

**APPENDIX C.  
RESPONSE TO COMMENTS ON THE DRAFT  
ENVIRONMENTAL IMPACT STATEMENT \_\_\_\_\_**



## Introduction

The Bog Creek Road Project Draft Environmental Impact Statement (DEIS) publication was announced in the Federal Register on June 1, 2018. The 45-day public comment period started the day following publication (June 2, 2018) and was extended 15 additional days, ending on August 1, 2018. Interested parties and other agencies were notified of the DEIS availability and comment period via official correspondence letters and legal advertisement, which provided the link to the DEIS on the project webpage. A hard copy of the DEIS was provided to the U.S. Environmental Protection Agency as required and provided options for requesting compact discs or hard copies of the DEIS for all other agencies and interested parties. The agencies held public open houses in Bonners Ferry, Priest Lake, and Sandpoint, Idaho.

## Content Analysis

Interested parties submitted specific written comments by email, in person, and via U.S. Postal Service mail. In all, 108 non-duplicate comment letters were received from individuals; environmental organizations; Native American tribal governments; and federal, state, county, and city agencies. In accordance with 40 Code of Federal Regulations (CFR) 1503.4 (Response to Comments), comments were considered individually and collectively in order to determine the appropriate response.

A standardized content analysis process was conducted to analyze the public letters received on the DEIS. Content analysis is designed to extract comments from each letter received and evaluate similar comments from different letters. Content analysis ensures that every comment is considered fully and accurately represents the public's viewpoints.

During the content analysis process, each letter was assigned a unique *Letter Identification* number. The letters were read in their entirety, and discrete comments within them were assigned a *Comment Identification* number. Each letter can contain from one to multiple comments. Each comment was coded and categorized by resource area or issue of concern. The list of comment coding categories is provided in Table C-1.

**Table C-1.** Comment Code Categories

Chapter 1 – Section 1.3 Purpose and Need
Chapter 2 – Range of Alternatives
Chapter 2 – Road Designations
Chapter 3 – Section 3.2 T&E Bull Trout
Chapter 3 – Section 3.2 T&E Canada Lynx
Chapter 3 – Section 3.2 T&E Caribou
Chapter 3 – Section 3.2 T&E Cumulative Impacts
Chapter 3 – Section 3.2 T&E General
Chapter 3 – Section 3.2 T&E Grizzly Bear
Chapter 3 – Section 3.2 T&E Wolverine
Chapter 3 – Section 3.3 Wildlife
Chapter 3 – Section 3.8 Recreation and Access

**Table C-1. Comment Code Categories (Continued)**

Chapter 3 – Section 3.9 Heritage and Tribal Resources
Appendix C – Ecological Conceptual Site Model*
Appendix D – Past, Ongoing, and Reasonably Foreseeable Future Activities
General – Impact Analysis
General – Public Comment Period Extension
General – Public Involvement
Consultation and Coordination
Mitigation
NEPA Process
Other Issues – Cumulative Impacts
Other Issues – Forest Plan
Other Issues – Grazing Access
Other Issues – Mineral Resources
Other Issues – Motorized Use
Other Issues – Settlement Agreement
General Opposition – Alternative 2
General Opposition – Alternative 4
General Project Opposition / No Action Support
General Support
General Support – Alternative 2
General Support – Alternative 3
General Support – Alternative 4

\* Ecological Conceptual Site Model removed from Final Environmental Impact Statement

Comment submitters by *Letter Identification* number are presented in Table C-2.

**Table C-2. Letter Identification Number and Submitter Information**

Letter Identification Number	Submitter Information
1	Jean Public
2	Justas Vilgalys
3	Jim Hubbard
4	BJ Hannon
5	Harry Jageman
6	Anna Brewer, Tina Beurtels, John Summers, Henry T., Vickey Osborn, Teddy Miller, Amanda Fields, Jurgen Sorens, Rita Suffolk, Mary Dalton, Joseph Pritchard, Kimberley Fields, Simon Sears, Beverly Woods, Anita Brewer, Daniel Russel, Petra Stafford, Kim Wright, Daphne Harlington, Kathy Stafford, Joan Butterfield, Kenneth Lawson, Myrthe Low, Diane Bremer
7	Mary Shabbott
8	Denine Mishoe
9	Elisabeth Bechmann
10	Chantal Buslot

**Table C-2.** Letter Identification Number and Submitter Information (Continued)

Letter Identification Number	Submitter Information
11	Kate Kenner
12	Jill Cobb
13	Wally Cossairt
14	Nancy Gould
15	Roland H. Hall
16	Jay Huggins
17	Wayne Nash
18	Dan A. Nystrow
19	Eric Sandaker
20	Paul Sieracki
21	Steve Ussher
22	Dave Wattenbarger
23	Casey West
24	Nancy Gould Nash
25	Bob Cegnar
26	Contiental Lands, Inc - Chuck Roady,
27	Kootenai Tribe of Idaho - Gary Atkin Jr., Chair
28	City of Bonners Ferry - David Sims, Mayor
29	Boundary County - Dan R. Dinning, Chairman
30	Glenda Poston
31	John Cummings
32	Linda Fioravanti
33	Jennifer Durbin
34	John O'Connor
35	Mary Shabbott
36	Chuck Roady
37	Laura Roady
38	Carol Butler
39	Saundra Holloway
40	Fritz Hudnut
41	Alison James
42	Michelle MacKenzie
43	Jeff Martin
44	Neil Miller
45	Brian Morris
46	Patrick Murphy
47	Mike Ripatti
48	Paul Sieracki Alliance for the Wild Rockies - Michael Garrity Tim Laysen

**Table C-2. Letter Identification Number and Submitter Information (Continued)**

<b>Letter Identification Number</b>	<b>Submitter Information</b>
49	Vicki Spleas
50	Kelly Sweeney
51	Patricia Vineski
52	Barbara Walklate
53	Jessica Black
54	Dennis Fitch
55	Rosemary Garofalo
56	Yellowstone to Yukon Conservation Initiative - Jessie Grossman
57	Tanya Kasper
58	Idaho Conservation League - Brad Smith
59	U.S. Environmental Protection Agency - Jill A. Nogi
60	U.S. Department of the Interior, Office of Environmental Policy and Compliance - Allison O'Brien
61	Jean Public
62	Bonner County - Board of Commissioners Glen Bailey, Dan McDonald, and Jeff Connolly
63	Priest Community Forest Connection - Liz Johnson-Gebhardt
64	Russell and Deborah Anthes
65	Chris Bachman
66	The Lands Council - Chris Bachman
67	Jake Billingsley
68	Anonymous
69	Suzy Dix
70	Emily Franko
71	Suzi Hokonson
72	Mary Lou Johnson
73	Jeff Johnson
74	Jeff Lambert
75	Nancy Enz Lill
76	Jonathan Moo
77	Jessica Side
78	Brenda Strange
79	Austen White
80	Bart Haggin
81	Tim Durnell
82	Michael Gladstone
83	David Hunt
84	Mary and Brian Jokela
85	Kim Lechtenberg
86	Nancy Taylor

**Table C-2.** Letter Identification Number and Submitter Information (Continued)

Letter Identification Number	Submitter Information
87	Toni Taylor
88	Michael Lucid
89	Lacy Robinson
90	Karen Berube
91	Leah Caplan
92	Bonner County - Jeff Connolly, Commissioner
93	Jennifer Hall
94	Margie Heller
95	Shelia Koerner
96	Crissy Trask
97	Johnna Winters Woodruff
98	Chris Yoder
99	Anonymous
100	Pat Bennett
101	Boundary County - Dan R. Dinning, Chairman
102	Kettle Range Conservation Group - Timothy Coleman
103	Genny Hoyle
104	Kootenai Tribe of Idaho
105	Meg McGough
106	Idaho Governor's Office of Species Conservation - Dustin Miller
107	Jim Cronin
108	Center for Biological Diversity and WildEarth Guardians

A complete record of all letters submitted during the 60-day comment period is available online at <https://www.cbp.gov/document/environmental-assessments/bog-creek-road-project-environmental-impact-statement>.

All coded comments and agency responses are presented in the following Response to comments table (Table C-3), which is organized by the Letter Identification Number presented in Table C-2.

**Table C-3. Response to Public Comments**

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
1-1	I oppose any road repair on this site. If customs wants to catch illegal immigrants a road should be built right at the border, which is where they are. They may not be in this site at all a few miles away from the border.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
1-2	The immigration service should be at the border not several miles from it.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
2-3	And we also don't want speeders speeding through that road killing bears.	Chapter 3 – Section 3.2 T&E Grizzly Bear	Section 3.2.5 discloses the low potential for mortality from vehicle strikes under all of the alternatives.
2-4	Please accept this email as my formal comment opposing restoring the Bog Creek Road. This road is not necessary for keeping the united states safe and secure.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
2-5	I also oppose removing seasonal restrictions to Blue Joe Creek Road (FSR 2546) for any further use.	Chapter 2 – Road Designations	Thank you for your comment. The information in this comment will be considered by the decision-makers in the decision process.
2-6	More important, opening it up again for border security will hurt grizzly bear recovery, which is why the road was closed in the first place.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #56-103.
3-7	Option 4 please! I understand the security requirements along the border and I can understand bear habitat. But if you're going to spend the money to open it and keep it open. then let the public enjoy the benefits too. When that road was open all the way through, it was one of the best "Sunday drives" in the area.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
4-8	As a resident of North Idaho for over 35 years, I very strongly oppose Alternative 4 of the Bog Creek Road EIS. My preference would be Alternative 1 Noa Action. But Alternative 2 or 3 would better than 4. Please leave the grizzly bear habitat unaltered by man and machines.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
5-10	I can see no reason why the border patrol needs to drive over the Selkirks, when access is available from both Priest Lake (on the West) and Bonners Ferry (on the East). Why can't an agent be assigned to the Priest Lake area if the risk is so great? It would seem more likely that you would be able to catch someone if have people on both ends of the road. Your idea that people can "blend in with legitimate activities" doesn't appear to be related to the fact of whether the road is open to motorized travel or not. Once people get off of the Bog Creek Road (which they can do quicker with a motorized vehicle) they can make this claim regardless of the road status...	Chapter 1 – Section 1.3 Purpose and Need	See response to Comment #5-9.



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>...Options for bringing the Blue-Grass Bear Management Unit up to standard are immaterial to the discussion regarding opening the Bog Creek Road to motorized use. The U.S. Forest Service is required to meet these standards by 2019 regardless of what happens to the Bog Creek Road, and opening of the road only contributes to more disturbances in the bear unit. If the road is opened, the Forest Service will be required to close additional roads to offset the losses of habitat associated with the Bog Creek road reconstruction...</p> <p>...In summary, I don't think your stated purpose and need for opening the Bog Creek Road holds much water. The current condition of an "untravellable" overgrown road is a much better deterrent to illegal activities than what would occur if the road is opened so that motorized travel is possible. The road would require constant surveillance if it is reconstructed and linking the opening of the road to need for additional road closures in the Blue-Grass Bear Unit is inappropriate.</p>		
5-9	<p>I worked as a US Forest Service wildlife biologist on the Priest Lake District from 1983-1988 and arrived on the district shortly after the decision was made to close the Bog Creek road to motorized traffic. Prior to the closure the road was heavily utilized by locals as "backdoor" route into Canada and was considered one of the most important road closures for grizzly bear and caribou recovery in the Selkirk range. My understanding was that the route was often utilized as way for getting relatively cheap Canadian whiskey and other contraband across the border. The closure was very controversial and initially there were numerous breaches of the gates that were placed to close the road. I suspect this illegal use likely continued until there was a major slide on the road in 2000-2001 and the road became impassable to all but the most determined users. The fact that the road is now grown over in numerous locations suggests that illegal use has declined over time due to the difficulty of motorized access along the route.</p> <p>As suggested in the DEIS, Grizzly Bears consistently utilized recently burned areas in the old Trapper Creek burn and other areas near the Continental Mine. Several bears ended up being illegally killed during my tenure and in subsequent years following my departure from Priest Lake. Many of these poaching incidents were associated with the gated Bog Creek Road, and I was personally involved in the recovery of a radio collar (in Canada) from a bear thought to have been killed near Upper Priest Lake. Following the Bog Creek Road from Priest Lake and through the breached gate on the Priest Lake side, Idaho Fish and Game biologists and I found the cut-off radio collar deposited a short distance from the road along the route thought to have been taken by the poacher.</p> <p>While I assume that the Border Patrol could use increased surveillance equipment and personnel to patrol the road, I do not believe the Forest Service has any more</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	The Final Environmental Impact Statement (FEIS) has been revised to include discussion and analysis of border security access in Section 3.8, Recreation and Access. Elements such as gates, signage, and monitoring that are included in the Proposed Action to deter poaching and other illegal activity are described in Section 2.2.2.1. The increased risk of direct mortality for listed species from poaching and other illegal activity as a result of the Proposed Action is addressed in Section 3.2.5.3.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>resources to monitor the road than I did as a District biologist back in the 1980's. In my mind, opening the road so that it can be used by full sized vehicles actually increases the likelihood that it will be utilized for poaching and other illegal activities. A grown over road that is untravellable by a motorized vehicle is much less likely to be utilized as a route for illegal immigration than a poorly monitored remote route that is suitable for motorized travel.</p> <p>Unless Customs and Border Patrol are willing to devote significant resources to monitoring this road once it is opened, I doubt that the intended purpose of reducing illegal immigration can be achieved. Opening the road will only serve to increase risks for listed species like the grizzly bear, mountain caribou, wolverine and lynx. It will encourage illegal use and increase the amount human activity along the road corridor.</p>		
6-11	We are against your plan to build the Bog Creek road, right through prime grizzly bear habitat! NO to inviting even more trappers, hunters, poachers, NO to these sadistic invaders belonging to the human species! Please give wildlife a decent chance to continue to live in their own surrounding!!! No road!!!	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
7-12	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #98-166. The agencies reviewed Lamb et al. (2018), "Effects of habitat quality and access management on the density of a recovering grizzly bear population," and added the citation to the EIS where applicable.
8-13	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. This would be setting these beautiful animals up for failure and death. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
9-14	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.		
10-15	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
11-16	I am writing concerning the building of the Bog Creek road. I think it has not been well thought out in terms of the needs of grizzlies and I want to say that I oppose it. More roads means fewer bears who tend to avoid habitats with road through them. This puts them and other wildlife at risk. It is the bears who are recovering and thus their welfare must be considered. Please make this road someplace that does not affect grizzlies or other wildlife in a negative manner. National security can be dealt with in an other area I am sure.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #5-9. Section 1.3.1 clarifies that “given the significant border access to this area from the north, the ongoing threats of terrorism facing this Nation, and the existence of a maintained network of roads throughout the Blue-Grass BMU, restoring and maintaining access to the area north of Continental Mountain has been identified by CBP as a priority.”  Section 3.2.5 discloses the effects on grizzly bears; and Sections 3.2.5 and 3.3.5 disclose effects on other wildlife species.
12-17	Given the public's concern for access and the need for bear security, there might be a compromise. Years ago when the PLRD implemented the Kalispell Granite Bear Mgmt (KGB) project, the USFS listened to the public about their concerns with closing miles (hundreds of miles) of road. At the time, the PLRD decided to open up RD 401 to allow citizens to drive the road for about one month out of the year. Doing this simple compromise allowed the USFS to implement the needed road closures and gave the public access to a road that was important to them. I believe there is an opportunity to do something similar with the Bog Creek road.	Chapter 2 – Range of Alternatives	This alternative suggestion (public access for 30-day window) is analyzed in the FEIS in Alternative 4 Modified. See response to Comment #104-206.
12-18	Also please consider closing optional roads on Bonners before closing more roads on Priest Lake.	Chapter 2 – Range of Alternatives	The 2016 Forest Service Travel Analysis Process report (TAPS) available in the project record (U.S. Forest Service 2016e), elaborates on why roads on the Priest Lake Ranger District, vs. the Bonners Ferry Ranger District, were proposed for

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			motorized closure. According to the 2015 Idaho Panhandle National Forests (IPNF) <i>Revised Land Management Plan, Idaho Panhandle National Forests</i> [herein called the Forest Plan; Forest Service 2015a), the Priest Lake Ranger District is located in Management Areas (MAs) 1b, 2b, and 5 (Recommended Wilderness, Eligible Wild and Scenic River, and Backcountry), whereas the Bonners Ferry Ranger District is located in MA 6 (General Forest). See also response to Comment #58-113.
13-19	Alternative 4. Opening some roads is good for public relations. I would like to see firewood areas.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
14-20	I would ask that this area be opened back up to the public	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
14-21	this bog creek area has been closed long enough we as the public would love to access your beautiful lands and have more area to enjoy. This will be a way to reach priest lake area rather than go the extra two hundred miles around on paved roads. The patrol needs to do their jobs. Let them do it more effectively. So I vote for Alternative 4. Less restrictions.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
14-22	Conditional use is fine. Like closed during the hunting season.	Chapter 2 – Range of Alternatives	The EIS range of alternatives included analysis of motorized use, ranging from open public access to open administrative use. Specific closure related to hunting season was not included, but it is covered in the EIS range of alternatives.
14-23	If concern for crossing the border illegally, they can put up gates or make the road in to Canada impassable. Like the road up to Buzzard, which was total closed visa excavator. No one goes that way any more cause they can't get through pretty efficient!!	Chapter 2 – Range of Alternatives	EIS Section 1.3, Purpose of and Need for Action, describes the need for U.S. Department of Homeland Security, Customs and Border Protection (CBP) agents to access the U.S.–Canada border to prevent illegal activities. According to the need presented in the EIS, gates would not be an adequate replacement for agents on the ground in the border area.
15-24	Four people own 383.96 acres at the Continental Mine Property. That was some of the first private property located in Boundary County, Idaho. The mine owners, at their own expense, engineered and constructed to the to the mine over	Chapter 3 – Section 3.8	See response to Comment #26-39.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	100 years ago. Under ANILCA the access not be restricted to private property by the Federal government period! We will work with any groups to help in way as we have access. Currently the Border Patrol has the electronic data transmitter located on the mines property. A cabin was built at the mine for over night stay and rental property. The mine / private property owners will not keep a log of trips to our property. No group or person or government agency should concern themselves with our access! To mine owners, alternative 4 may work for us.	Recreation and Access	
15-25	To mine owners, alternative 4 may work for us.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
16-26	I am all in for option #4. I would like to see open access to all of our forest service roads year around. I have been a resident in Boundary County for over 55 years. Our family used to spend time that area for camping trips or day trip picnics and would like to have the opportunity to share those experiences with my children and grand children.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
17-27	I would like to see this area open for year round public access, hunting, fishing, travel. Its been closed to long.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
18-28	I want option 4. Full access to hunting, fish, and general happiness. That would be great.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
19-29	I feel Alternative 4 is the best option for the community and everyone. It will offer more all year around activities including hunting, camping, snowmobiling, and etc. Everyone should have access to all of Idaho's great lands.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
20-30	Instead of opening the road, please restore it to the natural slope. This area is too important to wildlife to re-open it, especially in this time of the 6th extinction event.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
21-31	As a reserve Deputy Sheriff for Boundary County, I feel that Alternative #4 would be most beneficial. It would make search and rescue, as well as back country patrols easier and more effective. I also, that being said, feel that public access would enhance the job of the USBP, i.e. more eyes. The job of our USBP agents is stymied by limited access along our rugged border.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
21-45	I think the Alternative 4 Blue Grass BMU West-East open access is a great idea. The open road stays on the edge of the grizzly bear protection area while giving the people the access to this beautiful mountain area once again. So many people have commented about what a shame it is that the road was closed years ago and	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	closing off the opportunity for the next generation to see it. I truly hope this road gets opening again so the public can enjoy all the waterfalls and natural habitat of north Idaho.		
22-32	Prefer Alt #4 with some changes. Leave 2464U [Upper] seasonally restricted for use by the [illegible] cattle [illegible] end). Remove south sections of 2253 ([illegible] creek south) to increase acres lost from open 2464 upper.	Chapter 2 – Range of Alternatives	This alternative suggestion is analyzed in the FEIS in Alternative 4 Modified. See response to Comment #104-206.
22-33	Consider storing roads to minimum rather than obliterating, especially [illegible] of mine. Save money, may want to use after 10 years. Many of the roads scheduled for closure are grown in and not passable anyway!	Chapter 2 – Range of Alternatives	See response to Comment #101-176.
23-34	Alternative 4 should be implemented to provide access to lands previously accessible to lifetime residents before outside interest locked us out.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
23-35	The scope of this project should be expanded to include all gated forest service roads.	Chapter 1 – Section 1.3 Purpose and Need	Considering open motorized access on all gated Forest Service roads is not required to satisfy the purpose of and need for the project and is outside the relevant area of analysis.
23-36	public notice must have been completed by a forest service employee, as it was not put out in an effective manner. I only heard about by the local pawn shop owner.	General – Public Involvement	Thank you for your comment. The availability of the DEIS, the public comment period, and the public meeting schedule were noticed in multiple venues, including publication of the DEIS Notice of Availability in the Federal Register and newspaper of record ( <i>Coeur d'Alene Press</i> ), publication of documents and project updates on the project website, and notification of interested parties via email and/or mail.
24-37	Alternative 4 is the plan that would put the public land back to public use. I would love to be able to hunt, fish and enjoy the land again. it would give us back access to priest lake area that we haven't been allowed to drive on since 1980. i would love to show my grandson this beautiful area.thank you for your time.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
25-38	I have been a part owner of the Idaho Continental Mine Since 1971. It is a shame to see the situation that have evolved over time to bring us to this point. No [illegible]. After reading the alternatives, I support Alt #4. This would benefit the situation in my opinion for you and the in-holders as well as Boundary County, Kootenai Tribe, Border Patrol, Idaho Continental Mine, [illegible] livestock, others and the public.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
26-39	The access to our property will be directly impacted by the decisions to be made on the Bog Creek Road Project. All parties involved must understand there are	Chapter 3 – Section 3.8	The Forest Service decision-maker determines what constitutes reasonable access. Reasonable

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>two basic premises which are unacceptable to CLI ownership, we will not be limited to a certain number of administrative use trips and we will not be limited to access via the west through the Priest Lake Ranger District to our property. CLI supports Alternative #4, which provides for an open road unrestricted to the public from both the West and East sides to the Bog Creek road. There are no other current alternatives offered that would meet CLI's needs.</p> <p>It would appear there may well have been other alternatives that could have provided the Border Patrol (DHS), CLI, and other administrative user groups their necessary access without compromising grizzly bear security. We would appreciate the agencies keeping CLI apprised of the progress of this project, the time deadlines for decisions, and if there are any amendments made to the alternatives.</p>	Recreation and Access	access (as required by Alaska National Interest Lands Conservation Act) is being provided to the private inholding under all alternatives analyzed in the EIS. Access authorizations must be conditioned to ensure that the use and occupancy of federal lands for access purposes is exercised in a manner that complies with all applicable laws and regulations, including the Endangered Species Act (ESA). EIS Section 3.8.3.3 has been revised to reflect the decision-making process.
26-40	[We would like to take this opportunity to point out an incorrect statement in Appendix "D" ---- The original access to the Continental Mine was never via the Lime Creek Road. I'm not sure how anyone could have determined, assumed, or imagined that this was the case, but it is definitely not true. Albert Klockmann and some of his early miner associates made their early exploration trips by boating up Priest Lake and Upper Priest Lake and hiked various old trails up Lime Creek, but long before there was ever any type of road in the Lime Creek area. The original and subsequently used access while the Continental Mine was being developed and actively mined was via the Boundary Creek Road. It was laid out, designed and constructed by engineers hired by Mr. Klockmann.]	Appendix D – Past, Ongoing, and Reasonably Foreseeable Future Activities	Thank you for the information regarding the Continental Mine. The incorrect statement about Lime Creek Road was removed from the document.
27-41	The Kootenai Tribal Council appreciates the opportunity to provide both public comments and government-to-government dialogue concerning the Bog Creek Road Project DEIS. The issues raised in the DEIS are complex and require additional time for review, analysis and discussion than allowed by the 30-day comment period. The KTOI respectfully requests the USFS and USCBP extend the comment period an additional 45-days to ensure a full opportunity for public comment. The Tribe also requests ongoing G2G throughout the project's environmental analysis, decision making and implementation.	General – Public Comment Period Extension	Thank you for your interest in the Bog Creek Road Project EIS. The Forest Service and CBP received several requests for a public comment period extension during the initial 45-day comment period. After reviewing the requests, the Forest Service and CBP granted a 15-day extension. The full 60-day comment period ran from June 1, 2018, to July 31, 2018. Regarding government-to-government consultation see response to Comment #104-186.
28-42	The City of Bonners Ferry is requesting that the comment period for the Bog Creek Draft Environmental Impact Statement be extended for a minimum of 45 days beyond the current July 16, 2018 deadline. The Bog Creek Road Project is important for our community, and we need additional time beyond the 30 day comment period to adequately analyze the alternatives and make comment on them.	General – Public Comment Period Extension	Thank you for your interest in the Bog Creek Road Project EIS. The Forest Service and CBP received several requests for a public comment period extension during the initial 45-day comment period. After reviewing the requests, the Forest Service and CBP granted a 15-day extension. The full 60-day comment period ran from June 1, 2018, to July 31, 2018.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
29-43	Boundary County Commissioners made a motion on July 2, 2018, to request a 45-day extension of time to comment on the Bog Creek EIS. This request is to allow us and our other partners the time to fully analyze the alternatives and allow the Forest Service time to respond to our request for impacts regarding a discussed amendment to an alternative. This EIS and its alternatives are complex and extremely important to the citizens of Boundary County. Therefore, we ask that this extension be granted.	General – Public Comment Period Extension	Thank you for your interest in the Bog Creek Road Project EIS. The Forest Service and CBP received several requests for a public comment period extension during the initial 45-day comment period. After reviewing the requests, the Forest Service and CBP granted a 15-day extension. The full 60-day comment period ran from June 1, 2018, to July 31, 2018.
30-44	Prefer No Action which alter. #4	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
32-46	Well the US Forest Service and/or BLM are at it again, trying to deny access to our forests by closing more roads. This time it's 26 miles of roads off Bog Creek Road. Many times not even Border Patrol has access through these locked gates. So the forest service commits to atrocities: 1) Deny citizens access to our forests in the name of some type of wildlife 2.) Leave our borders wide open for illegals to come across affecting our nation's security. So the story plays out over and over again. So I say NO to decommissioning more roads, including these 26 miles. Leave Bog Creek Road as it is and turn lands within Idaho back to Idaho. There are so few people who would even be on this land that the wild animals are safe to live in peace. Plus, if the roads are kept, there's that better chance if a fire were to break out, just maybe a fire truck could get back in there and put out the fire, since we know what a poor job the US Forest Service does about maintaining our forests. If they really cared about the wildlife, they would thin the trees and underbrush instead of making it a keg ready to blow. Please leave all roads in place, clean the forest debris where needed and unlock the gates for all to enjoy our forests.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
33-47	I am writing to support Alternative 3 Modified Proposed Action for the Bog Creek Road Project Draft EIS.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
33-48	FSR 1013 in Bog Creek has not received motorized use in many years, and opening it to such use will be detrimental to the quality and security of the Blue-Grass BMU. Many of the road segments proposed for decommissioning in Alternative 2 Proposed Action to bring the BMU up to standard and offset the new use on FSR 1013 are currently not drivable due to conditions. Therefore decommissioning them does not truly offset the increased traffic use the BMU will receive when FSR 1013 is opened. However, it is proposed in Alternative 3 to decommission the southern segment of FSR 636 in Upper Grass Creek. This road does currently receive traffic use. Removing it as well as FSR 2464 from the	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #58-113.



