas occurrence available with surface occupancy; and no change for commercial livestock grazing;
- Alternatives C through F – provide a range of scenarios from a focus on wilderness protection to the highest level of commodity production and motorized use.

The EPA's Comments and Recommendations

We appreciate that the USFS has the unique challenge to develop alternatives to address multiple use issues in an area with high resource value. To ensure that potential impacts to public health and the environment are analyzed and disclosed, our comments and recommendations for the July 2012 DEIS are targeted to the following key topics: (1) aquatic resources; (2) air quality; and (3) adaptive management and monitoring. Concerns associated with these topics are the basis for the EPA's EC-2 rating discussed at the conclusion of this letter.

(1) Aquatic Resources

The EPA considers protection of aquatic resources to be among the most important issues to be addressed in any NEPA analysis for forest management planning. As a result of the proposed management area category allocations, future actions such as vegetation and habitat management, prescribed fire, motorized use, road construction, oil and gas development, and grazing have the potential to adversely impact aquatic resources, including surface water, groundwater, wetlands, streams, large rivers, riparian areas, and their supporting hydrology. Given the EPA's concerns regarding aquatic resources, we are providing recommendations related to specific water resources and/or management actions, as discussed below.

Existing Surface Water Characteristics: The DEIS notes that all or part of 147 watersheds are located on the Shoshone, with 89% considered functioning properly and 3% considered functioning at risk, as determined through the Watershed Condition Framework, most likely due to historical grazing and roads. The DEIS also notes that the Forest contains four municipal watersheds, about 4,150 miles of perennial streams (including the headwaters of numerous principle rivers in the area), and approximately 68,500 acres of riparian areas (including wetlands) with 89% considered in proper functioning condition. We recommend that the Final EIS (FEIS) describe how the public may access relevant data utilized in this analysis from the Watershed Condition Framework model, and that Appendix E, Maps, include an overview map of the watersheds (including municipal watersheds), rivers and riparian areas/wetlands of the Shoshone.

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The DEIS identifies a Clean Water Act (CWA) Section 303(d) impaired stream segment, the Clarks Fork of the Yellowstone, from the Montana border downstream to the confluence with Crazy Creek, located within the Forest boundary. The aquatic life other than fish use is impaired due to exceedances of the aquatic life other than fish chronic copper, silver and cadmium water quality criteria. The primary source of this impairment is past mining activities in Montana. We recommend elaborating on how proposed management area allocations provide for future activities that might affect water quality in this specific water body segment, and in downstream segments, and how and whether project design criteria could mitigate impacts to be consistent with the Montana Total Maximum Daily Load requirements that address this impairment in Wyoming. We also recommend identifying any impaired stream segments that may be located downstream from the Forest (e.g., Popo Agie and Greybull) and assessing whether activities on the Forest could exacerbate or improve conditions on downstream impaired segments.

The Wyoming Department of Environmental Quality (WDEQ) has not assessed all the water bodies within the Forest boundaries. For example, within the Clarks Fork sub-basin, only Dead Indian Creek, Squaw Creek, and the upper segment of the Clarks Fork of the Yellowstone River have been assessed. In the 2012 Wyoming Water Quality and Impaired Waters List, water bodies that have not been addressed are not categorized. The water quality condition of many miles of rivers and streams within the watershed is unknown. We recommend the FEIS indicate that the water quality condition is not known for many water bodies within the Forest and analyze how alternatives might affect water quality in CWA Section 303(d) listed segments and other water bodies regardless of impairment or assessment status.

To provide a baseline for future monitoring of impacts and evaluating of potential influence on downstream water quality, we recommend the FEIS provide a summary of any available water quality monitoring data. Identification of significant gaps in monitoring data could be targeted for collection through future project monitoring plans for Forest lands.

Existing Groundwater Characteristics: Including site-specific groundwater information in the FEIS would enhance the USFS's ability to determine where future leasing stipulations and/or mitigation and monitoring measures may be needed to protect current and future drinking water resources. As this information is likely to be revised within the 15-20 year timeframe of the LMP, the EPA further recommends the USFS include a commitment in the FEIS to periodically confirm that the most current groundwater information is being collected and considered in the planning area. We suggest this information be evaluated annually, as feasible, where projects are being considered that could affect groundwater resources.

Specifically, we recommend the FEIS include a map of all groundwater resources of the Shoshone and expanded discussion to include the following information, if available:

- Identification of major aquifers (including any Sole Source Aquifers) of the Forest, their three dimensional extent, the physical and chemical characteristics of their groundwater, estimates of the quantity of water in the aquifers and aquifer recharge rates;
- Location and extent of groundwater recharge areas;
- Characterization of source water protection zones designated by the State of Wyoming;
- Location of shallow and sensitive aquifers that are susceptible to contamination from surface activities; and

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- Location of existing and potential (i.e., those that can reasonably be used in the future) underground sources of drinking water (USDW).[1]

To assist you in this effort, the EPA recommends that the USFS incorporate the 2011 data from the Wyoming Water Development Commission's and Wyoming State Geological Survey's updated and expanded 2003 Available Groundwater Determination Technical Memorandum (Lidstone and Associates, Inc., 2003). The EPA also recommends the *Wyoming Groundwater Vulnerability Assessment Handbook* (SDVC Report 98-01, 1998) as a resource for developing maps of aquifer sensitivity and identifying shallow groundwater aquifers susceptible to contamination. Information regarding source water protection zones designated by the State of Wyoming is available on the State's Department of Environmental Quality website at http://deq.state.wy.us/wqd/www/SWP%20WHP/Documents/02560-doc.pdf.

Water Quality Impacts of Beetle Epidemic: The DEIS identifies four inventoried municipal watersheds located on the Shoshone – the North Fork Shoshone River and South Fork Shoshone River serving the municipality of Cody and numerous rural communities; the Wood River serving the community of Meeteetse; and the Middle Popo Agie River serving the community of Lander. The presence and handling of beetle-killed trees has the potential to impact public water supplies if it leads to organic loading of area waterbodies that are sources of drinking water. Organic matter interacts with disinfectants used in the drinking water treatment process to form disinfection byproducts, which are a human health concern. Organic loading may also decrease oxygen levels leading to the release of metals such as arsenic, manganese, and iron from sediments. Given that the Preferred Alternative increases the management area acreage allotted to vegetation management, in part to address concerns related to the beetle epidemic, we recommend the FEIS provide an assessment of the potential for organic loading impacts to drinking water supplies associated with these municipal watersheds.

Range-Related Impacts to Aquatic Resources: The DEIS notes that there are currently 88 commercial livestock grazing allotments on the Shoshone and that many changes have been made over the last 10-15 years in grazing management and practices to protect soil and water resources. Given that the Preferred Alternative maintains the number of acres deemed suitable for grazing at 375,400 and the number of animal unit months at 55,900, the same as the 1986 plan, we recommend elaborating on the referenced changes to management practices and new strategies associated with livestock grazing. Further, since range improvements (e.g., water developments, spring exclosures, fencing, corrals) are generally designed and constructed in a manner that protects aquatic resources from adverse impacts associated with livestock grazing, we recommend expanding the discussion to address how range improvements will be protected from impacts associated with vegetation management, prescribed fire, recreation use and road construction. For additional recommendations related to livestock grazing, please see comment *(3)* below.

[1] In general, this includes aquifers with a concentration of total dissolved solids (TDS) less than 10,000 mg/l and with a quantity of water sufficient to supply a public water system. Aquifers are presumed to be USDWs unless they have been specifically exempted or if they have been shown to fall outside the definition of USDW (e.g., over 10,000 mg/l TDS).

Impact of Roads on Aquatic Resources: The Preferred Alternative would maintain the existing miles of open roads and would increase the total miles of motorized trails. We recommend that Appendix E, Maps, identify the existing road network and that the FEIS include a summary discussion of foreseeable road construction and reconstruction, by alternative, based on revised management area allocations. While the DEIS describes potential impacts from roads and trails management, it notes that there would be little or no negative effects to soil and water resources if design criteria and Best Management Practices (BMPs) are followed. For disclosure purposes, we recommend these design criteria and BMPs be summarized in the FEIS.

For your consideration, we provide the EPA's general recommendations to protect aquatic resources from road impacts, as follows:

- Locate roads away from streams and riparian areas;
- Locate roads away from steep slopes, landslide prone areas, and erosive soils;
- Minimize the number of road stream crossings;
- Construct unavoidable road stream crossings during periods of low flow to avoid fish spawning and incubation periods, and/or dewater relevant stream segments prior to construction;
- Provide adequate road drainage and erosion control to avoid routing sediment to streams;
- Use bottomless or textured bottom culverts if possible;
- Design roads to allow for natural drainage patterns; and
- Consider road decommissioning or rehabilitation at an equal or greater rate than new road construction to prevent increases in overall watershed impacts.

Design Criteria, Mitigation and Monitoring: The DEIS identifies potential impacts to water resources from vegetation and habitat management, timber harvest, prescribed fire, livestock grazing, recreation (including roads and motorized use trails), and mineral and energy development. In each instance, reference is made to little or no negative effects to soil and water resources if design criteria from the watershed conservation practices are followed for any of the alternatives; however, there is no description of these design criteria and BMPs. Since the USFS released earlier this year its *National Best Management Practices for Water Quality Management on National Forest System Lands Volume 1: National Core BMP Technical Guide*, which identifies practices to be used on forest lands and recommends the development of site-specific BMP prescriptions, we recommend the FEIS include a summary discussion of design criteria and BMPs, particularly for the Preferred Alternative. The EPA supports the development of design criteria, mitigation and monitoring measures to reduce the potential for aquatic resource impacts. Additionally, to assure that general design criteria and mitigation measures provide the expected, adequate protection to streams, wetlands and riparian corridors under site-specific project conditions, the EPA recommends including a commitment to an audit program for periodic inspection, maintenance and any needed adjustment of protection measures.

Possible measures to consider include the following:

- Use existing landing locations and roads when reasonable;
- Minimize landing size and design for proper drainage;
- Require revegetation of all disturbed areas with native seed mix within the same growing season of disturbance, and monitor revegetation efforts for five years to ensure success;
- Specify buffer requirements to protect wetlands, riparian areas and floodplains;
- Require special protections for high quality wetland resources such as springs and fens;

Ltr#0902

- Specify steps to protect range improvements from impacts;
- Monitor impacts from treatments proposed adjacent to high value water resources;
- Monitor the breakdown of hydrophobic soils following prescribed burns; and
- Develop a monitoring plan and schedule to assess the effectiveness of road closures.

(2) Air Quality Impacts

Under the proposed management area category allocations, future actions such as timber harvest, prescribed fire, motorized use, road construction, and oil and gas development have the potential to adversely impact air resources. It is particularly important to provide management direction to mitigate project-related air quality impacts given the Shoshone's proximity to population areas and inclusion of mandatory Class I Federal areas (Washakie Wilderness Area, Fitzpatrick Wilderness Area, and North Absaroka Wilderness Area) and sensitive Class II areas (Absaroka-Beartooth Wilderness Area and Popo Agie Wilderness Area).

We appreciate that the DEIS includes a summary of available data for existing conditions in the counties near the Shoshone, as well as a presentation of visibility trends for the Class I areas on the Shoshone. Information regarding current conditions will be an important tool for monitoring the impacts of future projects that may be implemented under the proposed management area category allocations. Decision-makers will need to understand baseline conditions in an effort to ensure that USFS activities do not adversely impact the National Ambient Air Quality Standards (NAAQS) or Air Quality Related Values.

Design Criteria and BMPs Related to Dust: The DEIS notes that dust generated from recreational use of the transportation system would likely not be mitigated, except on roads with the greatest traffic and/or safety issues. In addition, the DEIS notes that road use associated with mineral development, oil and gas development, timber harvesting, and fire and fuels management may require dust abatement measures to reduce air quality impacts. We recommend that the FEIS include a commitment to require these dust management measures for future projects where such application is deemed necessary to reduce impacts.

Prescribed Fire: We appreciate the clear explanation of potential prescribed fire air quality impacts and the detailed steps to minimize such impacts. We fully support the prescribed fire management process outlined in the DEIS, which appears to closely mirror the process described in the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008). We suggest including a reference to this Interagency Guide to provide additional information to the public.

Oil and Gas Development: While allocation of management acreage available for oil and gas development is one of the key issues addressed by this draft LMP, no estimate of the reasonably foreseeable development (RFD) is included in the DEIS. It appears that USFS intends to defer development of the RFD to a future revision of the oil and gas leasing analysis for the Forest and/or future project-specific analyses. Until an RFD is estimated, it is difficult to definitively identify the appropriate level of air quality analysis. At the outset of the NEPA process for future oil and gas development projects and/or oil and gas leasing, the EPA would like to resume discussions with USFS regarding the air quality impact analyses and appropriate mitigation measures, consistent with the process described in the June 23, 2011 National Memorandum of Understanding regarding air quality analyses and mitigation for federal oil and gas decisions through NEPA.

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Ozone Nonattainment Area and General Conformity Requirements: A portion of the Upper Green River Basin (UGRB) Marginal Ozone Nonattainment Area is within the southern portion of the Shoshone National Forest. Section 176(c)(4) of the Clean Air Act (CAA) established the General Conformity provisions which play an important role in helping States and Tribes improve air quality in those areas that do not meet the NAAQS. In response to section 176(c)(4) of the CAA, the EPA promulgated General Conformity requirements ("Subpart B—Determining Conformity of General Federal Actions to State or Federal Implementation Plans") in 40 CFR 93.150 through 93.165. Under the General Conformity requirements, Federal agencies must work with State, Tribal and local governments in a nonattainment or maintenance area to ensure that federal actions conform to the air quality plans established in the applicable State or Tribal implementation plan. While not a part of the NEPA requirements that must be addressed in the LMP FEIS, please be advised that before finalizing approval of actions conducted under the LMP, the CAA requires that the USFS conduct a general conformity analysis for any project emissions occurring in an area designated as nonattainment or maintenance for the NAAQS.

We recommend that the FEIS include a discussion regarding the USFS's plans to address the CAA and 40 CFR 93 "Subpart B" General Conformity requirements for emissions from USFS-authorized activities in the UGRB Ozone Nonattainment Area. As noted in 40 CFR 93 Subpart B, a determination must be made that emissions from a Federal action will or will not exceed an applicable *de minimis* threshold level for the criteria pollutant of concern or its precursors; this would be 100 tons per year for NO_x or VOCs in the UGRB Ozone Nonattainment Area (see 40 CFR 93.153). If emissions from USFS-authorized activities in the UGRB Nonattainment Area will exceed the 100 tons per year ozone precursor emissions *de minimis* threshold level for NO_x or VOCs, then a full general conformity determination is required to document how the federal action will affect implementation of the applicable plan for the area to reach attainment. A Federal agency may use a combination of the criteria listed in section 40 CFR 93.158 to get a project to conform. See General Conformity Guidance, page 19 (July 13, 1994). The EPA has assisted other agencies in exploring options to reach conformity and is available to discuss conformity options with you if that would be useful.

