

## Part 2: Statements of Public Concern

### Category: Planning Process

### Section: Purpose and Need for Proposed Action

**PC #: 2**

**Public Concern: The Forest Service should provide the public with a clear statement of intent.**

Sample Statement:

Many people did listen to the interview with Jack Ward Thomas (Jan.18) on KUFM and I think most of us are aware of the relationship of the Forest Service to Washington and of the pressures brought to bear for production, etc. but someone, somewhere in any system gone awry must stand up and be heard. Believe me people will hear that voice and stand up and cheer. There is so much more I would like to say, but the intent of this letter is to say simply that honesty and a clear statement of intent is never wasted on the public and that hypocrisy and obfuscation are seen for what they are. Your well-thought out letter and the outline of the management plans and the introduction of the management team(s) inspired a ray of hope in me and, I would guess, in some other recipients. (Individual, Arlee, MT - #39)

Sample Statement:

The wording and explanation of the "actions" in the proposal for the most part, are very vague and biased. Blanket proposals are set forth, "fuzzy words" are used, new information and technology is mentioned, but not illustrated or elaborated, false or misleading statements are mentioned, and undefined comments, only to mention a few. I am sure the average public citizen had difficulty understanding these "findings" and "actions." I know I did, and I consider myself fairly knowledgeable and educated. I would like to go into details on these comments, but time and paper does not permit. I also think many of the "actions" are cover-ups of past mismanagement or discredit current plans by failure to implement such. An example of this is--had the USFS complied with the Federal Noxious Weed Management Act of 1974, and the Montana Noxious Weed Management Act of 1948, and had the FS monitored and performed weed control in the 1980s and 1990s, we would not have the problem we have today with the weed situation. (Individual, Bigfork, MT - #621)

Sample Statement:

When the Forest Service goes out on a limb and plays God, spending my tax dollars, this is wrong. There is a lot of confusion about what the Forest Service does. (Place Based Groups, Missoula, MT - #826)

Sample Statement:

Develop a plan that is logical--develop a plan for all kinds of users where it is appropriate for those kinds of uses. Planning needs to be simple. (Place Based Groups, Stevensville, MT - #823)

**PC #: 8**

**Public Concern: The Forest Service should not take the zone approach for the Forest Plan Revision.**

Sample Statement:

We object to the plan to merge the Bitterroot, Flathead, and the Lolo into one environmental impact assessment process and documents. We believe this will discourage public participation and understanding. Locally important issues and custom and culture of local communities will be ignored or the importance of their input diluted with input from individuals from other areas are neither impacted nor informed on those issues. Critical local issues such as mapping roadless areas, determining tentatively suitable timberlands, and public access issues are too complex and voluminous to include in one set of documents for all three forests. Affected interests should be able to choose the documents that deal with their issues and not have to receive maps and analyses for two forests they may not want. (Multiple Use or Land Rights, Kalispell, MT - #59)

Sample Statement:

I sincerely disagree with the decision to combine the revision of three forest plans into one process. While I understand the perceived economics of scale associated with combining the process, I strongly feel that there will be substantial inefficiencies in the resulting forest plans due to shortcuts and generalizations inherent in a combined project. We urge the planning team to reconsider the decision to combine revision activities, summaries, and conclusions. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

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### Sample Statement:

We should have separate plans for each National Forest. Each National Forest has its own unique characteristics. More importantly, the people of one area don't need or want our input and we don't need or want theirs. (Individual, Polebridge, MT - #656)

### Sample Statement:

Combining all of the forests (Bitterroot, Flathead, and Lolo) into one plan is very unwise given the different climate, resource capabilities, issues, culture, and customs of each area. (Place Based Groups, No Address - #967)

### Sample Statement:

I sincerely disagree with the decision to combine the revision of all three forest plans into one process. While I understand the perceived economies of scale associated with combining the process, I strongly feel that there will be substantial inefficiencies in the resulting forest plans due to shortcuts and generalizations inherent in a combined project. I urge the planning team to reconsider the decision to combine revision activities. (Individual, Trego, MT - #213)