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	system would largely compensate for the increased traffic the BMU will receive when FSR 1013 is opened. It would also consolidate core habitat in an area that is regularly used by bears, grizzly and black. Eliminating vehicle use here reduces the odds of human/bear encounters and conflicts. This more genuinely offsets the increased risk of conflict created by opening FSR 1013. Both Alternatives 2 and 3 propose managing FSR 1009 as seasonally restricted access, which is an excellent idea, further contributing to the security of the BMU. To open FSR 1009 to public use as proposed in Alternative 4 would certainly be detrimental to the quality of habitat within the BMU by increasing human activity, motorized and non-motorized, well into the BMU, and unnecessarily increase the risk of human/bear conflict.		
33-49	Alternative 3 is the most sensible proposal to improve the quality of core grizzly bear habitat within the Blue-Grass BMU and further the protection and recovery of this threatened species, while still providing improved access for law enforcement.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
34-50	I want to express my support for Alternative 3 Modified Proposed Action for the Bog Creek Road Draft EIS. I believe this alternative goes the greatest distance to both encourage the recovery of the grizzly bear and to enhance the security of the international boundary in Boundary County, Idaho. The defacto closure of the Bog Creek Road has been a boon to bear habitat, and opening it will be a loss. But closing the Upper Grass Creek drainage (roads 636 and all of 2464) would be good compensation, possibly over time resulting in a better situation for bears.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
34-51	Alternatives 2 and 4, while perhaps following the letter of the law, devote too little and too low quality protection for bear recovery. Recovering the grizzly is a goal virtually all sides share; alternatives 2 and 4 do more to keep the bear somewhat protected but listed, not recovered.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
34-52	Alternative 4, in particular, virtually bisects quality bear habitat east to west, limiting genetic diversity encouraged by grizzlies moving north and south through the Selkirks. Additionally, this alternative would complicated Border Patrol's mandate, effectively making the border less secure.	General Opposition – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process. See also response to Comment #5-9.
34-53	I believe the goals of recovering the grizzly bear and making the international line more secure are both highly desirable and not mutually exclusive, and that alternative 3 does by far the best job of moving toward accomplishing both. Please note that this infers both Border Patrol and the Forest Service communicate well and abide by each other's management actions. This should include greater use of interagency law enforcement cooperation.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
35-54	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
36-55	We are one of the families who own the Continental Lands, Inc. property and our access could be directly impacted by the decisions to be made on the Bog Creek Road Project. We support Alternative #4, which provides for an open road access unrestricted to the public through the Bog Creek road corridor from both the East and West. There are no other current alternatives offered that provide the same access parameters as does Alternative #4.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
36-56	We would appreciate the government agencies keeping us apprised of the progress of this project, the time deadlines for decisions, and if there are any amendments or modifications proposed to the alternatives. We would like to request an "interested party status" on any and all objections, should any objections be filed on this project. This issue and project are very important to us and we would like to be included in any objection process by possible opponents.	Consultation and Coordination	Thank you for your interest in the project. The agencies acknowledge your request and look forward to continued dialogue regarding this project.
36-57	I have worked with the management regulations of grizzly bears in the Selkirks and two other ecosystems for over 40 years in my profession as a forester with the forest products industry. As well, I have recreated with my family in grizzly habitat over the same time period having numerous opportunities to witness these bears in all sorts of situations. I firmly believe we can allow human activity to the level allowed under alternative #4, without negative impacts on the grizzly bear. The USFS, USFWS, and DHS could develop a very positive public image and reverse many years of negativity from the local citizens by allowing open access via the Bog Creek Road between the two Idaho Panhandle N.F. Ranger Districts, as well as serve the security needs by the Border Patrol.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
37-58	As family members of one of the owners of Continental Lands, we are in favor of reasonable access to the Continental Mine property from the Bonners Ferry side of the Selkirk Mountains. Alternative 1 and 4 are the only proposed actions that provide reasonable access to the Continental Mine property without a several hour drive through Priest River. The Alaska National Interest Lands Conservation Act (ANILCA) states that owners of non-Federal Land within the National Forest System shall be provided with adequate and reasonable access to their land	Chapter 3 – Section 3.8 Recreation and Access	See response to Comment #26-39.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	(Section 1323 (a)). Reasonable access for owners and their families that live in Boundary County is through Grass Creek from the east.		
37-59	As avid outdoorsmen, we are in favor of Alternative 4 to allow more access to the National Forest for us and everyone else.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
37-60	We realize that national security and grizzly bear core habitat are top priority for the Bog Creek Road project. However, please consider reasonable access for Continental Land owners and their families along with other administrative users in whichever alternative action you choose.	Chapter 3 – Section 3.8 Recreation and Access	See response to Comment #26-39.
38-61	I oppose the plan to build a road at Bob's Creek!! Stop destroying our wildlands!!	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
39-62	I write to you today in opposition of the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeatedly shown that building roads in grizzly bear habitat is extremely detrimental to the grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
40-63	I oppose the plan to build the Bog Creek road because this road would be located in prime grizzly bear habitat. Studies have repeatedly shown that building roads in grizzly bear habitat is extremely detrimental to a healthy grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads literally equals fewer grizzly bears. Bears generally tend to avoid habitats with roads through them, and further, roads invite poachers into the habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek, or a road there for any reason, as the consequent construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
41-64	I oppose your decision to build your Bog Creek road. It is prime Grizzle bear habitat.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
42-65	I write to oppose the building of Bog Creek Road which is located in important grizzly bear habitat. Recent studies have shown how important roadless areas are for grizzly bears. Bears avoid areas with roads in them. Further, roads invite poachers and hunters into habitat, which puts grizzly bears at risk. In addition, the construction of this road and deconstruction of other roads would be incredibly disruption to the recovering grizzly bear population in the area. For the foregoing reasons, I ask that the road not be built.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See also response to Comment #7-12. These effects are disclosed in Section 3.2.5 of the EIS.
43-66	I oppose the building of a road, any road, in prime Grizzly Bear habitat. Please reconsider this flawed plan. Sincerely Jeffrey	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
44-67	I oppose any development that expands into grizzly bear habitat.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
45-68	Please accept my objection to the proposal to build the Bog Creek road through the wilderness area that is a major habitat for grizzly bears. Grizzly bear populations are in a fragile condition and need as much support as possible. Where roads are built, it has been proven (University of Alberta, Clayton Lamb) that grizzly populations are reduced in number, partly due to increasing the accessibility for poachers and illegal hunting, but also as grizzly bears tend to keep out of areas with roads, thus reducing their area to roam. Please reject this plan and maintain the grizzly habitat as it is.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
46-69	Open the road to all! Alternative choice # 4.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
47-70	This alternative [Alternative 1] is the preferred option for us, as it does not impact our current grazing operation that we have adapted to. It also avoids possible conflicts with increased vehicular traffic but is less likely to be acceptable to the other parties involved. It does allow us to achieve a wide dispersal of cattle on the allotment by easy, quick access to multiple salting locations in the upper end of Grass Creek. This allows us to complete our monthly salting operations and check on the cattle in a one-day period when time is in short supply.	Other Issues – Grazing Access	The FEIS has been revised to include discussion and analysis of grazing permittee access in Section 3.8, Recreation and Access. The proposed action and alternatives are evaluated relative to impacts to future access to grazing permit areas in the Blue-Grass Bear Management Unit (BMU).
47-71	Alternative 2 – Proposed Action This alternative has less impact on our grazing operation than Alternatives 3 and 4. We would still be able to access the upper end of Grass Creek for quick access for most salting sites and cattle removal but would have to pack the 50lb blocks of salt almost 2 miles to the Search Creek site on the upper 2464 Rd and 1 mile to another site halfway to Search Creek on the upper 2464 Rd. We would also have	Other Issues – Grazing Access	Thank you for your comment. The information in this comment will be considered by the decision-makers during the decision process. See response to Comment #104-206 regarding the request for alternative modification. The request is covered under that alternative suggestion.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>to pack in salt 3 miles to a salting site at the obliterated section between the upper and lower 2464 Rd. Access to these sites would require an overnight campout in Grass Creek or an extra 100-mile round trip to Grass Creek each month.</p> <p>We would propose modifying Alternative 2 by the following actions:</p> <ol style="list-style-type: none"> <li>1) Only close the 2464 Rd to motorized access between Search Creek and Marsh Creek, as it is already impassable.</li> <li>2) Close the 2253 Rd from Marsh Creek south to its end, as this section is also practically impassable.</li> </ol>		
47-72	<p>Alternative 3 – Modified Proposed Action</p> <p>This alternative severely impacts our ability to disperse the cattle evenly over the allotment through a salting program, creating a hardship for us and possibly leading to some resource damage. It would be time consuming and require us to pack 350lbs of salt up to 7 miles each month along roads that will eventually become blocked with brush and windfall trees. It would also make cattle removal in the fall much more time consuming. Our current procedure involves driving to areas of fresh cattle sign and calling them out of the brush, making sure they are paired up, giving them a taste of 3rd cutting alfalfa, and heading for home. With all gates being open, contacted cattle are usually out of the mountains within 3 days.</p>	Other Issues – Grazing Access	Thank you for your comment. The information in this comment will be considered by the decision-makers during the decision process.
47-73	<p>Alternative 4 – Blue Grass BMU West-East Open Access</p> <p>We foresee some potential problems with year-round public access on the 1009 and 636 Roads. Most Americans are at least 3 generations removed from the farming and ranching businesses. They may stop to take pictures of wildlife, but domestic animals on the road are simply viewed as an impediment to getting to a destination without delay. Driving through cattle on a narrow mountain road takes patients and understanding. A motorist must slow down and approach the cattle cautiously and quietly, off to one side of the road and silence all barking dogs and loud children. They should never use the horn or siren or try to outrun them as I have witnessed previously. At night, a running calf will see its shadow on the brush running beside it from the vehicle's headlights, and it will jump to the other side of the road, where it again sees its shadow, causing it to jump back in front of the vehicle. We have had animals killed, injured, and stampeded for miles by vehicle traffic. Gates that are closed must be reclosed after passing through to hold cattle on the allotment. The general public views gates as a nuisance and will either intentionally or unintentionally leave the gates open. A year-round open road will probably encourage more camping in Grass Creek. People who insist on camping with guns and free running guard dogs can be a problem for wildlife and cattle. We have had a cow shot by a camper at night because he thought it was a bear approaching him in the dark. After the first week of August through late summer, the potential for fires started by campfires is also greatly increased.</p>	Other Issues – Grazing Access	Thank you for your comment. The information in this comment will be considered by the decision-makers during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>The time when conflict between cattle and the general public is greatest is in early July when the cows are entering or have just entered the allotment and after mid-August through September when they are drifting back to the lower end of the drainage and up against the gates while leaving or preparing to leave the allotment. There is a window of opportunity for the general public to have open access on this proposed route between July 16 and August 7 if the cattle are kept well-dispersed in the upper end of the allotment. After October 7, when all cattle are usually safely home, the road could be opened for general public access during hunting and wood gathering season, when the danger of wildfire is low, until snowfall closes the road.</p>		
47-74	<p>Our national forests were founded and have been managed on the concept of multiple use. We support that concept. To help accomplish this, we would support Alternative 2 if our previously mentioned modifications are accepted. Those modifications would allow us to also support some limited public access between July 16 and August 7 and again after October 7.</p>	General Support – Alternative 2	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
48-75	<p>The interests of wildlife, wild areas and border security are best served by not opening the Bog Creek Road. The earth is in the 6th large scale extinction event, conserving wildlife must be top priority. This must be addressed through aggressive rewilding / restoration of habitat, including road removal and re-contouring, and replanting. The proposal to open this road is an access convenience issue, is contrary to the Desired Future Conditions for the Priest Lake Geographic Area and is a violation of the Endangered Species Act.</p>	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process. See also response to Comment #5-9.
48-76	<p>The area is ecologically important, has a complete representation of species native to the Selkirk Mountains, including 4 ESA listed species; mountain caribou, grizzly bear, lynx and bull trout. It will be the last cold climate refugia to persist in the US Selkirks during this rapid climate change event. This area is too sensitive to re-open. The IPNF Forest Plan (page 93) desired condition states: GA-DC-VEG-PR-02. The Upper Priest and Upper Granite Creek areas are the most diverse in the IPNF from an ecosystem and species standpoint. These areas are within the desired conditions that are shown in figures 2 and 3 and continue to provide high ecological integrity. All alternatives in this dEIS proposal are counter to the desired future condition of the Priest Lake Geographic Area and will decrease the ecological integrity of the area.</p>	Other Issues – Forest Plan	<p>The EIS discusses Forest Plan (Forest Service 2015a) desired conditions in the various resource sections throughout the EIS. This will be added to Table 3.2.10 for the Priest Lake Geographic Area (GA): “GA-DC-VEG-PR-02. The Upper Priest and Upper Granite Creek areas are the most diverse in the IPNF from an ecosystem and species standpoint. These areas are within the desired conditions that are shown in figures 2 and 3 [regarding desired and future forest composition and structure] and continue to provide high ecological integrity.”</p> <p>Forest Plan figures 2 and 3 (page 12 of the IPNF Forest Plan) refer to desired and future forest composition and structure. The alternatives analyzed in this EIS propose modifications to existing roads but no timber management activities. The information presented in the comment will be</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
48-77	<p>All alternatives will negatively affect Malcom and Bog Creeks and the wildlife associated with them. The Malcolm Creek – Bog Creek headwaters are either connected directly or separated by less than 0.1 miles of almost flat bottom terrain. Along with the McArthur Lake area, they provide important headwater connectivity between the Pend Oreille River and the Kootenai River. Relatively low elevation headwater connectivity provides migration routes for amphibians and other species between watersheds. The headwaters, wetland complex offers non denning season habitat for the Grizzly Bear. Most components are within a 500 meter buffer of the Bog Creek road, outside of grizzly core. Use of the road, even administrative use will cause displacement of grizzly bears from an important habitat complex. The habitat complex, located adjacent to the Bog Creek Road, could be added to existing core areas, providing higher habitat quality than the side roads that the project proposes to close. This would potentially aid in grizzly recovery. Instead CBP would like to remove 41% of available wetland habitat in the Blue-Grass Bear Unit from use by grizzly bears. The maps in appendix 1 show that using NHD wetland maps results in an underestimation of the extent of the wetland complex especially on the Bog Creek (eastern) side. As one can see there are extensive wetland components on the north side of the riparian area.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>considered by the decision-makers during the decision process.</p> <p>The EIS used National Hydrography Dataset–mapped wetlands plus those wetlands field-identified during the 2014 field survey of Bog Creek Road. The commenter’s wetland mapping provided in Image 1 (assumed generated from aerial imagery) of Comment Letter #48 was added to the acres of Blue-Grass BMU mapped wetlands in the EIS analysis.</p>
48-78	<p>Core fragments may not be suitable for use by grizzly bear and should be discounted deferring to the bear's needs and not human access wants. Wakkinen and Kasworm (1997) suggest minimum core polygon sizes but their sample size was inadequate to make a determination: “Our attempt at identifying a useful minimum core polygon size was hampered by small sample sizes. We suggest that if a minimum size occurs, it is likely between 2 mi<sup>2</sup> and 8 mi<sup>2</sup>. Furthermore we believe that narrow strips of core habitat that may fit some minimum size criteria likely will not provide effective core habitat for bears.” and “larger blocks of core are likely beneficial to bears. All habitat greater than 0.31 mi from an open or gated road was considered core habitat in this analysis. Our attempt at identifying a useful minimum core polygon size was hampered by small sample sizes. We suggest that if a minimum size occurs, it is likely between 2 to 8 square miles. Furthermore we believe that narrow strips of core habitat that may fit some minimum size criteria likely will not provide effective core habitat for bears.” Importantly, 89% of locations of female bears were in core areas greater than 4 square miles: “Ninety-four percent of locations from female bears were in core polygons greater than 3.0 mi<sup>2</sup> and 89% of locations occurred in polygons greater than 4.0 mi<sup>2</sup>” Craighead et al (2005) also utilized 10 sq Kilometers (3.86) as a minimum size to be considered good core habitat. “Habitat quality adjacent to the road, as rated by the Habitat Effectiveness model and distance to “good” habitat,</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>See definition of core area on page 5 of the FEIS. Added to this: “(See also Allen et al. 2011:16–21 for a detailed evaluation of core area block size.)” Added to page 5, Table 1.2.1, Notes, at the end of Core Area: “Please refer to Allen et al. 2011 for a detailed evaluation of minimum core block size.” Added to Section 3.2.5.3, long term effects to grizzly bear per alternative, a disclosure of core area block sizes and this clarification: As discussed in detail in Allen et al. 2011:16–21, “There is currently no biological basis to discount or ignore smaller blocks of core.”</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>[which is] considered to be 10 km<sup>2</sup> of core area," Craighead et al, 2005. For the existing condition there are several core fragments totaling approximately 0.9 sq miles, shown in Exhibit 1 [NOTE: See Comment Letter for Exhibit], that propagate through the proposed action and some of the other alternatives. Since these core fragments by definition are not functional they should not contribute to core habitat calculations. Removal of these fragments would bring core calculations from 55.17% for the proposed alternative to about 54%, the BMU not meeting the 55% requirement and violating the Access Amendment and ESA. Wakinen and Kasworm also state that: "Furthermore we believe that narrow strips of core habitat that may fit some minimum size criteria likely will not provide effective core habitat for bears." Exhibit 2 [NOTE: See Comment Letter for Exhibit] for the proposed action, located in the Appendix, shows a core "peninsula" that may not be contributing to core habitat, further reducing core below the 55% threshold.</p>		
48-79	<p>The commentors question the accuracy of the areal calculations. As a professional Geospatial Analyst and Wildlife Biologist, It is doubtful that calculation of the BMU area and derived core percentages can be accurate to 1/100th of a percent (55.17%), or possibly even one tenth of a percent considering polygon surface area error. This is giving a false impression of accuracy to the general public. Please disclose the surface (horizontal and vertical) error ranges of all datasets used in analysis. A useful tool for assessing accuracy is located in the data viewer extension of ArcMap (<a href="http://desktop.arcgis.com/en/arcmap/latest/extensions/data-reviewer/what-is-positionalaccuracyassessment.htm">http://desktop.arcgis.com/en/arcmap/latest/extensions/data-reviewer/what-is-positionalaccuracyassessment.htm</a>). Surface are errors can be determined by using the following formula "Total surface area error, E, is therefore expressed as a combination of total measurable uncertainty, E1, along with potential variability error, E2. Total measurable uncertainty, E1, is defined by Carisio (2012) as: <math>E1 = \text{Sqrt}(Ai) * (p + u) * \text{Sqrt}(2)</math>" Retrieved from <a href="https://gis.stackexchange.com/questions/231977/how-do-i-calculate-area-errorprobability-of-a-polygon-with-knowledge-of-point-e">https://gis.stackexchange.com/questions/231977/how-do-i-calculate-area-errorprobability-of-a-polygon-with-knowledge-of-point-e</a></p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	All calculations in the EIS currently disclosed to the 1/100s were revised to the 1/10s. A footnote will be added to the FEIS Chapter 2 and 3 Introductions to clarify that "All GIS calculations included in this FEIS are subject to surface area (horizontal and vertical) calculation error."
48-80	<p>Lack of information on logging schedules, road building and development in adjacent BC and Idaho Department of Lands property which would displace bears in the Blue Grass GBMU will result in further reductions to core habitat.</p> <p>There are potential activities from logging and roadbuilding that were not taken account as reasonably foreseeable actions at a quantitative level. For lands adjacent to the Blue Grass Bear Unit on IDL and in British Columbia, areas that could be roaded and logged should be buffered 500 meters (see Exhibit 3) [NOTE: See Comment Letter for Exhibit], the same way lad was buffered for Hancock property holdings were buffered on the eastern edge of the bear unit. The dEIS has presented no schedule of logging, roadbuilding or development for a 10 year period, therefore all areas must be assumed that disturbance would occur in the 10 year period. Exhibit 3 shows a map of the Existing Condition and areas that</p>	Chapter 3 – Section 3.2 T&E Cumulative Impacts	All known motorized routes have been buffered out of the core area. If motorized activity occurs on British Columbia or Idaho Department of Lands lands not currently buffered out of the core area in the future, then at that time, the IPNF would evaluate approaches to ensure that the core area standard (55%) for the Blue-Grass BMU is maintained.