We also recommend that the FEIS note that if future activities in the nonattainment area trigger the need for a general conformity analysis, then the general conformity analysis for such future activities would be included in the USFS's project-specific NEPA analysis.

(3) Options for adaptive management and requirements for monitoring should be fully disclosed.

Given that this LMP provides management area allocation for future livestock grazing, we recommend the FEIS identify the features of an effective adaptive management plan that may be expected for future grazing allotment analyses, including the following:

- Decision tree with achievable and measurable objectives to provide accountability and guide future decisions;
- Specific decision thresholds with identified indicators for each impacted resource;
- Targets that specify a desired future condition;
- Firm commitment to implement and fund a monitoring plan with protocols to assess whether thresholds are being met;
- Firm commitment to use monitoring results to modify management strategies as necessary; and
- Designated timeframes for completion of necessary management modifications.

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For future allotment analyses, we recommend the FEIS include a summary discussion of specific BMPs and adaptive management strategies to protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat from grazing impacts. We support broad consideration of adaptive management techniques, such as exclusions and upland water developments, whenever feasible to protect streams, wetlands, riparian corridors, and fishery spawning areas. We also recommend protection of stream corridors through use of a minimum 100 foot buffer, particularly where grazing may contribute to pathogen, sediment, and/or temperature concerns. Limiting grazing intensity, frequency or season of use may be necessary where resource management objectives are not being met. Other tools worth considering are modifying allotment boundaries and controlling the timing of grazing to prevent damage to streambanks and riparian areas when they are most vulnerable to trampling damage.

Given the Shoshone's unique location in the Greater Yellowstone Area with its special status species, such as the Endangered Species Act (ESA)-listed threatened Grizzly Bear and the ESA experimental population of Northern Rocky Mountain Gray Wolf, the U.S. Fish and Wildlife Service (USFWS) may have recommendations for adaptive management strategies that could be implemented if monitoring indicates excessive livestock conflicts. As noted below under "Other Issues," such information would be a valuable addition to the FEIS.

We recommend that the FEIS include an expanded discussion of monitoring requirements, including the parameters to be monitored and the monitoring frequency, for water quality, wildlife impacts, and soil quality parameters. Timely monitoring is particularly important given the high aquatic and wildlife resource values in the project area. Water quality monitoring is of particular concern since most of the stream segments within the Forest are considered unassessed by WDEQ. The ability to evaluate the extent of impacts from Forest activities depends on both baseline and routine water quality monitoring in stream segments that would be affected. We recommend coordination with WDEQ to develop water quality monitoring programs and protocols.

The EPA recommends discussion of the general timing of adaptive management implementation and effectiveness monitoring. A firm commitment to effectiveness monitoring is desirable given that adaptive management cannot be employed without full implementation of associated monitoring.

Other Issues

The oil and gas leasing stipulations contained in the 1995 Record of Decision (ROD) may be inconsistent with the revised LMP and may require revision to ensure protection of resources.

Based upon conversations with USFS staff and information provided in the DEIS, we understand that a revision to the 1995 Shoshone ROD for oil and gas leasing may be necessary depending on the alternative selected for the current proposed LMP revision. Given that the ROD was issued in 1995, we encourage USFS to pursue this revision, and we will welcome the opportunity to discuss recommendations for leasing stipulations, mitigation measures and monitoring requirements to ensure protection of air and water resources from impacts associated with oil and gas development.

The EPA's Rating

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this DEIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that should be included in the Final Environmental Impact Statement. A full description of the EPA's rating system is enclosed.

We hope that our comments regarding aquatic resources, air quality, and adaptive management and monitoring will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this DEIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure

Ltr#0902

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Lt#r0863

From: Jessica Crowder
To: FS-shoshone forestplan
Subject: WDA Comments - Shoshone National Forest Draft Land Management Plan and Draft Environmental Impact Statement
Date: Monday, November 26, 2012 11:47:53 AM
Attachments: DOC000.pdf

Please accept the attached comments on behalf of the Wyoming Department of Agriculture. A signed copy is in the mail. If you have questions about the attached comments, please do not hesitate to contact me/

Thank you!

Jessica Crowder
Natural Resources & Policy Senior Analyst
State of Wyoming - Department of Agriculture
2219 Carey Avenue
Cheyenne, WY 82002
Office: 307-777-7024
Fax: 307-777-6593

Please note my new e-mail address

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Lt#r0863

Wyoming DEPARTMENT OF Agriculture

Matthew H. Mead, *Governor*
Jason Fearneyhough, *Director*
2219 Carey Ave. • Cheyenne, WY 82002
Phone: (307) 777-7321 • Fax: (307) 777-6593
Web: agriculture.wy.gov • Email: wda1@wyo.gov

The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

November 26, 2012

Joe Alexander, Forest Supervisor
Shoshone National Forest
Forest Plan Comments
808 Meadow Lane Avenue
Cody, WY 82414

Dear Mr. Alexander,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Draft Environmental Impact Statement (DEIS) and Draft Land Management Plan (Plan) for the Shoshone National Forest (SNF).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this DEIS and Plan have the potential to affect our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide the opportunity to express pertinent issues and concerns.

The WDA supports continued commercial livestock grazing on the SNF. We do not support Alternative C, which drastically reduces Animal Unit Months (AUMs) and decreases the ability to manage livestock grazing. It is imperative to continue commercial livestock grazing on the SNF at an economically viable level. In addition, the SNF must have the ability to increase AUMs in active allotments when conditions warrant such an increase. Vacant allotments must also be available to livestock producers for utilization either on a temporary basis or issued as a full permit. It is also important that livestock producers are able to construct and maintain range improvement projects to improve livestock management.

Each AUM permitted on the SNF has a larger economic impact than currently expressed in the DEIS/Plan. Taylor (2012[1]) found that the total economic impact per AUM ranges from $97.87 to $298.50 in the North SNF and from $95.54 to $291.40 in the South SNF. Removing AUMs on the SNF may have a significant impact on individual livestock grazing permittees, ranches and communities. The WDA believes this information should be showcased in the DEIS/Plan.

Rangeland vegetation condition on the SNF is outstanding; 98 percent is meeting or moving towards desired conditions (DEIS, Ch. 3, p. 110-111). SNF personnel and livestock grazing permittees have dedicated themselves to monitoring and implementing appropriate range improvements and management on grazing allotments. This effort, existing monitoring data and the current condition of rangelands must be considered and recognized throughout the DEIS and Plan. In addition, the WDA insists the SNF use monitoring data to inform the analysis and decision making process. Currently, the documents often overlook positive rangeland trends when analyzing other resources and resource uses. This must be corrected in the Final EIS and Plan.

[1] Taylor, D. T., T. Foulke and R. H. Coupal. 2012. An economic profile of the Shoshone National Forest. University of Wyoming Department of Agricultural and Applied Economics.

Equal Opportunity in Employment and Services
BOARD MEMBERS
Jana Ginter, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*
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Patrick Zimmerer, Southeast • Richard Schlenker, Northwest • John Hansen, Southwest • Cameron Smith, Northeast

Lt#r0863

Following are the WDA's specific comments regarding the DEIS and Plan:

Revision Topics, Commercial Livestock Grazing, p. 19
"Two aspects of commercial livestock grazing will be addressed in the revised forest plan. The first – what areas of the Shoshone should be available for commercial grazing…"
Change "should" to "may" since the capability and suitability analysis is merely a broad-scale model and not specific enough to determine which areas "should" be available for commercial livestock grazing.

Ch. 3, Affected Environment, Riparian/Wetlands, Environmental Consequences, Direct and Indirect Effects, Effects from Livestock Grazing, p. 80
Throughout the DEIS, the "Effects from Livestock Grazing" are characterized and most discussions include effects from big game. Some headings include "Big Game" and others do not. Please make headings consistent throughout the DEIS and add "and Big Game" after "Livestock."

Ch. 3, Affected Environment, Vegetation, Unique and Limited Habitats, Riparian Communities, p. 125
"Interdisciplinary team review of aerial photos (1937 to 1997) indicated current impacts to some riparian areas from livestock grazing."
Aerial photos analyzed are, at the least, over ten years old. Current impacts must be determined by more recent aerial photos or more current monitoring data.

Ch. 3, Affected Environment, Direct and Indirect Effects, Effects from Fire and Fuels, p. 132
"…can lead to the invasion of noxious weeds such as cheatgrass…"
Cheatgrass is not a noxious weed.

Ch. 3, Affected Environment, Gray Wolf, Direct and Indirect Effects, Alternative C, p. 151
"The number of AUMs would decrease by 47 percent from Alternatives A, B and D, and conflicts with cattle would likely decline as livestock grazing is eliminated on big game winter range."
Under no alternatives would livestock be "eliminated on big game winter range."
Our understanding is that under Alternative C, the SNF would eliminate commercial livestock grazing on elk and bighorn sheep crucial winter ranges as designated by the Wyoming Game and Fish Department, not all big game winter range (see page 38 of the DEIS). Please correct this wording throughout the document and ensure the effects analysis contains the correct alternatives and AUMs associated with this action.

Ch. 3, Affected Environment, Rocky Mountain Bighorn Sheep, Direct and Indirect Effects, p. 214
The "Effects from Domestic Sheep Grazing, Recreation Pack Goat Use, and Wildlife Management" is an opportune place to discuss the Wyoming Statewide Bighorn/Domestic Sheep Interactions Working Group's work and publications since these agreements apply to all alternatives. This group has designated areas of Wyoming as bighorn sheep native core areas, cooperative review areas, and non-emphasis areas. It is important for readers to understand that various entities have worked together to establish where domestic sheep grazing occurs, where domestic sheep grazing does not occur, and where bighorn sheep management is most intensive.

We also recommend adding this information to the discussion on page 402 (Ch. 3, Commercial Livestock Grazing, Affected Environment) to clarify why sheep grazing permits are currently not issued on the Clarks Fork and Greybull Ranger Districts.

Ch 3, Affected Environment, Brewer's Sparrow and Sage Sparrow, Risk Factors, p. 218

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"Primary risk factors from forest management include… livestock grazing…"
All livestock grazing is not a risk factor for sparrows. It is more likely that specific livestock grazing management may be a risk factor to sparrows and the DEIS must be changed to reflect this concept.

Ch. 3, Affected Environment, Brewer's Sparrow and Sage Sparrow, Alternative A: No Action, p. 220
"…the permitted amount and area for cattle grazing does not differ among alternatives A, B, and D. These activities are, therefore, predicted to have potential negative influences…"
The WDA strongly disagrees with this statement. If current levels of livestock are not negatively impacting sparrows (and there is no data showing this to be the case on the SNF) then it is unlikely they have the potential to do so in the future, especially negatively. This error occurs throughout the wildlife section (see page numbers and topics below) and the SNF must adjust the DEIS to reflect the fact that the majority of rangelands on the SNF are meeting desirable conditions. Maintaining current permitted amounts and areas for cattle grazing is not likely to change conditions.
p. 226 – grasshopper sparrow
p. 231 – greater sage-grouse
p. 238 – northern harrier
p. 248 – water vole
p. 275 – ruffed grouse
p. 279 - Brewer's sparrows
p. 299 – Yellowstone checkerspot

Ch. 3, Affected Environment, Short-eared Owl, Risk Factors, p. 240
"Any forest management activities, such as livestock grazing or road development, which cause fragmentation, may affect short-eared owls."
Livestock grazing does not cause fragmentation. New disturbances from new range improvements may cause fragmentation, but grazing itself does not. Remove "livestock grazing" from this discussion on fragmentation.

Ch. 3, Affected Environment, Riparian (lakes streams, marshes) Amphibians, Habitat Distribution and Condition on the Shoshone, p. 261
The WDA appreciates the discussion detailing the improvement of riparian habitats through improved livestock grazing management. We recommend adding or referring to riparian area monitoring information here to support the discussion.

Ch. 3, Affected Environment, Species of Local Concern, Rocky Mountain Elk, Desired Condition, p. 285
Conservation Measure #7.
"Manage domestic livestock grazing on elk crucial winter ranges to provide sufficient forage for wintering elk."
Add "within elk herd population objectives after "elk."

Ch. 3, Affected Environment, Species of Local Concern, Rocky Mountain Elk, p. 288
Add the following language:
"The disease known as Brucellosis is caused by the bacteria *Brucella abortus* and is transmitted when a susceptible animal contacts and ingests bacteria following the abortion or stillbirth from an infected female. Exposure of a susceptible animal to the bacteria elicits an antibody immune response that can be detected (with varying degrees of accuracy) following one to several unique blood tests. When several or more animals are tested from a population within a given time period, this provides an index of exposure (but not infection) to the bacteria. This mathematical proportion of exposure (i.e., those

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animals that are antibody-positive divided by the sample population) is commonly referred to as 'seroprevalence'.

Exposure of elk to brucellosis was first documented at the National Elk Refuge in 1933, and since then, has been documented in elk attending all 22 Wyoming state-operated winter feedgrounds on the adjacent Bridger-Teton National Forest, as well as winter free-ranging elk from western Wyoming, northeastern Idaho, and southern Montana. Seroprevalence of brucellosis in elk attending Wyoming winter feedgrounds averages about 25% and generally declines to levels less than 10% in winter free-ranging elk throughout the Greater Yellowstone Area. However, winter free-ranging elk habituating lands of the Shoshone National Forest in Wyoming, particularly those areas north of Lander and Dubois, have had seroprevalence levels as high as 22%.

It has long been recognized that elk of the Greater Yellowstone Area are a reservoir of brucellosis. Despite the use of winter feedgrounds, strain 19 vaccination, and several other best management practices, the threat of spillover from elk to domestic livestock has been realized and confirmed several times in the past decade. As elk herds of the Shoshone National Forest have continued to grow and utilize winter habitats in similarity to winter feedgrounds, it is likely that these elk will maintain elevated seroprevalence and also pose a threat to adjacent livestock operations. Most recently, this particular threat was realized following confirmed spillover of brucellosis from winter free-ranging elk of the Shoshone National Forest to adjacent livestock on private lands. Whether from elk attending feedgrounds or winter free-ranging, elk-to-livestock transmission events have caused economic and logistical constraints for livestock producers and induced time-consuming policy changes at state and federal levels.

Alternative C would provide the least potential transmission of brucellosis with domestic livestock. Alternative C would minimize disturbance to wintering elk, making it more likely they would remain on all Forest winter ranges, including crucial winter range. Without some type of timing restriction on elk crucial winter range, there is the potential of elk moving off the Forest to adjacent private property, increasing the opportunity for elk to intermingle with livestock. Alternative F would provide the greatest opportunity of transmission with domestic livestock because it proposes no timing restrictions on disturbing activities in elk crucial winter range, thereby providing the least amount of protection from disturbance during the critical winter months. Alternatives D, B, E, and A would provide disturbance free habitat in a descending order from the most to least, but all would provide more protection from winter disturbance then Alternative F."

Ch. 3, Affected Environment, Species of Local Concern, Rocky Mountain Elk, Direct and Indirect Effects, Effects from Livestock Grazing, p. 289
There are benefits of using livestock grazing management as a tool to improve elk habitat and the SNF must express this in the impact analysis. One major benefit is enhancing forage palatability[1,2].