### Subconcern:

#### **BECAUSE NOT ALL ISSUES APPLY TO THE ZONE**

### Sample Statement:

Action WRD-F4-A5: (Numerous privately owned dams exist within the Selway-Bitterroot Wilderness Area in Montana, an area managed by the Bitterroot National Forest. We propose storage of equipment be allowed when analysis indicates it is the most appropriate way to achieve operation, maintenance, reconstruction or breaching objectives. Equipment storage would be accomplished in ways that minimize impacts to wilderness values.)Action WRD-F5-A1:(Existing legislation for the Rattlesnake National Recreation Area and Wilderness, located on the Lolo National Forest, allows for the maintenance of dams found within the designated area. There is no need for change with respect to dam maintenance.)All of these "Findings" and "Actions" illustrate why NFMA requires forest planning process to accommodate the unique issues, potentials and limitation, and custom and cultures found associated with each National Forest "administrative unit". These are all unique site specific issues that only a few affected interests will have interest in and further illustrate why a three forest at once process is not practical. These are not public issues which affect preparation of a programmatic long term land use plan. These issues again illustrate things that could and should have been addressed in insignificant amendment if action is needed. There is no indication there will be any alternatives examined or public benefit tradeoff evaluations made. A waste of paper, electronic storage, and time for the vast majority of the public to include these issues in a LRMP proposal. (Multiple Use or Land Rights, Bigfork, MT - #588)

### Subconcern:

#### **BECAUSE IT IS INEFFICIENT AND WASTEFUL**

### Sample Statement:

It is too expensive to print and mail voluminous documents that not everyone wants, nor do people want their electronic files filled with massive amounts of data they may not need just to get some they do need. We believe the National Forest Management Act which requires "one integrated plan for each unit of the National Forest System, incorporating in one document or one set of documents, available to the public at convenient locations, all of the features required by this section" means just that, and the "other requirements of this section" includes the NEPA process and documents, not just a separate Forest Plan. As seen in the 100+ pages of the Analysis of the Management Situation, data, maps and documentation must be done for each Forest. It will not be a hardship for the Forest Service to publish and distribute documents separately for each Forest Unit. (Multiple Use or Land Rights, Kalispell, MT - #59)

### **PC #: 7**

#### **Public Concern: The Forest Service should adopt the zone approach in the Forest Plan Revision**

### Sample Statement:

This tri-Forest Revision offers an excellent opportunity to insure that management is consistent among these Forests. It must not, however, sink to the lowest common denominator nor ignore coordinating management and management standards with the other neighboring National Forests. (Preservation/Conservation, Kalispell, MT - #544)

### Sample Statement:

It is gratifying to know that geographically proximate forest administrations are striving for forest plan revision consistency. In one sense this trend implicitly recognizes the validity of the ecosystem approach to forest, range and water resource management as envisioned and framed in the stillborn Interior Columbia Basin Ecosystem Management Project. I hope the present modest effort to put forest management on a more ecologically literate and responsible footing than has prevailed up to now will have a happier outcome than did ICBEMP and SNEP. (Individual, Bigfork, MT - #600)

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Subconcern:

### **TO MANAGE FOR CONNECTIVITY AT THE LANDSCAPE SCALE**

Sample Statement:

Landscape level planning is necessary for the long-term protection of wildlife and wildlife habitat. In the recent Action Plan, Finding EM-F5 and the subsequent Action EM-A1 are substantial steps toward comprehensive, landscape level plan necessary to conserve biodiversity in the three forests as well as throughout the Northern Rockies. Thank you for recognizing the value of landscape connectivity and the potential for the identification and maintenance of linkages in EM-F5. Connected, non-fragmented habitats in these forests are important to me because I'm concerned about the long-term survival of wildlife populations. (Individual, Missoula, MT - #718)

Sample Statement:

The revision of the forest plan presents a great opportunity to identify some important linkages to preserve wildlife movement throughout the entire region. It is imperative to consider how more localized actions and decisions play into the broad and over arching goal of preserving biodiversity. (Preservation/Conservation, Missoula, MT - #719)

**PC #: 19**

### **Public Concern: The Forest Service should change the Revision Topics identified in the AMS and the Proposed Action.**

Sample Statement:

In preparation for writing my comments for the new Forest Plans, I attended the open house to pick up handout material and to see how the Forest Service was planning to solicit input for the new plans. The handout material addressed 6 areas of concern which had been selected by the Forest Service. I think you are getting the cart before the horse in that the public should be picking their own areas of concern and the Forest Service should be considering them in writing the new plan. Included with the handout material was several sheets of paper soliciting comments on the 6 areas of concern. These areas of concern appear to me to be more of a political agenda than an effort to write a plan which will solve current management problems. (Individual, Kalispell, MT - #506)

Sample Statement:

The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized access and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of a significant prejudice in the process. (Recreational, Helena, MT - #339)

Subconcern:

### **BECAUSE THE IDENTIFIED REVISION TOPICS DO NOT ADEQUATELY REPRESENT THE NEED FOR CHANGE**

Sample Statement:

To that end we submit the following observations and strategic suggestions. All of these might be contained under a seventh forest plan heading of "Management of USFS Administration." First Observation: Public divisiveness wastes significant time, money, personal energy and community good will. Some forest projects that might be worthwhile and make good sense, are jeopardized by this public divisiveness. We believe there is significant public consensus on these issues that is not being developed. Suggestions: 1. The public should be encouraged and included in a consensus and negotiation process to develop Management Area boundaries and preparation of management prescriptions. That is, use the consensus process to create Management Areas. 2. Rather than simply collect opinions from individuals with often extreme opposition, strive to find and develop common consensus. 3. A clear distinction needs to be made between "whether to" decisions and "how to" decisions. That is, for a given management area it should be clear what uses and prescriptions are, or are not, allowed. This would take away the debate of whether a particular project should be implemented, and focus the debate solely on how to achieve desired goals. Second Observation: In order for consensus building to be effective, the USFS administration must be managed with a strong commitment to community consensus. Suggestions: 1. The USFS administrative structure should be designed to search out, and efficiently implement, common agreement. With controversial issues, such as motorized vs. non-motorized uses, the USFS should be pro-active in encouraging diverse groups to find agreement. 2. Potentially controversial issues should be anticipated and monitored, and brought to the community consensus process for resolution, before they become divisive. 3. Pro-active implies that action is taken before civility and community good will is lost, and/or before environmental integrity is lost. (Multiple Use or Land Rights, Victor, MT - #698)

Sample Statement:

They liked the 6 issues that the Plan Revision team had identified, but also thought a couple of more should be added. Those two are Linkage Zone Management (as a stand alone issue), and Sustainable local economies. Then they prioritized the 8 issues, and will begin working on them in priority order. 1) Management of the Urban Interface; 2) Forest Products Management; 3) Wilderness/Roadless; 4) Sustainable Local Economies; 5) Access Management; 6) Recreation; 7) Linkage Zone Management; 8) Ecosystem Management. (Place Based Groups, No Address - #822)

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Sample Statement:

We do not necessarily agree with the list of the six areas in significant need of change. There are many ways to cut up a pie, and the Proposed Action (PA) does not clearly articulate why the Revision pie: is divided in this way. For example, Access Management is not a stand-alone issue but is instead an integral part of each of the other 5 issues. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

The fact that EM-F2-A2 does not include timber, jobs, public access and recreation as values at risk reveals the low level of concern that FNF has for these values. It is clear that you do not share the concerns of the public and that disconnection with the public is the most important need for change in this forest. (Recreational, Columbia Falls, MT - #589)

Subconcern:

### **BECAUSE THE REVISION TOPICS DO NOT ADEQUATELY ADDRESS ACCESS ISSUES**

Sample Statement:

We do not necessarily agree with the list of the six areas in significant need of change. There are many ways to cut up a pie, and the Proposed Action (PA) does not clearly articulate why the Revision pie: is divided in this way. For example, Access Management is not a stand-alone issue but is instead an integral part of each of the other 5 issues. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

Summary Recommendation: MFMU recommends that the major public issues to be addressed in revision are (in order of priority:1. Forest Health and Fire Hazard (critical facet: Forest Access)2. Local Economic and Social Needs (critical facets: Forest Access, suitable timber base and ASQ)3. Recovery of Threatened and Endangered Species(critical facet: Forest Access)4. Recreational Opportunity Spectrum Provided (critical facet: Forest Access)5. Roadless Inventory and Wilderness Recommendations (critical facet: MFMU Forest Access)If the above issues are addressed in a systematic integrated analysis that permits evaluation of values forgone so that the responsible official can make a reasoned decision that is believed to maximize net public benefits as required by law, the access issue will be an integral part of that decision. There is no reference in any of the documents to resource goals assigned to each forest by the Regional Forester as Resources Planning Act (RPA) program goals to be evaluated in Forest Plan Revision as required by 36CFR219.4. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