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>should be buffered inward, because activities on these areas are reasonably foreseeable and not disclosed, further reducing core habitat. Please disclose the following: - all proposed activities for a 10 year period on IDL and British Columbia lands that would cause displacement in the Blue-Grass Bear Unit. -all agreements between IDL and the USFS and British Columbia and the USFS that would show coordination of activities that would affect the bear unit. If this information is not available and agreements to timing of activities put in place, the core habitat deduction has to be taken.</p>		
48-81	<p>The agency should defer to the high value of the area to grizzly bears and take a deduction to core habitat for moderate use trails that almost meets high use criteria of 20 parties per week. "The non-motorized Upper Priest River and Continental Creek Trails are currently being monitored for consideration as "high-use" trails. "High-use" trails are those trails that receive an average of more than 20 parties per week. Currently, the Upper Priest River and Continental Creek Trails have up to 16 parties per week during the busy summer season." dEIS p 260. Trail use of both the Upper Priest and Continental Creek Trails would increase under some of the proposed alternatives because of generally increasing population. White et al (2018) projects hiking based recreation to increase by 30% nationally by 2030. "Hiking is the most popular single backcountry activity with 33 percent adult participation in 2008. By 2030, the participation rate is projected to increase about three percent with the number of projected participants exceeding 100 million. Total days of hiking are projected to increase by about 33 percent, which is slightly more than participation (30 percent). The increase in hiking days is among the highest for all activity groups." White et al, 2014 p8 Assuming a 30 percent increase in use applies to these currently moderately used trails, use would be projected to increase to 20.8 percent. They would become high use trails. Because of this likelihood of trail use to increase within a 10 year time frame, the trails should be buffered and a core area deduction should be used, deferring to the needs of the bear and not the wants of CBP to push the project through.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>See Table 3.2.33 discussion regarding high-use trails. If, in the future, these trails are observed to have high use, then at that time, the Forest Service would evaluate approaches to ensure that the core area standard (55%) for the Blue-Grass BMU is maintained.</p>
48-82	<p>A permit system must be implemented to keep use levels well below 20 parties per week. "Outdoor recreation is the fastest growing use within the national forests and grasslands; a use expected to increase in the future." IPNF EIS p432 The dEIS analysis ignores the potential core reduction from increasing trail use and will "just let it happen" in order to push the project through. "With a reduction in core area, the adjacent BMUs would still be expected to meet their core area standards, but the Blue-Grass BMU may not, depending upon which segment(s) of trail incur high-use and which alternative is chosen for implementation. If this situation occurs, the Forest Service would then evaluate approaches to ensure that the 55 percent core area standard for the Blue-Grass BMU is maintained.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>See responses to Comments #48-80 and #48-81. All known motorized routes have been buffered out of core area. If, in the future, additional motorized routes or high-use trails would affect the core area available within the Blue-Grass BMU, then the Forest Service would be required under the <i>Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones</i> (Forest Service 2011a; herein called the Access Amendment) to</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>No further evaluation related to this potential shift in core area from high-use trails is included in this DEIS." dEIS D-2 Core areas are supposed to remain stable over a 10 year period. Because of the likelihood of these trails to increase from medium to high use within the 10 year grizzly core habitat guidelines, the USFS and CAP must consider these trails as high use and remove them and remove their buffer as core habitat. In order to justify not deducting these trails from core habitat, the USFS and CAP should implement a permit system to keep weekly use well below the 20 party limit. Not implementing trail use limits by permitting would further reduce core habitat below the 55% minimum, violating the Access Amendment and the ESA. Additionally there is a high recreation use area at Boundary Lake, BC, only 1 mile north of the Bog Creek Road that should be taken account for in the analysis along with all projects in adjacent British Columbia that involve road construction, logging, recreation or national security issues. Emphasizing the importance of not opening this road, as it is on the other side of a major mountain which would act as a barrier from activity. [NOTE: See comment letter for figures] Figure 1, Boundary Lake BC, an area of high recreational use (downloaded from Google Earth).</p>		<p>evaluate approaches at that time to ensure that the core area standard (55%) is maintained.</p>
48-83	<p>Snowmobile Use in core habitat during the spring portion of the bear year further erodes core habitat calculations.</p> <p>There is documented off road snowmobile use after April 1 in the bear unit that likely impacts core habitat. Disturbing early emerging bears constitutes take under the ESA. Please disclose the following: -All snowmobile use monitoring, dates of monitoring, paths and play areas (eg, high marking areas) and snowmobile user names and organizations if possible for the Blue-Grass Bear Unit. -Specific to the Dept. of CBP, please disclose all snowmobile use and routes throughout the year and include gps tracks. -Specific to the Dept. of CBP, please indicate the availability of body camera footage and their use in the bear unit. -Please tie in snowmobile use level mapping with the Winter Recreation EA which is in progress. In conclusion, the core habitat calculations are poorly done, additional displacement from activities in adjacent lands are not taken into account, and late season winter rec or snowmobile use by CBP during the bear year is not accounted for. No alternatives meet the 55% core habitat requirement of the access amendment.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>All alternatives meet the 55% core area habitat requirement of the Access Amendment. If there are administrative snowmobiling trips during the active bear year (April 1 to November 15), then those would count toward the seasonal trip counts. No core calculation revision is necessary for emergency-related law enforcement snowmobiling. With the exception of designated snowmobile trails, the BMU (west of Forest Service Road [FSR] 2455) is closed to public snowmobiling April 1 through June 30. The Forest Service would not alter core area calculations for illegal snowmobiling. If illegal motorized trips are observed by the Agencies, they will be included in that year's open motorized route density (OMRD).</p>
48-84	<p>CBP use is erratic and has not been reported in the past. The Bog Creek road must be considered open because of the unpredictability of use levels by the CBP. In the past they have not reported use behind gates. They may have to access the area in excess of use limits to apprehend people illegally crossing the border. It is not believable that the CBP will report all activities to the USFS for gate monitoring purposes.</p>	<p>Other Issues – Motorized Use</p>	<p>CBP would have unlimited motorized use of the roads designated as "open to the public" or "administratively open." Under all action alternatives, CBP would have unlimited motorized access to Bog Creek Road. For all seasonally restricted roads, CBP would coordinate with the</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
48-85	Reconstructing the Bog Creek Road opens up additional routes for logging and mining, potentially increasing use of Highway 57 and associate roads from the border to Priest River and the proposed Newport Smelter. Reconstructing the Bog Creek Road opens up a direct route for log trucks from Blue Joe and Grass Creek to mills in Priest River. Reconstructing the Bog Creek Road opens up another direct route from the Continental Mine to the proposed Newport Smelter. There is no evidence that the proposed smelter will only be used for silicon. Both operations would drastically increase human presence and use levels through the bear unit and of Highway 57 to Priest River.	Other Issues – Cumulative Impacts	Forest Service on trip limitations and count trips. See also response to Comment #104-190.  See also response to Comment #48-80. In accordance with 36 CFR 220.3, reasonably foreseeable future actions are “those Federal or non-Federal activities not yet undertaken for which there are existing decisions, funding, or identified proposals.” Presently, there are no identified proposals for logging or mining within the Blue-Grass BMU.
48-86	Mining claims that may need access are not disclosed. Requesting access for mineral exploration is a reasonably foreseeable action. Please map and disclose all plans for mining exploration for at least a 10 year period in the bear unit. Because mining claim use is unpredictable, core habitat should be deducted around mining claims likely to be used in a 10 year time frame.	Other Issues – Mineral Resources	See also response to Comment #48-80. No logging or mining is reasonably foreseeable within the Blue-Grass BMU.
48-87	Riparian Area Avoidance Caused by Open Roads within 500 meters of a Stream. All alternatives will negatively impact grizzly bear access to year round wetland components in Bog Creek. Reconstruction of the Bog Creek Road will significantly impact wetland habitats used by grizzly bears. The dEIS states that 41% of wetlands in the Blue-Grass Bear Unit will be made unsuitable for use by the reconstruction. “There is a total of 200 acres of wet meadow/peatland habitat within the BMU. This is an important spring foraging habitat for grizzly bears, though this habitat is used throughout the active season. Of the 200 acres, 82 acres occur within 500 meters of existing open or seasonally restricted roads (not including Bog Creek Road since it is undrivable), resulting in 41 percent of existing habitats being subject to avoidance disturbance.” (Bog Creek Road Project dEIS, p 76) Riparian areas and wetlands are important components of grizzly bear habitat in the Selkirks. Depending on the alternative, this project will negatively impact 41% of wetland habitat necessary for grizzly bear persistence and recovery. All alternatives violate the ESA and the Access Management Design Elements in (Waakinin and Kasworm, 1997), “Previous research has shown that riparian areas are important to grizzly bears and generally provide more food and security than other cover types (Mealey et al. 1977; Mace and Jonkel 1979; Servheen 1983; Craighead 1982; Aune et al. 1984; Kasworm 1985; Almack 1986). In many cases, riparian areas run perpendicular to the linear arrangement of human developments along higher-order waterways, thus facilitating grizzly bear movement through developed areas.” (Servheen et al, 2001). “Road closures should consider adjacent habitat and prioritize high quality	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #104-196.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>areas. Consideration should be given to habitat quality in proximity to road closures. Certain types of habitat may not be sufficiently represented in all Bear Management Units and require additional protection (e.g., spring range or high quality foraging sites). Additional habitat analysis utilizing the radiolocation database could guide this process." Access Management Design Elements 7. Management Recommendations Waakinin and Kasworm (1997) The action alternatives violate the ESA and Forest Plan direction on wetland habitats for "associated species". "FW-DC-WL-11. A mosaic of aquatic and riparian habitats with a low level of disturbance is available for associated species." Bog Creek Road Project dEIS p90." Furthermore the dEIS does not have habitat components in the Blue-Grass Bear Unit mapped. There is no way to tell how much of each seasonal and year round habitat component are affected by this proposal. "When possible, core areas would be delineated by identifying and aggregating the full range of seasonal habitats that are available in the BMU. " Access Management Design Elements 1. Management Recommendations Waakinin and Kasworm (1997). Please map grizzly bear habitat components in the Blue-Grass Bear Unit and use changes to these components as part of effects analysis in the dEIS.</p>		
48-88	<p>The Bear Year should be extended from April 1 to March 15 to allow disturbance free use by early emerging grizzly bears. Early (pre April 1) emerging bears have been documented in the Selkirk Mountain Grizzly Bear Ecosystem. It is important to provide security habitat to the bears for all seasons. Allowing disturbance by snowmobiling from CBP or recreationists to early emerging bears is a violation of the ESA. "In 1993 and 1999, the USFWS found that reclassification from threatened to endangered in the Selkirk ecosystem was warranted due to existing threats to recovery." The USFWS found that the Selkirk Grizzly Bear population should be classified as endangered, but precluded by other priority species. Deference should be given to grizzly bear recovery and not to CBP wants. Extending the bear year to March 15 is already being done for the road into Hughes Meadow, a wetland complex. This extension needs to be applied to all bear units in the Selkirks. Failure to implement a spring extension and impacting the ability for bears to use 41% of the wetland habitat in the bear unit violates the following IPNF Forest Plan Desired Condition. "FW-DC-WL-04. All grizzly BMUs have low levels of disturbance to facilitate denning activities, spring use, limit displacement, and reduce human/bear conflicts and potential bear mortality. Spring, summer, and fall forage is available for the grizzly bear." Bog Creek Road Project dEIS p 90.</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	<p>Kasworm et al. (2018a, 2018b) indicate in the annual Selkirk and Cabinet-Yaak recovery area research and monitoring progress reports that the majority of den exits occur after April 1. Management within the Hughes-Sullivan BMU differs from the Blue-Grass BMU. See also response to Comment #104-196.</p> <p>Because of the many types of projects and activities that can occur over the life of the Forest Plan (Forest Service 2015a), it is not likely that a project or activity can maintain or contribute to the attainment of all goals and desired conditions, nor are all desired conditions relevant to every activity (i.e., recreation desired conditions may not be relevant to a fuels treatment project). Most projects and activities are developed specifically to maintain or move conditions toward one or more of the desired conditions of the Forest Plan. It should not be expected that each project or activity will contribute to all desired conditions in the Forest Plan, but usually to one or to a subset. To be consistent with the goals and desired conditions of the Forest Plan, a project or activity must be designed to meet one or more of the following</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>conditions:</p> <ol style="list-style-type: none"> <li>1. Maintain or make progress toward one or more of the desired conditions of the Forest Plan without adversely affecting progress toward, or maintenance of, other desired conditions; or</li> <li>2. Be neutral with regard to progress toward Forest Plan desired conditions; or</li> <li>3. Maintain or make progress toward one or more of the desired conditions over the long term, even if the project or activity would adversely affect progress toward or maintenance of one or more desired conditions in the short term; or</li> <li>4. Maintain or make progress toward one or more of the desired conditions over the long term, even if the project or activity would adversely affect progress toward other desired conditions in a minor way over the long term. Here, the desired condition to coordinate with the CBP on issues relating to national security along the northern international border of the United States and Canada (FW-DC-CC1-02) would be achieved, as well as the long-term recovery of ESA-listed species in the analysis area (FW-DC-WL-03 and FW-DC-WL-05), despite short-term adverse impacts.</li> </ol>
48-89	This project will increase human activity in the caribou recovery zone. Off trail snowmobiling by CBP and recreationists, legal or not will preclude caribou from occupying habitat necessary for their survival. Open roads will increase the risk for poaching and accidental shooting during hunting season. All alternatives would violate the ESA.	Chapter 3 – Section 3.2 T&E Caribou	<p>The EIS discloses the potential effects on caribou from CBP winter motorized patrol and public snowmobiling on designated trails. The agencies' effects analysis does not include analysis of illegal activities.</p> <p>See also Section 3.2.3.2, "Predation-caused mortality by mountain lions and wolves is considered to be one of the leading factors limiting woodland caribou recovery in the southern Selkirk population.[Mortality due to poaching or mistaken identity is not thought to be affecting the Selkirk caribou population.]"</p>
48-90	The dEIS discussed boreal toad breeding habitats but does not disclose where boreal toads are actually breeding. Please conduct a survey locating breeding	Chapter 3 – Wildlife	See Section 3.3.3.1 of the EIS; no western toads were observed during 2014 site-specific surveys. The disclosure and comparison between

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	ponds and number of boreal toads for this species and disclose site specific effects to breeding ponds.		alternatives of affected acres of western toad breeding habitat in Section 3.3.5 provides an effects comparison in this EIS.
48-91	Opening up roads will allow additional access for trappers to negatively affect these species. Please implement an area closure to trapping for marten, bobcat and beaver to protect the candidate and sensitive Wolverine, and sensitive fisher from incidental trapping. This can be required in the biological assessment or evaluation.	Chapter 3 – Section 3.2 T&E General	The Idaho Department of Fish and Game (IDFG) manages populations and hunting/trapping areas. The agencies would not implement an area trapping closure.
48-92	Are bull trout inhabiting Malcom Creek above the fish migration barrier or not? The dEIS states that: “On Malcom Creek, bull trout likely occur only as far upstream of the Upper Priest River as a documented fish migratory barrier, 1,200 feet upstream of the confluence with the Upper Priest River (Irving 1987; Fredericks et al. 2002; Forest Service 2014b).” Using the word “likely” indicates that bull trout may be present above the barrier but it is not known. Please conduct surveys to determine if bull trout occur in Malcom Creek above the fish barrier and modify the effects analysis if they are found.	Chapter 3 – Section 3.2 T&E Bull Trout	See also response to Comment #65-138. The Forest Service plans to conduct environmental DNA (eDNA) sampling for aquatic species in Malcom Creek.  Bull trout occupancy above the Malcom Creek migratory barrier has not been validated. According to Table 4 (page 27) in Irving (1987), the migratory barrier is 4,200 feet downstream of the Bog Creek Road corridor. Irving (1987:50) also says, “Bull trout were not found above barriers.” The upper end of bull trout designated critical habitat (DCH) (above the migratory barrier) is 2,500 feet downstream of the Bog Creek Road corridor. The EIS environmental consequences section (Section 3.2.5) discloses the potential effects on bull trout DCH (these are also “streams known to be occupied by bull trout,” according to the U.S. Fish and Wildlife Service [USFWS 2011c]). At some point in the future, surveys above the migratory barrier may be conducted, but until then, an effects disclosure is possible using the best available information.
48-93	Skade’s jumping-slug ( <i>Hemphillia skadei</i> ) A new species of jumping-slug has been found in North Idaho as part of the Multispecies Baseline Initiative project (Lucid et al, n.d). Although the status is unknown, the commentors are concerned that this species might be rare and need protection. The jumping-slug occurs in cold refugia of the Selkirks. The Bog Creek construction project, located on a northerly slope may meet criteria for use by this species. Please consider the species as sensitive until the status is better quantified and conduct surveys for this species in areas that will be disturbed or affected by the alternatives.	Chapter 3 – Section 3.3 Wildlife	This clarification: “Sensitive wildlife species are those species identified by the Regional Forester for which population viability is a concern (Forest Service 2011b)” was added to three places in the FEIS: start of Section 1.8.4.4 on page 13; end of second paragraph in Section 3.3.1 on page 177; and as a footnote to Table 3.3.7.  See also responses to Comments #88-151 and #89-159.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
48-94	<p>Suggested positive solutions to promote endangered species recovery, help rewind the area and maintain National Security:</p> <ol style="list-style-type: none"> <li>1. Implement an area closure to trapping to protect wolverine, lynx and fisher from incidental trapping and allow populations of martin and beaver to rebound.</li> <li>2. Recontour road segments shown in red and green on the map below to exclude atv's, and snowmobiles, and fix erosion problems. The exact locations to be determined. This will combine smaller core fragments and allow additional use of the Upper Priest River area. It would also provide for a continuous core habitat condition between the Salmo-Priest Wilderness on the west side of the Selkirks to Long Canyon and the Selkirk Crest to the south and east. This approach is directed by the IPNF Forest Plan for the Priest GA: GA-DC-WL-PR-01. NFS lands provide habitat conditions for wildlife movement, especially woodland caribou, throughout the Selkirk recovery zone. GA-DC-WL-PR-02. Low levels of human disturbance allows for denning activities of wide-ranging carnivores that are sensitive to human disturbance (e.g., grizzly bear). Areas with low levels of disturbance are available for use by woodland caribou throughout the year. GA-DC-WL-PR-03. Habitat conditions for wildlife movement on the divide between Idaho and Washington, from the Canadian border south are retained. The elimination of roads shown as red-green dashes in Map 1 below will reduce opportunities for illegal immigration and drug traffickers and reduce the workload of the CBP.</li> <li>3. Prohibit snowmobiling on Federal Lands 10 miles south of the US/Canada border, to reduce the potential for over the snow illegal immigration and drug trafficking. This would also contribute greatly to caribou recovery.</li> <li>4. Remove the two bridges providing access to Canada at Blue Joe Creek and Boundary Creek. This would further discourage illegal crossings.</li> <li>5. Eliminate the destructive cattle allotments in Grass Creek, part of the Blue Grass BMU.</li> <li>6. Use eminent domain to purchase the Continental Mine and turn the land back to USFS jurisdiction.</li> <li>7. There are plenty of options for the CBP to access the area, CBP can book hotels in Priest Lake and Bonners Ferry, or just use personnel from the Bonners Ferry side to patrol that portion of the border. It is better to inconvenience the CBP and reduce human use than to negatively affect the grizzly bear and the high ecological integrity of the area.</li> <li>8. Re-contour access road 1662 (to Hughes Meadows) and remove the two bridges crossing two bridges crossing the Hughes Fork. The horse access trailhead eyesore could be rebuilt at the Junction of 1662 and 1013. This would provide additional security habitat in the time of the 6th great extinction especially since the grizzly bear population in the Selkirks is not or barely recovering and Hughes Meadows is high quality year round grizzly bear habitat.</li> </ol>	Mitigation	Please see Table 2.3.1 in the FEIS regarding these alternative suggestions. Mitigations will also be developed with the USFWS as part of the Section 7 consultation process.
48-95	Alternative 4 is especially devastating to wildlife and would empower drug traffickers and illegal border crossings. In the past one commentator (Paul Sieracki)	General Opposition – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	has had the opportunity to drive the loop road proposed in alternative 4 (late 1980's). Political officials have in the past wanted this loop route opened for tourism opportunities. The author has been told that the Smith Creek road was built to high standards to accommodate a northern route just south of the US – Canada border (late 1980's). This desire is still alive among conservative Boundary County officials. It was a major victory for wildlife to close off this road during that time period and reduce human activity in grizzly bear habitat. Despite what the USFS and CBP state, fixing this road will result in increased and disturbance to wildlife and increased probability of drug trafficking and illegal border crossings and will violate the Endangered Species Act.		comment during the decision process. See also response to Comment #5-9.
49-96	Sent are these roads really needed? Our earth has been cut up in all directions. We Must stop this now. There are lesser and lesser animals left	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process. See also response to Comment #5-9.
50-97	I wish to go on record as opposed to the plan to build the Bog Creek road in the Selkirk Mountains of Idaho. This road will be located in prime grizzly bear habitat, and will likely have a deleterious effect not only on the bears but on the entire ecosystem of the area. Studies done have repeatedly shown that building roads through grizzly bear habitat is extremely detrimental to bear populations. A recent study done by Clayton Lamb, of the University of Alberta, Canada, demonstrated that more roads equals fewer grizzly bears. Bears tend to avoid habitats including roads, pushing them out of their lands and into possible conflict with humans. Further, the convenience of roads invites poachers into these habitats, putting the recovering grizzly bear population, as well as other wildlife, at risk. For these reasons, I oppose the construction of this "national security" road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
51-98	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
52-99	Instead of ruining the national treasure, we should be preserving it Don't you think that the wildlife has enough to cope with? So I therefore would like to say; I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.		
53-100	I oppose the plan to build the Bog Creek road. This road will be located in prime grizzly bear habitat. Studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. A recent study by Clayton Lamb, from the University of Alberta, demonstrated that more roads equals fewer grizzly bears. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. For these reasons, I oppose the construction of a national security road at Bog Creek. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
54-101	I would like #4 open the land to the public the way it belongs.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
55-102	Thank you for taking comments on the Bog Creek Road Project. I support Options 3 Alternative Proposed Action. It is the best option all; bears, Border Patrol and Forest Service.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
56-103	While we recognize and understand CBP's desire to open the Bog Creek and Blue Joe Creek roads to keep US borders safe, we have some concerns about the effects the proposal will have on endangered wildlife populations in this region, and their ability to access secure habitat and connect across large landscapes. The DEIS fails to present an alternative that meets the needs of wildlife in this way, and we believe that additional, stronger, mitigations must be developed to offset the impacts of the proposed road maintenance and increased use.	Chapter 3 – Section 3.2 T&E General	The No-Action Alternative (Alternative 1), Proposed Action (Alternative 2), and Alternative 3 provide secure habitat and habitat connectivity. Additional analyses have been added to the FEIS to supplement these disclosures. See also response to Comment #56-108.
56-104	It is important to create permeable boundaries in the Selkirk recovery zone to enable movement for species like caribou and grizzly bear in all directions, which provides connectivity to other populations, a critical element of grizzly1 and caribou2 recovery [NOTE: See comment letter for footnotes]. For this reason, we support the USFS in closing roads to meet Access Amendment standards in this BMU to provide secure habitat and travel corridors in this important area. While the proposed action alternatives "add" core habitat from an accounting standpoint, the DEIS should describe the condition and current use of each road proposed to be "added" to core. Many of the roads are already functioning as core habitat, and	Chapter 3 – Section 3.2 T&E Grizzly Bear	See also response to Comments #58-113 and #104-196. See also response to Comment #56-105 regarding Management Situation (MS) 1 and the alternatives' potential long-term effects on grizzly bear.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	labeling them as core does not change the amount of secure habitat on the ground. If this project is to move forward, it is necessary to truly mitigate for the impact of opening the Bog Creek and Blue Joe Creek roads. It is not enough to merely re-categorize overgrown roads that are currently functioning as secure habitat but not in the accounting system. A true compensation must be made by closing roads that are passable to motor vehicles and have some level of motorized use. Otherwise, while on paper the road closures appear to mitigate for effects, there is no net gain of secure habitat on the ground. The latter is what matters for wildlife. This reality is not clearly described in the DEIS, and therefore does not paint an accurate picture of the reality of the project on the ground.		
56-105	Because the Blue Grass BMU is designated Management Situation 1, it must be managed for grizzly bear as a priority, with a focus on habitat improvement and minimization of grizzly-human conflict. All management decisions must favor the needs of grizzly bears when grizzly bear habitat and other land use values compete. <sup>3</sup> In addition, data in the DEIS shows that this BMU contains high-quality habitat and secure areas that receive higher use by grizzly bears than other BMU's, and provide an important centrally located movement corridor within the recovery zone. <sup>4</sup> For this reason, we urge you to take extra care and precaution with this project to ensure that the existing levels of habitat and large-scale connectivity are maintained or improved. We are concerned that the proposed activities, specifically the increase in allowance of administrative use from "seasonally restricted" to "unrestricted" will harm genetic connectivity and north-south linkage in this important area over the long term. The DEIS acknowledges this as a likely outcome of implementing this project. <sup>5</sup> [NOTE: See comment letter for footnotes]	Chapter 3 – Section 3.2 T&E Grizzly Bear	Additional discussion regarding MS1 has been added to Section 3.2.3.1, with details from Interagency Grizzly Bear Committee 1986 guidelines. An MS1 assessment per alternative has been added to the grizzly bear discussion in Section 3.2.5.3. See also response to Comment #104-196.
56-106	In addition to grizzly bears, the South Selkirk Caribou herd is down to three known animals, and this area is in their habitat. <sup>6</sup> [NOTE: See comment letter for footnotes] The DEIS states that Caribou have been documented both historically and recently in this project area. <sup>7</sup> Because of their extremely precarious situation, we are concerned that this project is at risk of having significant impacts to the South Selkirk Caribou herd who are, at this time, functionally extinct. <sup>8</sup> We urge you to take every possible measure to protect these last three animals and maintain connectivity to their habitat in British Columbia.	Chapter 3 – Section 3.2 T&E Caribou	See pages 116, 117, 118, and 119 of the FEIS. See response to Comment #104-202.
56-107	For these reasons, while the DEIS attempts to provide on paper secure habitat for grizzly bear and caribou, none of the proposed alternatives adequately meet grizzly bear or caribou's need for secure habitat on the ground. The proposal threatens north-south connectivity in the Selkirk range by bisecting high value linkage areas. Loosening restrictions by opening these roads to unlimited administrative use and use by private landowners would cause an unnecessary	Chapter 3 – Section 3.2 T&E General	See response to Comment #56-103.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
56-108	<p>amount of disturbance on grizzly bears and caribou in this area, and the current proposal does not mitigate for this disturbance in an acceptable way.</p> <p>Of all the alternatives, the mitigations in Alternative 3 provide the best option for wildlife, however, as stated above they do not go far enough. We urge you to consider a new alternative, which could be based on Alternative 3, that adequately protects and/or enhances connectivity and linkage areas for grizzly bears and caribou. Components should include:</p> <p>Limit roads open for administrative access to “seasonally restricted,” meaning 57 trips or fewer per year. Adequately monitor and report on administrative use and compliance with these limitations.</p> <p>Permanently close and fully decommission roads in Upper Grass Creek and road 1388 on the Priest Lake side.</p> <p>Provide a description of each road proposed to be added to core, including the current condition and documented motorized use.</p> <p>Add roads to core that are currently open to motorized use, to create a true 1:1 compensation and increased core habitat.</p>	Chapter 2 – Range of Alternatives	<p>The Proposed Action presented during public scoping in May 2016 maintained the current Bog Creek Road and Blue Joe Creek Road seasonally restricted designations, limiting administrative motorized access to 57 trips per active bear year. The agencies determined that this designation would not allow CBP adequate access to the border to effectively conduct its statutory mission and thus it would not meet the project’s purpose and need as presented in Section 1.3 of the FEIS. In addition, the Forest Service determined that removing the seasonally restricted designation from Blue Joe Creek Road would trend toward meeting the Access Amendment standards and legal obligation to provide access to private property within the Blue-Grass BMU. Please refer to FEIS Sections 2.3 and 3.8.3.3 and 3.8.3.5 for additional discussion regarding the need for the proposed administrative open designation.</p> <p>Currently, the only open roads within the Blue Grass BMU are either encumbered by potential ANILCA (Alaska National Interest Lands Conservation Act) claims, legal agreements, or are necessary for CBP border access and, therefore, are not available for closure to all motorized use as requested by the commenter. As described in the Travel Analysis Process Report prepared by the Forest Service for this project (Forest Service 2016e), the Smith Creek/Saddle Pass route from the Westside Road (County Road 45) to the Canadian border (FSR 281/2454/1009/2455) is under permanent easement to Boundary County under the Boundary Creek Road settlement. Similarly, the lower portion of the road in the Blue Joe Creek drainage (FSR 2450) from the border to the FSR 1013 junction is also covered by this easement. The preferred route from the Saddle Pass route to a private inholding at the Continental</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>Mine in upper Blue Joe Creek (FSR 1009/636/1011/2546) has been used by the landowners to access their property. The currently open portion of FSR 1013 (south of the guardrail barrier) and the portion of FSR 2546 between the Bog Creek Road gate and the FSR 1011 junction is needed by CBP to complete their east-west patrol route. These road segments comprise the "green" open roads designation displayed in Figure 2.2.1 of the FEIS.</p> <p>The range of alternatives analyzed in the FEIS includes both closing to motorized use the roads in Upper Grass Creek (as a feature of Alternative 3) and closing to motorized use FSR 1388 (as a feature of Alternative 2). Compensating for the administrative open designation of Bog Creek Road and increasing core habitat is provided in Alternative 3 to the extent feasible by the proposed closure of roads in Upper Grass Creek.</p> <p>The alternative discussion in Chapter 2 includes tables that display the current conditions of roads proposed for closure by alternative (e.g., see Table 2.2.2). In addition, Figure 2.2.2 displays the current (2017) motorized use and current drivability conditions of roads within the Blue Grass BMU.</p> <p>When selecting a final alternative for implementation, the responsible official will have the ability to choose those features, from among the alternatives analyzed in detail, which best achieve the identified purpose and need while responding to the identified issues, and which comply with existing law and regulation, including closing or storing roads in Upper Grass Creek or FSR 1388. Therefore, considering a new alternative, which would include the requested features, would either not meet the identified purpose and need for the proposal (limiting CBP to 57 trips) or would not be substantially different than what has been included and analyzed in the existing range of alternatives. See also response to Comment #58-113.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
57-109	I completely oppose the plan to build the Bog Creek road – we must protect our environment and our wildlife. This road will be located in prime grizzly bear habitat. Please look at the facts – they really matter, studies have repeated shown that building roads in grizzly bear habitat is extremely detrimental to grizzly bear population. Bears also tend to avoid habitats with roads through them. Further, roads invite poachers into habitat, putting the recovering grizzly bear population and other wildlife at risk. The construction and use would be too disruptive to the grizzly bears in the region.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #7-12.
58-110	I would like to reiterate that this project represents a serious setback to wildlife recovery efforts in the Selkirk ecosystem. The project area is a vital link to habitats north of the international border. As the DEIS points out, this part of the mountain range is more frequented by the listed species than any other portion of the U.S. Selkirks.	Chapter 3 – Section 3.2 T&E General	The EIS discloses these effects in Sections 3.2.5 and 3.3.5.
58-111	If this project is to proceed, then the U.S. Customs and Border Patrol and the U.S. Forest Service must develop a more robust environmental impact statement than was presented in the draft. The document fails to tell the whole story because it does not fully describe the conditions as they exist on the ground today, relative to how the situation will change under the Action Alternatives.	General – Impact Analysis	See response to Comment #58-113.
58-112	Stronger mitigation measures will also need to be developed in order to truly offset the effects of repair, maintenance, and use of the Bog Creek Road. While likely no better than the No Action scenario, Alternative 3 (with the modifications suggested in our attached comments) represents the best option for wildlife. We highly encourage the U.S. Customs and Border Patrol and the U.S. Forest Service to take these recommendations to heart if we are to achieve recovery of listed species in the Selkirk Mountains.	Mitigation	See response to Comment #56-103.
58-113	In the Draft Environmental Impact Statement (“DEIS”) for the Bog Creek Road Project, the U.S. Customs and Border Patrol (“CBP”) and the U.S. Forest Service (“FS”) failed to adequately characterize the No Action Alternative. The regulations implementing the National Environmental Policy Act (“NEPA”) provide that an EIS should “should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.” 40 CFR § 1502.14. Federal agencies must describe “each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.” 40 CFR § 1502.14(b). Under NEPA, the No Action Alternative (the existing condition) serves as a baseline from which the effects of action alternatives are measured. An accurate description of the No Action Alternative is therefore essential. Without an accurate yardstick, the public and the	General – Impact Analysis	Road conditions for each segment proposed for motorized closure were added from the 2016 Forest Service TAPS report to the tables per alternative in Chapter 2. As appropriate, Chapter 3 sections (Threatened, Endangered, and Proposed Species; Wildlife; and Recreation and Access) discuss in more detail what the current road condition, the No-Action Alternative, and the proposed motorized closures means for those resources and their habitats.  Table 3.1.3 provides a qualitative level of trips within the BMU. The agencies have added additional detail for the No-Action Alternative to

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
58-114	Trip and vehicle counts are necessary because they illustrate which roads are actually being used, how much they are being used, and how the changes	General – Impact Analysis	See response to Comment #58-113.