Ch. 3, Affected Environment, Moose, Direct and Indirect Effects, Effects from Livestock Grazing, p. 297
"Areas where the combination of high use by livestock and moose negatively impact willow would be addressed through allotment planning and coordination efforts with the WGFD."

[1] Frisina, M. R. 1992. Elk habitat use within a rest–rotation grazing system. *Rangelands* 14:93–96.
[2] Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. Journal of Range Management. 28:120-125.

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Add "and livestock grazing permittees" after WGFD.

Ch. 3, Affected Environment, Effects from Livestock and Big Game Grazing, Aquatic Resources, p. 315
"As the livestock numbers and use increase, we will begin to reach the upper limits of acceptable use and potential for adverse aquatic resources effects, especially if additional allotments and use were added."
Adding additional allotments and increasing use does not equate to an adverse effect on aquatic resources if livestock grazing is managed well. We recommend removing this statement.

Ch. 3, Commercial Livestock Grazing, Affected Environment, p. 405
"All acres were generated by GIS and may not exactly match actual allotment acres. Even though some allotments contain small amounts of capable acres, grazing may still be occurring based on site-specific conditions not covered in this strategic analysis. Therefore, changes to rangeland capability and suitability may occur at the project scale using site-specific data."
This is a good explanation of how there may be differences between acres "capable" of being grazed and where grazing actually occurs. We recommend additional language from the Region 2 Planning Desk Guide - *Rocky Mountain Region Process Paper: A Process to Determine Rangeland Capability and Suitability and Standards for NEPA Display.*

> "The capability and suitability analysis and determination is not a decision to graze livestock on any specific area of land, nor is it a decision about or estimate of livestock grazing capacity. The capability/suitability analysis and determination may or may not provide supporting information for a decision to graze livestock on a specific area.
> Any grazing allotment will contain areas that are capable and/or suitable as well as areas that are modeled as being not capable and/or suitable. Since the evaluation is based on a modeling process and is dealing with a variety of complex landscapes, it is inevitable that this intermingling will occur on a land base of any significant size. Therefore, these capability/suitability determinations are not intended to imply that livestock will be precluded from occasionally being found on lands that may be modeled as non-capable or non-suitable."

This information must be evident in the several places, including the EIS, Land Management Plan and Appendix B.

Draft Land Management Plan, Summary of the Analysis of the Management Situation, Commercial Livestock Grazing, p. 16
The "Need for change" section includes the need to "improve critical wildlife habitat and to prevent negative impact on riparian areas." As commented on in the Draft Analysis of the Management Situation, monitoring data provided by the SNF does not show current livestock grazing is causing a negative impact on wildlife habitat or riparian areas. The WDA recommends the SNF remove these items from the AMS as no change in current management is necessary to reach desired conditions in these areas.

Draft Land Management Plan, Management Challenges, Grazing, Species of Local Concern Standard (3), p. 20 and p. 60
"Big game requirements for forage have a priority in the management of crucial winter range used in common by livestock and big game."

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The requirement should be to provide forage for big game population objectives on crucial winter range. The WDA recommends changing this standard to "Provide forage to main big game herd objectives in the management of crucial winter range used in common by livestock and big game."

Draft Land Management Plan, Chapter 1 – Forest-wide Direction, Guidelines for Vegetation, Commercial Livestock Grazing #4, p. 34
"Livestock management should be modified when conditions are not moving toward desired conditions as determined through trend condition and monitoring."
The WDA supports basing decisions to change livestock management on monitoring. However, there are a variety of reasons an area may not be meeting desired conditions. We support changing livestock management only if current livestock management is a reason desired conditions are not being met. We recommend changing this guideline to "Livestock management should be modified when conditions are not moving toward desired conditions due to current livestock grazing management and as determined through trend condition and monitoring."

Draft Land Management Plan, Chapter 1 – Forest-wide Direction, Guidelines for Vegetation, Vegetation #5, p. 35
"Livestock should be removed from the unit when monitoring of key riparian areas reflects one or more of these criteria…Streambank stability is below the moderate level."
Define "unit".
What is a "moderate level" of streambank stability?

Draft Land Management Plan, Chapter 1 – Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #7, p. 43
There is no Appendix 1.

Draft Land Management Plan, Chapter 1 – Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #8, p. 43
"Inside and outside the Primary Conservation Area, cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices may be placed under long-term non-use agreements or retired as opportunities arise with willing permittees."
The current language does not reflect the intent of the Conservation Strategy. We strongly recommend rewording to place an emphasis on the collaboration that will occur with livestock grazing permittees to resolve grizzly bear/livestock conflicts and removing areas outside the Primary Conservation Area (PCA) from the guidelines. This change will align more closely to the intent of the Conservation Strategy, allow for use on allotments with conflicts and protect livestock grazing permittees form unnecessary closures of allotments. The WDA recommends the following language:
"Inside the Primary Conservation Area, work with livestock grazing permittees to resolve conflicts and/or change management on cattle allotments or portions of cattle allotments with recurring grizzly bear conflicts. If conflicts cannot be resolved, livestock management will follow the Conservation Strategy."

Draft Land Management Plan, Chapter 2 – Management Area Direction, Standards for Management Area 1.5A, Commercial Livestock Grazing #9, p. 144
Please add "Existing range improvements can be maintained."

Draft Land Management Plan, Chapter 2 – Management Area Direction, Management Area 5.4, Management Approach, p. 193

Lt#r0863

"On a case-by-case basis, commercial livestock use levels in some pastures or allotments may be reduced to ensure adequate forage remains..."
Add "In coordination with livestock grazing permittees..."

Draft Land Management Plan, Chapter 3, Monitoring, Monitoring Strategy, p. 203
"Establish monitoring priorities: Criteria from the goals and objectives are used to establish priorities for monitoring within the expected program of work and budget constraints."
Monitoring is one of the most important actions on National Forest System Lands and the WDA does not believe priorities for this important program should be based on budget constraints. Monitoring should be based purely on goals and objectives.

Draft Land Management Plan, Chapter 3, Monitoring, Monitoring Strategy
The WDA strongly recommends designing monitoring meetings similar to the Bighorn National Forest Plan (2005). Page 4-5 of the Bighorn National Forest Plan outlines the process to continue to include cooperating agencies in Forest Plan monitoring and implementation. We recommend adopting this language and concept in the Shoshone National Forest Plan.

> "Bi-annual monitoring and evaluation meetings with the forest plan revision cooperating agencies (state of Wyoming, County Commissioners, and Conservation District Board members) will be offered. The meetings will be open to the public, with ground rules similar to those used in plan revision...meetings.
>
> Steering Committee members can help Forest personnel in monitoring forest plan and project implementation, in evaluating biological, social, and economic impacts; and by identifying amendment needs and proposed solutions. Maintaining the knowledge base and relationship with state agencies and elected officials will provide continuity in the adaptive management cycle, from development of the Revised Plan to plan implementation, monitoring, evaluation, and amendment through to the next plan revision."

Draft Land Management Plan, Chapter 3, Monitoring, Vegetation, p. 209
The monitoring question is "What is the rangeland vegetation condition?" Is this a generic term that includes various monitoring techniques to determine rangeland condition? Or does this refer to the old rangeland condition classes (poor, fair, good, excellent)? Please clarify the monitoring question and potential monitoring items.

Appendix B, Rangeland Capability and Suitability Evaluation, Rangeland Capability, #3, p. 11
"Slopes greater than 40 percent were subtracted. These areas are identified as not suitable for cattle grazing. We did not address the 40 to 60 percent slope range, which is generally suitable for sheep grazing. Most of the Shoshone is not available for sheep grazing and the information on capability for sheep was not needed by the decision maker. Sheep are only grazed on two allotments on the south end of the Forest and the terrain is generally less than 40 percent slopes in those areas."
The capability analysis must follow the guidelines set forth in 36 CFR 219.20 and the Rocky Mountain Region Process Paper: A Process to Determine Rangeland Capability and Suitability and Standards for NEPA Display. We understand the reasoning behind removing slopes greater than 40% in the capability analysis, but believe the capability analysis should include all lands potentially capable of supporting grazing. The suitability analysis is the appropriate place to investigate sheep allotments and changes in allotments due to varying alternatives. The Bighorn National Forest Supplemental Information Report (2006) summarizes the guidelines very well:

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> "Step 8 of the rangeland capability determination process incorporates the landform attribute of slope to help determine capable range. This step identifies areas greater than 60% slope as not capable for cattle or sheep range. Areas between 40% and 60% slope are identified as capable for sheep grazing only and areas between 0% and 40% slope are capable for sheep and cattle grazing."

In addition, rangeland capability does not vary by alternative. Rangeland suitability does vary by alternative. We recommend developing a map of rangeland capability (following the guidelines outlined above) in order to have a visual comparison for areas modeled as capable of supporting grazing versus areas considered suitable by alternative. We also recommend overlaying these on one map.

In conclusion, we appreciate the opportunity to comment on the Shoshone National Forest DEIS and Draft Land Management Plan. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

for Jason Fearneyhough
Director

JF/jc

CC: Governor's Policy Office
Guardians of the Range
Rocky Mountain Farmer's Union
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming Stock Growers Association
Wyoming Wool Growers Association

Ltr#1074

From: Pike, Kelsey B -FS
To: FS-shoshone forestplan
Subject: Scanned comments
Date: Wednesday, November 28, 2012 3:54:33 PM
Attachments: HealowL.pdf
DSPCRMcKinneyR.pdf

Ltr#1074

PM12:02 NOV28'12

November 15, 2012

Shoshone National Forest
Forest Plan Comments
808 Meadow Lane Avenue
Cody, WY 82414

Dear Planning Team:

I am writing on behalf of the Wyoming Department of State Parks and Cultural Resources – State Trails Program in regard to the Shoshone Draft Environmental Impact Statement (DEIS) and the Shoshone Land Management Plan (LMP) revision. Thank you for the opportunity to provide these comments as well as for the opportunity to serve as a cooperating agency during this planning process. These comments from the Trails Program are submitted from the perspective of our role as the primary statewide funding provider for motorized trails serving snowmobilers and ORV users, along with our role as an advocate for all motorized and nonmotorized trail opportunities statewide.

In general, we support most of the proposed framework outlined by DEIS Preferred Alternative B and the draft LMP. Please consider the following general and specific comments as you work toward a final revised forest management plan:

Specific DEIS Related Comments
Page 7 – in the 'Recreation Uses and Opportunities: What type of recreation opportunities will be provided on the forest, where can they occur, and when can they occur?' section: it states, "Existing opportunities for motorized use on snowmobile trails, motorized trails, and roads will continue." We request this sentence be revised to clarify that off-trail snowmobiling will also be allowed to continue.

On page 8 of this same section it states, "Proposed research natural areas and special interest areas preclude future expansion of motorized use in those areas. All existing uses in those areas can remain, including continued use of the Morrison Jeep Trail that passes through the Sawtooth Peatbed Geologic Area." This introductory statement is misleading since it appears off-trail snowmobiling would be eliminated by creation of the proposed Beartooth Butte RNA. Please clarify the exact intent regarding continued off-trail snowmobiling in the Beartooth Butte area.

Page 478 – Miles of Trail: it states there are "32 miles of motorized trails (managed for vehicles 50 inches or less in width), 1,640 miles of hiking and equestrian trails, 276 miles of snowmobile trails, and 48 miles of cross-country ski trails" on the Shoshone National Forest. This totals 1,996 miles of trail.

These numbers in the EIS are inconsistent with total trail miles presented on page 106 of the draft LMP where it states, "System trails on the Shoshone include 1,389 miles of hiking and equestrian trails, 306 miles of snowmobile trails, and 48 miles of cross-country ski trails." The LMP section totals only 1,743 miles, doesn't include the summer motorized trail miles, and has lower numbers for both hiking/equestrian and snowmobiling trails. Please correct this discrepancy in the final EIS and LMP.

It also incorrectly states on page 478 that, "Currently, there are no single-track motorized (motorcycle) trails on the Forest." There is actually one very short single-track trail (Wolf Trail #907, 2.5 miles) on the Washakie District.

Page 489 – Recreation – Environmental Consequences, General Effects: it states, "In general, alternatives that increase levels of non-motorized recreational opportunities will generally increase the quality and quantity of non-motorized recreation." We disagree with this conclusion. While the forest has extremely abundant nonmotorized opportunities, much of it is not accessible, or at least easily accessible. Therefore increasing nonmotorized opportunities does not automatically mean the quality of nonmotorized recreation will also increase.

Page 492 – Travel Management – Over-Snow Vehicle Use: it states, "The 1986 Forest Plan generally allowed over-snow motorized vehicle use in management areas allocated to non-motorized recreation, including the Dunoir Special Management Unit (MA 1.6B). Only summer motorized use was specifically restricted in these areas. Though current plan allocation permits the use, over-snow motorized vehicle use is not occurring in all acres that are open to that use under the current forest plan." While snowmobile use is not occurring in all currently open acres, dispersed snowmobiling *is* widespread across the forest wherever and whenever there is sufficient snowfall. Consequently this is an erroneous general conclusion which becomes problematic once it is blanket applied to Alternative B.

This section then goes on to say, "Table 137 shows the total miles of existing and projected trails open to over-snow vehicle use. Under alternative B, over-snow motorized vehicle recreation would continue to be allowed in areas where it is currently occurring under the current forest plan (alternative A), except within MA 1.6B, where use is not allowed. Over-snow motorized use is not allowed within MA 1.6B in any of the action alternatives." We understand that snowmobiling within the Dunoir is inconsistent with existing law and accept that it should be discontinued. We do, however, question why over-snow travel should unilaterally be eliminated from all backcountry nonmotorized area in which it has been permitted forever.

This policy change outside the Dunoir will create remote parcels which will now be off-limits to entry by snowmobiles. How will the forest sign these boundaries or otherwise educate snowmobilers that there will be new areas now off-limits to their entry? We believe this blanket policy shift would unnecessarily create new enforcement nightmares and therefore request this policy shift be reconsidered in the final LMP. Cross-country travel by over-snow vehicles should continue to be allowed in 1.3 management areas unless there are parcel-specific justifications to warrant specific closures. Snowmobiling is the #3 'primary activity' on the forest (surveys show participation by14% of all visitors) behind 'viewing natural features' (23.9%) and 'hiking/walking' (15.5%). This shows the importance of snowmobiling access on the forest – and that it is truly a world class snowmobiling destination despite the Shoshone's primarily nonmotorized recreation focus – so it would be wrong to squeeze all snowmobile activity into a considerably smaller area since this shift removes 380,000 acres (43% reduction) of open snowmobiling.