In terms of system roads alone, each of the WMPZ Forests has far more miles of road than it, has the budget to maintain - six times as many in the case of the Flathead! (See WMPZ AMS, at 4-2). While the Forest Service adopted a new Roads Policy under Chief Dombeck, aimed at determining the necessary minimum road system and reclaiming the rest, Forests like the Flathead are instead reneging on their road reclamation programs and ignoring their inability to maintain the current road system. (Preservation/Conservation, Kalispell, MT - #544)

Subconcern:

### **BECAUSE THE PROPOSED ACTIONS DO NOT ADEQUATELY ADDRESS THREATENED AND ENDANGERED SPECIES ISSUES**

Sample Statement:

I would argue that the effect of the Lynx proposal, on management of the Flathead and other involved forests would make all of the other proposed actions seem irrelevant. We strongly urge the Flathead National Forest to schedule a public meeting on the proposed Lynx plan or if that is not possible, include the Lynx plan discussion in the plan revision discussion. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

Subconcern:

### **BECAUSE THE PROPOSED REVISION ITEMS ARE NOT NECESSARILY PROGRAMMATIC**

Sample Statement:

Action WRD-F4-A5: (Numerous privately owned dams exist within the Selway-Bitterroot Wilderness Area in Montana, an area managed by the Bitterroot National Forest. We propose storage of equipment be allowed when analysis indicates it is the most appropriate way to achieve operation, maintenance, reconstruction or breaching objectives. Equipment storage would be accomplished in ways that minimize impacts to wilderness values.)Action WRD-F5-A1:(Existing legislation for the Rattlesnake National Recreation Area and Wilderness, located on the Lolo National Forest, allows for the maintenance of dams found within the designated area. There is no need for change with respect to dam maintenance.)All of these "Findings" and "Actions" illustrate why NFMA requires forest planning process to accommodate the unique issues, potentials and limitation, and custom and cultures found associated with each National Forest "administrative unit". These are all unique site specific issues that only a few affected interests will have interest in and further illustrate why a three forest at once process is not practical. These are not public issues which affect preparation of a programmatic long term land use plan. These issues again illustrate things that could and should have been addressed in insignificant amendment if action is needed. There is no indication there will be any alternatives examined or public benefit/tradeoff evaluations made. A waste of paper, electronic storage, and time for the vast majority of the public to include these issues in a LRMP proposal. (Multiple Use or Land Rights, Bigfork, MT - #588)

**PC #: 18**

**Public Concern: The Forest Service should move forward with the Western Montana Planning Zone Proposed Action as a good starting point.**

Sample Statement:

The revision of the Forest Plan and its six elements that have been identified is right on course, however, I feel that we should have started this particular revision several years ago when problems in the original Lolo Forest Plan were beginning to show up. The six areas of concern, that have been listed, are of course, very important and I am sure they going to lead to other problems in the plan. At this time, I feel that the working groups are moving a little too fast to accomplish a plan that will last. (Individual, No Address - #800)

**PC #: 9**

**Public Concern: The Forest Service should expand the zone to include other areas.**

Sample Statement:

We commend you on developing a Proposed Action that is concise and easily understood. While we understand that your proposal is very preliminary and general in nature, there are several issues with which we disagree, or on which we believe greater emphasis should be placed. These areas include: proposed wilderness, motorized use, monitoring and enforcement, consistency between forests and the boundaries of the Great Burn proposed wilderness. Consistency. We it is particularly appropriate and necessary that the Lolo National Forest work cooperatively with the Clearwater National Forest to provide consistent management and treatment of, for example, the Great Burn proposed wilderness, parts of which exist on both Forests. Please retain the Lolo's current direction and work with the Clearwater to bring that Forest up to the Lolo's standards. (Preservation/Conservation, Missoula, MT - #439)

Sample Statement:

The Canadian Flathead is one of the most important linkage zones for the Northern Continental Divide Ecosystem. The Flathead Forest needs to be actively involved in cooperative efforts to ensure that management of the Canadian Flathead is consistent with the unsurpassed natural values of the area. Current threats of coal and coal bed methane development would be devastating to the Flathead National Forest. This may necessitate unprecedented steps, including involvement of the State Department and Legislative Branch. In addition, all actions across the border must be bilateral. If we are asking the Canadians to treat the drainage with special care, all management of the Flathead National Forest in the North Fork must be done with the strictest ecosystem management principles. To this end, designation of North Fork wilderness is imperative. The cooperatively developed Conceptual Strategy for the North Fork that the Forest participated in developing and signed off on should be incorporated into the Forest Plan. (Preservation/Conservation, Polebridge, MT - #705)

Sample Statement:

There is concern with adjoining forests and consistency issues (access management, veg. Types). - Suggestion that the combination of forest in this planning group should be the Bitterroot, Lolo, and B-D to deal with issues consistently across boundaries. -There should be management across property ownerships for the ecosystems. -Invite the B-D folks to meet with the Group. (Place Based Groups, Stevensville, MT - #823)

Sample Statement:

One initial major concern is that while the three forests (Bitterroot, Lolo and Flathead) are combined under one planning process, adjoining forests (Beaverhead-Deerlodge and Salmon) are not. Refusing to develop coordinated management for the Bitterroot-Lolo-Deerlodge (Beaverhead-Deerlodge) Forest while doing so instead for the Bitterroot-Flathead Forests which have no common boundaries flies in the face of agency policy and requirements for Ecosystem Management. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

The proposed Lolo, Beaverhead-Deerlodge, and Bitterroot Forest Plan Revisions need to develop and coordinate common management areas (MAs) direction, guidelines, goals and standards for the Sapphire Crest Divide Wildlands which include the Stony Mountain RA and the Sapphire WSA. The Bitterroot Forest and Salmon Forest also need to develop coordinated management areas (MAs), direction, guidelines, goals and standards for the Allan Mountain Roadless Area which lies along another artificial bureaucratic boundary. (Preservation/Conservation, Hamilton, MT - #720)

**PC #: 71**

**Public Concern: The Forest Service should fully develop and analyze a formal alternative (the Citizen's ReVision) in the DEIS that emphasizes regional wildland systems, and restoration activities which benefit watershed integrity and economic vitality.**

Sample Statement:

Watershed health, integrity and stability will allow the recovery of healthy, fishable bull trout populations no longer needing Endangered Species Act protection, and all Water Quality Limited Stream Segments on the Bitterroot, Flathead and Lolo

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National Forests will have been removed from that status. Key blockages to native fish migrations will be remedied and Wild & Scenic Rivers designations will ensure no new dams will fragment our free-flowing rivers and that our recreational opportunities will be enhanced and protected. Protection of roadless lands, including Wilderness designation, will be a boon to elk, deer and wild sheep populations. Grizzly bears and other species listed under the Endangered Species Act will be recovered and well-distributed and key linkage corridor habitats will ensure the vitality of wildlife populations throughout the Northern Rockies. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

We request that our submitted proposal be fully analyzed as one of the alternative studies for detailed analysis in the Draft EIS. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

The Citizen reVision outlines a Desired Future for these three national forests as well as specific standards and guidelines for achieving that condition. We incorporate the Citizen reVision within these comments, and ask that the Forest Service include the Citizen reVision as an alternative in the Draft Environmental Impact Statement on the Forest plan revisions. (Preservation/Conservation, Missoula, MT - #521)

Sample Statement:

We ask that the Forest Service develop and analyze an alternative in the Revision DEIS and FEIS that fairly represents the principles and desired future condition portrayed in the Citizen revision that we have developed collaboratively with the other groups identified on the inside of the front cover - <http://www.wildrockiesalliance.org/issues/citizenrevision.html>. (Preservation/Conservation, Missoula, MT - #527)

Sample Statement:

We ask that the Forest Service develop and analyze an alternative in the Revision DEIS and FEIS that fairly represents the principles and desired future condition portrayed in the Citizen reVision. Know that we will be increasing the broad-based support for such an alternative as the Revision process proceeds. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