decisionmaker cannot correctly understand the trade-offs associated with the action alternatives. The characterization of the No Action Alternative falls short because the DEIS omits critical information about the current condition and use of individual road segments implicated by the project. The DEIS only describes whether a road segment is designated as “open” or “seasonally restricted”. It does not describe the physical condition of individual road segments, nor does it describe how frequently individual road segments are traveled with motorized vehicles (i.e. trip counts and number of vehicles). The only road segment described in any kind of detail is the Bog Creek Road itself: Although Bog Creek Road is currently designated as “seasonally restricted,” it is grown over with vegetation and undrivable. For this reason, the surrounding habitat has been effectively functioning as core grizzly habitat because the unused road does not fragment the habitat. Bog Creek Road repair and maintenance would result in a long-term semipermeable barrier to grizzly bear movement because the vegetation would be removed, it would be maintained, and vehicles would drive on the road. The surrounding habitat would no longer function as core habitat. (DEIS, Pages 99-100). Details about the physical condition and use of individual road segments is necessary because the metrics for Open Motorized Route Density (“OMRD”), Total Motorized Route Density (“TMRD”), and Core Habitat do not tell the whole story. For example, we know from field reviews that roads 1322, 1322A, 1013C, 1013D, and 1388A are over grown and impassible. These roads are slated for “motorized closure” under each of the action alternatives. The stated purposed for these closures is to “create” Core Habitat. The CBP and the FS take credit for “creating” Core Habitat when in reality, these roads are currently impassible, and the surrounding habitat has been effectively functioning as core habitat for years. Meanwhile, repair, maintenance, and use of the Bog Creek Road by CBP and the Continental Mine property owners will change the reality for grizzly bears, caribou, and other wildlife. These kinds of on-the-ground realities are not reflected in the No Action Alternative, and consequently, the decision-maker and the public cannot accurately evaluate the “comparative merits” of the alternatives as envisioned by NEPA. In order to rectify this deficiency, the CBP and the FS must describe the current physical condition of individual road segments and account for the number of trips and vehicles used on each road segment on an annual basis. This could be provided in the form of a table that describes:

- The current physical condition of each road segment
- The existing designation
- The proposed designation (including whether or not a road will be maintained, stored, or fully decommissioned)
- The existing volume of vehicular use (trip and vehicle counts) by season (April 1 through June 15; June 16 through September 15; September 16 through November 15)

Table 3.1.3, providing the OMRD and motorized use under the “Current Access Amendment Designated Use” and the “Actual Use Since 2006” columns.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	envisioned under the action alternatives will affect wildlife and other resources. Moreover, the Forest Plan Amendment for Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones (hereafter referred to as the "Access Amendment") limits the number of administrative trips that may be taken on seasonally restricted roads.		
58-115	The Final EIS should provide a similar level of detail for each of the action alternatives. In addition to metrics for OMRD, TMRD, and Core Habitat, the CBP and the FS should describe any estimates of or limitations on trips and vehicles on individual road segments. For each road segment, the agencies should also calculate the net difference in trips and vehicles, relative to the No Action Alternative. The CBP and the FS should also calculate the net difference in vehicle trip across the entire BMU. As stated above, this level of detail is necessary for two reasons. First, there are seasonal limitations on vehicular access that apply to roads that are designated as seasonally restricted under the Access Amendment. A failure to adhere to the limitations on trips would result in an increase in OMRD and potential noncompliance with the Access Amendment. Secondly, describing the management and use of individual road segments by alternative helps the reader to understand the whole story and evaluate the comparative merits of the alternatives.	General – Impact Analysis	See response to Comment #58-113.
58-116	As the DEIS notes, the Blue-Grass BMU is one of the most important BMUs in the Selkirk Recovery Zone. Between 1986 and 2000, approximately 22 percent of all collared grizzly bear use in the Selkirk Recovery Zone occurred in the Blue-Grass BMU (DEIS, Pages 75 and 76). It also represents a vital link between habitat in the southern portion of the recovery zone on the U.S. side of the international border and habitat on the Canadian side. Consequently, if this project is to proceed, mitigation measures will be vital to ensuring that the grizzly bear population in the Selkirk Recovery Zone continues on its path to recovery. NEPA requires federal agencies to "[i]nclude appropriate mitigation measures not already included in the proposed action or alternatives." 40 CFR § 1502.14(f). Mitigation may include:  a) Avoiding the impact altogether by not taking a certain action or parts of an action. b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment. d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.	Mitigation	See response to Comment #56-108.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
58-117	<p>e) Compensating for the impact by replacing or providing substitute resources or environments. 40 CFR § 1508.20.</p> <p>Of the action alternatives, Alternative 3 generally represents the best option for grizzly bears and other wildlife. However, we recommend several modifications in order to adequately mitigate for the effects of repair, maintenance, and use of the Bog Creek Road. If there is to be a permanent use of the Bog Creek Road by the CBP, the Continental Mine Owners, and other state and federal agencies, then there needs to be an equally permanent commitment on the other side of the ledger. For example, the CBP and the FS make no commitments in the DEIS to the methods of motorized closures that were presented in order to fulfill the requirements of the Access Amendment. The CBP and the FS state only that “[t]he means by which motorized road closure would take place would vary by site and would include both decommissioning and long-term storage.” (DEIS, Page 21). Once again, without greater specificity and a stronger commitment to the mitigation measures, it is difficult for the public and the decision-maker to evaluate the comparative merits of the alternatives. Alternative 3 was designed in part to respond to the fact that there are areas within the Blue-Grass BMU that are more frequently used by grizzly bears. Under this alternative, road 636 and a portion of road 2253 would be closed to all motorized use because they are located in upper Grass Creek, a place that has been heavily and continuously used by grizzly bears since at least the 1980s (DEIS, Page 25). Given the importance of upper Grass Creek to grizzly bears, we would like the CBP and the Forest Service to make a commitment to fully and permanently decommission roads 636, 2464, and 2253 to ensure that upper Grass Creek will provide a contiguous block of core grizzly bear habitat for the long-term. We are not satisfied by the notion that these roads could be stored and reopened in another ten years. Similarly, we ask the CBP and the Forest Service to commit to fully decommissioning the 1388 road on the Priest Lake Side. If access to the Continental Mine is to be provided via the Bog Creek and the Blue Joe Creek Roads, then this route is not needed to provide access to the mine site. Of the roads proposed for motorized closure on the Priest Lake side under the action alternatives, the 1388 road is the only road that is currently passible to motorized vehicles (it is passible to fourwheelers but not standard automobiles). Decommissioning this road would provide some relief to the semipermeable barrier to wildlife that will be created by the unlimited use of the Bog Creek and Blue Joe Creek Roads by the CBP and the Continental Mine owners. Which leads to the next point. The number of trips and vehicles should be limited on the Bog Creek and Blue Joe Creek Roads. Quotas or limits should be developed for each entity (CBP, FS, state, ranchers, and mine owners) by season. Limitations on trips and vehicles would improve the permeability of the barrier that will be posed to wildlife through repair, maintenance, and use of the Bog Creek and Blue Joe Creek Roads.</p>	Mitigation	<p>As stated in Section 3.1.1.1: “For the purposes of this FEIS analysis, it is assumed that motorized road closure would be accomplished through full road decommissioning to ensure full disclosure of potential impacts. Specific short-term motorized road closure actions are listed in Table 3.1.1.”</p> <p>See also response to Comment #58-113.</p>



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
58-118	At the time these comments were filed, a Freedom of Information Act Request to the Forest Service by ICL was pending. Among other things, we requested information about the number of trips taken by various entities on seasonally restricted roads in the Blue-Grass BMU. While we do not yet have the data, we have reason to believe that the limitation on 57 trips per active bear year is frequently exceeded. If we are correct, then this represents a breach of the Access Amendment that will require the Forest Service to reinstate consultation with the U.S. Fish and Wildlife Service. Whether or not the Bog Creek Road Project is approved, we believe that more complete and accurate trip reports need to be completed in the future. Moreover, the trip limits must be adhered to if recovery of grizzly bears in the Selkirks is to be achieved. A plan for improved trip logging and compliance in the Blue-Grass BMU must be included in the FEIS.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #58-113.
58-119	Given the likely adverse affects to wildlife associated with this project, the CBP and the FS must consult with the U.S. Fish and Wildlife Service and develop appropriate terms and conditions.	Consultation and Coordination	The agencies initiated consultation with the USFWS under Section 7(a)(2) of the ESA on April 2, 2013. A summary of USFWS consultation is provided in Section 5.1.1 of the FEIS.
59-120	Overall, the EPA supports the CBP and Forest Service's proposal to repair and maintain roads necessary for agency access and road closures aimed to meet requirements for the Selkirk Grizzly Bear Recovery. We agree that preserving continuous habitat is important to the recovery of the species. We also promote implementing the BMPs and culvert guidelines described when stream crossings are necessary. When developing the project's preferred alternative, we encourage the agencies to adopt actions that protect threatened and endangered species long-term, while providing safe public access in accordance with Forest Service Standards.	General Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
60-121	The Bog Creek Road Project, located within the Blue-Grass Bear Management Unit (BMU), is located within the Selkirk Recovery Zone (SRZ), which is one of five occupied grizzly bear recovery zones within the U.S. Located along the U.S. - Canadian border, the Blue-Grass BMU is a central BMU that contains high quality habitat preferred by grizzly bears – including females with young – and provides critical connectivity between the U.S. and Canadian portions of the SRZ. Repairing and maintaining the Bog Creek Road to allow open administrative-only use and modifications to motorized access management may affect the recovery criteria necessary to achieve a recovered grizzly bear population within the U.S. portion of the SRZ by increasing human-caused mortality risk or changes in grizzly bear behavior that lead to loss of preferred habitat and/or potential population fragmentation.	Chapter 3 – Section 3.2 T&E Grizzly Bear	Section 3.2.5 discloses these potential effects on grizzly bears.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
60-122	Based on the information available at this time, Alternative 3, the Modified Proposed Action, appears to be the choice that minimizes, offsets, and balances the needs of the grizzly bear and meets the operational needs of the USFS and CBP.	General Support – Alternative 3	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
60-123	Roads are of particular concern for the survival and recovery of grizzly bears; the majority of human-caused grizzly bear mortalities have occurred in close proximity to roads (McClellan 2015, p. 756; Boulanger and Stenhouse 2014, p. 9; Nielsen et al. 2004, p. 107; Benn and Herrero 2002, p. 216) and, due to increased human presence, mortality risk is greatest along roads which are open year-round. Opening Bog Creek Road to open administrative-only use that includes private inholding access has the potential to increase the mortality risk to the grizzly bear in a critical portion of its habitat in a critical BMU. In time, grizzly bears might exhibit a negative behavioral response towards roads, effectively resulting in loss of preferred habitat. In addition, opening seasonally-restricted roads to year-round public use along the eastern approach to Bog Creek Road – as proposed in Alternative 4 – has the potential to introduce an additional mortality risk and, over time, reduce connectivity between U.S. and Canada grizzly bear populations. Reducing such connectivity could adversely affect genetic diversity and compromise the persistence of grizzly bear in the U.S. portion of the SRZ.	Chapter 3 – Section 3.2 T&E Grizzly Bear	See also response to Comment #7-12. These citations were reviewed and added to Section 3.2.3.1 and the Alternative 4 effects discussion in Section 3.2.5.3 of the FEIS.
60-124	The value of replacement habitat to grizzly bears should be evaluated in any modifications to motorized access management. The Department recommends that, as appropriate, each alternative analyzed in the FEIS include provisions for replacement habitat of similar or greater value to grizzly bears in terms of habitat quality and preference to grizzly bears. Compared to Alternatives 2 and 4, the recommended road closures identified in Alternative 3 would provide secure, interior habitat in a geographic area preferred by grizzly bears, allowing the bears access to forage opportunities provided by both Grass Creek and the nearby Trapper Fire burn area.  In summary, Alternative 3 appears to effectively minimize the additional grizzly bear mortality risk, potential loss of habitat, and reduced connectivity between U.S. and Canadian grizzly bear populations associated with opening the Bog Creek Road to open administrative-only use that includes private inholding access and modifications to access management. While we would also have no objection to Alternative 1, the Department understands that that this alternative does not meet the national security and operational needs of CBP, nor will Alternative 1 allow the USFS to meet the access management standards required by the Idaho Panhandle National Forest's Forest Plan.	General Support – Alternative 3	See responses to Comments #56-105, #58-113, and #104-196.  The decision-makers will consider the information contained in this comment during the decision process.
61-125	I AM AGAINST OPENING BOG CREEK ROAD. I AM AGAINST LETTING ANY ROADS BY THE BORDER BE UTILIZED BY ORDINARY TRAFFIC. I AM IN FAVOR OF DRONES BEING USED AT THE BORDER LOCATIONS TO	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	MONITOR WHO TRIES TO COME ACROSS AND IS ON THOSE GROUNDS AT ANY TIME OF THE DAY ANY DAY OF THE YEAR. CERTAINLY WE DONT WANT ILLEGAL IMMIGRANTS USING THIS AREA. MAYBE THE GRIZZLIES CAN KEEP SOME AWAY IF WE LET THEM STAY ALIVE INSTEAD OF KILLING THEM WITH NEW ROADS. DONT OPEN ROADS TO MAKE IT EASIER FOR ILLEL GAL IMMIGRANTS TO DRIVE IN. ATVS COULD BE USED WITHOUT ROAD, BIKES COULD BE USED WITHOUT ROADS. ITS CLEAR THAT DRONE MONITORING, ETC. USE OF THAT IS BEST USE. SURVEILLANCE AS USED IN WAR HAS OTHER METHODS I AM SURE TO DETECT MOVEMENT. HOW ABOUT PUTTING SOME ARMY UP THERE AND ON THE SOUTHERN BORDER TO STOP ILLEGALS FROM WALKING IN. [Note: spelling errors in the original comment letter were corrected.]		comment during the decision process. See also responses to Comments #5-9 and #103-184.
62-126	After review of the prosed alternatives for the Bog Creek Road Project the Bonner County Commissioners would like to offer their support for alternative #4 as proposed by the United States Forest Service. This alternative would allow for maintenance of 5.6 miles of the existing Bog Creek Road and approximately 26 miles of motorized roads would be closed under this proposal. However, after road repair activities, motorized use along Bog Creek Road, Blue Joe Creek Road, and the west to east access roads would be changed from seasonally restricted to an open road designation. Opening up these roads would allow for the enhancement of recreational opportunities in Northern Idaho. Hunting, fishing, and motorized recreational opportunities are an important part of tourism and everyday life in the Panhandle, with the tendency to lean toward road closure these activities are limited. Alternative #4 would open up access for new generations to enjoy an area of the Panhandle that hasn't been available for years.	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
63-127	The Proposed Action (Alternative 2) is definitely NOT acceptable. To propose such a major reconstruction of road(s) with tax payer dollars only to keep it closed for questionable reasons is unsatisfactory. We recognize the border safety issues, the grizzly bear issues and the other stated reasons for the year round closure. But as residents of this area, as an organization that engages the public in their public lands, and as advocates of economics that enhance our region, we feel that complete, year round closure of this road to the public is unnecessary. This particular border area is not so dangerous with illegal activity that seasonal public access should be constrained.	General Opposition – Alternative 2	Thank you for your comment. The information in this comment will be considered by the decision-makers during the decision process. See also response to Comment #5-9.
63-128	PCFC would instead recommend the main components of Alternative 4 with some further considerations. Though Alternative 4 states: "Under the open road designation, Bog Creek Road would be open to the public for unrestricted motorized travel." This is technically not feasible as that area is closed to over-snow vehicles due to caribou habitat. A seasonal closure is obvious as the snow	General Support – Alternative 4	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	depth is not passable for close to 6 months. PCFC does feel that administrative open status for the Blue Joe Creek Road into Continental Mine is warranted for the stated reasons. Lending to those facts, the Bog Creek area is a stupendous part of our region. There hasn't been reasonable access into that country for many years. PCFC feels that if that road is to be repaired, the public should have seasonal access for sightseeing, berry picking and possibly part of the fall hunting season. We recommend opening the road to the public from July 1st until November 1st This would protect the wildlife species of concern but still give ample opportunity to the public to enjoy this phenomenal area.		
64-129	The Bog Creek Road Project will cause great harm to sensitive wildlife in the project area.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
64-130	The Agencies have discussed "legitimate threats," yet there is no discussion anywhere in the DEIS as to what these legitimate threats might entail.	Chapter 1 – Section 1.3 Purpose and Need	See response to Comment #5-9.
64-131	CBP's vegetation removal work on Bog Creek Road was performed illegally. The Agencies have violated the National Environmental Policy Act by conducting work on Bog Creek Road before completing a NEPA analysis prior to beginning work. CBP's work on the Bog Creek Road is also a violation of the Endangered Species Act ("ESA"), because CBP failed to consult with the Fish and Wildlife Service on the impacts of its actions on grizzly bears, Woodland caribou, Canada lynx, and bull trout – all of which are federally listed species.	NEPA Process	The prior brush trimming is outside the scope of this National Environmental Policy Act (NEPA) analysis. It was done for safety purposes to facilitate a non-motorized response to an exigent circumstance and not to presage the repair of Bog Creek Road. The brush trimming is described in Section 1.2, Background, and the current state of vegetation is addressed in the baseline environment sections. Continued coordination between CBP and the Forest Service on this project will help ensure that all environmental requirements are fulfilled appropriately.
64-132	The DEIS fails to comply with law and we support the No Action Alternative.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
64-133	Due to the significant negative impacts to wildlife and their habitat, we support the No Action alternative.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
65-134	The DEIS fails to comply with law and we support the No Action Alternative.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
65-135	<p>CBP's vegetation removal work on Bog Creek Road was performed illegally. The Agencies have violated the National Environmental Policy Act by conducting work on Bog Creek Road before completing a NEPA analysis prior to beginning work. Without completing the required analysis under the NEPA, CBP went forward and conducted vegetation-clearing activities on the eastern portion of the Bog Creek Road corridor in 2016, on public lands. What is clear is that the Agencies have taken the first steps in repairing Bog Creek Road, as proposed in the DEIS, before the NEPA analysis is complete.</p> <p>NEPA's twin objectives are (1) to ensure that agencies take a "hard look" at every significant aspect of the environmental impact of a proposed action, and (2) to guarantee that relevant information is available to the public to promote well-informed public participation. NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken.</p> <p>CBP's work on the Bog Creek Road is also a violation of the Endangered Species Act ("ESA"), because CBP failed to consult with the Fish and Wildlife Service on the impacts of its actions on grizzly bears, Woodland caribou, Canada lynx, and bull trout – all of which are federally listed species. What is happening on the ground impacts wildlife and wildlife habitat.</p>	NEPA Process	The prior brush trimming is outside the scope of this NEPA analysis. See response to Comment #64-131.
65-136	<p>The Agencies failed to take a hard look at impacts to wildlife. Grizzly bears in the Selkirk ecosystem are listed as a threatened species under the Endangered Species Act. The most recent population estimate for the Selkirk Recovery Zone is 83 bears; the minimum population goal of 90 set forth in the Grizzly Bear Recovery Plan. The Interagency Grizzly Bear Guidelines call on the Forest Service to "emphasize actions which contribute toward conservation and recovery of the bear within areas identified in the Grizzly Bear Recovery Plan" and "to maintain and enhance habitat and to minimize potential for grizzly-human conflicts." Other land uses will only be permitted if they can be made compatible with grizzly needs. None of the action alternatives in the DEIS are compatible with grizzly bear needs, as building and repairing the Bog Creek Road and increasing access and motorized use on the Blue Joe Creek Road will cause disturbance, avoidance, and is likely to displace bears currently using the area. NEPA requires that agencies use "high quality" information and "accurate scientific analysis," and thus we request that the Agencies update this section of the EIS with timely and up-to-date science and data.</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	Table 3.2.4, "Status of the SRZ during 2012–2017 in Relation to the Demographic Recovery Targets from the Grizzly Bear Recovery Plan" indicating recovery criteria (USFWS 1993a) and current population status (Kasworm et al. 2018a) was added to Section 3.2.3.1. See also response to Comment #98-166.
65-137	<p>In addition to impacting grizzly bear recovery, the Bog Creek Road Project impacts the southern Selkirk Mountain population of woodland caribou, a federal and Idaho Tier 1 Species of Greatest Conservation Need. It is critically important to protect caribou habitat in the Selkirks.</p>	Chapter 3 – Section 3.2 T&E Caribou	The potential for effects on woodland caribou and bull trout is disclosed in the EIS in Section 3.2.5.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	Bull trout in the project area are listed as threatened under the Endangered Species Act and are considered to be in decline across their range. Road construction and increased use—as proposed under all action alternatives—threatens to increase sedimentation into streams occupied by bull trout reducing habitat complexity, pool depth and egg survival and emergence; and killing young bull trout, and insect larvae preyed upon by bull trout.		
65-138	Bull trout in the project area are listed as threatened under the Endangered Species Act and are considered to be in decline across their range. Road construction and increased use—as proposed under all action alternatives—threatens to increase sedimentation into streams occupied by bull trout reducing habitat complexity, pool depth and egg survival and emergence; and killing young bull trout, and insect larvae preyed upon by bull trout.	Chapter 3 – Section 3.2 T&E Bull Trout	Bull trout effects analyses are included in Section 3.2 of the EIS. See also Summary in Table 2.4.4:  “No in-stream work would occur in stream segments occupied by bull trout or in bull trout DCH. Bull trout distribution and migratory corridors would not be affected by the Proposed Action.  Downstream sedimentation from in-stream work (culvert removal and replacement) on Continental Creek could temporarily affect mapped DCH downstream on Malcom Creek.  Sedimentation from culvert replacement could be measurable to 800 feet downstream (Forest Service 2013c), and 3,000 feet downstream of culvert removals (Foltz et al. 2008). These effects would be temporary, with 95% of sediment released within several hours to 24 hours of completing the culvert replacement or removal (Foltz et al. 2008). It is likely that bull trout are located over 4,000 feet downstream of this in-stream work (downstream of the Malcom Creek migratory barrier).”
67-139	Opening the Bog Creek Road contrary to both wildlife and habitat protection and to national security.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process. See also response to Comment #5-9.
68-140	Why would you threaten trees and our few remaining wild animals when many other options are available? Drones, electronic or laser beam surveillance, helicopters when the alarm goes off etc. etc. Please don't do this.	Chapter 2 – Range of Alternatives	See response to Comment #103-184.
69-141	Please do not put any more pressure on our wildlife. It is a delicate balance which we must not disrupt. We are so blessed to have the ability to preserve and protect before it is too late!	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
74-142	Don't allow access via Bog Creek Road. It is unnecessary. And the harm to endangered species is great. The proposal to open this road is an access convenience issue, is contrary to the Desired Future Conditions for the Priest Lake Geographic Area and is a violation of the Endangered Species Act.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
76-143	I have learned that the USFS and Border Protection Agencies are considering opening the Bog Creek Road to motorized access, supposedly to make it easier for Border Patrol to address unspecified "threats". I am emailing to express my strong disagreement with this notion and my support for the "No Action" alternative, which would leave restrictions in place and protect critical habitat for grizzly bears, mountain caribou, lynx, and bull trout. Impacts to wildlife in this beautiful and critical area, where I also love sometimes to backpack, hike and fish, are too important to justify opening yet another road. It begins to feel like the lack of transparency with the Customs and Border Protection agency is threatening our democracy, with vague allusions to threats at our border used to overturn all other considerations. Let's keep our country a place worth defending, a place where we value such things as the needs of other wildlife and honor long-standing legislation like our Endangered Species Act -- of which work on the Bog Creek Road would be in violation.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
79-144	I strongly oppose the DHS decision to open up Bog Creek Rd and affiliated connections. These areas are the last habitat for endangered species and we will never get them back. There are thousands of miles of roads along the border to patrol and these animals get mere acres to exist unmolested. I especially oppose such actions as a response to unnamed threats. We cannot allow our agencies to cancel past agreements and studies simply because they say it's necessary.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
84-145	Please include this comment to the Draft Environmental Impact Statement ("DEIS") that will cause great harm to sensitive wildlife in the project area. Rewilding, reclaiming and at least contouring and decommissioning roads concerning this project is imperative.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
85-146	It is my wish that the Bog Creek road will not be re-opened as this could impact endangered species that are already having to struggle to survive.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
87-147	The Forest Service and U.S. Customs and Border Protection have released a Draft Environmental Impact Statement that will cause harm to sensitive wildlife in the project area. Bottom line: It is time for people responsible for land management to choose our environmental ecosystems over short-term gain or enjoyment. PLEASE THINK about how your decisions are impacting the life and health and LIVABILITY of Earth!!	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
88-148	I am a landowner and resident of Boundary County. I strongly oppose the Bog Creek Road Project and strongly support Alternative 1- No Action.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
88-149	The 'Purpose and Need For Action' section of the DEIS outlines two reasons for this project: 1. To improve east-west access across the Selkirk Mountains to enable CBP to protect the border and 2. To meet legally required IPNF Forest Plan standards for motorized access in the Blue-Grass BMU. This project undermines both of those objectives. The DEIS Purpose Section states "Preventing entry requires access to areas where legitimate threats to border security have been identified." Creating a road for CBP to monitor will only increase the potential for illegal traffic along that road. It makes no sense to create a road that didn't functionally exist in order to protect that road from illegal use. Further, no 'legitimate threats' from the Bog Creek Road have been documented because it is currently impassable and unused. Additionally, re-opening the Bog Cr. Road in no way helps the IPNF to meet its road closure objectives in the Blue-Grass BMU. The roads proposed for administrative closure under Alternatives 2 and 3 are already closed to the public and receive very little administrative use. So closing these roads to administrative use will not even come close to offsetting the administrative use that the Bog Creek Road will receive by CBP since it will be the only means of crossing the Selkirk Mts and therefore connecting the CBP offices in Bonners Ferry and Priest Lake. Further, administrative open access on road 2546 would not apply to the public owners of the Continental Mine (a private inholding) who have continuous access to operate the mine. So changing the status of road 2546 would have almost no perceivable effect on road use and would not offset the use of the Bog Creek Road.	Chapter 1 – Section 1.3 Purpose and Need	See responses to Comments #5-9 and #58-113.
88-150	With regard to the Bog Creek Road Project Draft Environmental Impact Statement (DEIS), I support Alternative 1- No Action for the following reasons: 1. Decreased border security  The potential for increased illegal traffic along the Bog Creek Road is only increased by re-opening it. This will result in decreased border security along that section of border- counter to CBP's mission.	Chapter 1 – Section 1.3 Purpose and Need	See response to Comment #5-9.
88-151	With regard to the Bog Creek Road Project Draft Environmental Impact Statement (DEIS), I support Alternative 1- No Action for the following reasons: 2. Harm to wildlife  This road is located in a sensitive area for many rare species. Opening this road will have significant negative consequences for many species of wildlife including grizzly bears, lynx, wolverine, wolves, moose, elk, deer, insects, amphibians, gastropods and many others who use this area as core habitat or a travel corridor. Many of these species were not included in the DEIS. It will also increase the	Chapter 3 – Section 3.2 T&E General	The FEIS analyzed potential impacts to grizzly bears, lynx, wolverine, and wolves. The following was added to Section 1.8.4.4: "Regarding moose, elk, deer, insects, amphibians, gastropods, and other species not analyzed in this EIS (including some evaluated in the Idaho State Wildlife Action Plan; Idaho Department of Fish and Game [IDFG] 2017), there would be minor impacts to their habitat