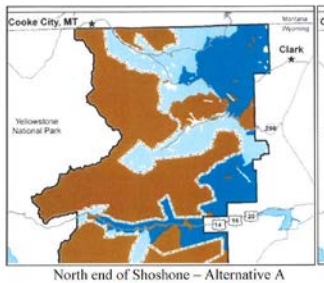
Page 494 – Table 139 footnote: Footnote 1 for Table 139 states, "Over-snow vehicle use does not currently occur on all accessible acres in Alternative A. Use occurs on approximately the same number of acres that are accessible in Alternative B." Again, we don't feel this is an accurate statement. While some of the drastic decrease in acres between Alternative A and Alternative B (887,600 acres / 36% of the forest in A compared to only 479,800 acres / 20% of the forest in B) may relate to 'accessible' acres, our review of the DEIS shows it's likely more directly connected to the policy shift of no longer allowing over-snow travel in backcountry nonmotorized areas (1.3 areas discussed above). In general terms 80% of the Shoshone is classified as nonmotorized and 20% is classified as motorized. Therefore it is not a coincidence that the '20%' of the forest proposed to be open for over-snow travel directly correlates to the overall 20% motorized definition of forest lands. We've seen no justification presented in the DEIS for this drastic policy shift and therefore request that it be rescinded or revised in the final LMP.

Snowmobiling Related Comments

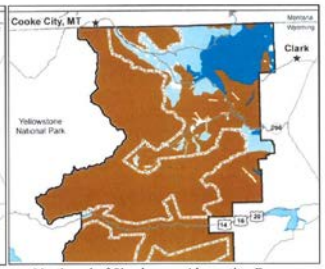
Table 18 on page 52 of the DEIS shows that 887,800 acres (36% of the forest) is currently open to over-snow recreation in Alternative A as compared to Alternative B which proposes to provide only 480,000

acres (20% of the forest) for open over-snow travel. The DEIS attempts to explain this away as simply 'removing area currently classified as open but not actually used for snowmobile recreation.' We initially accepted this explanation at face value. However when we compare winter motorized maps for Alternatives A and B we see there is actually existing snowmobiling use in much of the forest area which would be closed under Alternative B. Therefore this methodology is objectionable.

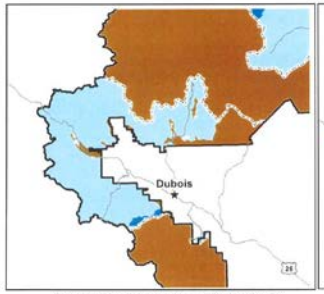
Viewing winter motorized maps for the northern end of the forest side-by-side (below) gives a very graphic depiction as to just how much over-snow access would be lost under Alternative B. Substantive areas in the Sunlight Basin and North Fork areas would go from totally 'Available' (dark blue) or "Available with restrictions' (light blue) to completely 'Unavailable' (brown). Likewise a substantive area south of the Beartooth Plateau would go from Available to Unavailable. While there are no snowmobile trails in these areas, general off-trail snowmobile use does occur in portions of these areas which would be closed by Alternative B.



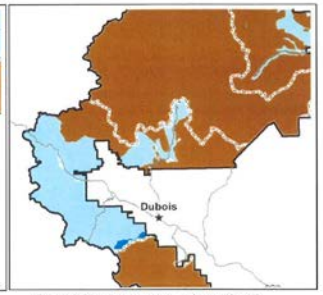
North end of Shoshone – Alternative A



North end of Shoshone – Alternative B



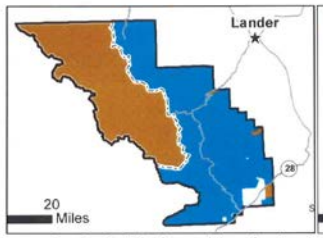
Central Shoshone area – Alternative A



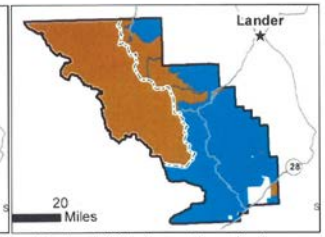
Central Shoshone area – Alternative B

When viewing winter motorized maps for the central portion of the forest side-by-side (page above) – and discounting the Dunoir area where snowmobile use will be discontinued to comply with existing law – it shows there will be substantive over-snow access lost under Alternative B, in addition to the Dunoir. Of particular concern is the Horse Creek and Ramshorn Basin area north of Dubois where existing snowmobile use absolutely occurs. There is also concern with blanket closure to snowmobile access in the Wood River and Meteetsee areas shown at the upper right corner of the two maps.

Finally viewing winter motorized maps for the southern end of the forest side-by-side (below) shows substantive over-snow access would be lost under Alternative B in the Cyclone Pass and Shoshone Lake areas west of Sinks Canyon. Again, existing snowmobile use is absolutely occurring in this area.



South end of Shoshone – Alternative A

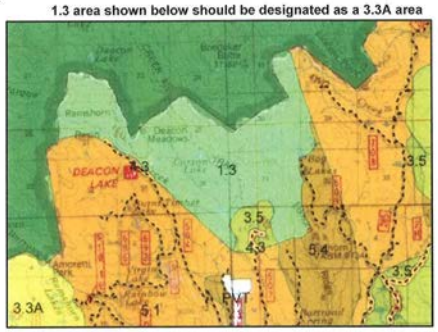


South end of Shoshone – Alternative B

Additional more specific comments about the areas generally referenced above are as follows:

Horse Creek Area north of Dubois

1.3 area shown below should be designated as a 3.3A area



We object to designation of the Ramshorn Basin/Deacon Meadows area as 1.3 Backcountry Nonmotorized, as proposed by Alternative B. This area has currently been managed under Alternative A as 2A – Semiprimitive Motorized Recreation and 7E – Wood Fiber Production. Motorized recreation is currently permitted in this area, as well as in all the surrounding areas outside of Wilderness; it is routinely used by backcountry snowmobilers. Consequently this proposed designation raises the question if such a large shift in management prescription is driven by desire

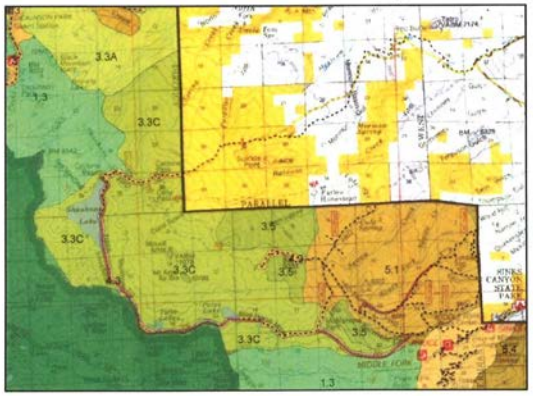
for a buffer area around Wilderness – which would be illegal as per the Wyoming Wilderness Act. This area should instead be classified as 3.3A in the final LMP.

Horse Creek area ungroomed snowmobile trails are shown in red

The Horse Creek area snowmobile trails are shown in red on the map at right and follow roadways in the Horse Creek vicinity, as well as north to the Double Cabin area. These trails are designated on the state snowmobile trail map, but are ungroomed. The final LMP needs to assure the small segments of ungroomed snowmobile trails which pass through 5.4 – Managed Big Game Crucial Winter Range remain open to snowmobile access.

3.3C Area west of Sinks Canyon to Shoshone Lake and to north of Cyclone Pass

3.3C area shown below should be designated as 3.3A area



We are opposed to the proposed designation of this large area as a 3.3C (as shown on Alternative B map at right) since it would create a winter nonmotorized area in a significant portion of the forest which has historically been used by backcountry snowmobilers. Consequently this would result in a large existing snowmobiling

area being eliminated by Alternative B – contrary to SEIS claims that 'no areas currently used by snowmobiles' would be eliminated under B.

The proposed designation of this area as a 3.3C Backcountry Summer Motorized area (meaning winter nonmotorized) makes no sense since it is not easily accessible to winter nonmotorized users. They would have to travel over two miles, most of it uphill, from the parking area in Sinks Canyon just to reach the eastern boundary of this extremely large area. And since the only other access (through Mormon Basin) to this large block of land is across adjacent state and BLM lands which are 'closed to all human presence' due to it being wildlife winter range, this proposal is all the more puzzling. Consequently the vast majority of this area would be located far beyond a '3-mile radius' commonly traveled on a typical day trip by the average backcountry skier, and truly inaccessible to the majority of publics.

The portion of the forest directly north of the western end of this block is proposed by Alternative B to be managed as 3.3A – Backcountry Motorized. While technically winter motorized use would be allowed, winter motorized users would essentially be locked out of it due to the 3.3C designation to the south and east, BLM winter closures to the east, and poor winter access across tribal lands to the north.

This area has been previously managed under Alternative A as primarily 2A – Semiprimitive Motorized Recreation area (equivalent to 3.3A in the new plan) or as a 7E – Wood Fiber Production area (equivalent to 5.1 in the new plan). We feel strongly the portion proposed to be designated as 3.3C in this area should instead be designated 3.3A in the final plan so that winter and summer motorized recreation can continue to be enjoyed in this area – as is currently allowed in Alternative A.

Two Ocean Mountain

We are quite opposed to closing the Two Ocean Mountain area (the area shown as 3.3C in the photo below) to snowmobiles as is proposed by Alternatives C and D. Such a change would make it an exclusive use area catering to the desires of a vocal few. We have monitored this situation closely over the past several years and believe moving away from multiple use management would be poor public policy. This mountain should remain open for multiple winter recreation uses as currently outlined by Preferred Alternative B.

One of our reasons for this position is that only a portion of Two Ocean is located on the Shoshone National Forest. The balance of the mountain is actually located on the Bridger-Teton National Forest and, in our discussions with Bridger-Teton staff members, they have indicated there is no intention of closing the portion of Two Ocean located on the B-T to snowmobiles. Consequently, if the Shoshone were to bow to groups advocating for snowmobile closure in this area, a very poor and confusing situation for the public would be created since 'rules of use' would be different on one side of the mountain versus the other.

As we've watched this situation evolve over the past few years we've heard a wide range of debate from the public as well as federal partners about which user groups actually pose the greatest risk of triggering avalanches. It is our opinion that there are a wide range of misperceptions being bantered around and that *all* user groups could potentially cause an avalanche – *and* they could cause it almost anywhere on the forest versus only at Two Ocean. Consequently the best solution is to work forest-wide with all users

about 'sharing the slopes' winter recreation etiquette education. Rather than closing areas to multiple uses, all user groups should work together to improve avalanche awareness by all backcountry users, to which we offer our assistance.

Dunoir Special Management Area

Again, we understand the Dunoir Special Management Area must be managed consistent with its enabling legislation and that allowing snowmobiling in this area is an unauthorized use. While some snowmobiling use has been occurring along the western fringe of the Dunoir, we want to be clear that we support its future closure to become fully compliant with existing federal law. It should however be noted that approximately two miles of existing ungroomed snowmobile trail 'H' will be eliminated by this action in the Bonneville Pass area (so the draft EIS statement that 'no existing snowmobile trails will be eliminated by Alternative B' is not entirely accurate).

Trail H is commonly used by snowmobilers who access Austin Peak for astounding photo opportunities. It is our understanding that the trail will remain open far enough to enable riders to still access the chute used as their jumping off point for Austin Peak access. But since the Dunoir boundary is a short distance beyond this point, it will be important that the Dunoir boundary is clearly signed where Trail H intersects its boundary.

High Lakes Wilderness Study Area

It is important that snowmobiling be allowed to continue in the High Lakes Wilderness Study Area, as is specifically allowed by its enabling Act. This area provides valuable snowmobiling opportunities on the Beartooths Plateau and represents a fairly significant area where snowmobiling has occurred historiacally. Please ensure this provision remains clear and carries forward in the final LMP.

Summer Motorized Trails

Even though the Shoshone is predominantly a nonmotorized forest, about 23% of the forest (570,800 acres) is still classified as 'open' to summer motorized uses. While this is not a lot it is still substantive. Consequently the fact only 32 miles of motorized trail exist for vehicles 50 inches or less in width – and only 2.5 miles of single-track motorized trails for motorcycles (even though the DEIS mistakenly states there are zero miles of single track trail) – is a quite abysmal situation for motorized trail enthusiasts. While it's great that the Shoshone has enrolled 874 miles of roads in our State ORV Program, summer motorized opportunities remain deficient since riders prefer real trails to riding on roads. Therefore the goal for summer motorized trails needs to be set considerably higher than developing only 'a minimum of three additional loop trails' as is currently stated in Alternative B. We suggest a more appropriate target, given the scarcity of existing trail opportunities, would be a minimum of at least one or two additional new loops per year versus three over the life of the plan.

We fully understand that moving this need forward will ultimately require a separate formal travel planning process. Nonetheless it is critical that final management area designations be broad enough in respect to 'summer motorized opportunity' in the final EIS and LMP so as to not prematurely limit motorized travel planning before it has a chance to even begin. We believe an extra effort is warranted between daft and final whereby Shoshone staff and State Trails staff should sit down to pour over maps to determine what, if any, tweaks can potentially be made to ensure all potential motorized areas remain available for consideration by travel planning.

We believe that between our two agencies we have a lot of expertise – which most importantly should involve on-the-ground knowledge of summer trail rangers we fund for the forest – which can make informed decisions about exactly where real potential (versus perceived citizen potential) may exist. This joint effort would consider all required filters like grizzly bear primary conservation area (PCA) boundaries, etc., but most importantly bring in the added filter of first-person involvement from those

who understand realistic on-the-ground candidate locations from which loops could be developed from existing dead-end routes. Ultimately we feel this information should end up in the final EIS as a table or appendix to serve as a starting point for future summer motorized travel planning.

Comparing 'miles of trail' in respect to 'acres open' to motorized and nonmotorized uses spotlights how extremely deficient the shortage of real motorized trails on the Shoshone actually is. Table 133 in the DEIS shows a total of 570,800 acres (23% of the forest) available to 'summer motor vehicles' under Alternative B compared to 1.867 million acres (77% of the forest) where summer motorized use is not allowed. Comparing the 1,640 miles of summer nonmotorized trails open to hikers and equestrian users against those1.867 million nonmotorized acres shows the Shoshone hosts an average of 0.562 mile of nonmotorized trail per square mile – which seems a bit bizarre since 75% of those 'nonmotorized acres' are located in Wilderness and the balance is supposedly in remote, undeveloped backcountry.

Comparing the 32 miles of true motorized trails against the 570,800 motorized acres calculates to an average of only 0.036 mile of motorized trail per square mile – almost 16 times less than the nonmotorized trail ratio. The 874 miles of enrolled ORV roads equate to 0.980 mile of ORV road per square mile of motorized area. So when these road miles are added to the 32 miles of motorized trail miles the overall motorized ratio jumps to 1.016 mile of motorized routes per square mile of motorized zone – but again, ORV riders desire more trail versus road opportunities. The new Shoshone management plan needs to be much more aggressive about correcting this inequity so that motorized trails have a fair chance to grow through future travel planning.

Table 1: Comparison of Alternative B Summer Allocations

Classification	Total Acres Allocated	Square Miles Allocated	% of Forest	Total Miles	Mile of Trail per square mile of classification
Summer Nonmotorized	1,867,000	2,917	77	Trail: 1,640	0.562
Summer Motorized	570,800	892	23	Trail: 32	0.036
				ORV Roads: 874	0.980
				Trail + ORV Roads: 906	1.016

Discussing summer motorized access in respect to 'acres open' is an extreme misnomer since wheeled vehicles are not allowed off designated roads or trails – so no single 'acre' of the forest is truly open for motorized recreation. Consequently portraying a perception that 23% of the Shoshone National Forest is actually 'open' for motorized recreation is extremely inaccurate. Table 2 below on the following page demonstrates how only about 0.4% of total Shoshone forest acres are actually used for summer motorized recreation and that just over 0.5% of the forest is used for all motorized travel by wheeled vehicles.

Consequently all the discussion and debate over 'limiting' the level of OHV/ORV use during this planning process is blown way out of proportion – actual use of the forest is really next to nil when viewed in the proper perspective. This perspective should be related in a more accurate context in the final EIS and LMP. Certainly, more aggressive future management actions are warranted to help provide more equitable summer motorized recreation opportunities across the forest.

Table 2: Calculation of Summer Motorized Route Acres

Motorized Route Type	Miles	Average Width	Acres per Mile	Total Motorized Route Acres	% of Forest
Motorized Trails	32	15 feet	1.8	57.6	0.002
ORV Roads	874	100 feet	12.1	10,575.4	0.434
Sub-Total used by motorized recreation				10,633	0.436
Motorized Trails	32	15 feet	1.8	57.6	0.002
All Roads	1,132	100 feet	12.1	13,697.2	0.562
Sub-Total used by all vehicles				13,754.8	0.564

General Nonmotorized Trail Management
With roughly 55% of the Shoshone National Forest designated Wilderness and a total of 80% of the forest classified for solely primitive or semi-primitive nonmotorized uses, there is no doubt the Shoshone National Forest places high emphasis on nonmotorized recreation and offers a wide range of world class nonmotorized opportunities. We believe Alternative B and the draft LMP do a good job of carrying this emphasis forward and that management policies will continue to cater to nonmotorized recreation. It's truly hard to improve on the current situation – other than improving maintenance on existing nonmotorized trails – since this proposed plan will continue to allow nonmotorized recreation on essentially 100% of the forest.

Since mechanized use is prohibited within the forest's large Wilderness base, it does make it somewhat challenging to provide substantive expanded mechanized / bicycling opportunities in the remaining 25% of nonmotorized backcountry areas outside of Wilderness. Therefore we encourage the forest to promote shared use of nonmotorized trails outside of Wilderness by equestrian users, bicyclists and hikers, to the greatest extent possible, since hikers and equestrian users have the other 75% of Wilderness nonmotorized areas for their recreational use while bicyclists do not. This may likely require coalition building at local levels to build consensus for change, as well as travel management planning for summer nonmotorized recreation.

We understand the Dunoir Special Management Area must be managed consistent with its enabling legislation and that continuing to allow bicycling is an unauthorized use of this area. While disappointing from a recreation perspective, we support its closure to all vehicular travel, including bicycles, to enable forest management to become fully compliant with existing federal law.

Wilderness Management
Alternative B does not propose to add any new Recommended Wilderness areas to the Shoshone National Forest. We support this since not adding this restrictive label will continue to allow the Shoshone more options for active forest management. Therefore we firmly do not support Alternatives C and D's provisions that would add new Recommended Wilderness areas.

Any Recommended Wilderness designations would unduly restrict access for many existing recreation uses. As a case in point we refer to Page 513 where it states, "Motorized and winter motorized use would be prohibited in areas recommended for wilderness designation, therefore, motorcycle, snowmobile, all-terrain vehicle, utility vehicle, and full-size vehicle use would be displaced in recommended wilderness areas. Mechanized use would be restricted to system roads and trails until Congressional designation, then use would be prohibited." We believe such a blanket policy of immediately removing all vehicle use as well as restricting mechanized uses would be wrong and in effect create 'de-facto wilderness' areas without Congressional approval. If existing uses have obviously not disqualified an area or areas for

wilderness consideration, all existing uses should be allowed to continue until such time Congress, and only Congress, act upon such a designation. Consequently the Shoshone's policy going forward – in the event any area is formally designated as Recommended Wilderness – should be for existing uses to be allowed to continue unless those uses truly threaten wilderness character. The mere presence of any such non-wilderness activity certainly does not automatically warrant its immediate elimination; otherwise the area should not have, theoretically, been eligible for wilderness consideration in the first place since such historic uses would have disqualified candidacy long ago.

It states on page 515 that, "Table 148 highlights the total acres for each of the ROS settings that fall within 1 mile of a wilderness boundary. The three ROS classes of Rural, Roaded-Natural and Semi-Primitive Motorized allow for non-conforming types of uses in wilderness and have the greatest potential to have a negative effect on existing wilderness when this type of management is within 1 mile of an existing wilderness boundary. In table 148, the acres of these three ROS settings are then added together and compared by the various alternatives to highlight potential effects to existing Wilderness." Since Section 504 of the Wyoming Wilderness Act of 1984 specifically prohibits buffer zones, we find this entire '1 mile negative effects measure' to be quite inappropriate.

Wyoming Wilderness Act Section 504 – Prohibition of Buffer Zones, specifically states, "Congress does not intend that the designation of wilderness areas in the State of Wyoming lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area." Consequently it is irrelevant in Wyoming which ROS classification or particular use occurs directly adjacent to any wilderness area, so such consideration should be eliminated from all potential impacts analysis as the final EIS and LMP are developed.

Specific comments on Draft LMP Chapter 2: Management Area Direction

Management Area 1.1 – Wilderness
The draft LMP, on page 136, outlines Guidelines for Management Area 1.1 – Wilderness. Under Land Adjustments, Guideline 13 states, "Wilderness boundary posting should be maintained at recurring wilderness trespass locations and along motorized routes immediately adjacent to wilderness." We support strict enforcement of motorized and mechanized wilderness trespass and believe good signing is critical to proper motorized management. Therefore we request that this Guideline be elevated to a Standard so that posting the boundaries of problem areas is not optional.

Management Area 2.2 – Line Creek Plateau Research Natural Area
There are inconsistent statements regarding this management area that should be corrected to ensure snowmobiling continues to be allowed during winter:

In the Management Area 2.2A Desired Conditions on page 150 it states, "…The area remains unroaded and provides a non-motorized recreation opportunity in the summer and motorized and non-motorized recreation opportunities in the winter…"

At the same time the Guidelines under the heading of Recreation state in Guideline 14: "Manage for an adopted Recreation Opportunity Spectrum class of semi-primitive non-motorized." Guideline 14 should be corrected to include motorized recreation opportunities in the winter as the final LMP is developed.

Management Area 2.3 – Proposed research natural areas
The text on pages 154 and 155 is conflicting since it references both 'eight' and 'six' new areas. Since Table 25 lists six areas, it would appear that 'six' is the correct number? Please clarify in the final LMP.

Guideline 5 under Recreation states: "Manage for an adopted Recreation Opportunity Class of semi-primitive non-motorized. Over-snow motorized use is allowed in areas currently open to such use." Continued access, on and off trail, for existing over-snow motorized use is important, so please ensure this provision carries through to the final LMP.

This guideline at the same time is confusing and concerning since it is inconsistent with RNA language in the SEIS where it states on page 504 that, "Research natural area designation prohibits motorized recreation aside from over-snow vehicle travel on designated trails." It further states on page 506 that, "Existing roads and trails contained within any new research natural area would continue to be open to the public for recreational purpose. A minor negative effect on winter motorized recreation would result from the cross-country prohibition of winter motorized use currently occurring in the Beartooth Butte Research Natural Area proposed in alternatives C and D. In these two alternatives, winter motorized use would be required to stay on system trails." Additionally, it states on page 540 that "Motorized use is not allowed in RNAs outside of wilderness, unless deemed necessary for research or authorized administrative access." We find this very confusing since Beartooth Butte RNA is also in Alternative B. If an exception is actually proposed to be made under Alternative B – that's great – but we're concerned about this provision standing for the long-term. Consequently we believe it would be best to NOT designate the portion of this area outside of Wilderness as a new RNA.

Management Area 3.3A – Back country recreation year-round motorized
There are several contradictions and misstatements in this section which should be revised in the final LMP:

It states in the Desired Conditions that, "A variety of non-motorized and motorized recreation opportunities are provided." We question whether the reference to non-motorized recreation is appropriate as a 'desired condition' for this management area. In comparison, there is Management Area 1.3 – Backcountry Non-Motorized along with Management Areas 3.3B and 3.3C which also specifically include 'non-motorized' in their titles. This sentence is identical in the Desired Conditions for 3.3A, 3.3B and 3.3C, inferring that non-motorized is treated equally with motorized recreation across all three management area prescriptions. We don't believe that should be the case since 3.3A is portrayed to be *the* only true backcountry motorized area. We're not saying that non-motorized recreation should not be allowed within 3.3A, because it is clearly allowed on 100% of the Shoshone, but rather that motorized recreation should be given clear *preference*, across the board, over non-motorized in all 3.3A managed areas. As presented in Alternative B, this is only 64,243 acres and would represent merely 2.6% of the total Shoshone National Forest. Given the extreme deficiency of motorized opportunities currently offered, it seems that preference for motorized recreation needs to be given *somewhere*; otherwise motorized recreation seems to always play second-fiddle to non-motorized interests.

Guideline 2 under Recreation states, "Some trails may be restricted to non-motorized use." Again since 3.3A should, in our opinion, be a true motorized management area, this guideline is inappropriate. It may be an appropriate guideline for 3.3B and 3.3C areas, but should be removed from 3.3A.

The Goals for Management Area 3.3A are (1) Provide year round motorized recreation opportunities and (2) Increase diversity of motorized experiences. Both are good goals and appropriate for 3.3A areas. Unfortunately there is a disconnect from these goals to the 3.3A 'Management Approach' which states, "Management of use within this specific recreation setting focuses on sustainability and providing high-quality motorized experiences. (That's good.) A variety of experiences may be provided, ranging from off-highway vehicle use on existing roads to single-track motorcycle trails. (Motorcycle trails would also be good since there is currently only one 2.5 mile long single track trail on the entire forest.) In some local areas, non-motorized uses may be separated to provide a safe experience and meet desired conditions."

Really, it's hard to understand how designating separate non-motorized areas in a year-round motorized area 'meets desired conditions' since it ultimately means closing some of this motorized zone to motorized uses. We feel strongly that 3.3A year-round motorized areas should focus on a motorized preference if the stated goals are to be achieved. Consequently if there are safety concerns or conflicts in a 3.3A area the non-motorized use should be removed rather than giving it a chunk of forest for exclusionary and exclusive use in the middle of what is supposed to be a motorized area.

Management Area 3.6A – Continental Divide National Scenic Trail
Standard 4 under Recreation states, "Existing snowmobile use is allowed. New sections of the Trail will not be located coincidentally with snowmobile trails." We have experienced instances on the Wind River District where, when the snowmobile trail was relocated by state crews, the CDNST was also moved to the new state-relocated snowmobile route. This is inconsistent with the standard; the Trail should not be routinely following improvements to motorized trails while simultaneously maintaining a location-superiority position over motorized trails.

Under 'Management Approach' it states, "Management of uses within this specific recreation setting focuses on sustainability and providing high-quality non-motorized experiences, especially within 0.5 mile of the Trail's travel route." This statement is not realistic since the CDNST passes through a wide range of opportunity spectrums that are not limited to only nonmotorized uses. Consequently the forest cannot assure that only nonmotorized or high quality 'experiences' will occur within a ½ mile of the Trail's corridor. It would be better to revise this statement so the measurement is related to visual quality or scenic quality experiences versus to nonmotorized experiences within a half mile of the Trail.

The 'Management Approach' also states, "If existing uses are, or become, incompatible with the nature and purposes of the Trail, management of the Trail will be reexamined. In the case of wheeled motorized conflicts, the management approach will generally be to move the Trail route to a location that is non-motorized. If conflicts occur within sections open to winter motorized use or mountain bicycle use, any approach taken to resolve the conflict will generally favor the Trail in its present location rather than moving the Trail. Motorized use by the public on relocated sections of the Trail will generally be prohibited, with the exception of a special circumstance." This statement should have its focus narrowed to only trails relocated due to conflict versus to any CDNST corridor which is relocated. Additionally, it should apply to only trails developed directly by CDNST management activities or funding and not to pre-existing trail routes or trails developed by non-CDNST efforts. This Approach, as written, is too broad and could lead to snowmobile trail relocations such as we referenced above being usurped, even though the State Snowmobile Program bore the efforts and cost to build the new trail route onto which the CDNST later relocated.

Management Area 5.4 – Managed big game crucial winter range
The Desired Conditions state, "National Forest System roads and trails through winter range are open to public motorized use to provide access to non winter range lands when necessary." However, this important access provision is not reflected in the Standards and Guidelines for 5.4 areas. We therefore request an additional Guideline for Roads and Trails be added to the final LMP stating: 7. Established roads and trails through winter range will be open to wheeled and over-snow vehicle travel as needed to provide access to non winter range lands beyond the winter range.

The 'Management Approach' states, "Seasonal closures are used where necessary in big game crucial winter range and parturition areas to reduce open road densities, limit disturbance from motorized use and provide increased secure habitat during the winter and spring. Exceptions will be allowed for identified existing snowmobile routes and play areas." We believe it is important to clarify that 'existing snowmobile routes' may include ungroomed trails or routes, as well as groomed snowmobiles trails. We

request that this be added to the final LMP. Additionally snowmobile trail routes sometimes need to be relocated due to uncontrollable changes such as logging, service business changes, resource conditions, etc. The final LMP needs to allow trail routes to be changed or even newly created when driven by other forest management actions.

The 'Management Approach' also states, "Currently, there is little concern for non-motorized dispersed recreation impacts to wintering wildlife. The Forest Service will educate the public about impacts to wildlife from dispersed recreation and remain vigilant about potential areas of conflict; the Forest Service will not promote dispersed use in winter range." We point out that numerous scientific studies show the impacts upon wintering wildlife are often greater from a person walking or someone on skis or snowshoes than it may be from vehicles or motorized recreation (see the information pertaining to wildlife in the Library of Research Studies at http://www.snowmobileinfo.org/snowmobiling-access-resources.aspx). We understand and support the importance of winter range. Therefore we encourage the forest to be proactive and aggressive in prohibiting 'all human presence' whenever there may be any level of potential disturbance from off-road or off-trail nonmotorized uses within winter range.

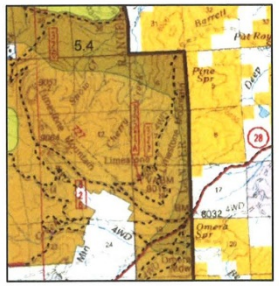
Specific comments on Draft LMP Chapter 3: Monitoring

Table 28 Monitoring Strategy – page 225
The Monitoring Driver is stated as "Maintenance occurs on at least 15 percent of System trails annually."