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	spread of weeds through this sensitive habitat as traffic enters this area thereby decreasing habitat quality for wildlife.		<p>from the minor vegetation removal associated with Bog Creek Road construction and motorized road closure activities. It is also possible that individuals could be affected during the short-term effects, but they are not discussed in detail in this EIS because those short-term effects would be minor and localized and would not touch on identified risk factors for the species concerned." Also, "no change" in the last sentence of this section was replaced with "inconsequential changes." See also response to Comment #89-159.</p> <p>Also, the IDFG manages hunting tags available for moose, elk, and deer, and the Recreation and Access Environmental Consequences section (Section 3.8.5) discloses the potential for changes in hunting access.</p> <p>Please see Section 1.8.4.6 regarding noxious weeds. Also, Sections 3.2.5 and 3.3.5 disclose that regardless of the selected alternative, weed management would continue as prescribed in the <i>Priest Lake Noxious Weed Control Project Final Environmental Impact Statement</i> (Forest Service 1997) and the <i>Bonnars Ferry Ranger District Noxious Weed Management Projects Environmental Impact Statement</i> (Forest Service 1995c). Therefore, it is unlikely that weeds would reduce habitat quality.</p>
88-152	<p>With regard to the Bog Creek Road Project Draft Environmental Impact Statement (DEIS), I support Alternative 1- No Action for the following reasons:</p> <p>3. Increased traffic on surrounding roads including Westside Road</p> <p>I live on Westside Road, the only access road to the east side of the Bog Creek Road Project. This project will significantly increase the traffic volume on Westside Road and surrounding roads, decreasing my quality of life and that of my neighbors. Increased traffic will inevitably increase wildlife-vehicle collisions (WVCs) along all feeder roads on both sides of the Selkirk Mts. approaching the Bog Creek Road. The potential increase in WVCs along feeder roads to the project area was not addressed in the DEIS.</p>	Chapter 3 – Section 3.2 T&E General	Sections 3.2, 3.3, and 3.8 Cumulative Effects analyses have been revised to reflect the potential for increased risk of direct mortality from vehicle strikes or humans and increased vehicle traffic outside the analysis areas.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
88-153	In closing, this project will harm the community of Bonners Ferry and Priest Lake, the wildlife that inhabit the Selkirk Mountains, and fails to serve the objectives of the CBP and IPNF. It should not be undertaken.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
89-154	I am a landowner and resident of Boundary County. I strongly oppose the Bog Creek Road Project and strongly support Alternative 1- No Action. I do not support Alternatives 2, 3, or 4 as they will be detrimental to wildlife. Many of the detrimental effects to wildlife are not outlined in the draft EIS. A subset of these detrimental effects are outlined below and should be addressed in any subsequent versions of the EIS.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
89-155	Lynx: Page 85: "There are infrequent, but consistent, lynx sightings in the Selkirks (Forest Service 2016b). . . .Recent forest carnivore research in this part of north Idaho has resulted in three confirmed sightings of lynx in the Selkirks and Purcells (Lucid et al. 2016). In 2010, a male Canada lynx was photographed at a forest carnivore DNA hair-snare/remote camera site in the Grass Creek LAU (Lucid, Robinson, et al. 2011; Lucid, Robinson, and Ehlers 2016)."  This statement inadequate and does not fully represent the most recent scientific information as it ignores recent reports a data from the Idaho Department of Fish and Game (Lucid 2016 and Lucid et al. 2017). Lynx are regularly detected in the Selkirk Mountains including the proposed project area. Further, lynx are currently expanding in the Selkirks and have been detected at greater frequency in 2016 and 2017.	Chapter 3 – Section 3.2 T&E Canada Lynx	The FEIS was revised in the Section 3.2.3.2 in the following ways: removed "infrequent, but;" replaced "three" with "35"; removed "and Purcells;"; replaced "Lucid et al. 2016" with "Lucid et al. 2017;"; replaced "(Lucid, Robinson, et al. 2011; Lucid, Robinson, and Ehlers 2016)" with "Lucid et al. 2017."  Removed from Chapter 6 Lit Cited: Lucid et al. (2011).
89-156	Wolverine: Page 88: "Wolverine have been observed within the analysis area (Forest Service 2016b; IDFG 2014: Figure 3)." This statement inadequately describes the state of knowledge of this species in the project area. The project area occurs within the home range of the only documented resident wolverine on the Idaho Panhandle or Colville National Forests (Lucid et al 2016). Additional motorized use, particularly in the winter, is likely to negatively affect this individual animal and other wolverines that may colonize the area.	Chapter 3 – Section 3.2 T&E Wolverine	The sentence referenced in the comment was updated to also cite Lucid et al. (2016). Discussion was added to Section 3.2.5.3 regarding CBP winter motorized patrol potentially displacing wolverine.
89-157	Boreal Toad: Page 142: "This section summarizes current species information for the boreal toad ( <i>Bufo boreas</i> ), the only IPNF sensitive aquatic species with potential for impacts from the project actions. Boreal toad are primarily found in wetlands, seeps, springs, and streams.: This is species is not recognized by current taxonomy. The correct nomenclature is Western Toad ( <i>Anaxyrus boreus</i> ). This species is only associated with aquatic areas during breeding and during the larval stage. As adults individuals of this species are largely terrestrial. Breeding activity of this species is clearly documented within and around the study area (Lucid et al 2016). Further, roads are a clear and well recognized threat to this species (i.e. Dixon et al. 2017). If any proposal beyond Alternative 1 is accepted	Chapter 3 – Wildlife	"Boreal" was replaced with "western" and " <i>Bufo boreas</i> " with " <i>Anaxyrus boreas</i> " throughout the FEIS. The design features include well-engineered culverts (described in Appendix B and called out in the EIS). <i>Best Management Practices for Amphibians and Reptiles in Urban and Rural Environments in British Columbia</i> identifies culverts as being appropriate mitigation to avoid road mortality for amphibians: <a href="https://www.for.gov.bc.ca/ftp/toc/external!/publish/S">https://www.for.gov.bc.ca/ftp/toc/external!/publish/S</a>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	mitigation measures for this species including well engineered road crossing should be included.		AR/Amphibian%20and%20Reptile%20BMPs_final%20(old%202004).pdf.
89-158	Fisher: Fisher have been extirpated from the Selkirk Mountains in recent years (Lucid et al. 2016). How the proposed project will help to ensure suitable habitat remains intact and reduce threats to any re-colonizing individuals during proposed actions is not addressed in the EIS.	Chapter 3 – Section 3.3 Wildlife	Less than 1% of available fisher habitat will be affected by the Bog Creek Road improvements under Alternatives 2, 3, or 4 (Table 3.3.8). Motorized road closure would result in 3% fewer roads in fisher habitat under Alternatives 2 or 4 and 11% fewer roads under Alternative 3. The potential for temporary displacement during road improvements and motorized closure is discussed. See also Section 3.3.5.3 for discussion of effects from long-term motorized use within the analysis area.
89-159	Additional Sensitive Species: The following species occur within or around the project area (Dixon et al. 2017, Lucid et al. 2016, Lucid et al. 2018). These species should be included in the EIS: Townsend's Big-eared Bat ( <i>Corynorhinus townsendii</i> ) Silver-haired Bat ( <i>Lasionycteris noctivagans</i> ) Little Brown Myotis ( <i>Myotis lucifugus</i> ) Western Ridged Mussel ( <i>Gonidea angulate</i> ) Pale Jumping-slug ( <i>Hemphillia camelus</i> ) Skade's Jumping Slug ( <i>Hemphillia skadei</i> ) Mangum Mantleslug ( <i>Magnipelta mycophaga</i> ) Western Flat-whorl ( <i>Planogyra clappi</i> ) Shiny Tightcoil ( <i>Pristiloma wascoense</i> ) Coeur d'Alene Oregonian ( <i>Cryptomastix mullani</i> ) Mayfly ( <i>Ephemerella alleni</i> ) Western Bumble Bee ( <i>Bombus occidentalis</i> ) Suckley's Cuckoo Bumble Bee ( <i>Bombus suckleyi</i> ) Monarch Butterfly ( <i>Danus plexippus</i> )	Chapter 3 – Section 3.3 Wildlife	The EIS includes the IPNF sensitive species listed in its Forest Plan (Forest Service 2011b, 2015a). See Table 3.3.1 for species not analyzed in detail and the supporting rationale, including Townsend's big-eared bat.  Section 3.3.1 includes the following clarification: "Individual wildlife (including those not analyzed in this EIS [IDFG 2017]) present in the vicinity of the proposed road improvements and motorized closures could be affected during the short-term effects period, but they are not discussed in detail in this EIS because those short-term effects to individuals would be minor and localized and would not have population-level impacts."  See also response to Comment #88-151.
89-160	Climate Change: The project area, surrounding area, and most of the northern portion of the U.S. Selkirk Mountains are considered cool-air refugia and important areas for the conservation of climate sensitive species during climate change (Dixon et al 2017, Lucid et al 2016, Lucid et al. 2018). The EIS should address how the project will affect cool-air associated species and the cool air refugia they depend on. This is a conservation target of the Idaho State Wildlife Action Plan. The EIS focuses on the small amount of increased emissions that will be created by allowing Alternative's 1-3; however it should address how increased traffic and human use will directly degrade the habitat of the following climate sensitive species (as identified in Dixon et al 2017, Lucid et al 2016, Lucid et al. 2018): Pale	Chapter 3 – Section 3.3 Wildlife	See also response to Comment #89-159.  The EIS recognizes that vehicles emit greenhouse gases that contribute to global climate change; however, the action alternatives do not authorize whether or not motorized activity would occur on the Priest Lake or Bonners Ferry Ranger Districts, but rather where it may occur. We have seen no evidence to indicate that the general public will meaningfully alter the amount of motorized use because of the designation of motorized routes on

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>Jumping-slug (<i>Hemphillia camelus</i>) Skade's Jumping Slug (<i>Hemphillia skadei</i>) Mangum Mantleslug (<i>Magnipelta mycophaga</i>) Shiny Tightcoil (<i>Pristiloma wascoense</i>) Mayfly (<i>Ephemera alleni</i>) Western Bumble Bee (<i>Bombus occidentalis</i>) Suckley's Cuckoo Bumble Bee (<i>Bombus suckleyi</i>) Monarch Butterfly (<i>Danus plexippus</i>) Further, the following species are considered cool-air associates and very sensitive to climate change. Any additional threats to the species exacerbate those conservation concerns (Dixon et al. 2017, Lucid et al. 2016, Lucid et al. 2018). The EIS should specifically address mitigation measures which will affect the following cool-air associate species: Pale Jumping-slug (<i>Hemphillia camelus</i>) Skade's Jumping Slug (<i>Hemphillia skadei</i>) Mangum Mantleslug (<i>Magnipelta mycophaga</i>) Shiny Tightcoil (<i>Pristiloma wascoense</i>)</p>		<p>National Forest System lands, whether the preferred use is to drive to a trailhead to hike, tour in a passenger vehicle, or recreate with off-highway vehicles on or off the IPNF. Depending on the alternative selected for implementation, more or less area would be available for motorized use than is currently designated as available, but there is no indication that would result in more motorized use by either the Forest Service, CBP, or general public.</p>
89-161	<p>Literature That Should Be Cited In EIS:</p> <p>Dixon et al. 2017. Idaho State Wildlife Action Plan. Idaho Department of Fish and Game, Boise, Idaho, USA. <a href="https://idfg.idaho.gov/swap">https://idfg.idaho.gov/swap</a></p> <p>Lucid, M. K., Rankin, A., Espindola, A., Chichester, L., Ehlers, S., Robinson, L., &amp; Sullivan, J. (2018). Taxonomy and biogeography of <i>Hemphillia</i> (Gastropoda: Pulmonata: Arionidae) in North American rainforests, with description of a new species (Skade's jumping-slug, <i>Hemphillia skadei</i> sp. nov.). <i>Canadian Journal of Zoology</i>, 96(4), 305-316. <a href="http://www.nrcresearchpress.com/doi/abs/10.1139/cjz-2017-0260#.W14BzJNIA2x">http://www.nrcresearchpress.com/doi/abs/10.1139/cjz-2017-0260#.W14BzJNIA2x</a></p> <p>Lucid, M.K. L. Swartz, C. McKormack. 2017 Idaho Panhandle Forest Carnivores, F15AF00962, Final Report. <a href="https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2017.pdf">https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2017.pdf</a></p> <p>Lucid, M.K. 2016. Idaho Panhandle Forest Carnivores, F15AF00962, Interim Report. <a href="https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2016.pdf">https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2016.pdf</a></p> <p>Literature Inadequately Cited In EIS:</p> <p>Lucid, M., Robinson, L., &amp; Ehlers, S. (2016). Multi-species Baseline Initiative Project Report: 2010-2014. Idaho Department of Fish and Game, Coeur d'Alene.</p>	<p>Chapter 3 – Section 3.3 Wildlife</p>	<p>FEIS additionally cited IDFG et al. (2017) and Lucid et al. (2017). See also responses to Comments #48-93, #88-151, #89-155, and #89-159.</p>
92-162	<p>After review of the proposed alternatives for the Bog Creek Road Project I would like to offer my support for alternative #4 as proposed by the United States Forest Service. This alternative would allow for maintenance of 5.6 miles of the existing Bog Creek Road and approximately 26 miles of motorized roads would be closed under this proposal. However, after road repair activities, motorized use along Bog Creek Road, Blue Joe Creek Road, and the west to east access roads would be changed from seasonally restricted to an open road designation. If you have ever hunted, hiked or spent any time in this area you would understand the importance</p>	<p>General Support – Alternative 4</p>	<p>Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	that it has to our heritage in the Panhandle. I hunted there with my father when I was a boy and it's time that future generations get to do so as well. For years the area was closed due to lack of funding, now that the funding is available, it should be opened back up for all to enjoy, it is unnecessary to continue to keep this road closed. I also understand the need to protect wildlife and the need to protect our citizens from perceived dangers, however I believe that the benefit outweighs the threat. Bog Creek is a gem in the Panhandle, let's get it opened back up for all to enjoy, no more excuses.		
93-163	I want to share my great displeasure with the potential Bog Creek Road Project, and that work has already begun on it, ignoring important due process. The area potentially impacted by this Bog Creek Road Project is sensitive and protected habitat for several species, most notably the Grizzly Bears of the Selkirk Mtns, who are listed as Threatened Species by the Endangered Species Act. They require significant contiguous habitat for an ecosystem that supports their full life. I don't think you would want a road developed through the middle of your home, separating your kitchen and living room. The Grizzly, caribou, lynx and others deserve intact habitat that will support their long-term survival. I strongly support the "No-Action Alternative (Alternative 1)" option.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
98-164	The agency action proposed by the Draft Environmental Impact Statement prepared by the and U.S. Customs and Border Protection would cause great harm to endangered wildlife in the project area without the legally required analysis in order to respond to a undefined but presumed threat.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process. See also response to Comment #5-9.
98-165	The DEIS does not meet the standards established by NEPA and the Endangered Species Act. NEPA requires an objective assessment of the environmental impact of a proposed action and publication of relevant information adequate to allow informed public participation in the decision making process. When an action would affect a species listed as "endangered", no decision or action can be taken without consultation with the Fish and Wildlife Service. In this case, significant action has been taken without meeting this standard. CBP's work on the Bog Creek Road is also a violation of the Endangered Species Act ("ESA"), because CBP failed to consult with the Fish and Wildlife Service on the impacts of its actions on grizzly bears, Woodland caribou, Canada lynx, and bull trout – all of which are federally listed species.	NEPA Process	See response to Comment #64-131. See Section 5.1.1 for information regarding the agencies' consultation to date with the USFWS.
98-166	Grizzly bears are a threatened species in the Selkirk ecosystem and have not achieved the minimum population goal of 90 set forth in the Grizzly Bear Recovery Plan. In such a case, the Grizzly Bear Recovery Plan allows other land uses only if those uses can be made compatible with grizzly needs. Since none of the DEIS alternatives are compatible with grizzly bear needs, and the DEIS lacks the	Chapter 3 – Section 3.2 T&E Grizzly Bear	See also responses to Comments #56-105, #58-113, and #104-196.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>required high quality information and accurate scientific analysis needed to assess the effect of the proposed road project on endangered species, it is clear that "no action" is the required outcome of the process. and thus we request that the Agencies update this section of the EIS with timely and up-to-date science and data.</p>		
99-167	<p>Alternative 4 is the best choice for us, however, all the roads in Canada are automobile accessible from Canadian side.</p>	<p>General Support – Alternative 4</p>	<p>Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.</p>
100-168	<p>The proposed Bog creek Road Project is a grossly over step of the Customs and Border Patrol. This project is should not proceed and in no way will it better protect our northern border. It will in fact allow any individual to more easily cross our northern Boundary County border. I know this area very well and as stated in the report the area is difficult to access because of the current road condition and the area itself is rugged and now you are proposing on fixing the road to have easier access. How does that even make sense??? With today's technology there are better ways to monitor this boarder and they are in practice today such as drones. I would like to know what warrants such access to these areas, when asked by others they typically get the ridicules response of its classified which I feel is just another excuse for not having the proper information to answer the question. The decision is wrong in so many ways basically you are forcing some project through that you have no good data to back it up and you are taking away access from this community. The boarder Patrol already over steps its bounds by going into closed areas not just to patrol but to screw off on company time. I will vouch for this because I have seen it first hand during snowmobile season. Today we have limited access from this are because of the Caribou and the grizzly bear and I respect that. But for you the Border Patrol to just move in and tell us we have no rights to our public land and take it away from us is bs. And you are taking it away from by reestablishing a condemned road that public will not have access to and forcing the Forest Service to close other roads that we currently have access to is just wrong. And you say this is all in the nature of national security is full of @#!\$ excuse my French but it is. The best thing you should do the Border Patrol is to respect our current closers and to find other ways to patrol these areas. And to stop harassing the public who recreate and work in this area for just being there.</p>	<p>Chapter 1 – Section 1.3 Purpose and Need</p>	<p>See responses to Comments #5-9 and #103-184.</p>
101-169	<p>Boundary County has had a long history with the Boundary Creek drainage. Until the USFS Forest Service decommissioned the Boundary Creek Road in conjunction with a management action, the general public had unrestricted access to the intersection of Roads 2456 and 2450, albeit there were some miles that were in Canada. Boundary County litigated the decommissioning of the Boundary Creek Road and entered into a settlement agreement that gave the County an easement generally from the intersection of the Smith Creek Road and the</p>	<p>Other Issues – Settlement Agreement</p>	<p>The EIS Proposed Action and alternatives do not conflict with the settlement agreement with Boundary County. The decision-makers will consider the information contained in this comment and the settlement agreement in the decision process.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	Boundary Creek Road to the intersection of Road 2455 and the International Boundary. Then coming back into the United States on Road 2450 to its intersection with Road 2546, at which point the access ended. This occurred in 2002, at which time the Forest Service, unknown to the County, had already been in conversation with the Border Patrol regarding closing Roads 2450 and 2455 at the Border. The roads were gated at the Canadian Border approximately in the summer of 2011. The settlement agreement also stated the prism of the Bog Creek Road would remain intact for future use.		
101-170	Along with the decommissioning, the grazing permittee and the owners of the inholding were essentially denied their historic access and had to use the easement as given to the County. This has created great hardship, including less access and less available days in the year for access because Saddle Pass is at a much higher elevation than the historic route.	Other Issues – Grazing Access	Thank you for your comment. The information in this comment will be considered by the decision-makers during the decision process.
101-171	We say all this to show that there has been and still should be non-restricted access provided for the public, grazing permittee and owners of the inholding.	Chapter 2 – Range of Alternatives	The EIS range of alternatives included analysis of motorized use, ranging from open public access to restricted administrative use. Within this range, Alternative 4 provides non-restricted access to the public, grazing permit holder, and inholding owners. The Record of Decision (ROD) will identify the agency decision and describe how factors such as access to the public, grazing permit holder, and inholding owners were taken into account.
101-172	Alternative 2 & 3 only allow unrestricted access for the inholding owners from the west on Roads 1013 and 2546. This route of travel will increase the length of time necessary to reach their property by many hours and is not acceptable for them. These alternatives only allow for unrestricted travel for Border Patrol to the intersection of Roads 1013 and 2546.	Chapter 3 – Section 3.8 Recreation and Access	See response to Comment #26-39.
101-173	Road 1009 as administratively restricted does not allow full unrestricted access for Border Patrol or the private inholding. Thus, the free movement of either party is not met, especially the agency responsible for national security, as has been the intent of this action from the beginning. To allow Border Patrol unrestricted east-west access along this portion of the border.	Chapter 2 – Road Designations	See response to Comment #26-39. Alternatives 2 and 3 were designed to meet the needs of CBP to accomplish its border security mission.
101-174	Neither alternative 2 nor 3 allow for any public access to the area. All the alternatives meet the Access Amendment standards and the public should benefit from the storing of roads to meet the standards for Road Density, OMRD and Core; of which all alternatives comply.	Chapter 2 – Road Designations	The EIS range of alternatives included analysis of motorized use, ranging from open public access to restricted administrative use. Within this range, Alternative 4 provides non-restricted motorized access to the public. The ROD will identify the agency decision and describe how factors such as

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>access to the public, road density, OMRD, and core habitat were taken into account.</p> <p>See also response to Comment #56-105 regarding MS 1 and the alternatives" potential long-term effects on grizzly bear.</p>
101-175	<p>Although Boundary County demands open public access to all our forests, we recognize the requirements/restrictions of the Endangered Species Act, and, to regain public access in the area(s), we recommend the review and contemplation of any chosen alternative consider the following options:</p> <ul style="list-style-type: none"> <li>• That Road 2464 be stored from its intersection with Marsh Creek to Search Creek. The remainder of Road 2464 be administratively open from its intersection with Road 1009 to Marsh Creek and from its intersection with Road 636 to Search Creek. That Road 2253 be stored from Marsh Creek southerly to the end of the road. And the remainder be administratively restricted. That Road 636 be administratively restricted. The above suggestions are considerations that will benefit all parties, including our citizens and any grazing permittee's. Also, that Road 2546 road be administratively open to its intersection with the private inholding.</li> </ul>	Chapter 2 – Range of Alternatives	This alternative suggestion is analyzed in the FEIS in Alternative 4 Modified. See response to Comment #104-206.
101-176	<p>Boundary County does not support decommissioning of roads, as they are removed from the landscape at great cost, usually much higher than the original construction cost. Removal of these road prisms eliminates their use for emergencies or any future long-term management activities. This is especially true in the Boundary Creek drainage as a large portion of the landscape is in General Forest. Most of the roads proposed for storage are already grown in and impassible. Stored roads meet the intent of the Access Amendment.</p>	Chapter 2 – Range of Alternatives	<p>FEIS Section 2.2.2 describes the suite of options for motorized road closure, from storage to decommissioning, along with the multiple factors for future decisions. The FEIS states, "The decision to either decommission roads or place them into long-term storage will depend on several factors, including anticipated future need, location in relation to other roads, and, to a lesser extent, the current condition of the road." As described on page 68, "Motorized road closure would vary by site and could be accomplished through full road decommissioning, long-term storage, or administrative closure (see Section 2.2.2.2 for details). For the purposes of this FEIS analysis, it is assumed that motorized road closure would be accomplished through full road decommissioning to ensure full disclosure of potential impacts." Road conditions for each segment proposed for motorized closure were added from the 2016 Forest Service Travel Analysis Process report (Forest Service 2016e) to the alternative description tables</p>



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			in Chapter 2 as described in the response to Comment #58-113.
101-177	We would demand that any alternative provide for open, public east-west access over Roads 1099 and 1013 and that the road prisms remain and be maintained on the landscape in perpetuity.	Chapter 2 – Range of Alternatives	The EIS analyzes open, public, east-west access in Alternative 4. The ROD will identify the agency decision and describe how factors such as access to the public were taken into account. See the response to Comment #101-176 for the response to maintenance of road prisms.
102-178	On behalf of the board and membership of the Kettle Range Conservation Group, I write to urge cancellation of the proposal to open Bog Creek Road and Blue Joe Creek Road in prime grizzly bear habitat. The Idaho Panhandle NF and U.S. Customs and Border Protection have released a Draft Environmental Impact Statement (“DEIS”) that would, if adopted, cause great harm to grizzly bear, caribou, lynx and other sensitive wildlife.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
102-179	During scoping in May 2016 seasonal restrictions have been in place on Bog Creek Road and Blue Joe Creek Road, limiting administrative motorized access to 57 trips per active bear year. In the DEIS it has been determined that a seasonally restricted designation would not be sufficient to ensure border security in this area, and thus your preferred alternative would remove seasonally restricted designation for Bog Creek Road from all alternatives as well as removing the seasonally restricted designation from the Blue Joe Creek Road via Bog Creek Road and Blue Joe Creek Road to deal with “legitimate threats.” What of the threats to ESA listed grizzly bears – aren’t the bears enough of a deterrent to dangerous Canadians infiltrating the US? There is no discussion anywhere in the DEIS as to what these legitimate threats might entail. As such, selecting an action alternative based on insufficient information to the PUBLIC to make an informed decision is, illegal.	Chapter 1 – Section 1.3 Purpose and Need	See response to Comment #5-9 regarding border security. The administrative open access designation for Blue Joe Creek Road is intended to provide reasonable access to the Continental Mine as described in Sections 2.2.2.1 and 3.8.3.3.
102-180	The DEIS fails to comply with law and we support the No Action Alternative.	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.
102-181	CBP’s vegetation removal work on Bog Creek Road was performed illegally and should be undone. The Agencies have violated the National Environmental Policy Act and Endangered Species Act by conducting work on Bog Creek Road before completing a NEPA analysis prior to beginning work.	NEPA Process	See response to Comment #64-131.
102-182	The interests of wildlife, wild areas and border security are best served by not opening the Bog Creek Road. Earth is in its sixth large scale extinction event - conserving wildlife must be top priority. This can be addressed through	General Project Opposition / No Action Support	Thank you for your comment. The decision-makers will consider the information contained in this comment during the decision process.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	rewilding/restoration of habitat, including road removal and re-contouring, and replanting.		
102-183	The proposal to open this road is an access convenience issue, is contrary to the Desired Future Conditions for the Priest Lake Geographic Area and is a violation of the Endangered Species Act. Without completing the required analysis under the NEPA and ESA, the CBP went forward and conducted unwarranted vegetation-clearing activities. These errors must be corrected and adequate information provided to the public and reissuance of supplemental documentation to the DEIS.	NEPA Process	The EIS includes discussion and analysis of the Management or Geographic Area Desired Condition (DC), Standard (STD), Goal (GOAL), Guideline (GDL), or Objective (OBJ) for all resource sections. The Forest Plan also has a desired condition to coordinate with the CBP on issues relating to national security along the northern international border of the United States and Canada (FW-DC-CC1-02). With regard to the ESA, the agencies are engaged in consultation with the USFWS. Any alternative selected for implementation will be compliant with the ESA, as required by law. See response to Comment #64-131 regarding vegetation clearing activities. See response to Comment #104-185 regarding reissuance of a Supplemental EIS.
103-184	The following proposal to construct a road in current grizzly bear and caribou closures should not be allowed. The CBP currently has the technology to monitor for suspicious activity via drones or on foot. Building a new road will increase the potential for suspicious activity, and will negatively impact the wildlife. It has been scientifically shown that grizzly bear and caribou populations respond negatively to roads. Also, the usage of tax dollars for a CBP 'private' road is inappropriate. Please do not allow this project to be approved.	Chapter 2 – Range of Alternatives	The EIS discussed the use of technology as an enforcement tool in Section 1.3, Purpose of and Need for Action, and Table 2.3.1. The table states, "Technology is an important enforcement tool, one that may reduce the need for regular patrols. However, as discussed above, the exclusive use of technology for remote surveillance would not preclude an active law enforcement response to the issue. Therefore, the use of technology as an alternative to the Proposed Action does not meet the project purpose and need."
104-185	The analysis should highlight the positive and negative effects of each alternative to inform the public and provide the Deciding Officials adequate information to make an informed decision. Unfortunately, the DEIS is poorly organized and contains many inaccuracies. In the Tribe's opinion, the DEIS does not adequately analyze the effects of each alternative so that the public and Deciding Officials can reach a reasoned decision. The Kootenai Tribe recommends the agencies consider issuing a supplemental draft environmental impact statement for additional public review and comment, taking into consideration the public comments received on this DEIS.	General – Impact Analysis	The EIS provides impact analysis for identified issues using comparisons by applicable context (e.g., BMU, recovery zone, species' habitat) or relative to impacts described for the Proposed Action. The analysis provides adequate information for the decision-maker to answer questions regarding intensity of the action and decision. Although the EIS was revised based on public comments, the revisions do not meet the criteria that require publication of a supplemental EIS at 40 CFR 1502.9. Agencies shall prepare