It appears the 306 miles of snowmobile trails on the Shoshone (or 276 miles if you use DEIS figures) are included in the definition of System trails. All these miles of snowmobile trail receive extensive grooming and maintenance on a weekly basis for the entire winter season year after year. Therefore the maintenance performed on just snowmobile trails represents 15.3% (or 13.8% if using DEIS figures) of the 1,996 total miles of trails on the forest. Consequently the monitoring driver of 'maintenance occurring on at least 15% of System trails annually' could essentially be met solely with Snowmobile Program contributions. It would appear the annual proposed benchmark of '15%' is likely set too low since all other trail classifications should also receive some minimum level of annual maintenance to be properly managed.

Additional Area-Specific Comments

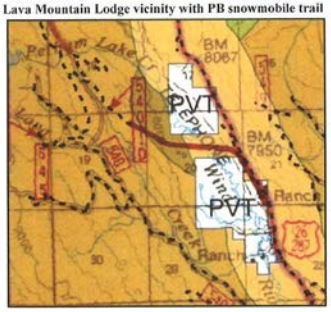
Access across winter range areas
The final LMP needs to assure that over-snow winter access is allowed across winter range on all roadways, including when the roadways are not groomed or mapped as snowmobile trails. One example of this are the roads off Highway 28, in the Omera Spring vicinity (shown at right), which provide access to private cabins and national forest lands beyond small slivers of winter range which would be designated by Alternative B. This is likely only one example of a situation that likely occurs across the forest.



Omera Springs area – example of roads across 5.4 zone

Another potential issue with access across designated winter range is in the Lava Mountain Lodge area (formerly Pinnacle Buttes) shown on the map below. The 'PB' snowmobile trail has followed various different routes in this area over the years. At one point it crossed a portion of the private land but currently stays on national forest land to the highway and then follows the highway to the lodge while crossing the small (dark brown) pod of winter range (trail is drawn in red).

Lava Mountain Lodge vicinity with PB snowmobile trail

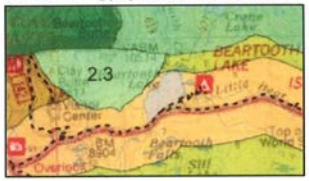


Access to the lodge is difficult yet important since it provides access to fuel along with other services. The current route along the highway is less than ideal. While lodge access through private land is better, it continues to be a moving target as the private lands change hands or landowners' moods change. It is likely this trail route will continue to change as we work to improve access to lodge services. Consequently, at a minimum, continued trail access across this particular piece of winter range will continue to be important while the exact route may need to be flexible.

There are also a number of private landowners in this area who are snowmobilers. They commonly ride from their private property onto the forest on historically used routes to access the PB trail as well as surrounding cross-country snowmobiling opportunities. Local residents state the numbers of wintering moose in this area is generally quite low and that they never see wintering deer or elk. Consequently, since the proposed winter range area is quite small and sandwiched against private lands as well as road corridor, we question the wisdom in managing this small, isolated parcel as winter range. We request that you consider removing this small parcel of winter range from the final EIS/LMP. If not, then the final EIS and LMP needs to ensure continued snowmobiling access in the area.

Proposed Beartooth Butte RNA

2.3 Area showing proposed Beartooth Butte RNA



We are opposed to designation of the Beartooth Butte area (that portion located outside of Wilderness) as a new 2.3 – Research Natural Area since the Beartooth Lake and Clay Butte areas are extremely popular off-trail snow play areas for snowmobilers. This area is currently classified as 2B – Rural/Roaded Natural Recreation under Alternative A and is open for snowmobiling. The portion of the proposed RNA outside of Wilderness should instead be classified as either 3.3B – Backcountry Winter Motorized or 4.2 – Travel Corridor in the final LMP.

Additional new information

The State Trails Program has new information regarding snowmobile use and ORV permit sales which may be useful to the planning team as the final EIS and LMP are developed. This information is available at http://wyotrails.state.wy.us/Research/Index.aspx and is summarized as follows:

ORV Registration Numbers

The Draft EIS states on page 482 that, "In 2002, the State instituted a mandatory off-road vehicle permit program. Since then, the number of permits sold has climbed from 6,767 to 55,060 in 2009, the last year data was available. Some of this 88 percent increase in permits sold is due to increased compliance since the mandatory program was initiated. Sales of permits in the Shoshone's three-county area ranged from 1,196 in 2002 to 6,970 in 2005." We're providing updated statewide and 3-county permit sales information below:

Table 3: Statewide ORV Permit Sales by calendar year

Sales Year	2002*	2003	2004	2005	2006	2007	2008	2009	2010	2011
Total ORV Permits Sold	6,767	26,467	32,393	39,216	45,011	51,943	52,326	55,060	56,368	54,177

* 2002 sales did not start until July 1 so does not represent a true baseline of annual sales

Table 4: Total ORV Permit Sales in Shoshone's 3-County Area

County	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Fremont	705	2,430	3,024	3,654	4,408	4,867	4,965	4,816	4,861	4,584
Hot Springs	40	295	244	262	311	384	379	382	414	360
Park	236	1,416	1,674	1,952	2,251	2,716	2,478	2,661	2,795	2,647
3-County Total	981	4,141	4,942	5,868	6,970	7,967	8,065	7,859	8,070	7,591

It should be clarified that the state ORV permit is not entirely 'mandatory' since many ATV riders choose to 'plate' their vehicle for legal operation on roadways. It is also important to clarify that 2002 was a start-up year, with permits not initially going on sale until July 1, so represents only six months of sales along with reflecting the start-up task of having to 'sell' the initial concept and value of ORV permits.

It is unclear how the stated "88 percent increase" was calculated in the DEIS since 26,467 permits sold in 2003 (first full year of sales) compared to 55,060 permits sold in 2009 represents 108% growth. Likewise going from 32,393 permits sold in 2004 (second full year of sales) to 55,060 sold in 2009 equals a 70% increase. This calculation should be clarified and corrected. It should also be noted in the final EIs that, after 8 consecutive years of sales growth since inception, total ORV permits sales actually declined by 2,191 (3.9%) in 2011.

It should also be clarified that the stated '6,970' of 3-county permit sales occurred in 2006 rather than 2005. Total permit sales for the Shoshone's 3-county area peaked at 8,070 and then declined by 479 permits (5.9%) in 2011. Fremont County routinely ranks number one, two or three in regard to the highest number of County ORV permit sales.

2011-2012 Wyoming Comprehensive Snowmobile Recreation Report

A recent study by the University of Wyoming determined snowmobiling generates over $175 million per year in total economic contributions to the Wyoming economy. This stems from $147 million in direct annual spending by snowmobilers across Wyoming which supports the equivalent of 1,300 jobs and

generates $7.4 million in annual state and local government revenue. This survey was conducted by the University of Wyoming – Department of Agricultural and Applied Economics and focused on snowmobiling activity on the twelve trail systems and 2,000 miles of snowmobile trails managed by the Wyoming Department of State Parks and Cultural Resources.

Tables 5 through 8 below provide a synopsis of this study's finding as they relate to snowmobile trail systems on the Shoshone National Forest. Without doubt, the Shoshone provides important snowmobiling opportunities and hosts a substantial amount of activity since 'total statewide use' outlined by this survey covers twelve different snowmobiling systems or regions scattered across the state.

Table 5: Estimated Snowmobiling Use in Shoshone-related areas

User Segment Factor	Beartooth Mountains Sub-Area	Dubois / Union Pass Sub-Area	Lander / South Pass Sub-Area	Total Shoshone Area
Resident % of Statewide **trips**	2.9	3.3	6.7	12.9
Resident % of Statewide **days**	2.5	3.8	5.3	11.6
Non-Resident % of Statewide **trips**	5.6	5.9	0.2	11.7
Non-Resident % of Statewide **days**	4.9	5.7	0.2	10.8
Outfitter Client % of Statewide **trips**	3.4	7.2	0	10.6
Outfitter Client % of Statewide **days**	6.0	10.2	0	16.2

Table 6: Primary Destination of Most Recent Snowmobiling Trip

Snowmobiling Region	% of Total Statewide Trips		
	Resident	Non-Resident	Outfitter Client
Beartooth Mountains	4.1	7.3	7.8
Continental Divide*	25.4	26.4	38.9
Shoshone NF Total	29.5	33.7	46.7

* includes the Lander and Dubois areas of the Shoshone NF as well as a portion of the Bridger-Teton NF in the Togwotee area; not able to segment Shoshone portion from B-T portion

Table 7: Statewide Snowmobile Trip and Expenditure Patterns

User Segment	# Registered Snowmobiles (2011-2012)	Average Days per Snowmobile	Total Snowmobile Recreation Days	Average Daily Trip Expenditures per visitor	Average Annual Equipment Expenditures per sled	Total Annual Expenditures in WY
Wyoming Resident	15,781	20.07	316,725	$98.29	$3,367.28	$84,269,913
Non-Resident	17,370	10.95	190,202	$159.80	$624.86	$41,248,018
Outfitter Client	700	51.0 per sled 4.9 per client	174,930	$168.55	NA	$21,259,995
Total	33,851		681,857			$146,777,926

Table 8 below provides a synopsis of estimated snowmobile recreation days in Shoshone areas, along with estimated economic contributions from snowmobiling trips on the Shoshone. Annual equipment expenditures are not included in Table 8, so total economic impacts would be greater than shown in Table 8 based upon average 'per sled' expenditures provided in Table 7 above.

Table 8: Estimated Shoshone-related Snowmobiling Recreation Use Days and Trip Expenditures

User Segment Factor	Beartooth Mountains Sub-Area	Dubois / Union Pass Sub-Area	Lander / South Pass Sub-Area	Total Shoshone Area
Resident Snowmobile Recreation Days	7,918	12,036	16,786	36,740
Non-Resident Snowmobile Recreation Days	9,320	10,842	382	20,544
Outfitter Client Snowmobile Recreation Days	10,496	17,843	0	28,339
Area Total	27,734	40,721	17,168	85,623
Resident Snowmobiling Trip Expenditures	$778,260	$1,183,018	$1,649,896	$3,611,174
Non-Resident Snowmobiling Trip Expenditures	$1,489,336	$1,732,552	$61,044	$3,282,932
Outfitter Client Snowmobiling Trip Expenditures	$1,769,101	$3,007,438	0	$4,776,539
Area Total	$4,036,697	$5,923,008	$1,710,940	$11,670,645

In conclusion, we generally support most of the proposed framework outlined by DEIS Preferred Alternative B and the draft LMP. We have identified several areas where we feel the plan could be improved but at the same time are confident we can jointly work through these issues.

Thank you for this opportunity to comment. We look forward to working closely with Shoshone staff to address our suggestions and concerns as you move toward completion of the final forest management plan. Please feel free to contact me at 307-332-5107 or by e-mail at ron.mckinney@wyo.gov if you have any questions.

Respectfully submitted by,

Ron McKinney
Trails Program Manager
P.O. Box 1429
Lander, WY 82520

Ltr#1074

PM12:03 NOV28'12

2011-2012 WYOMING COMPREHENSIVE SNOWMOBILE RECREATION REPORT

Prepared for the State of Wyoming,
Department of State Parks and Cultural Resources

by:
Amy M. Nagler, Christopher T. Bastian, David T. Taylor, and Thomas K. Foulke
Department of Agricultural and Applied Economics
University of Wyoming

October 2012

Ltr#0860

From:	Gwen Booth
To:	FS-shoshone forestplan
Cc:	Rebekah Fitzgerald
Subject:	Draft (EIS) and Management Plan Shoshone National Forest Game and Fish comments
Date:	Monday, November 26, 2012 11:33:01 AM
Attachments:	wer11162.00l signed letter.pdf

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Gwen Booth
Wyoming Game and Fish Department
Habitat Protection Office Support Specialist
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November 26, 2012

WER 11162
USDA Forest Service
Shoshone National Forest
Draft Environmental Impact Statement and
Draft Management Plan for the Shoshone National Forest

Joseph G. Alexander
Shoshone National Forest
808 Meadow Lane
Cody, WY 82414-4516

Dear Mr. Alexander:

The staff of the Wyoming Game and Fish Department (Department) has reviewed the Draft Environmental Impact Statement and Draft Management Plan for Shoshone National Forest. We offer the following comments.

We support the Governor's recommendation for No Surface Occupancy (NSO).

Designation of gray wolves needs to be updated throughout the plan, based on the recent US Fish and Wildlife Service delisting.

There are multiple instances throughout the document where it does not state explicitly that existing snowmobile trails and play areas will remain open in big game crucial winter range. The Department has worked with local stakeholder groups to jointly identify big game crucial winter range areas where snow machine use can continue and where the regional biologist have determined there will be no adverse effects to wildlife. Please correct and make consistent within the DEIS and Draft Management Plan references to existing snowmobile use continuing in big game crucial winter range.

To stay consistent with previous recommendations made as a result of on the ground negotiations with cooperators and stakeholders: We support the management area designations on pages 6 and 7 of the Alternative B management area designation map with the following two exceptions:

> The area bordering wilderness north and west of the Deacon Lake trailhead is designated 1.3 in Alternative B. Historically some sites in this area have had winter motorized use with no known adverse affects to wildlife. The Department recommends this area be

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designated 3.3B B (Back country winter motorized) to allow existing winter use to continue.

There is a large area designated 3.3C (Back country summer motorized) paralleling the Wiggins Fork drainage north. Historically this area has been open to winter, motorized use and is utilized by lion hunters and trappers. The Department recommends the area on the map east of Bear Creek and along the north side of Spring Mountain be designated as 3.3 C (Back country summer motorized). The region paralleling the Wiggins Fork drainage should be designated 3.3A (Back country motorized).

The Department supports Forest Service efforts to improve forest health, and offers assistance in development of wildlife habitat management plans incorporated into forest health management. These functions should be mutually beneficial, as a healthy forest would also provide healthy wildlife habitat functionality. Aspen and riparian habitat restoration should be a priority where these habitats seem to be disappearing in many areas, due to lack of regeneration from fire and drier climate over the past few decades. With pine beetle outbreaks imminent, plans to prevent and offset die-offs should include guidelines for restoring pine forests where appropriate. Natural regeneration may be slower with beetle killed forests than from fire, but care should be taken to recognize the needs of early and mid-succession species before automatically "replanting" pine forests by hand. As with fire, a natural mosaic should be encouraged where possible.

We support the need to revise the travel management plan and strongly recommend that the Forest Service begin travel management planning within 2 years after the Record of Decision is sign for the Forest Plan revision.

Draft Environmental Impact Statement
Shoshone Land Management Plan Revision

Page 7. We agree with the statement, 'increased OHV use in unauthorized areas is leading to increased wildlife disturbance'. This underscores the need for effective travel management planning.

Page 18. The document states four management indicator species will be used to assess the effects of forest management activities. To do this, the Forest needs adequate baseline population information or historical population indices. The plan needs to detail monitoring strategies for each of these species. Without effective monitoring and historical demographic data, the use of management indicator species will be ineffective.

Page 34. We support the exclusion of pack goat use in core native bighorn sheep habitat as stated in Alternative B.

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Page 65, Water, 4th Paragraph. We recommend adding a map of the Class 1, Class 2, and Class 3 watersheds.

Page 69, Water Quantity, 1st Paragraph. We recommend adding language that discusses the impacts from cutting trees to increase water yield to water quality.

Page 71, Watershed Condition Framework. We recommend adding a map of the Class 1, Class 2, and Class 3 watersheds.

Page 142-143. Whether it is under "Regulations, Policies, and Regional Direction" or under "Other Agreements and Management Direction", the following should be included;

Wild Sheep Working Group. 2012. Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. Western Association of Fish and Wildlife Agencies.

Schommer, T., and M. Woolever. 2001. A process for finding management solutions to the incompatibility between domestic and bighorn sheep. USDA Forest Service, Washington, DC, USA.

Wyoming Statewide Bighorn Sheep – Domestic Sheep Interaction Working Group. 2004. Final Report and Recommendations.

Page 146. Both the gray wolf and the grizzly bear are classified as G4/S1 - Globally relatively secure/critically impaired in Wyoming, representing the highest probability of elimination. Is this correct?

Page 208, Rocky Mountain Bighorn Sheep – 3rd Paragraph. "It (the Temple Peak herd) is classified as a remnant herd by the WGFD." Although it is true the Temple Peak herd is a remnant herd, this is not a true "classification" of the Department. Suggested edit; "It is a remnant herd."

Page 209, Rocky Mountain Bighorn Sheep. If the statement "No pack goat use occurs within this core native herd range" applies to the Yount's Peak, Trout Peak, Wapiti Ridge, and Clarks Fork sheep herds, it should be included here also.

Page 209. While much of the Yount's Peak Bighorn Sheep herd is non-migratory and resides year-round at high elevation, portions of the herd do migrate to low elevation winter range in the South Fork Shoshone River. As such, the blanket statement sheep in this herd are non-migratory is incorrect.

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Page 212, Rocky Mountain Bighorn Sheep – Temple Peak Bighorn Sheep Herd. Regarding the statement "Suitable bighorn sheep habitat within these domestic sheep allotments on the Shoshone is very limited as a vast majority of the land is forested and within occupied habitat of gray wolves." We do not understand this statement, as all of the bighorn sheep herds on the Shoshone National Forest are within the occupied habitat of wolves. Wolves do not automatically make sheep habitat unsuitable.

Pages 213, 214. We agree with the statement the possibility of disease transmission between domestic goats and bighorn sheep in core native area poses a catastrophic threat. Domestic goat presence in core native bighorn sheep range should thus be precluded as proposed in Alternative B.

Page 214, Rocky Mountain Bighorn Sheep. "Conservation measures summarized include: Close all occupied core native bighorn sheep habitat and the area with 26 km of the occupied core native habitat to pack goat use. This is needed to protect core native bighorn sheep herds from the potential for contact with pack goats. The closure for the 26 km buffer is to protect foraying bighorn sheep from coming into contact with pack goats."

Page 214. We do not support the notion of "buffer zones" to manage disease transmission risk between bighorn sheep and domestic sheep and goats. While the intent of this language is understood, use of the term "buffer zone" is discouraged. Although there may be some unoccupied bighorn sheep habitat on the Clarks Fork, Wapiti, Greybull, and Wind River Ranger Districts it is very limited and would be problematic to design and enforce pack goat restrictions that would not endanger bighorn sheep. We strongly support the recreational pack goat closure on the Clarks Fork, Wapiti, Greybull, and Wind River Ranger Districts and is also supportive of continued pack goat use on the Washakie Ranger District, which as recognized is outside of core native bighorn sheep habitat. We believe this represents an attempt to allow recreational pack goat use where it will not have impacts to the unsurpassed bighorn sheep resource of the Shoshone National Forest.

Page 214, Rocky Mountain Bighorn Sheep, Conservation Measures. The "Effects from Domestic Sheep Grazing, Recreation Pack Goat Use, and Wildlife Management" is an opportune place to discuss the Wyoming Statewide Bighorn/Domestic Sheep Interactions Working Group's work and publications since these agreements apply to all alternatives. This group has designated areas of Wyoming as bighorn sheep native core areas, cooperative review areas, and non-emphasis areas. It is important that readers understand that various entities have worked together to establish where domestic sheep grazing occurs, where domestic sheep grazing does not occur, and where bighorn sheep management is most intensive. We also recommend adding this information to the discussion on pages 396 and 402 (Ch. 3, Commercial Livestock Grazing, Affected Environment) to clarify why sheep grazing permits are not issued on the Clarks Fork and Greybull Ranger Districts.

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Page 274. Given no historical demographic data are available for ruffed grouse, how can the Forest Service effectively use them as a management indicator species to assess changes in aspen habitat? The document does not detail how the Forest Service plans to monitor ruffed grouse in the future which will be necessary to use the species as a management indicator.

Page 284. We agree with the statement the main challenge to maintaining secure habitat for elk and other species is the increased use of OHVs; in particular, unauthorized travel on closed roads and off-road. The Department believes the Forest Service needs to provide more detail in the plan on how they will manage this disturbance.

Page 284, 5th Paragraph. We recommend rewording the paragraph to make it very clear that the big game crucial winter range timing stipulations on the Forest is December 1 to April 30th. As written it is very confusing on what dates will be used.

Page 285. We support the conservation measures listed for elk with the addition of a statement indicating increased enforcement efforts to reduce unauthorized motorized travel under item #8.

Page 288. The disease known as Brucellosis is caused by the bacteria *Brucella abortus* and is transmitted when a susceptible animal contacts and ingests bacteria following the abortion or stillbirth from an infected female. Exposure of a susceptible animal to the bacteria elicits an antibody immune response that can be detected (with varying degrees of accuracy) following one to several unique blood tests. When several or more animals are tested from a population within a given time period, this provides an index of exposure (but not infection) to the bacteria. This mathematical proportion of exposure (i.e., those animals that are antibody-positive divided by the sample population) is commonly referred to as "seroprevalence".

Exposure of elk to brucellosis was first documented at the National Elk Refuge in 1933, and since then, has been documented in elk attending all 22 Wyoming state-operated winter feedgrounds on the adjacent Bridger-Teton National Forest, as well as winter free-ranging elk from western Wyoming, northeastern Idaho, and southern Montana. Seroprevalence of brucellosis in elk attending Wyoming winter feedgrounds averages about 25% and generally declines to levels less than 10% in winter free-ranging elk throughout the Greater Yellowstone Area. However, winter free-ranging elk habituating lands of the Shoshone National Forest in Wyoming, particularly those areas north of Lander and Dubois, have had seroprevalence levels as high as 22%.

It has long been recognized that elk of the Greater Yellowstone Area are a reservoir of brucellosis. Despite the use of winter feedgrounds, strain 19 vaccination, and several other best management practices, the threat of spillover from elk to domestic livestock has been realized and confirmed several times in the past decade. As elk herds of the Shoshone National Forest

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have continued to grow and utilize winter habitats in similarity to winter feedgrounds, it is likely that these elk will maintain elevated seroprevalence and also pose a threat to adjacent livestock operations. Most recently, this particular threat was realized following confirmed spillover of brucellosis from winter free-ranging elk of the Shoshone National Forest to adjacent livestock on private lands. Whether from elk attending feedgrounds or winter free-ranging, and elk-to-livestock transmission events have caused economic and logistical constraints for livestock producers induced time-consuming policy changes at the state and federal levels.

Alternative C would provide the least potential transmission of brucellosis with domestic livestock. Alternative C would minimize disturbance to wintering elk, making it more likely they would remain on all Forest winter ranges, including crucial winter range. Without some type of timing restriction on elk crucial winter range, there is the potential of elk moving off the Forest to adjacent private property, increasing the opportunity for elk to intermingle with livestock. Alternative F would provide the greatest opportunity of transmission with domestic livestock because it proposes no timing restrictions on disturbing activities in elk crucial winter range, thereby providing the least amount of protection from disturbance during the critical winter months. Alternatives D, B, E, and A would provide disturbance free habitat in a descending order from the most to least, but all would provide more protection from winter disturbance then Alternative F.

Under all alternatives, should brucellosis issues between elk and domestic livestock become more of a concern on National Forest System lands, recommendations in the Cody brucellosis management action plan developed by the Wyoming Governor's Brucellosis Coordination Team and Wyoming Game and Fish Department will be utilized.

Page 289 (Elk), 294 (Mule Deer), 296 (Moose): Effects of Livestock Grazing.

Page 293. We support the conservation measures listed for mule deer. We emphasize the need to improve those mixed mountain shrub habitats at mid-elevations and provide mule deer transition range between winter and summer ranges. It is becoming apparent the condition of these transition habitats is at least as important as the condition of winter range habitats in mule deer winter survival.

Page 296. We support the conservation measures listed for moose with the addition of a monitoring component to assess the health and vigor of riparian, deciduous shrub habitats under item #4.

Page 412. Effects from Recreation, 3rd paragraph, Fences are a common solution… We recommend adding language addressing the potential impacts of adding fencing to manage livestock on wildlife.

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Page 296, Moose: Conservation Measures Summarized, Number 2. Include reclamation (i.e. prescribed fire and **reclamation**).

Page 380, Wyoming Game and Fish Department Aquatic Invasive Species Management Plan. Change Department to Commission…Wyoming Game and Fish Commission Aquatic Invasive Species Management Plan.

Page 394, Cumulative Effects. We recommend adding language addressing hauling water and the potential of spreading aquatic invasive species.

Page 396, Other Agreements. See above comments for Page 214.

Page 455, Leasable Minerals. We recommend developing a table similar to Table 118, but showing oil and gas potential for development including the percent of high development potential, percent of moderate development potential, percent of low potential, percent of very low potential, and percent of no potential.

Page 455. We believe it is important to emphasize potential oil and gas development as opposed to potential occurrence. An additional table should be included on page 455 detailing acres of high, low, very low, and non-existent development potential and how they are affected by various alternatives.

Page 457, 1st Paragraph. We recommend adding the following language:

> If the project proponent proposes alternative mitigation that the USFS and WGFD believes is better than the protection provided by the timing stipulations, then the timing stipulations maybe waived.

Page 477, Affected Environment, Transportation System.

We recommend adding a paragraph detailing the significant increase of illegal ORV trails that have been created since the last Forest Plan. Once this has been addressed, details will need to be included on how the Forest Service will address these illegal ORV trails.

Draft Land Management Plan
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Page 20 and 60, Management Challenges, Grazing, Species of Local Concern Standard (3).

Big game requirements for forage have a priority in the management of crucial winter range used in common by livestock and big game." The requirement should be to provide forage to

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Mr. Joseph G. Alexander
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maintain big game population objectives on crucial winter range. We recommend changing this standard to "Provide forage to maintain big game herd objectives is a priority in the management of crucial winter range used in common by livestock and big game."

Page 41, Standards for T&E Species Table (line 6). With recent documentation of grizzly bears in the Washakie Ranger District, we recommend the language to minimize conflicts be changed to reflect grizzly bear presence on the entire forest, rather in just the Primary Conservation Area (PCA). We don't wish to imply a change in management outside the PCA, just a need to recognize conflicts could occur there. This language change would also be needed in Guidelines # 6 and 16 on pages 43 and 44. Minimizing black bear conflicts should be a priority too.

Page 42. We recommend there should be an additional guideline for threatened, endangered and candidate species stating any inactive or voluntarily abandoned livestock allotment in the grizzly bear PCA will be evaluated and considered for permanent closure.

Page 43, Chapter 1 – Forest-wide Direction, Guidelines for Threatened, Endangered, Proposed, and Candidate Species #8. "Inside and outside the Primary Conservation Area, cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices may be placed under long-term non-use agreements or retired as opportunities arise with willing permittees." This language does not reflect the intent of the Conservation Strategy. We recommend rewording to place an emphasis on the collaboration that will occur with livestock grazing permittees to resolve grizzly bear/livestock conflicts and removing areas outside the PCA from the guidelines. This change will align more closely to the intent of the Conservation Strategy and allow for use on allotments with conflicts. We recommend the following language: "Inside the Primary Conservation Area, work with livestock grazing permittees to resolve conflicts and/or change management on cattle allotments or portions of cattle allotments with recurring conflicts. If conflicts cannot be resolved, livestock management will follow the Conservation Strategy."

Page 46, Sensitive Species. The Department has produced the State Wildlife Action Plan (SWAP, 2010) which is a comprehensive strategy to maintain the health and diversity of wildlife within the state, including reducing the need for future listings under the Endangered Species Act. Special emphasis is given to addressing wildlife species that have received less attention in the past, including those that are not hunted or fished. This plan should be referenced by the Forest for all sensitive species management.

Page 48. We support standards 5 and 6 for sensitive species.

Page 50. Guideline 10 should be listed as a standard.

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Page 53, Other Guidance. The citation for Conservation Agreement for Yellowstone Cutthroat Trout…is incorrect and should be Montana Fish, Wildlife and Parks, 2010.

Page 55. An additional standard should be included stating effective surveys will be utilized to track or index management indicator species in order to adequately assess the impacts of forest management activities.

Page 60. We support standard 1.

Page 60. We support guideline 5.

Page 60, and Page 192, Number 2. "Standards for species of concern" number 3 states that big game requirements for forage will be prioritized for big game crucial winter range in places where big game and cattle share the range. We would rather see it stated as, "Forage use conflicts between big game and cattle will be evaluated on a case-by-case basis." A good example of appropriate wording can be found on page 192, paragraph 3.

In the Draft Plan on page 60 "Standards for species of concern" number 4 where it discusses the winter season stipulation, it should be noted that exceptions to the stipulations are possible in some circumstances.

Page 61. We do not recognize the 30% threshold came from for security habitat? We asked about this in an earlier review. While this is not a big concern, explanation would help the public better understand why 30% is used or if it is significant?

Page 63-65, Desired Condition. Add another sentence to align standards and guidelines with existing Wyoming Aquatic Invasive Species law and Wyoming Game and Fish Commission (WGFC) regulations (Chapter 62) that state that all conveyances coming into Wyoming must be inspected before entering Wyoming Waters.

Page 107. Goal 9 should include a statement of how resource impacts will be reduced or eliminated .

Page 138. We support standard 1 and guideline 1.

Page 152 Management Area 2.2 A Line Creek Plateau Research Natural Area, Guidelines - Under Wildlife and Fish, #5. The following sentence, "Fish stocking will be allowed to continue in lakes stocked before research natural area designation" should be modified to include the words "streams and" to be consistent with language found on page 154-management approach. Both streams and lakes have been stocked according to Department stocking records within the Line Creek Plateau Research Natural Area.

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Page 164. An additional goal to reduce unauthorized motorized travel should be added.

Page 203, Chapter 3, Monitoring, Monitoring Strategy. "Establish monitoring priorities: Criteria from the goals and objectives are used to establish priorities for monitoring within the expected program of work and budget constraints."

Monitoring is one of the most important actions on National Forest System Lands. Monitoring should be an agency committed action to help determine if the Forest is actually meeting the Plan's goals and objectives regardless of budget constraints.