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-186	<p>The Project alternatives must fully analyze impacts on Kootenai Tribe Treaty, cultural and religious rights and interests. While the DEIS mentions archaeological resources and the importance of the area to the Kootenai Tribe, it fails to properly consider the Tribe's need to access this portion of Kootenai Territory.<sup>1</sup> [Footnote: The DEIS contains an error regarding the extent of Kootenai Territory at Section 3.9.3. The Priest-Priest Lake area is shared among the Kootenai Tribe and others. See, Forest Plan Chapter 4 (Priest Geographic Area).] Access to Kootenai Territory is one of the most critical issues related to protection and enhancement of Kootenai Tribe Treaty, cultural and religious rights and interests. As described in the Tribe's Forest Plan comments<sup>2</sup> [Footnote: The Tribe's Forest Plan comments are available for viewing at <a href="http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5441942.pdf">http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5441942.pdf</a>], providing access to traditional and Treaty resources and sacred sites requires balancing the need for motorized access with protection of tribal resources from misuse and vandalism. The Forest Plan established Desired Conditions relevant to those rights and interests that may be useful for the analysis:</p> <ul style="list-style-type: none"> <li>• FW-DC-CR-02. Cultural resources are safeguarded from vandalism, looting, and environmental damage through monitoring, condition assessment, protection, and law enforcement measures.</li> <li>• FW-DC-AI-02. The IPNF recognizes and maintains culturally significant species and the habitat necessary to support healthy, sustainable, and harvestable plant and animal populations to ensure that rights reserved by Tribes in treaties are protected or enhanced. The IPNF recognizes, ensures, and accommodates tribal access to the Forest for the exercise of reserved treaty rights and cultural uses.</li> <li>• GA-DC-WL-LK-01. National Forest System lands contribute habitat conditions for wildlife movement between the Yaak and the Selkirk Mountain range, between the Cabinet and the Selkirk Mountain ranges, and also to the Canadian border.</li> </ul>	Chapter 3 – Section 3.9 Heritage and Tribal Resources	<p>supplements to either Draft or Final EISs if the agency makes substantial changes in the proposed action that are relevant to environmental concerns or there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.</p> <p>See also responses to Comments #104-188 and #104-189.</p> <p>The Forest Plan (Forest Service 2015a) states that a portion of the IPNF is part of the traditional territory of the Kootenai Tribe of Idaho and that, under the Hellgate Treaty of 1855, they have the right to hunt, fish, and gather within the Pend Oreille and Priest Geographic Areas. Additionally, as a federal agency, the IPNF is required to comply with Section 106 of the National Historic Preservation Act requiring government-to-government consultation with American Indian tribes regarding any historic properties within a project area to which they attach religious and cultural significance and that may be affected by the undertaking.</p> <p>As part of the Section 106 process, the Forest Service and the Kootenai Tribe of Idaho have engaged in government-to-government consultation regarding the proposed project. Consultation is ongoing. The EIS Section 3.9 has been retitled "Heritage and Tribal Resources" and revised to include a Protection of Native American Access and Traditions section to address concerns raised regarding access to traditional areas for tribal members.</p>
104-187	One of the largest inaccuracies that directly relates to the purpose and need is contained in Appendix C, which states that grizzly bears do not inhabit Boundary County and are listed as "Experimental Population, Non-essential". Grizzly bears	Appendix C – Ecological	As discussed in Chapter 3 of the DEIS, CBP developed the Ecological Conceptual Site Model (ECSM) (Appendix C of the DEIS) for the Bog

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>in fact inhabit Boundary County and meeting Forest Plan standards related to the species is one of the core elements of the purpose and need. This appendix (intriguingly titled "Ecological Conceptual Site Model") contains a number of errors, particularly in the wildlife section, and should be deleted or completely reworked.</p>	Conceptual Site Model	<p>Creek Road Project, as required by the <i>Programmatic Environmental Impact Statement for Northern Border Activities</i> (CBP 2012). The ECSM functioned as a preliminary analysis of ecological and other environmental considerations for the EIS and was used to inform the resources impact analysis sections in this EIS, as relevant. It was presented in Appendix C in its original form. The ECSM contains errors and inaccuracies that were corrected in the DEIS analysis. To avoid confusion resulting from the various errors and inaccuracies contained in the ECSM, the document was removed as an appendix from the FEIS.</p>
104-188	<p>Reorganization of this document is needed. Information is scattered throughout different sections of the DEIS, thus making it difficult to follow. A better organized document that clearly identifies the existing condition, standards and guidelines, metrics used to detect differences, and an explanation of the importance/context of these changes that is consistent between the alternatives for each species would be easier for the public and decision maker to comprehend.</p>	General – Impact Analysis	<p>See also responses to Comments #58-113 (re: existing condition), #104-189 (re: context and intensity), and #104-196 (re: additional grizzly bear habitat analyses).</p> <p>The EIS, to the extent possible, organizes a great deal of information. Section headers and repeated analysis patterns throughout Chapter 3 provide an organized flow. The sections requested for clear identification are presented here:</p> <p>Existing condition for each analysis is under the Affected Environment header.</p> <p>The standards and guidelines are under the Management Framework header.</p> <p>The metrics used to detect differences are tabularly listed out in the Issue Indicators tables at the beginning of each Environmental Consequences Methodology section.</p> <p>The Environmental Consequences section is organized by alternative, then by "Effects Common to All Threatened, Endangered, and Proposed Wildlife Species in the Analysis Areas," and then by effects on each species that were not already covered in the "Common to All" section.</p> <p>Table 2.4.4 provides a Summary Comparison of Alternatives.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-189	The DEIS states many effects, but generally fails to put these effects into context or provide the public or decision maker much information on the expected level of those effects. In some cases, there is a reference to being more or less than another alternative, but no understanding, discussion, or basis to assess the outcome of the expected effect. For an informed decision to be made, the level of effects needs to be disclosed with an explanation and basis for the determination. Currently, this is a document that provides a list of potential effects but provides little assessment or context of those effects. Further, there is little discussion on how the anticipated level of effects differ between each alternative or what it means for the species in question. Stating that there is more or less habitat affected, but not putting it into context of what that means to a species does not provide an adequate level of detail to make an informed decision.	General – Impact Analysis	<p>The EIS provides context and intensity via the percentage of available suitable habitat affected by species, and the comparison of impacts from the alternatives will inform the decision.</p> <p>In Section 3.2.5 at the end of each species' effects discussion, there is a summary paragraph clarifying whether there would be direct or indirect effects on that species and whether they would be detrimental or beneficial.</p> <p>Section 3.3.5.5 summarizes the impacts to sensitive wildlife species analyzed in Section 3.3: "All alternatives are consistent with the Forest Plan and policy direction to 'ensure that these species do not trend toward Federal listing as a result of management actions.' None of the action alternatives would affect more than 1 percent of potentially suitable sensitive species habitat in the project-scale wildlife analysis area, and the action alternatives would affect a lower percentage of habitat available within the landscape-scale analysis area...the alternatives may impact individuals or habitat, but would not likely contribute to a trend toward Federal listing or cause a loss of viability to the population or species."</p> <p>See also response to Comment #104-196.</p>
104-190	In the Purpose and Need, the primary purpose is to provide an east-west access for USCBP, but only the Bog Creek Road (Road 1013) is classified as an administratively open road. If the purpose is east-west access, it seems that the classification of the 1009 Road should also be classified as administratively open under Alternatives 2 and 3. The rationale for this restricted designation and a process to ensure compliance needs to be disclosed.	Chapter 2 – Range of Alternatives	Under Alternatives 2 and 3, CBP would continue to have limited seasonally restricted motorized trips available on the eastern roads in the BMU. It is anticipated that, with open administrative motorized access to Bog Creek Road, CBP would require fewer trips on the eastern seasonally restricted roads in the BMU because CBP can accomplish mission requirements through use of Bog Creek Road.
104-191	The use of the term "seasonally restricted" is misleading. This classification of roads includes roads that are restricted to trips during the bear season (01 April – 15 November) and restricted to snowmobile use (20 November – 30 June), so it is confusing how they are seasonally unrestricted. It would be more precise to refer to them as "restricted" roads.	Chapter 2 – Road Designations	The EIS used the standard road classifications defined in the <i>Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones</i> (Access Amendment) (Forest Service 2011a).

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-192	<p>The range of open motorized road density (“OMRD”) annually over the last 10 years ranges from 22.76% to 34.65% (mean 29.86%) (DEIS, p. 74) with the 2016 OMRD calculated at 30% (DEIS, p. 5), but the No Action Alternative cites a misleading 14.87% that has not been achieved in the past 10-years. The 14.87% is based on the classification of open roads, which infers that many of the restricted roads have been used to a “moderate” use level over the past 10 years. The No Action Alternative table and related text should report the most recent OMRD (30% - 2016) along with a map showing which roads would be deemed open based on the 2016 use levels. A discussion of the variance from year to year in the text would be appropriate along with any commitments that would retain the desired road classification. Currently, the comparison to the No Action Alternative OMRD provided in the DEIS is irrelevant. Relying on the desired management designation, not realized use, results in indefensible conclusions.</p> <p>The above example suggests that these road classifications are not hard and fast. Throughout the document, there are statements about “flexibility” in OMRD within the BMU to allow for “routine law enforcement, forest management, and research.” However, the area where this “flexibility” would occur is undefined and therefore an accurate analysis of the effects under each alternative cannot be undertaken. It is understandable that emergency/exigency situations might result in overuse of restricted roads, but by definition these situations should be rare, not “routine”. When realized use is considered, it appears that the OMRD differences between Alternatives 2, 3 and 4 may only occur on paper. A clear discussion of the current realized use, the proposed alternative, and commitments, policies, and procedures that will be in place to adhere to road classifications are critical to support the differences in alternatives and analysis in the DEIS.</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	See response to Comment #58-113. A map displaying road drivability and the 2017 actual motorized use was added to Chapter 2 of the FEIS. “Flexibility” as used in this EIS regarding administrative motorized access was further clarified.
104-193	The Kootenai Tribe strongly supports the on-going education of administrative personnel to reduce wildlife-human interaction and assure that personnel are provided with bear deterrent (spray).	Mitigation	See “Features Designed to Protect Special Status Wildlife Species” in EIS Appendix B, and Appendix I. This is an ongoing, and planned future, measure.
104-194	It would be beneficial to invoke the terms of the 2006 MOU to cross-deputize USCBP to help enforce USFS and USFWS regulations as a mitigation action.	Mitigation	Thank you for your comment. CBP and the Forest Service will consider cross-deputization as a potential approach to enforcement or mitigation.
104-195	Assertions such as: “unlimited motorized access in the center of this important linkage zone would directly impact the grizzly bear population connectivity in the SRZ” (p. 122) needs more discussion, along with explaining how this meshes with the high road densities north of the border.	Chapter 3 – Section 3.2 T&E Grizzly Bear	This quote from the <i>Grizzly Bear Recovery Plan</i> (Recovery Plan) (USFWS 1993a) was added to Section 3.2.3.1: “The SRZ . . . includes part of Canada because the habitat in the U.S. portion is not of sufficient size to support a minimum population . . . the habitat is contiguous across the border . . . grizzlies north and south of the border are considered one population” (USFWS 1993a).”

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-196	<p>Statements like “27 percent of denning and wet meadow habitat available and 46 percent of the wet meadow habitat in the BMU would be within 500 meters of roads designated as having administrative open or publicly motorized access” (DEIS p. 122) provides some measure of change, but without an explanation of what that means for the species, these metrics provide little information to assess the differences between alternatives. In this case, these habitats are used when the area is generally inaccessible by motorized vehicles due to snow conditions/restrictions, therefore disturbance/displacement impacts by motorized vehicles would be unlikely under any alternative. Without putting the change of the stated metrics into context, an accurate, defensible assessment of effects is unlikely.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Grizzly Bear</p>	<p>The discussion in Section 3.2.5.2 was further revised to state that: “Due to bear road-avoidance behavior described above, this could discourage some bear individuals from moving through the BMU, ultimately decreasing the genetic flow between the U.S. and the Canadian portion of this population in the short term. As described in Section 3.2.3.1, the U.S. portion of the SRZ is ‘not of sufficient size to support a minimum population’ (USFWS 1993a); without connectivity to Canada, the SRZ population recovery may be inhibited.”</p> <p>Further population connectivity discussion occurs in Section 3.2.5.4, Cumulative Effects.</p> <p>See Section 3.2.3.1, for the introduction of these important grizzly bear habitats and the seasons in which bears typically occupy them:</p> <p>“Grizzlies commonly choose low-elevation riparian areas and wet meadows during the spring and generally are found at higher elevation meadows, ridges, and open brush fields during the summer (Volsen 1994). Habitat use is highly variable between areas, seasons, local populations, and individuals (Almack 1985; Servheen 1983; Slone 2007; Volsen 1994; Wielgus et al. 1994).”</p> <p>“Natural caves or excavated dens (typically above 5,000 feet in the SRZ) are entered after the first snowfall and occupied for 4 to 5 months (Forest Service 2013a).”</p> <p>Disclosure of these impacted habitats was retained in the effects section of the EIS (Section 3.2.5), along with a clarification that “as these habitats are used when the area is generally inaccessible by motorized vehicles due to snow conditions, the disturbance impacts by motorized vehicles would be low.”</p> <p>Additionally, impacts per alternative to female spring, summer, and fall habitats by habitat quality rating (per Proctor and Kasworm [2017]) were added to the EIS.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-197	The statement that “improvements to grizzly bear security has improved due to hunting enforcement, hunter info/education, and reduced motorized access” is misleading (DEIS p. 75). By definition, grizzly bear security core is defined by all motorized use. It would be more accurate to state that managed motorized access, increased enforcement, and education have led to more secure habitat for bears.	Chapter 3 – Section 3.2 T&E Grizzly Bear	Revision was incorporated.
104-198	The DEIS states that the Proposed Action would benefit caribou by reducing roads that predators could use to access deep snowpack. This is a concern during the winter period due to snowmobile activity, which is currently prohibited in the area, except for USCBP and road 1388. Closure of the 1388 public snowmobile route under Alternative 2 would be beneficial. That closure is only in Alternative 2, so this would be an item to help contrast the alternatives. Additionally, the 1388 route bisects a caribou travel route modeled by Wakkinen and Slone (2010).	Chapter 3 – Section 3.2 T&E Caribou	See also responses to Comments #104-199 and #104-203.  The benefit to caribou from motorized closure of FSR 1388 is discussed and contrasted between Alternatives 2/4 and 3 in Section 3.2.5.2 and summarized in Table 2.4.4.  Wakkinen and Slone’s (2010) modeled potential movement corridors for caribou are shown in Figure 3.2.4 and introduced in Section 3.2.3.2.  Table 3.2.17 was added to Section 3.2.5 comparing those roads for which a change (increase or decrease) in the potential for predator access would occur. (Within the analysis area, there would be no change to predator accessibility from roads that are 1) currently drivable with no change proposed to their maintenance level or 2) currently undrivable and proposed for motorized closure.)  The benefit/alternatives comparison on the caribou movement corridors from closure of Forest Service roads per alternative were added to the discussion in Section 3.2.5.
104-199	The DEIS correctly states that a potential increase in winter predator access due to USCBP use of Bog Creek Roads could occur. However, the Bog Creek Road segment stays at lower elevations and winter use in the area, even when caribou were translocated, was low, so the impacts to caribou would be limited. These effects would be higher for lynx, since the Bog Creek Road traverses lynx habitat. However, USCBP use on higher elevation roads could be more impactful, but are not discussed in the DEIS.	Chapter 3 – Section 3.2 T&E Caribou	See also responses to Comments #104-198 and #104-203. Where Bog Creek Road is discussed as potentially receiving CBP winter motorized patrol in Section 3.2.5.2, the clarification will be added that “the Bog Creek Road stays at lower elevations (2,717–4,467 feet) and winter caribou use in that area is low (Public Comment from Kootenai Tribe of Idaho 2018), so the impacts to caribou would be limited.”
104-200	Year-round caribou use occurred near Shorty Peak and Silver Mountain, so storing 2252 under Alternatives 2 and 4 and the southern portion of 2253 under	Chapter 3 – Section 3.2 T&E Caribou	See also response to Comment #104-199. Added this specificity to caribou effects discussion by alternative in Section 3.2.5.



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	Alternative 3 would reduce potential disturbance to caribou if these areas were used in the future.		
104-201	The DEIS contains a misunderstanding of the difference between the United States and Canada processes (DEIS p. 79). The first several paragraphs on page 78-79 are correct. However, the statement relating to the USFWS considering COSEWIC's (Canada) recommendation to list caribou as endangered is incorrect. These are two different processes in different countries. It is correct to say that Southern Mountain Caribou are listed as threatened under Canada's Species at Risk Act, but Canada is currently assessing a COSEWIC recommendation to change their status to endangered.	Chapter 3 – Section 3.2 T&E Caribou	Revisions to distinguish the two processes were incorporated into Section 3.2.3.2.
104-202	The South Selkirk Caribou census occurs on both sides of the border and is a combination of fixed-wing and helicopter surveys. The census population is for the entire subpopulation in both the United States and British Columbia. Currently, the subpopulation consists of 3 cows, which were located in British Columbia.	Chapter 3 – Section 3.2 T&E Caribou	Replaced mentions of “12 caribou (including one calf)” with “two female caribou.”
104-203	The contention that reduced road densities would benefit lynx by reducing competitor access is incorrect. These roads (except 1388) are subject to public snowmobile restrictions, therefore storage of these roads would not affect lynx. Competitor access would be enhanced by the construction and winter USCBP use of Bog Creek Road which traverses lynx habitat. Again, the effect needs to be assessed in context and a discussion supporting that assessment is needed.	Chapter 3 – Section 3.2 T&E Canada Lynx	The discussion in Section 3.2.5 refers to changes in CBP winter motorized patrol on any open roads, or public use of the designated snowmobile route (FSR 1388).  Table 3.2.17 was added to Section 3.2.5 that compares roads for which a change (increase or decrease) in the potential for predator access would occur. (Within the analysis area, there would be no change to predator accessibility from roads that are 1) currently drivable with no change proposed to their maintenance level or 2) currently undrivable and proposed for motorized closure.)  Revised the Table 2.4.4 and Table 3.2.33 discussions to specify CBP winter motorized patrol, as well as snowmobiling on FSR 1388.
104-204	The DEIS also does not disclose how the reduction in lynx habitat relates to the Forest Plan Standards.	Chapter 3 – Section 3.2 T&E Canada Lynx	Added to the end of the <i>Northern Rockies Lynx Management Direction</i> amendment (NRLMD) (Forest Service 2007) summary, Table 3.2.11: “The [vegetation management] objectives, standards, and guidelines do not apply to . . . removal of vegetation for permanent developments such as . . . roads . . . (Forest Service 2007: Attachment 1, page 2).”

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
104-205	<p>The assertion that Alternative 4 could result in increased impacts to lynx, fisher, and wolverine due to trapping is misleading. Is there any information on trapping pressure in the area that can help the reader understand the context of this threat? Regardless, trapping seasons run from November – March depending on species. During this time frame, much of the area is inaccessible by motorized wheeled vehicles due to snow conditions/closures. There may be a small window in which increased trapping access may occur, but a trapper would be unlikely to install a trap line in an area that they could not get back to due to snow conditions. Under all action alternatives, the reconstruction of Bog Creek Road enhances non-motorized access into lynx, wolverine, and likely fisher habitat during the trapping season. The motorized management of these roads is unlikely to change access during the trapping season due to weather constraints.</p>	<p>Chapter 3 – Section 3.2 T&amp;E General</p>	<p>Please also see EIS Appendix E, Assessment of Project Compliance with NRLMD.</p> <p>The two instances of (within lynx and wolverine Alternative 4 Effects) “trapping of their prey species, incidental trapping (when other species are targeted)” were removed.</p> <p>No additional information regarding trapping was available in Lucid et al. (2017). Additionally cited Lucid et al. 2017 in the EIS and added it to Chapter 6: Lucid, M.K., L. Swartz, and C. McKormack. 2017. <i>Idaho Panhandle Forest Carnivores, F15AF00962, Final Report</i>. Available at: <a href="https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2017.pdf">https://idfg.idaho.gov/sites/default/files/media/idaho_panhandle_forest_carnivores_2017.pdf</a>. Accessed August 30, 2018.].</p>
104-206	<p>The Kootenai Tribe proposes analyzing a modified Alternative 2. [NOTE: See comment letter for map of proposal] The rationale for the modified Alternative 2 includes the following: • Allows for increased motorized Tribal Treaty and religious use, while meeting the stated purpose and need. • Restricts access and use during critical times of the year for grizzly bear (spring season, vulnerable young wildlife, hunting seasons, livestock operations, etc.), thereby mitigating many of the potential effects under Alternative 4. • USCBP, USFS and other law enforcement agency presence in the area should reduce the risk of vandalism and looting of cultural resources, environmental damage, trespass, and malicious killings or poaching of wildlife.</p> <p>The proposed modified Alternative 2 includes the following modifications:</p> <ul style="list-style-type: none"> <li>• Roads 2464 and 2253 would be stored between Search Creek and Marsh Creek. Segments of Roads 2464 and 2253 would be left as restricted (trip restrictions). It could be beneficial to extend the storage of these roads back to the unnamed drainage north of Marsh Creek for more core habitat.</li> <li>o Rationale: • Under Alternative 2, storage of Road 2464 creates a sliver of core between Roads 636 and 2253. Conversely, the proposed storage creates a more contiguous block of core. • Storage of these roads does not disrupt access for the existing permittee. • Road 2253 occurs above 5,000' in elevation and extends into caribou habitat and a modeled caribou movement corridor. Storage of the road would decrease potential disturbance if caribou were to repopulate the area. • Travel Analysis Process Report (“TAPS”) (USFS 2016) – suggestion to remove failing culvert/fish barrier in Search and March Creeks. In addition, removal of the</li> </ul>	<p>Chapter 2 – Range of Alternatives</p>	<p>The FEIS includes analysis of this suggested alternative. Although the commenter suggests that it is a modification of Alternative 2, it is closer to the road designations and analysis presented in Alternative 4. The Alternative 4 Modified description and analysis is included in the FEIS.</p> <p>See also response to Comment #58-113. The 2016 Forest Service TAPS report (Forest Service 2016e) is available in the project record.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>culvert on March Creek may increase potential connectivity of red band cutthroat trout population.</p> <ul style="list-style-type: none"> <li>• Road 2252 would be stored its entire length o Rationale:• Creates a larger contiguous block of core habitat• TAPS - Storage of 2.7 miles could be needed for core; the remaining 0.3 miles does not serve a purpose.▪ The road accesses caribou habitat that was used fairly heavily and yearround by translocated animals. Storage would decrease potential disturbance, if the area were repopulated.▪ Road bisects a modeled caribou movement corridor.</li> <li>• Roads 1009 and 1013 classified as a restricted and administrative open road, respectively, that may be open to the public between 15 July and 15 August.</li> </ul> <p>In addition, administrative round trips along the Road 1009 system in spring and fall would be limited, (preferably to 19 and 15, respectively), even though the road would be classified as open for the entire bear year for OMRD calculations. Some flexibility in trips may be accommodated, but trips in the spring and fall would be minimized. If management flexibility is needed in other areas of the BMU, the public would be notified that the road would not be open for the upcoming year as soon as a need is identified. Public use of the road would be predicated on the following criteria. If any of these criteria are violated, the USFS can decide to not open the road indefinitely. These criteria would be placed on a sign at both ends of the restricted road system. Suggested wording for the signage is:</p> <p>This road system is open to the public between 7/15-8/15, but may be closed indefinitely, if any of the following occur:</p> <ul style="list-style-type: none"> <li>▪ Malicious killing/poaching of wildlife, especially caribou and/or grizzly bears</li> <li>▪ Damage and/or breaching of associated gates</li> <li>▪ Vandalism or looting of cultural or other resources</li> <li>▪ Environmental damage</li> <li>▪ Road damage</li> </ul> <p>Please notify Forest Service Law Enforcement (phone) immediately if you see any violations to promote future public use of this road system.</p>		
106-207	<p>Thank you for considering comments on the Bog Creek Road Project DEIS. The project site area is important for a number of species of fish and wildlife, including grizzly bears, so any alternative in this analysis must take into account the needs and security of fish and wildlife populations in the area. However, national security is of utmost importance to the United States and the State of Idaho, and unfettered administrative access for U.S. Customs and Border Protection personnel is essential. While we have no specific comments on the individual alternatives within the DEIS, the State of Idaho requests that east-west</p>	Chapter 2 – Road Designations	<p>The EIS range of alternatives included analysis of motorized use, ranging from open public access to restricted administrative use. Within this range, Alternative 4 provides non-restricted access to Forest Service Roads 1009 and 1013. The ROD will identify the agency decision and describe how factors such as impacts to species and border security were taken into account.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	access be open to allow access over the 1009 and the 1013 roads without any administrative trip prohibitions.		
106-208	Additionally, the State requests that you work closely with private landowners with inholdings in the project area to ensure that adequate access is provided to those private inholdings.	Chapter 3 – Section 3.8 Recreation and Access	See response to Comment #26-39.
108-209	What the Agencies fail to provide is information as to why CBP suddenly feels it needs year-round, unlimited access on these roads, and why the Agencies feel it needs to open Blue Joe Creek Road to allow private property owners to access the Continental Mine when the Agencies have seemingly met the requirement to provide access to the mine with a seasonal restriction on Blue Joe Creek Road in the past...while the Agencies assert that CBP needs continuous access to the border via Bog Creek Road and Blue Joe Creek Road to deal with "legitimate threats," there is no discussion anywhere in the DEIS as to what these legitimate threats might entail.	Chapter 1 – Section 1.3 Purpose and Need	<p>See Section 1.2 Background of the EIS regarding private land access. See response to Comment #5-9 regarding threats and border security access: The [FEIS] has been revised to include discussion and analysis of border security access in Section 3.8, Recreation and Access. Elements such as gates, signage, and monitoring that are included in the Proposed Action to deter poaching and other illegal activity are described in Section 2.2.2.1. The increased risk of direct mortality for listed species from poaching and other illegal activity as a result of the Proposed Action is addressed in Section 3.2.5.3.</p> <p>See response to Comment #56-108: The Proposed Action presented during public scoping in May 2016 maintained the current Bog Creek Road and Blue Joe Creek Road seasonally restricted designations, limiting administrative motorized access to 57 trips per active bear year. The agencies determined that this designation would not allow CBP adequate access to the border to effectively conduct its statutory mission and thus it would not meet the project's purpose and need as presented in Section 1.3 of the EIS. In addition, the Forest Service determined that removing the seasonally restricted designation from Blue Joe Creek Road would trend toward meeting the Access Amendment standards and legal obligation to provide access to private property within the Blue-Grass BMU. Please refer to EIS Sections 2.3 and 3.8.3.3 and 3.8.3.5 for additional discussion regarding the need for the proposed administrative open designation.</p> <p>Currently, the only open roads within the Blue Grass BMU are either encumbered by potential</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>ANILCA (Alaska National Interest Lands Conservation Act) claims, legal agreements, or are necessary for CBP border access and, therefore, are not available for closure to all motorized use as requested by the commenter. As described in the Travel Analysis Process Report prepared by the Forest Service for this project (Forest Service 2016e), the Smith Creek/Saddle Pass route from the Westside Road (County Road 45) to the Canadian border (FSR 281/2454/1009/2455) is under permanent easement to Boundary County under the Boundary Creek Road settlement. Similarly, the lower portion of the road in the Blue Joe Creek drainage (FSR 2450) from the border to the FSR 1013 junction is also covered by this easement. The preferred route from the Saddle Pass route to a private inholding at the Continental Mine in upper Blue Joe Creek (FSR 1009/636/1011/2546) has been used by the landowners to access their property. The currently open portion of FSR 1013 (south of the guardrail barrier) and the portion of FSR 2546 between the Bog Creek Road gate and the FSR 1011 junction is needed by CBP to complete their east-west patrol route. These road segments comprise the "green" open roads designation displayed in Figure 2.2.1 of the EIS.</p> <p>The range of alternatives analyzed in the EIS includes both closing to motorized use the roads in Upper Grass Creek (as a feature of Alternative 3) and closing to motorized use FSR 1388 (as a feature of Alternative 2). Compensating for the administrative open designation of Bog Creek Road and increasing core habitat is provided in Alternative 3 to the extent feasible by the proposed closure of roads in Upper Grass Creek.</p> <p>The alternative discussion in Chapter 2 includes tables that display the current conditions of roads proposed for closure by alternative (e.g., see Table 2.2.2). In addition, Figure 2.2.2 displays the</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-210	Without completing the required analysis under the National Environmental Policy Act, CBP went forward and conducted vegetation-clearing activities on the eastern portion of the Bog Creek Road corridor in 2016. <sup>7</sup> According to the DEIS, “[v]egetation removal was performed on an approximately 6-foot-wide x 1-mile-long corridor on the east end of the roadway.” <sup>8</sup> It is unclear if there was any public notice or an opportunity to comment before this “vegetation removal” was	NEPA Process	<p>current (2017) motorized use and current drivability conditions of roads within the Blue Grass BMU.</p> <p>When selecting a final alternative for implementation, the responsible official will have the ability to choose those features, from among the alternatives analyzed in detail, which best achieve the identified purpose and need while responding to the identified issues, and which comply with existing law and regulation, including closing or storing roads in Upper Grass Creek or FSR 1388.</p> <p>Therefore, considering a new alternative, which would include the requested features, would either not meet the identified purpose and need for the proposal (limiting CBP to 57 trips) or would not be substantially different than what has been included and analyzed in the existing range of alternatives.</p> <p>See also response to Comment #58-113: Road conditions for each segment proposed for motorized closure were added from the 2016 Forest Service TAPS report to the tables per alternative in Chapter 2. As appropriate, Chapter 3 sections (Threatened, Endangered, and Proposed Species; Wildlife; and Recreation and Access) discuss in more detail what the current road condition, the No-Action Alternative, and the proposed motorized closures means for those resources and their habitats.</p> <p>Table 3.1.3 provides a qualitative level of trips within the BMU. The agencies have added additional detail for the No-Action Alternative to Table 3.1.3, providing the OMRD and motorized use under the “Current Access Amendment Designated Use” and the “Actual Use Since 2006” columns.</p> <p>As responded to for Comment #64-131: The prior brush trimming is outside the scope of this [NEPA] analysis. It was done for safety purposes to facilitate a non-motorized response to an exigent circumstance and not to presage the repair of Bog Creek Road.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	performed, and it is completely clear that no NEPA analysis was approved or completed before CBP undertook these activities on public lands. What is clear is that the Agencies have taken the first steps in repairing Bog Creek Road, as proposed in the DEIS, before the NEPA analysis is complete...CBP's work on the Bog Creek Road is a clear violation of NEPA....We request that the Agencies complete a supplemental environmental impact statement for the work already completed on Bog Creek Road. Agencies must prepare supplements to either draft or final EISs when the agency makes substantial changes in the proposed action that are relevant to environmental concerns or when there are significant new circumstances or information relevant to environmental concerns bearing on the proposed action or its impacts. Id. § 1502.9(c)(1). CBP must prepare a supplement environmental impact statement on the work completed on Bog Creek Road, which reflects a change in the proposed action and significant new information.		The brush trimming is described in Section 1.2, Background, and the current state of vegetation is addressed in the baseline environment sections. Continued coordination between CBP and the Forest Service on this project will help ensure that all environmental requirements are fulfilled appropriately.
108-211	The Agencies Have Violated the Endangered Species Act By Conducting Work on Bog Creek Road. CBP's work on the Bog Creek Road is also a violation of the Endangered Species Act ("ESA"), because CBP failed to consult with the Fish and Wildlife Service on the impacts of its actions on grizzly bears, Woodland caribou, Canada lynx, and bull trout – all of which are federally listed species. Section 7 of the ESA requires each federal agency, in consultation with the Fish and Wildlife Service ("FWS"), to insure that any proposed action is not likely to jeopardize the continued existence of a threatened or endangered species, or result in the destruction or adverse modification of its critical habitat....Section 9 requires that agencies insure that the proposed action does not result in the "take" of any listed species. It is highly likely that CBP's road work harmed and harassed listed species, including grizzly bears, Woodland caribou, Canada lynx, and bull trout. CBP's road work violates both Section 7 and Section 9 of the ESA.	NEPA Process	See response to Comment #108-210.
108-212	In order to avoid litigation on CBP's illegal road work, we urge the Agencies to reclaim the work done on Bog Creek Road and return the road to its pre-project condition. This may include the placing of boulders, seeding, and/or shrub planting to prevent motorized equipment from using the old existing route. The Agencies must provide a written agreement to the undersigned organizations of its intent to reclaim the road. Furthermore, the Agencies must agree in writing to do no more repair work, including but not limited to vegetation clearing, on the Bog Creek Road or the Blue Joe Creek Road until a NEPA analysis and ESA consultation is complete. If no action is taken, the undersigned organizations may initiate a lawsuit to seek judicial remedies.	NEPA Process	See response to Comment #108-210.
108-213	None of the Action Alternatives Would Meet the Access Amendment Standards. the Service must ensure the project complies with all forestwide standards and	Chapter 2 – Road Designations	As responded to for Comment #58-113: Road conditions for each segment proposed for

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-214	<p>Failure to Demonstrate Compliance with the Grizzly Core Habitat Buffer. Under the action alternatives, the DEIS notes the Agencies will monitor the use of Bog Creek Road for potential high use after repair. If an average of more than 20 parties per week use the trail, it would be considered a high use trail and a buffer would be removed from grizzly bear core area habitat. High-use trails have the potential to disturb or displace bears, and are buffered in the same fashion as drivable roads. The buffered area surrounding high-use trails is removed from core area habitat. The Agencies fail to explain how it would still meet the core area habitat requirements of the Access Amendment standards under the action alternatives when this happens, because presumably a buffer will be removed.</p>	Chapter 2 – Range of Alternatives	<p>motorized closure were added from the 2016 Forest Service TAPS report to the tables per alternative in Chapter 2. As appropriate, Chapter 3 sections (Threatened, Endangered, and Proposed Species; Wildlife; and Recreation and Access) discuss in more detail what the current road condition, the No-Action Alternative, and the proposed motorized closures means for those resources and their habitats.</p> <p>Table 3.1.3 provides a qualitative level of trips within the BMU. The agencies have added additional detail for the No-Action Alternative to Table 3.1.3, providing the OMRD and motorized use under the “Current Access Amendment Designated Use” and the “Actual Use Since 2006” columns.</p> <p>See Table 2.4.2 to see how the action alternatives meet the Access Amendment standards. See also Table 2.4.4 and Sections 3.2.5 and 3.3.5 for impacts to wildlife and wildlife habitat.</p> <p>See all EIS Figures in Section 2.2, a buffer surrounding Bog Creek Road has been removed from core area habitat under all of the alternatives. See also EIS page 151 (Table 3.2.33). See also response to Comment #48-81: See Table 3.2.33 discussion regarding high-use trails. If, in the future, these trails are observed to have high use, then at that time, the Forest Service would evaluate approaches to ensure that the core area standard (55%) for the Blue-Grass BMU is maintained. See also response to Comment #48-82: See responses to Comments #48-80 and #48-81. All known motorized routes have been buffered out of core area. If, in the future, additional motorized routes or high-use trails would affect the core area available</p>



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-215	<p>the Idaho Panhandle National Forest Plan aims to ensure that “[a]ll grizzly BMUs have low levels of disturbance to facilitate denning activities, spring use, limit displacement, and reduce human/bear conflicts and potential bear mortality.” The Forest Plan favors that “[r]ecover of the grizzly bear is promoted by motorized access management within the IPNF portion of the Cabinet-Yaak and Selkirk recovery zones,” and asserts that the agency shall apply the Interagency Grizzly Bear Guidelines to management activities. The Interagency Grizzly Bear Guidelines call on the Forest Service to “emphasize actions which contribute toward conservation and recovery of the bear within areas identified in the Grizzly Bear Recovery Plan” and “to maintain and enhance habitat and to minimize potential for grizzly human conflicts.” The agency will manage these lands for multiple land use benefits, but only “to the extent these land uses are compatible with the goal of grizzly recovery.” “Land uses which cannot be made compatible with the goal of grizzly recovery, and are under FS control, will be redirected or discontinued.” The Blue-Grass BMU has been designated Management Situation 1, meaning that managing for grizzly bears shall receive “the highest management priority,” and land management decisions must favor the needs of grizzly bears over other competing land use values. Other land uses will only be permitted if they can be made compatible with grizzly needs. None of the action alternatives in the DEIS are compatible with grizzly bear needs, as building and repairing the Bog Creek Road and increasing access and motorized use on the Blue Joe Creek Road will cause disturbance, avoidance, and is likely to displace bears currently using the area. Current data shows extensive use by grizzly bears of the Blue-Grass BMU, including breeding bears and denning habitat. While the Agencies</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	<p>within the Blue-Grass BMU, then the Forest Service would be required under the Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones (Forest Service 2011a; herein called the Access Amendment) to evaluate approaches at that time to ensure that the core area standard (55%) is maintained.</p> <p>Response to Comment #48-80 is: All known motorized routes have been buffered out of the core area. If motorized activity occurs on British Columbia or Idaho Department of Lands lands not currently buffered out of the core area in the future, then at that time, the IPNF would evaluate approaches to ensure that the core area standard (55%) for the Blue-Grass BMU is maintained.</p> <p>Table 3.2.10 includes the Forest Plan Desired Conditions from this comment. As responded to for Comment #56-105: Additional discussion regarding MS1 has been added to Section 3.2.3.1, with details from Interagency Grizzly Bear Committee 1986 guidelines. An MS1 assessment per alternative has been added to the grizzly bear discussion in Section 3.2.5.3. See also response to Comment #104-196: See Section 3.2.3.1, for the introduction of these important grizzly bear habitats and the seasons in which bears typically occupy them:</p> <p>“Grizzlies commonly choose low-elevation riparian areas and wet meadows during the spring and generally are found at higher elevation meadows, ridges, and open brush fields during the summer (Volsen 1994). Habitat use is highly variable between areas, seasons, local populations, and individuals (Almack 1985; Servheen 1983; Slone 2007; Volsen 1994; Wielgus et al. 1994).”</p> <p>“Natural caves or excavated dens (typically above 5,000 feet in the SRZ) are entered after the first</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>admit that all of the action alternatives would cause both short-term and long-term detrimental impacts to grizzly bears, the Agencies fail to follow the mandates of the Forest Plan and the Interagency Grizzly Bear Guidelines to prioritize grizzly recovery over other land use values in the Blue-Grass BMU. The Agencies cannot justify its actions by creating and Purpose and Need statement that prioritizes other land use values, including the stated goal to improve border access. In addition, the project area contains lands in the Priest Lake Geographic Area and the Lower Kootenai Geographic Area, both of which have Forest Plan desired conditions to maintain low levels of human disturbance in grizzly bear habitat and to retain linkage corridors for grizzly bears and other wildlife. The Project Area also includes Management Areas 1b (Recommended Wilderness) and 5 (Backcountry), both of which contain large remote areas with little human disturbance that should be retained and contribute habitat for species with large home ranges such as wide ranging carnivores (e.g., grizzly bears). In other words, these large expanses of habitat should remain remote with little human disturbance to provide secure habitat and connectivity corridors for grizzly bears. As the DEIS admits, however, the action alternatives have the potential to disrupt grizzly bear movement through linkage corridors, and therefore do not meet the desired conditions as described in the Forest Plan. Specifically, the Blue-Grass BMU is an important connectivity corridor for grizzly bears. But the repair, motorized closure activities, and increased motorized use of Bog Creek and Blue Joe Creek roads will significantly impact bear movements throughout the BMU, which bears use as a movement corridor between other BMUs in the Selkirk and Recovery Zone, including bears that move in a north-south direction to reach the Canadian portion of the Selkirk Recovery Zone. The Agencies acknowledge that the proposed activities will “reduc[e] the permeability of the movement corridor as a whole” and may decrease the genetic flow between the U.S. and Canadian bear populations. This avoidance behavior could continue indefinitely given the long-term administrative motorized use proposed. By reconstructing a currently overgrown and impassible road and opening another seasonally restricted road up to unrestricted access, the Agencies fail to comply with the Desired Conditions in the Forest Plan laid out for these geographic and management areas. The action alternatives will simply add more disturbance to an area considered necessary habitat for grizzly bear recovery, and thus cannot be aligned with the goals of the Forest Plan.</p>		<p>snowfall and occupied for 4 to 5 months (Forest Service 2013a).”</p> <p>Disclosure of these impacted habitats was retained in the effects section of the EIS (Section 3.2.5), along with a clarification that “as these habitats are used when the area is generally inaccessible by motorized vehicles due to snow conditions, the disturbance impacts by motorized vehicles would be low.”</p> <p>Additionally, impacts per alternative to female spring, summer, and fall habitats by habitat quality rating (per Proctor and Kasworm [2017]) were added to the EIS.</p>
108-216	<p>the Agencies rely on research from the 1980s in attempts to predict when bears will be using higher and lower elevations in the BMU, and to predicate its assertions that it will base its work season around when grizzly bears may be using the areas surrounding the roads under construction. This research, however, is woefully outdated and does not present an accurate account of what grizzly bears are doing on the ground now. For example, this research does not account for climate change, which may be causing bears to emerge from their</p>	Chapter 3 – Section 3.2 T&E Grizzly Bear	<p>See response to Comment #108-215 regarding incorporation into the EIS of Proctor and Kasworm's (2017) habitat quality modeling. See also response to Comment #48-88: Kasworm et al. (2018a, 2018b) indicate in the annual Selkirk and Cabinet-Yaak recovery area research and monitoring progress reports that the majority of den exits occur</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>dens and use low elevations lands later in the season than they did in the 1980s. NEPA requires that agencies use “high quality” information and “accurate scientific analysis,” and thus we request that the Agencies update this section of the EIS with timely and up-to-date science and data.</p>		<p>after April 1. Management within the Hughes-Sullivan BMU differs from the Blue-Grass BMU. See also response to Comment #104-196 [included above in response to Comment #108-215].</p> <p>Because of the many types of projects and activities that can occur over the life of the Forest Plan (Forest Service 2015a), it is not likely that a project or activity can maintain or contribute to the attainment of all goals and desired conditions, nor are all desired conditions relevant to every activity (i.e., recreation desired conditions may not be relevant to a fuels treatment project). Most projects and activities are developed specifically to maintain or move conditions toward one or more of the desired conditions of the Forest Plan. It should not be expected that each project or activity will contribute to all desired conditions in the Forest Plan, but usually to one or to a subset. To be consistent with the goals and desired conditions of the Forest Plan, a project or activity must be designed to meet one or more of the following conditions:</p> <ol style="list-style-type: none"> <li>1. Maintain or make progress toward one or more of the desired conditions of the Forest Plan without adversely affecting progress toward, or maintenance of, other desired conditions; or</li> <li>2. Be neutral with regard to progress toward Forest Plan desired conditions; or 3. Maintain or make progress toward one or more of the desired conditions over the long term, even if the project or activity would adversely affect progress toward or maintenance of one or more desired conditions in the short term; or 4. Maintain or make progress toward one or more of the desired conditions over the long term, even if the project or activity would adversely affect progress toward other desired conditions in a minor way over the long term. Here, the desired condition to coordinate with the CBP on issues relating to national security along the northern international border of the United States</li> </ol>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-217	<p>According to the DEIS, under all action alternatives, road maintenance and decommissioning may last up to three seasons. With just a dozen caribou documented as remaining in this population, however, it is unknown whether this population—so close to the brink of extinction—could survive three full seasons of road work. Remoteness from human presence, low road densities, and limited motorized access are all important factors impacting caribou habitat selection and survival. In addition to causing displacement as caribou avoid human presence, roads may also increase predation upon caribou by wolves and other predators. Notably, law enforcement patrol, because exceptions to winter motorized closures and road use are often made, is listed as a specific factor that has impacted and may continue to impact the destruction and fragmentation of caribou habitat. Roads may also impact modeled travel corridors necessary to achieve the goals of the Recovery Plan. The action alternatives also do not comply with the Forest Plan guideline to avoid or minimize disturbance in occupied caribou summer habitat from July 8 to October 16. Rather than follow this guidelines, the Agencies propose road construction and repair work from July 16 to November 15 for up to three years in known occupied caribou habitat, and would increase road use in the same area in perpetuity. Due to the small size of the Woodland caribou population in the Selkirks and the negative impacts that roads can have upon caribou and their habitat, we believe that this project will jeopardize the recovery and continued survival of this Woodland caribou population. We believe that the Agencies must take a closer look at the impacts to Woodland caribou and the likelihood that this project may accelerate the extinction of this small population.</p>	Chapter 3 – Section 3.2 T&E Caribou	<p>and Canada (FW-DC-CC1-02) would be achieved, as well as the long-term recovery of ESA-listed species in the analysis area (FW-DC-WL-03 and FW-DC-WL-05), despite short-term adverse impacts.</p> <p>See EIS page 85: "The majority of den emergence in the CYRZ and SRZ occurs after April 1 (Kasworm et al. 2018a, 2018b)." and EIS page 86: "**SRZ females have been observed emerging from dens as early as the third week in March, but the majority are after the first week in April (Kasworm et al. 2018a)."</p>
108-218	<p>The Agencies note that repair and maintenance of Bog Creek Road would include installation of six new culverts and replacement of six out of 67 existing corrugated metal pipe culverts located along the length of the roadway. The Agencies further assert that a culvert failure and resulting road washout made the road completely impassable at Spread Creek. The fact that this washout exists demonstrates the</p>	Chapter 3 – Section 3.2 T&E Bull Trout	<p>See Tables 3.6.8, 3.6.9, and 3.6.10; the number of culverts under all action alternatives would be less than under the No-Action Alternative. EIS page 125 explains why the action alternatives reduce the risks to bull trout, by explaining: "there would be a</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>lack of maintenance by the Agencies on existing culverts, despite the known and demonstrated risk of culvert washouts. Proposing new culverts ignores the Agencies' limited capacity to maintain even the existing culverts, much less ensure protection of bull trout and water quality in bull trout critical habitat downstream from culverts. This, despite the Agencies' historic lack of maintenance and resulting culvert washouts. It fails to disclose that culvert washouts are just as likely under the action alternatives (given that the number of culverts will actually increase and the agency's maintenance funding continues to decrease) as the no action alternative. For the action alternatives, the Agencies' state sedimentation from culvert replacement could be measurable to 800 feet downstream, while sedimentation from culvert removals could be measurable 3,000 feet downstream. The DEIS also states the effects from culvert replacement or removal would be temporary (less than 24 hours). And it states that bull trout are located over 4,000 feet downstream from the proposed in-stream work to remove or replace culverts. The Agencies improperly skew the impacts analysis in favor of the action alternatives by conveniently ignoring impacts that will result under all of the alternatives. For example, the DEIS makes no mention of the ongoing risk of culvert failure from the 67 culverts remaining on Bog Creek Road even after maintenance under each of the action alternatives. In contrast, the agency states that under the No Action alternative "culvert failure or blowout could catastrophically release sediment downstream" with detrimental impacts for the following 5-10 years to downstream bull trout and designated bull trout critical habitat (Upper Priest River, Malcom Creek, and Lime Creek). The Agencies' analysis arbitrarily and capriciously omits the impact of keeping 67 culverts on Bog Creek Road under the action alternatives. These culverts are subject to catastrophic failure, as explained in the No Action alternative analysis.</p>		<p>lower long-term potential than under the No-Action Alternative for culvert failure at the road-stream crossings upstream of mapped bull trout DCH on Upper Priest River, Malcom Creek, and Lime Creek, following culvert replacement or removal. This is because 1) the new culvert at the Continental Creek crossing (upstream of Malcom Creek) would be hydraulically designed in accordance with Forest Service standards and receive regular (at least annual) maintenance; 2) the culvert removal locations (upstream of Upper Priest River and Lime Creek) would be reshaped to resemble the natural channel up- and downstream. The reduced potential for culvert failure to contribute sediment to downstream bull trout DCH is a long-term beneficial direct impact." See also EIS page 139: "During long-term maintenance and use of Bog Creek Road, culvert cleaning on the Continental Creek culvert could produce occasional sediment pulses in mapped DCH downstream in Malcom Creek. This analysis assumes that periodic monitoring and cleaning would be conducted at the remaining culverts along Lime Creek and its tributaries to avoid culvert failure upstream of streams occupied by bull trout and bull trout DCH."</p>
108-219	<p>The Agencies mention the action alternatives will remove vegetation that may provide snowshoe hare habitat (which is prey for lynx). In a study in Maine, lynx killed fewer hares near logging roads, likely because hare density was lower there than in adjacent un-roaded habitats or possibly because of increased potential for interactions with generalist competitors like coyotes. At bottom, roads of all sizes may have direct and indirect effects to lynx, including habitat loss and fragmentation, vehicle collisions, increasing human access, increased incidental trapping and illegal shooting, and reduced prey.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Canada Lynx</p>	<p>All of these direct and indirect effects to lynx are disclosed in Section 3.2.5 of the EIS: habitat loss and fragmentation, vehicle collisions, increasing human access, increased incidental trapping and illegal shooting (referred to as "illegal kills" in the EIS), and reduced prey. Refer to the FEIS Errata Sheet regarding a revision to cite these additional references in the Affected Environment.</p>
108-220	<p>Wolverines appear to avoid transportation corridors in their daily movements. Most roads in wolverine habitat are low-traffic volume dirt or gravel roads. Wolverines tend to locate natal dens a distance from public (greater than 4.6 miles) and private (greater than 1.9 miles) roads. The Agencies fail to fully assess these direct, indirect, and cumulative impacts to wolverine from its proposal to open and authorize use on Bog Creek Road and Blue Joe Creek Road.</p>	<p>Chapter 3 – Section 3.2 T&amp;E Wolverine</p>	<p>See pages 138, 144, and Section 3.2.5.4 of the EIS regarding the potential for direct, indirect, and cumulative impacts to wolverine from human access. Refer to the FEIS Errata Sheet for revisions to additionally cite references in the Affected Environment regarding denning.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-221	Roads contribute to the spread of invasive species. Roads themselves, regardless of whether they are open or closed to public access, split apart the forest landscape, creating more buffers where invasive species are likely to grow. The Agencies should include in the EIS an assessment of how the proposed roads (even absent vehicles and regardless of maintenance level) provide a vector for the spread of invasive species by fragmenting the landscape and creating buffers that are less resistant and resilient to stressors like invasive species.	General – Impact Analysis	See Section 1.8.4.6 of the EIS.
108-222	Science shows that roads and trails play a role in affecting wildfire occurrence. See Attachment A at 9 (noting human-ignited wildfires account for more than 90% of fires on national lands and are almost five times more likely in areas with roads). Closed roads remain on the landscape and thus continue to allow for human-caused wildfires. What's more, roads that remain on the landscape can affect where and how forests burn. In taking a hard look at this proposal, the Agencies must consider how opening Bog Creek Road and Blue Joe Creek Road to year-round access is likely to increase the risk of wildfire occurrence in this area.	General – Impact Analysis	In reviewing the references cited, the Forest Service was unable to find the older references cited by the commenter through Internet searches (USDA Forest Service 1996a and USDA Forest Service 1998). However, there is much more current information available on national wildland fire statistics available at the National Interagency Fire Center's webpage ( <a href="https://www.nifc.gov/fireInfo/fireInfo_statistics.html">https://www.nifc.gov/fireInfo/fireInfo_statistics.html</a> ) . In general, the trends described by the commenter are correct on a national level. For example, humans cause far more fires than lightning, but most of the human-caused fires occur in the Southern and Eastern areas (68%), not the Northern Rockies. Also, it is correct that human-caused fires are more likely in a roaded area than in a roadless area (USDA 2000, Table 3-19). However, national fire statistics do not necessarily translate to the forest, or even project-area scale. The IPNF Spatial Fire Management Plan summarized wildfire ignitions occurring from 1996–2016 (included in project file), and there are distinct patterns that are not consistent with national trends. First, there were more than twice as many natural ignitions (lightning) than human-caused ignitions on the IPNF (1,884 natural ignitions compared to 792 human ignitions). In addition, human ignitions are concentrated in populated areas, primarily valley-bottoms near private land. Conversely, lightning fires are much more frequent in higher-elevation forested locations and are not inherently related to forest road density. Given the historical patterns of wildfire ignitions in the project area and across the forest, there is no evidence to suggest