There is no mention of having a steering committee or a similar structure. The Bighorn National Forest has a steering committee and is working to the interest of all stakeholders. Therefore, we recommend designing monitoring meetings similar to the Bighorn National Forest Plan (2005). Pages 4 and 5 of the Bighorn National Forest Plan outlines the process to continue to include cooperating agencies in Forest Plan monitoring and implementation. We recommend adopting this language and concept in the Shoshone National Forest Plan.

> *"Bi-annual monitoring and evaluation meetings with the forest plan revision cooperating agencies (state of Wyoming, County Commissioners, and Conservation District Board members) will be offered. The meetings will be open to the public, with ground rules similar to those used in plan revision…meetings.*
>
> *Steering Committee members can help Forest personnel in monitoring forest plan and project implementation, in evaluating biological, social, and economic impacts; and by identifying amendment needs and proposed solutions. Maintaining the knowledge base and relationship with state agencies and elected officials will provide continuity in the adaptive management cycle, from development of the Revised Plan to plan implementation, monitoring, evaluation, and amendment through to the next plan revision."*

Page 230, Literature Cited. Change citation for conservation agreement to Montana Fish Wildlife and Parks 2010. The conservation strategy for Yellowstone Cutthroat trout as noted in page 52 should also be included in the literature cited. The citation is:

> Range-Wide YCT Conservation Team. 2009. Conservation strategy for Yellowstone cutthroat trout (Oncorhynchus clarkii bouvieri) in the States of Idaho, Montana, Nevada, Utah, and Wyoming. Montana Fish, Wildlife & Parks, Helena. Conservation Agreement.

Page 261, Appendix 2 Possible Actions, Invasive Species. We recommend that possible actions should include following the State of Wyoming Aquatic Invasive species' law and Wyoming

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Game and Fish Commission chapter regulations calling for mandatory inspection of all conveyances (i.e., watercraft and other water bearing equipment) that enter the state before using Wyoming Waters.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Rick Huber, Staff Aquatic Biologist, at 307-777-4558.

Sincerely,

John Emmerich
Deputy Director

JE/mf/gb

Attachment

cc: USFWS
Tim Woolley, Cody Region
Steve Yekel, Cody Region
Doug McWhirter, Cody Region
Bart Kroger, Cody Region
Daryl Lutz, Lander Region
Kevin Johnson, Lander Region
Greg Anderson, Lander Region
Stan Harter, Lander Region
Rebekah Fitzgerald, Governor's Office

Ltr#0939

From: LSO - Matt Obrecht
To: FS-shoshone forestplan
Cc: Senator Rebout; Representative Semlek; Senator Geis; Senator Hastert; Representative Goggles; Jeriniah Rieman; Rebekah Fitzgerald
Subject: Comments of Joint Subcommittee on Federal Natural Resource Management.
Date: Monday, November 26, 2012 7:42:13 PM
Attachments: Subcommittee Comments on Shoshone NF Plan 11-26-12.pdf

Please see the attached comments of Wyoming State Legislature's Subcommittee on Federal Natural Resource Management (Subcommittee) on the National Forest Service Draft Land Management Plan and Draft Environmental Impact Statement for the Shoshone National Forest.

Please let me know if you have any questions.

Matt Obrecht
Staff Attorney
Wyoming Legislative Service Office
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Cheyenne, Wyoming 82002
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matt.obrecht@wyoleg.gov

Ltr#0939

SUBCOMMITTEE ON FEDERAL NATURAL RESOURCE MANAGEMENT

November 26, 2012

Joe Alexander
Supervisor, Shoshone National Forest
808 Meadowlane Ave.
Cody, WY 82414

SUBMITTED VIA ELECTRONIC MAIL:
shoshone_forestplan@fs.fed.us

RE: **Joint Subcommittee on Federal Natural Resource Management Comments on Shoshone National Forest Plan Revision**

Dear Supervisor Alexander:

The Wyoming State Legislature's Subcommittee on Federal Natural Resource Management (Subcommittee) would like to thank you for the opportunity to comment on the National Forest Service Draft Land Management Plan (LMP) and Draft Environmental Impact Statement (DEIS) for the Shoshone National Forest. The Subcommittee believes the LMP will have an impact on the natural resources and socio-economic well-being of an extensive portion of western Wyoming. The Subcommittee has always, and continues to support the multiple uses of Wyoming's public lands. For this reason, the Subcommittee supports Preferred Alternative B of the LMP (with specified amendments) as the best plan for the Shoshone National Forest.

Except where specifically noted in these comments, the Subcommittee supports Governor Matt Mead's comments on the Shoshone LMP and Draft Environmental Impact Statement (DEIS) for the Shoshone National Forest. The Governor and his staff worked extensively with local cooperating agencies, impacted businesses and individuals to formulate specific, well developed comments that will best serve the interests of the residents of Wyoming. The Subcommittee hopes that you incorporate all of the Governor's comments into the Final LMP.

The Subcommittee would like to mention three areas of concern to Subcommittee members that should be addressed in the Final Forest LMP: motorized travel, livestock grazing and energy development.

First, the Subcommittee is concerned that Preferred Alternative B restricts traditional areas of motorized winter travel. With over eighty-four percent (84%) of the Forest under some form of motorized travel restriction, it is essential that you provide a full range of recreational opportunities on those areas of the Forest which do not have travel restrictions in place. As stated in Governor Mead's comments, the proposed management for snowmobiling within the LMP is a significant

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change from the current Forest Plan with the proposal that snowmobiling being limited to only existing trails and play areas. The available acreage for snowmobile use is a substantial decrease compared to current areas where snowmobiling is allowed. The Subcommittee asks that you reevaluate the areas open to motorized winter travel and increase the acreage in the Final LMP. Specifically, the Subcommittee requests that snowmobile use and access by continued in:

- The Lava Mountain area;
- Two Ocean Mountain;
- Ramshorn Basin/Deacon Meadows;
- Sink Canyon and North of Cyclone;
- Pass Brecciae Cliffs;
- Sublet Pass;
- Jade Lakes;
- Upper Brooks Lake,;
- Austin Peak;
- Bonneville Meadows; and
- Jules Bowl.

It is the Subcommittee's understanding from comments submitted by concerned forest users that these areas offer unique experiences for all winter recreationalists because of the quality of early season snow accumulation and availability of vertical terrain. These areas should be managed as multiple use, including motorized winter travel. The Subcommittee also requests that you heed the comments of local landowners and forest users and amend the LMP to allow for winter motorized access to PB trail.

Additionally, summer off-road vehicle trails should be expanded on the Forest where appropriate. Currently, the draft documents increase the motorized trail target to 52 miles of trails. However, the Subcommittee believes this will not provide for an adequate trail system on the Forest. The Subcommittee requests that you work with cooperators and interested parties to determine how many miles of off-road vehicle trails is necessary to support an adequate trail system on the Forest. You should specifically determine whether the entirety of the PB trail is appropriate for motorized summer use. This would create a unique loop from Sheridan Creek Road up the CD trail and back to the Highway 26 and would conform to traditional uses of this trail.

The Subcommittee would echo the comments of Governor Mead that economic impacts from livestock grazing is not captured correctly within the planning documents and that DEIS should identify all lands potentially capable of supporting grazing and determine whether grazing is suitable given the management objective for that area.

Finally, the Subcommittee is aware that there is currently little oil and gas development occurring on the Shoshone National Forest. There are however, several areas on the Forest, or adjacent to it, which have a high potential for oil and gas occurrence, especially on the western edge of the Bighorn Basin. With continually involving exploration and extraction technologies, it may become economically and environmentally feasible to develop oil and gas on the Forest within the proper legal and regulatory framework. The Subcommittee requests that for all areas identified with a high potential for oil and gas occurrence from which the resource can be extracted, you provide a

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framework within the Final LMP which provides for the possibility that those energy resources may be developed in an environmentally responsible manner.

Thank you again for taking the time to consider the comments of the Wyoming State Legislature's Subcommittee on Federal Natural Resource Management on the National Forest Service Draft Land Management Plan and Draft Environmental Impact Statement.

Sincerely,

Senator Eli Bebout
Chairman

Representative Mark Semlek
Chairman

cc – The Honorable Matthew H. Mead, Governor of the State of Wyoming

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Ltr#0964

From: Jay Hein
To: FS-shoshone forestplan
Subject: WSFD's Comments on the Shoshone National Forest Draft DEIS
Date: Tuesday, November 27, 2012 10:08:53 AM
Attachments: Wtoming State Forestry DEIS-Dplan comments.docx
Shoshone DEIS Comment Cover Letter 11-19-2012.docx

Please see the attached cover letter and comments regarding the Forest Plan.

Thanks,

Jay

--
Jay Hein
Resource Forester
Wyoming State Forestry Division
Office of State Lands & Investments
State of Wyoming
307-777-6137

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Ltr#0964

60th Anniversary 1952-2012

Wyoming State Forestry Division

THE FOREST RESOURCE AGENCY OF WYOMING

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Matthew H. Mead
Governor

Bill Crapser
State Forester

November 19, 2012

Carrie Christman
Planning Staff
Shoshone National Forest
808 Meadowlane
Cody, WY 82414

Dear Carrie,

Thank you for giving us the opportunity to review and comment on the Shoshone National Forest Draft Environmental Impact Statement (DEIS). Wyoming State Forestry Division has sent its comments to the Governor's office to be combined with other state agencies. Should you have any questions specific to the comments we have submitted, please feel free to contact me.

The State of Wyoming, as well as the west in general, is facing enormous challenges with forestry and forest management. With the loss in mill infrastructure, the current beetle epidemic, and the number of Wildland Urban Interface issues facing us today, it is often difficult to accomplish the management objectives that the forest needs. The forest health issues the Shoshone has been facing are unprecedented. Management needs are changing at a rapid pace, and a shift in management strategies will be key to continuing a successful forest management operation.

As the Shoshone National Forest and its Cooperators went through the process of creating this Forest Plan, there was some concern over whether or not the Forest had covered the forest health issues sufficiently. More specifically, there was a push to create a "Forest Health" Alternative. Wyoming State Forestry Division does not see this as a necessary step. Forest health issues have been taken into account in each of the Alternatives, obviously at different levels of intensity. It is our opinion that forest health is at the forefront of each of these Alternatives. Each Alternative creates a different level of management intensity, which will consequently affect the overall health of the forest. A "Forest Health" Alternative would not look much, if at all, different than Alternative B. Management activities will be similar in scope and the overall health of the forest would not be altered significantly enough to create a separate alternative. Wyoming State Forestry Division's main focus within the Alternatives based largely on how many suitable acres are available, what the Allowable Sale Quantity (ASQ), and how many acres are planned to be treated over the life of the plan. None of those numbers would vary with the inclusion of an additional Forest Health Alternative.

The direction the Shoshone National Forest is taking in regards to forest management is encouraging, and I feel that this plan is a step in the right direction. No plan is perfect, and these Forest Plans can not possibly answer every question and fill every need. Creating a plan that allows for adaptive management and that allows flexibility with its boundaries is going to be key in today's global and political climates.

Ltr#0964

Over the last 2 years, the Shoshone National Forest has done an excellent job of working with its cooperators and the public to try to accommodate our needs. As Cooperators, we feel that our voice was heard and our comments were taken into account throughout this process. We thank you for the opportunity to be a part of this long, arduous process and look forward to the completion of the plan.

Sincerely,

Jay Hein

Jay Hein
Resource Forester
Wyoming State Forestry Division

DEIS/Draft Plan Comments

1. **Page 18 – 1st Paragraph** - " In accordance with 1982 regulations, MIS are selected from the five categories listed below:

   Comment: There are only four categories listed. The sentence below #4 may actually be #5, but it is not considered a part of the list as is. It either needs to be numbered as #5, or #5 needs to be input into the document.

2. **Page 121 – 1st Paragraph –** "The patch size of aspen stands …has probably declined due to fire suppression… Overall, patch size on the Shoshone is probably smaller than on the adjacent BT National Forest.

   Comment: This paragraph is essentially meaningless. Using "probably" throughout that paragraph means that there is no real data to support the statement. If the Shoshone has data to back up the statements, our suggestion would be to strengthen that paragraph. If there is no data to support it, perhaps it is either best left out, or at the very least, rewritten. The same goes for other paragraphs throughout the document. The use of probably infers that the Shoshone doesn't really have the knowledge to actually make that statement.

3. **Page 285 – Rocky Mountain Elk – Direct and Indirect Effects – Effects from Timber Management, Fire Management and Road Use –** "Disease risks include chronic wasting disease. Chronic wasting disease is currently not known to be prevalent in elk herds on the Shoshone."

   Comment: I don't disagree with the statement, but do disagree with its placement in the document. Whether CWD is a concern for elk or not is not at all related to effects from Timber Management, Fire Management, or Road Use. The disease is not transmitted from logging or road building equipment, nor does wildfire spread CWD. Suggest moving the paragraph into the main body of discussion about Rocky Mountain Elk.

4. **Page 293 – Mule Deer – Direct and Indirect Effects – Effects from Timber Harvest –** "Disease risks include chronic wasting disease, which is currently only known to occur in one hunt area that contains a small portion of the Shoshone."

   Comment: See Comment #4. I don't believe this is the right section to place that statement. It gives the impression that timber harvest is responsible for the spread of CWD.

5. **Page 301 – Clark's Nutcracker – Direct and Indirect Effects – Effects from Timber Management and Fire Management –** "Loss of whitebark and limber pine to disease, insect outbreaks, and fire may lead to local and widespread population decline of Clark's Nutcrackers."

   Comment: Similar to Comments #4 and #5, the way this is written infers that timber and fire management lead to increased insect and disease outbreaks. Proper timber management reduces these effects which would then lead to steady or increased populations of Clark's Nutcracker.

6. **Page 392 – Effects from Timber Harvesting –** "Effective implementation, administration, and compliance with Forest Service Regional and National BMP Directives…are critical to avoiding or minimizing impacts…"

   Comment: I appreciate that you have placed that language into the plan. With the increased pressure on forest industry to monitor water quality and protect our water resources during any management activities, this will become an increasingly important part of our work. In addition to the Directives written about in the plan, it is also very important to state that you will also follow the "Wyoming Forestry Best Management Practices – Water Quality Protection Guidelines." Wyoming State Forestry Division is one of the lead agencies in monitoring and evaluating our BMP effectiveness, and we conduct BMP audits across all ownerships. These results are published and released to the public as well as to all other agencies. It is imperative that each agency follow these guidelines when conducting any management activity.

7. **Page 426 – Paragraph just below Table 104 – Last Sentence –** "No attempt was made to estimate the **mount** or type of salvage that may occur from natural events…"

   Comment: Spelling error. Change "mount" to "amount."

8. **General Comment about the Planning Process**

   Comment: While this has been a long and tedious process, I would like to express my appreciation to the folks on the Shoshone for their persistence in trying to finish this plan. Over the last 2 years, the collaboration between the forest and the Department has been great. The Forest Supervisor and the Forest Planner(s) have been open and upfront about the entire process and more than willing to accommodate the needs/requests we may have. While it is impossible to fill the needs of each request, the Shoshone National Forest has done a solid job of providing quick response times and working with Department to come to the best solution possible.