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-223	<p>The Agencies must analyze in detail the impact of climate change on forest roads and forest resources. The analysis should start with a vulnerability assessment, to determine the project area's exposure and sensitive to climate change, as well as its adaptive capacity. For example, the Agencies should consider the risk of increased disturbance due to climate change when analyzing this proposed project. It should include existing and reasonably foreseeable climate change impacts as part of the affected environment, assess them as part of the Agencies' hard look at impacts, and integrate them into each of the alternatives, including the no action alternative. The Agencies should also consider the cumulative impacts likely to result from the proposed project, proposed road activities, and climate change. In planning for climate change impacts and the proposed road activities, the Agencies should consider: (1) protecting large, intact, natural landscapes and ecological processes; (2) identifying and protecting climate refugia that will provide for climate adaptation; and (3) maintaining and establishing ecological connectivity.</p>	General – Impact Analysis	<p>that there would be a measurable effect to wildfire occurrence under the action alternatives.</p> <p>The IPNF recently completed (2015) a revision of its 1987 Forest Plan. The analysis conducted for the 2015 revised plan included preparation of a Climate Change Report (2010) that compiled and synthesized scientific information on past and projected trends in regional climate and climate-related impacts on forest resources and their respective disturbance processes. It also identified possible management options to reduce ecosystem vulnerability to climate change and to increase ecosystem resilience to both climate and non-climate stressors. The adaptive management approach of the forest planning process is expected to allow the Forest Service to update and adjust the forest plan comprehensive evaluations and management options as additional information becomes available. Predicting climate change impacts at the local or even regional scale is more difficult to deduce than are the general indications. Anticipated changes in the climate for the Pacific Northwest (e.g., more rain, less snow, warmer temperatures) (Mote 2004, Mote et al. 1999) or elevated CO<sub>2</sub> may not be realized at a local area, particularly within the time frame of this analysis. The complex interaction of multiple and uncertain variables makes site-specific predictions speculative. However, Joyce et al. (2008) suggest several concepts that could inform development of proactive management of potential climate change impacts: 1) Create resistance or promote resilience to climate change; 2) Enable forests to respond to change; 3) Increase redundancy and diversity; and 4) Promote connected landscapes. These concepts have been incorporated into the revised forest plan's stated goals, desired conditions, objectives, guidelines, and standards and to the extent feasible, given the project's purpose and need, into its design by creating blocks of core habitat for</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-224	The DEIS notes that winter restrictions do not apply to law enforcement activities and thus CBP may access the developed roads via snowmobile during the winter. The Agencies must consider and disclose impacts from the proposal to allow snowmobile use along Bog Creek Road, including impacts to imperiled wildlife.	General – Impact Analysis	grizzly bear and other wildlife species, reducing existing road density, improving up- and downstream passage from removal or replacing stream crossings. Finally, the EIS for the Bog Creek Road Project includes cumulative effects discussions related to past, ongoing, and foreseeable activities, including from climate change upon relevant resources within the project area. Discussions with respect to climate change and its impacts are included in the threatened, endangered, and proposed species (p. 156), other wildlife species (p. 198), and fish species (p. 224–225) discussions.  See Sections 3.2.5 and 3.3.5 of the EIS. See also responses to Comments #108-217, #108-225, #108-227, #108-228.
108-225	Effects of snowmobiles on grizzly bears occur primarily when bears are entering or leaving their dens. Possible effects include den abandonment, loss of young, increased energetic costs while bears are in dens or displaced away from suitable habitat if outside dens, learned displacement from suitable habitat resulting from exposure to disturbance, and death. Grizzly bear denning habitat often overlaps with winter recreation areas, making them susceptible to disturbance, thereby increasing energy expenditures and the potential for den abandonment. Grizzly bears typically den in relatively high elevation areas with more stable snow conditions and steep slopes. Direct mortality is possible if an avalanche is triggered on a slope where bears are hibernating. In general, grizzlies avoid roads and select den sites one to two kilometers from human activity. Snowmobiles can easily access these remote sites and therefore pose a potential for disturbance. A comprehensive review found human disturbance within one kilometer of a den site has a significant risk of causing abandonment, especially early in the denning season. Snowmobiles may have direct harmful effects to emergent bears, mainly females and cubs. Because females with cubs have high energetic needs and cubs have limited mobility for several weeks after leaving the den, they remain in the den site area for several weeks after emergence from dens. Disturbance levels that cause a female to prematurely leave the den in spring or move from the den area could impair the fitness of the female and safety of the cubs. The mean week of den emergence ranged from the third week in March to the fourth week in May. It is important to provide secure habitat—areas free of motorized access—so bears are able to fully use available resources.	Chapter 3 – Section 3.2 T&E Grizzly Bear	Snowmobile use by CBP in the analysis area would not be a newly authorized activity under any of the alternatives. See EIS page 130, "CBP may occasionally access these roads via snowmobile during the winter, as winter restrictions do not apply to law enforcement activities; CBP snowmobile use of these roads could increase from that of the No-Action Alternative." The only potential snowmobile access added within the analysis area by the action alternatives would be CBP (law enforcement) winter patrol along the improved Bog Creek Road. All other snowmobile access within the analysis area would remain the same as under the No-Action Alternative. See also page 153 of the EIS: "The Kaniksu Over-The-Snow TMP NEPA analyses would include additional disclosure of potential impacts from over-the-snow motorized use." See EIS page 21, "Winter motorized snowmobile use by the public is currently not allowed on Bog Creek Road as a result of the legal rulings of November 7, 2006, and February 27, 2007, relating to recovery of woodland caribou and the potential impacts of snowmobile use within the recovery area. Law enforcement members are



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			currently exempt from the snowmobile closure.” Refer to the FEIS Errata Sheet for revisions to the Affected Environment (Section 3.2.3.1).
108-226	It is well established that undisturbed “winter range” is essential for ungulates survival. Snowmobiles cause both a physiological and behavioral response on ungulate species, resulting in disturbance and displacement. Limiting disturbance – including limiting the duration and spatial footprint – to woodland caribou, especially in winter range, is a key management strategy for protecting the species.	Chapter 3 – Section 3.2 T&E Caribou	See response to Comment #108-217.
108-227	For Canada lynx, the Agencies state that snowmobile trails allowed by the court-ordered closure within the Blue-Grass BMU would not change under the No Action alternative, but it fails to consider the impacts of newly authorized snowmobile use (for CBP) on Canada lynx under each of the action alternatives. Snowmobiles may directly affect Canada lynx during winter months when the species is especially vulnerable by causing physiological responses like increased heart rate and elevated stress level. The noise from snowmobiles is likely detrimental to lynx, disturbing their ability to hunt and increasing stress. Studies on other large mammals that reside in lynx habitat indicate that snowmobiles elicit an even higher stress response than off road vehicles. Snowmobiles may disturb den sites during a time when lynx are rearing young. Snowmobiles may also displace lynx and disrupt otherwise quiet winter habitat by facilitating human access into historically remote winter forest landscapes, increasing lynx interactions with humans, and increasing hunting, trapping, and poaching mortality. This in turn may result in direct collisions, death, habitat fragmentation, and potential population declines. Snow compaction from snowmobiles is another threat to lynx. Snow compaction may suffocate or alter the subnivean movements of small mammals on which lynx prey. Compacted snow trails may also allow coyotes to move into lynx habitat that coyotes previously used only seasonally. Lynx are well adapted to travel and hunt in the deep, powdery snow where snowshoe hares reside and benefit from a natural spatial segregation from other carnivores. One study in Montana found limited use of snowmobile trails by coyotes. But studies in Utah and Wyoming found extensive use of compacted snowmobile trails by coyotes, resulting in potential competition with and displacement of lynx. The differing results are likely due to different snow characteristics, predator communities, and snowmobile use at the various sites. Under the LCAS, the Forest Service assesses the potential for snowmobile trails to provide routes for competitors such as coyotes, bobcats and cougars based on the density of groomed or commonly used snowmobile routes in LAUs.	Chapter 3 – Section 3.2 T&E Canada Lynx	Snowmobile use by CBP in the analysis area would not be newly authorized. See EIS page 130, "CBP may occasionally access these roads via snowmobile during the winter, as winter restrictions do not apply to law enforcement activities; CBP snowmobile use of these roads could increase from that of the No-Action Alternative." Snowmobile use by CBP in the analysis area along the Bog Creek Road would be possible under all of the action alternatives. See pages 105, 113, 118, 120, 128, and 131 of the EIS for disclosure of potential impacts to lynx from snowmobile and CBP winter motorized patrol. See also response to Comment #108-219.  Regarding this portion of the comment, "Snowmobiles may directly affect Canada lynx during winter months when the species is especially vulnerable by causing physiological responses like increased heart rate and elevated stress level." citing Gaines et al. 2003 (Assessing the cumulative effects of linear recreation routes on wildlife habitats on the Okanogan and Wenatchee National Forests (2003), Gen. Tech. Rep. PNW-GTR-586, available at <a href="http://www.fs.fed.us/pnw/pubs/gtr586.pdf">http://www.fs.fed.us/pnw/pubs/gtr586.pdf</a> [last accessed August 22, 2017], pages 5-6. See Tables 1, 2, 3, and the Appendix within GTR-586.) This GTR did not document physiological responses in Canada lynx from winter recreation/snowmobiling.

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-228	<p>Snowmobile use commonly overlaps with wolverine denning habitat. Dispersed recreational activities like motorized winter recreation have the potential to negatively impact wolverine by disrupting natal denning areas. Wolverines have one of the lowest successful reproductive rates known to mammals, and this is hypothesized as linked to winter energy constraints. Female wolverines select and enter dens and give birth in February to mid-March and the overlap of winter recreation with this energetically taxing period is highly concerning. Any disturbance during this important winter period can negatively affect productivity and other vital rates. Researchers have reported that female wolverines may be sensitive to human disturbance in the vicinity of natal and maternal dens, and disturbance from foot and snowmobile traffic has been purported to cause maternal females to abandon or move dens. Preliminary findings from the ongoing study suggest wolverine exposed to higher levels of winter recreation in their home range may avoid recreated areas and move at higher rates in higher intensity recreation areas. In particular, denning female wolverines showed higher movement rate increases in response to higher intensity recreation areas, which causes higher expenditure of energy and reduced ability to hunt for food. These behavioral changes can negatively affect individuals' physiological stress levels and reproductive capacity in several ways, as evidenced in numerous studies on different species. It may reduce the amount of time and thus ability of female wolverines to hunt or to utilize food caches. This would result in significant additive energetic effects, reducing foraging success for adult females already stressed by the demands of bearing and raising a litter. In addition, this could reduce kit survival rates by increasing the potential for predation and exposure to cold temperatures. These results indicate that winter recreation may impact wolverines in as yet unknown ways. As snowmobiling continues to grow in popularity and as snowpack continues to decline due to climate change, there is increasing concern that wolverine denning habitat may become limiting. Recent warming has already led to substantial reductions in spring snow cover in the mountains of western North America. Numerous recent and sophisticated studies support the conclusion that climate changes caused by global climate change are likely to negatively affect wolverine habitat. Protection of denning habitat may be critical for the persistence of the species. An additional concern related to snowmobile use is that motorized access leads to increased trapping pressure (direct or indirect capture) for some furbearers that prefer more mesic habitat conditions generally found at higher elevations or in riparian habitats, such as marten, fisher, lynx, and wolverine. Trapping season for these species is limited to the winter months, and</p>	<p>Chapter 3 – Section 3.2 T&amp;E Wolverine</p>	<p>See also FEIS Errata for revisions to Section 3.2.3.3 (Canada Lynx Affected Environment) and 3.2.5.3 (Canada Lynx Competitor and Human Access).</p> <p>See response to Comment #108-220. The only potential snowmobile access added within the analysis area by the action alternatives would be CBP (law enforcement) winter patrol along the improved Bog Creek Road. All other snowmobile access within the analysis area would remain the same as under the No-Action Alternative. See EIS page 130, "CBP may occasionally access these roads via snowmobile during the winter, as winter restrictions do not apply to law enforcement activities; CBP snowmobile use of these roads could increase from that of the No-Action Alternative." See also page 153 of the EIS: "The Kaniksu Over-The-Snow TMP NEPA analyses would include additional disclosure of potential impacts from over-the-snow motorized use." Refer to the FEIS Errata Sheet for revisions to the Affected Environment (Section 3.2.3.4), wolverine effects analysis in Section 3.2.5.3, and in EIS Appendix G.</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-229	<p>most trappers prefer the relatively easy access to suitable habitat provided by snowmobiles. Wolverine populations in small, isolated mountain ranges can be very susceptible to trapping pressure. Trapping pressure for these species is dramatically reduced if there is less snowmobile access.</p> <p>NEPA's implementing regulations require that when agencies prepare an EIS, that document must consider the cumulative impacts of the action under consideration, and defines cumulative impacts as "the incremental impact[s] of the action when added to other past, present, and reasonably foreseeable future actions." The Agencies state the effects of past and ongoing activities are reflected in the description of existing conditions for each resource. This is insufficient under NEPA's requirements. "In a cumulative impacts analysis, an agency must take a 'hard look' at all actions" that may combine with the action under consideration to affect the environment. By clumping past and present actions into the environmental baseline, the Agencies fail to take the required hard look at cumulative impacts. There is no detailed discussion about these impacts, nor is there a quantified assessment of those impacts. The Agencies also fail to consider various cumulative impacts. As just one example, the DEIS fails to consider the cumulative impacts of climate change and forest roads (i.e., how climate change is expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes).</p>	Other Issues – Cumulative Impacts	<p>Each analysis section (see Chapter 3) details the past and present actions in the analysis area and provides, at a minimum, a qualitative disclosure of how these actions have affected that resource and established its current baseline under the No-Action Alternative. The impacts from past and present actions are the same between all alternatives, including the No-Action Alternative. Quantitative detailed discussion of the impacts from past and present actions would not strengthen the comparison between alternatives within the EIS. See also response to Comment #108-223. Refer to the FEIS Errata Sheet for revisions to the Special Status Plants (Section 3.5) and Soils (Section 3.7) sections of the FEIS.</p>
108-230	<p>NEPA requires agencies to consider the growth-inducing effects of proposed actions.<sup>144</sup> An agency may not simply state that growth will increase with or without the project, or that development is inevitable; the agency must provide an adequate discussion of growth-inducing impacts.<sup>145</sup> Here, all of the action alternatives contemplate giving owners of Continental Mine unfettered year-round access. The Agencies must consider and disclose the extent to which this year-round access may lead to growth-inducing impacts, such as development of the mine. If so, the agencies must also consider the potential induced growth and development of Continental Mine as a connected action in this analysis.</p>	General – Impact Analysis	<p>See response to Comment #48-80: All known motorized routes have been buffered out of the core area. If motorized activity occurs on British Columbia or Idaho Department of Lands lands not currently buffered out of the core area in the future, then at that time, the IPNF would evaluate approaches to ensure that the core area standard (55%) for the Blue-Grass BMU is maintained.</p> <p>See response to Comment #48-85: See also response to Comment #48-80. In accordance with 36 CFR 220.3, reasonably foreseeable future actions are "those Federal or non-Federal activities not yet undertaken for which there are existing decisions, funding, or identified proposals." Presently, there are no identified proposals for logging or mining within the Blue-Grass BMU.</p> <p>See response to Comment #48-86: See also response to Comment #48-80. No logging or mining</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			is reasonably foreseeable within the Blue-Grass BMU.
108-231	Due to the significant negative impacts to wildlife and their habitat, we support the No Action alternative. Through this project proposal, the Agencies seek to undertake road construction and repair and increase motorized use in areas that contain sensitive habitat for sensitive wildlife and fish, including grizzly bears, Woodland caribou, Canada lynx, wolverine, and bull trout. By reconstructing Bog Creek Road and repairing and increasing use on Blue Joe Creek Road, the Agencies threaten to adversely modify and fragment important habitat in the project area. While the Agencies combine this proposal with the closure of other roads, most of those roads are "legacy" roads that are not currently subject to a great deal of motorized use. For example, the Proposed Action would close FSR 1322 and FSR 1332A; while not "formally closed to motorized access," these roads are already gated and blocked with boulders. Thus, even the closure of these roads will not fully mitigate the increased human presence, construction, and increase in motorized use in the project area. Additionally, the DEIS states that because the current OMRD is modeled at just 14.87 percent, over 18 percent below the Access Amendment standard of 33, the No Action alternative would give the agencies motorized access flexibility throughout the BMU to accomplish law enforcement activities, as well as other land management needs. By comparison, the Agencies would have only half as much flexibility under the action alternatives. Thus, we believe the No Action alternative could meet the purpose and need of the project proposal.	General Project Opposition / No Action Support	See responses to Comments #108-213 and #108-234.
108-232	If the Agencies approve the No Action alternative as suggested here, the Forest Service will still be responsible for complying with the Access Amendment standards, which will further benefit grizzly bears and other wildlife.149 Because the Forest Service would need to comply with the Access Amendment standards under the No Action alternative, the Agencies should have evaluated road closures to comply with those standards as part of this alternative. By failing to do so, the Agencies have failed to fully analyze the No Action alternative. We request that the Agencies remedy this failure by evaluating proposed road closures to comply with the Access Amendment standards as part of the No Action alternative in a supplemental EIS.	General – Impact Analysis	See Section 2.2.1 describing the No-Action Alternative for this project, "Although the Forest Service would continue to examine road closure options to meet Access Amendment requirements within the Blue-Grass BMU under the No-Action Alternative, compliance with the Access Amendment standards would not change until currently unidentified other viable road closure options are implemented." Also, the No-Action Alternative is the current operational situation for the IPNF before the proposal to meet the purpose and need (which includes meeting access amendments) was developed. See Section 1.2 describing the background for this project, "The entire Blue-Grass BMU is within 10 miles of the Canadian border; therefore, the status of all roads in the BMU is of great interest to CBP. Because the options of which roads to close to

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-233	<p>Although we support the No Action alternative as stated above, we would also urge the Agencies to consider another reasonable alternative. Under our proposed alternative, the Agencies would work to close open roads and meet the Access Amendment standards before moving forward to repair and open to increased use Bog Creek and Blue Joe Creek roads. By closing roads before conducting construction and repair activities, the Agencies could lessen the negative impacts to wildlife by limiting where human activity is conducted in the Blue-Grass BMU. As all three action alternatives stand now, construction, repair, and closure activity all takes place during the same time over up to three years, thus unnecessarily decreasing undisturbed areas in the BMU where displaced wildlife can seek refuge. Although extending the life of the project may have some pitfalls, we believe that spreading out the impacts over a longer period of time is more beneficial than having increased human activity throughout the BMU by overlapping construction/repair work and closure work. CEQ regulations implementing NEPA require that agencies "rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14(a). The importance of this mandate cannot be downplayed, as a rigorous review of alternatives is considered "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. According to CEQ regulations, the ARS must "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." 40 C.F.R. § 1500.1(e). Because the alternative proposed is a reasonable one and could accomplish the purpose and need of the project while simultaneously decreasing the negative impacts to wildlife, the Agencies have a duty to evaluate and analyze this reasonable alternative.</p>	Chapter 2 – Range of Alternatives	<p>motorized use to meet the Access Amendment standards are limited, it was imperative for CBP and the Forest Service to work together to determine alternatives that would meet CBP's requirements for access as well as the Forest Service's requirements to comply with the ESA."</p> <p>The shorter the construction activities' timeframe, the better and less impactful overall for grizzly bear. By concentrating construction within phases (for up to three seasons), the bears have more room to move to less impacted parts of the BMU. With improvements occurring in Bog Creek, all the equipment and activities will have to mainly go from east to west, along with CBP and Continental Mine activities, so the first year will be the most active and disruptive to bears. While other activities in Grass Creek will still be disruptive, they will not be compounded with the improvement activities in Bog Creek and the travel associated with those efforts. Then the third phase will be concentrated around the Upper Priest River and would not impact the previous activity areas in Grass Creek and Bog Creek. By the third phase, trips within the BMU should be adhering to seasonal trip restrictions, since Bog Creek Road will be administratively open.</p>
108-234	<p>the Agencies' latest proposal expands and alters the project by, inter alia, eliminating the seasonal restrictions on Bog Creek Road and Blue Joe Creek Road. An alternative reflecting the action as originally proposed during scoping in May 2016 – that would maintain season restricted designations on Bog Creek Road and Blue Joe Creek Road, limiting administrative motorized access to 57 trips per active bear year – is reasonable and should be considered in detail. Without justification or explanation, the Agencies determined that a seasonally restricted designation for Bog Creek Road would not be sufficient to ensure border security in the area. Similarly, the Agencies determined it is necessary to remove</p>	Chapter 2 – Range of Alternatives	<p>See response to Comment #56-108: The Proposed Action presented during public scoping in May 2016 maintained the current Bog Creek Road and Blue Joe Creek Road seasonally restricted designations, limiting administrative motorized access to 57 trips per active bear year. The agencies determined that this designation would not allow CBP adequate access to the border to effectively conduct its statutory mission and thus it would not meet the</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
	<p>the seasonally restricted designation from the Blue Joe Creek Road without justification or explanation. There is no reasoning to explain why seasonal restrictions will prevent the Agencies from achieving the stated purpose and need for this proposal.</p>		<p>project's purpose and need as presented in Section 1.3 of the FEIS. In addition, the Forest Service determined that removing the seasonally restricted designation from Blue Joe Creek Road would trend toward meeting the Access Amendment standards and legal obligation to provide access to private property within the Blue-Grass BMU. Please refer to FEIS Sections 2.3 and 3.8.3.3 and 3.8.3.5 for additional discussion regarding the need for the proposed administrative open designation.</p> <p>Currently, the only open roads within the Blue Grass BMU are either encumbered by potential ANILCA (Alaska National Interest Lands Conservation Act) claims, legal agreements, or are necessary for CBP border access and, therefore, are not available for closure to all motorized use as requested by the commenter. As described in the Travel Analysis Process Report prepared by the Forest Service for this project (Forest Service 2016e), the Smith Creek/Saddle Pass route from the Westside Road (County Road 45) to the Canadian border (FSR 281/2454/1009/2455) is under permanent easement to Boundary County under the Boundary Creek Road settlement. Similarly, the lower portion of the road in the Blue Joe Creek drainage (FSR 2450) from the border to the FSR 1013 junction is also covered by this easement. The preferred route from the Saddle Pass route to a private inholding at the Continental Mine in upper Blue Joe Creek (FSR 1009/636/1011/2546) has been used by the landowners to access their property. The currently open portion of FSR 1013 (south of the guardrail barrier) and the portion of FSR 2546 between the Bog Creek Road gate and the FSR 1011 junction is needed by CBP to complete their east-west patrol route. These road segments comprise the "green" open roads designation displayed in Figure 2.2.1 of the FEIS.</p> <p>The range of alternatives analyzed in the FEIS includes both closing to motorized use the roads in</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>Upper Grass Creek (as a feature of Alternative 3) and closing to motorized use FSR 1388 (as a feature of Alternative 2). Compensating for the administrative open designation of Bog Creek Road and increasing core habitat is provided in Alternative 3 to the extent feasible by the proposed closure of roads in Upper Grass Creek.</p> <p>The alternative discussion in Chapter 2 includes tables that display the current conditions of roads proposed for closure by alternative (e.g., see Table 2.2.2). In addition, Figure 2.2.2 displays the current (2017) motorized use and current drivability conditions of roads within the Blue Grass BMU.</p> <p>When selecting a final alternative for implementation, the responsible official will have the ability to choose those features, from among the alternatives analyzed in detail, which best achieve the identified purpose and need while responding to the identified issues, and which comply with existing law and regulation, including closing or storing roads in Upper Grass Creek or FSR 1388. Therefore, considering a new alternative, which would include the requested features, would either not meet the identified purpose and need for the proposal (limiting CBP to 57 trips) or would not be substantially different than what has been included and analyzed in the existing range of alternatives.</p> <p>See also response to Comment #58-113: Road conditions for each segment proposed for motorized closure were added from the 2016 Forest Service TAPS report to the tables per alternative in Chapter 2. As appropriate, Chapter 3 sections (Threatened, Endangered, and Proposed Species; Wildlife; and Recreation and Access) discuss in more detail what the current road condition, the No-Action Alternative, and the proposed motorized closures means for those resources and their habitats.</p> <p>Table 3.1.3 provides a qualitative level of trips within the BMU. The agencies have added</p>

Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
108-235	We encourage the Agencies to be transparent about any consultation process and affirmatively post all consultation documents, including any Biological Evaluations or Assessments by the Agencies, any letters seeking concurrence, and any responses or Biological Opinions from FWS. Without these records, we are unable to assess the agency's analysis of impacts to wildlife and habitat in light of FWS's expert opinion. Providing this information will allow the public to view these critical documents, and other documents in the project record, without the need to submit a formal Freedom of Information Act request. Without this information being publicly available during the notice and comment period, we are unable to meaningfully comment on the Agencies' determinations or analysis.	NEPA Process	<p>additional detail for the No-Action Alternative to Table 3.1.3, providing the OMRD and motorized use under the "Current Access Amendment Designated Use" and the "Actual Use Since 2006" columns.</p> <p>The Agencies have conducted informal consultation with the USFWS throughout the EIS process. The BA was submitted to the USFWS on March 5, 2019, initiating formal consultation. A corrected version and an errata sheet (making minor numerical corrections that did not change the BA conclusions) were provided on March 18, 2019. These documents were uploaded to the Forest Service project website on March 19, 2019.</p>
108-236	Here several waters in the project area are 303(d) listed as impaired for temperature. The Agencies must ensure that the project will comply with the CWA by not causing or contributing to a violation of Idaho's water quality standards. Reliance on best management practices (BMPs) is insufficient; the Agencies must demonstrate how the project will not cause or contribution to a violation of water quality standards despite anticipated increases of sedimentation into receiving waters and a lack of future maintenance plans for these roads.	General – Impact Analysis	<p>See EIS page 257: "The Proposed Action would cross 17 impaired waters, some of which could potentially be disturbed. All these impaired waters fall within two of the five Assessment Units listed in Table 3.6.1: Upper Priest River and Grass Creek tributaries (#ID17010215PN018_02 and #ID17010104PN003_03, respectively). They are on the 303(d) list because of temperature...Temperature is most affected by stream shading. Design features to help mitigate a potential increase in water temperature include leaving riparian vegetation and overstory tree cover along water bodies as feasible to provide shade, along with preserving and replanting woody vegetation where necessary to speed the recovery." "The potential disturbed RHCAs for Bog Creek Road represents 0.04 percent of the 9,195 acres of total RHCAs in the analysis area."</p> <p>Under all action alternatives, the potential for temporary sedimentation impacts has been disclosed in the EIS, and BMPs have been shown to reduce the intensity and duration of sedimentation impacts (Foltz et al. 2008; Forest Service 2013c; King and Burroughs 1989). See Table 3.1.2 for the long-term maintenance and use</p>



Letter ID Comment ID	Public Comment	EIS Section / Topic	Agency Response
			<p>actions, including culvert cleaning and monitoring and maintenance (if necessary) of road drainage features.</p> <p>Foltz, R.B., K.A. Yanosek, and T.M. Brown. 2008. Sediment concentration and turbidity changes during culvert removals. <i>Journal of Environmental Management</i> 87:329–340.</p> <p>King, J.G., and E.R. Burroughs, Jr. 1989. Reduction of Soil Erosion on Forest Roads. General Technical Report INT-264. Ogden, Utah: Intermountain Research Station.</p> <p>U.S. Forest Service. 2013c. Forest Plan Monitoring and Evaluation Report, Fiscal Years 2010-2013, Bitterroot National Forest, pp. 90–242. Available at: <a href="http://www.fs.usda.gov/detail/bitterroot/landmanagement/planning/?cid=fseprd490792">http://www.fs.usda.gov/detail/bitterroot/landmanagement/planning/?cid=fseprd490792</a>. Accessed October 28, 2016.</p>