I urge you to include the Citizen reVision as an alternative to be analyzed in the Forest Plan NEPA process. It can be viewed at <http://wildrockiesalliance.org/issues/citizenrevision.html>Note that the text inadvertently left out inclusion of Stony Mountain Roadless Area (103,000 acres) as being recommended for Wilderness designation. (Individual, Darby, MT - #582)

We hope you will adopt the Citizen reVision (attached as FOWS Exhibit #1 and found at <http://wildrockiesalliance.org/issues/citizenrevision.html>, which outlines a Desired Future Condition for the three Forests, a blueprint for achieving that condition by implementing the accompanying standards and guidelines. The Citizen reVision should be fully analyzed as an alternative in the Environmental Impact Statement being prepared for the three-forest Forest Plan revision process. (Business, Missoula, MT - #616)

Sample Statement:

We request that the Citizen reVision be fully analyzed and included as an alternative in the Draft Environmental Impact Statement and considered in decisions relating to the revision of the Forest Plans for the Lolo, Flathead, and Bitterroot National Forests. (Preservation/Conservation, Missoula, MT - #696)

Sample Statement:

We ask that the Forest Service include the Citizen reVision as an alternative in the Environmental Impact Statement on the Forest Plan revisions because it is based on good scientific and economic information and has broad support. (Preservation/Conservation, Big Fork, MT - #708)

Sample Statement:

FOB supports and requests that the Forest Service include and analyze the "Citizen reVision Alternative" developed by a coalition of environmental groups. FOB also has supported the NREPA proposal for many years and requests that the Forest Service Plan Revision process analyze and develop Forest Plan alternatives that incorporate it. (Preservation/Conservation, Hamilton, MT - #720)

### **PC #: 70**

#### **Public Concern: The Forest Service should adopt the following comments and recommendations as part of a formal alternative which emphasizes ecosystem and wildland values.**

Sample Statement:

I urge the Forest Service to include the recommendations outlined above as formal alternative for detailed analysis in the Draft Environmental Impact Statement. (Business, Polebridge, MT - #145)

Sample Statement:

Please include a formal alternative in the DEIS that includes these suggestions regarding the forest plans for the Flathead,

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Lolo, and Bitterroot NF.

1. keep all roadless area as is to maintain wilderness qualities.
2. log no existing old growth and allow other areas to turn into old growth.
3. limit motor vehicles and ATVs to open roads only
4. develop an integrated road management and reclamation program that restores all watersheds so they provide adequate and permanent security habitat for grizzly bear, bull trout, and all other fish and wildlife species.
5. propose for wilderness designation all areas proposed for wilderness designation in the Northern Rockies Protection Act,
6. establish wildland restoration areas in the Northern Rockies Ecosystem Protection Act which will create high paying jobs while restoring damaged watersheds.
7. establish legally enforceable management standards and monitoring requirements that will achieve on the ground conditions warranting the removal of all water bodies and species from impaired, threatened, and endangered status.

(Individual, No Address - #204)

Sample Statement:

I would like to see a formal Alternative in the DEIS that would represent the views stated in this letter. (Individual, Bigfork, MT - #471)

Sample Statement:

I would like to see alternatives that consider reduced timber harvest, reduced ORV access, and increased management as a wilderness setting. (Individual, Missoula, MT - #750)

Subconcern:

**AS EXPRESSED IN LETTERS NUMBERS 750.3, 145.11, 204.8, 471.8**

**PC #: 72**

**Public Concern: The Forest Service should develop an alternative "To meet the needs of the public for a functional network of motorized roads and trails for access and recreation with practical and reasonable consideration of the environment", and that mitigates the cumulative impact on motorized recreationists that has occurred.**

Sample Statement:

A reasonable alternative instead of all motorized closures is a sharing of resources. A reasonable alternative for accomplishing this can be done by designating alternating weeks for motorized and non-motorized use. The schedule can be communicated to the public by signs at each end of the trail segments, newspaper articles, and through local user groups. This alternative eliminates any reasonable concern about conflict of users (which we think is over-stated and over-emphasized based on reasons stated in Attachment A). (Recreational, Helena, MT - #339)

Sample Statement:

We suggest the following hierarchy of uses be followed on lands intended for multiple-uses where resource conditions dictate allowable uses: (1)all roads are important for access and recreation for all multiple-uses including those listed in the introductory letter. Roads are essential for handicap access. Therefore, wherever reasonable, all roads should remain open for all multiple-use access and recreation; (2)where a road or trail is not appropriate for 4x4, use, then it should remain open to ATV, motorcycle, mountain bike, equestrian and hiking use; (3)where a road or trail is not appropriate for ATV use, then it should remain open to motorcycle, mountain bike, equestrian and hiking use; (4)where a road or trail is not appropriate for motorcycle use, then it should remain open to mountain bike, equestrian and hiking use; and lastly (5)where a road or trail is not appropriate for mountain bike use, then it should remain open to equestrian and hiking use. In all cases, if user conflict is claimed as a reason for consideration of motorized closures, then the use of alternating weeks for motorized and non-motorized access must be considered as a reasonable alternative to total motorized closure. (Recreational, Helena, MT - #339)

Sample Statement:

Motorized recreationists would accept area closure (restriction of motorized vehicles to designated routes and elimination of cross-country travel) when reliable documentation demonstrates that it would provide measurable and significant improvement to the natural environment in exchange for a reasonable number of designated motorized routes. We request that the analysis develop a preferred alternative with a reasonable number of designated routes in exchange for the environmental improvements that have been realized by motorized visitor's acceptance of millions of acres of area closure under the 3-State OHV Plan. (Recreational, Helena, MT - #339)

Sample Statement:

An alternative to motorized closures in many cases would be to keep motorized opportunities open and use education on principles such as those found in the Tread Lightly program and Blue Ribbon Coalition Recreation Code of Ethics and Principles to address and eliminate specific issues associated with motorized recreationists. These efforts could include the use of pamphlets, information kiosks, and presentations. Education can also be used to address and eliminate issues associated with anti multiple-use recreationists by encouraging their use of reasonable expectations, reasonable tolerance of others, and reasonable sharing of our land resources. To date, educational measures have not been adequately considered, evaluated or implemented. We request that educational measures be incorporated as part of this proposed action

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and that the significant cumulative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities be addressed. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative impacts associated with inadequate use of education measures in past actions. (Recreational, Helena, MT - #339)

Sample Statement:

FS should incorporate a vigorous recreational education program into all management alternatives. (Preservation/Conservation, Pocatello, ID - #545)

Sample Statement:

...the cumulative impact of all motorized access and recreational closures is significant. Simply, there are very few places left where motorized recreationists can recreate and yet the trend continues. This stealthy attack on motorized recreational opportunities must be acknowledged. Please quantify and consider these cumulative impacts and develop a preferred alternative that will mitigate the significant cumulative impact on motorized recreationists that has occurred. (Recreational, Helena, MT - #339)

### **PC #: 74**

**Public Concern: The Forest Service should adopt the following comments and recommendations as part of a formal alternative which emphasizes multiple use values.**

Sample Statement:

Refer to this document as a possible "Proposed Alternative," submitted by the Mineral County Commissioners. (County Agency or Official, Superior, MT - #507)

### **PC #: 34**

**Public Concern: The Forest Service plan should disperse management activities across the landscape.**

Sample Statement:

First -the sum of the whole is being rapidly diminished by reactive rather than proactive management. We cannot expect a small part of our landscape; specifically the timber base acres to provide everything for all other users. We need to spread the impacts! spread the opportunities. Case in point: to do nothing "here" and to intensively do something "there" creates the problem of always having to mitigate "cumulative effects", which in turn keeps the cycle of reactive management in place. Second - we need to integrate planning with action and be objective about what we need to do and how we perform during and after that specific action. We cannot position one specie against another and expect anything less than failure. But, we must be realistic in the sense that we aren't going to win every battle (Individual, Whitefish, MT - #811)

Sample Statement:

It is obvious that revision is necessary as we not only have some new and previously unforeseen issues (i.e.: drought, lynx and effects of) but some issues that have opposing if not incompatible goals (i.e.; lynx, bears, forest management, access timing and competing fish species).I firmly believe that there can be something for everyone and every specie if we put together a framework that recognizes the fact that we have 2 million acres out there to work with. And I emphasize the 2 million acres Let's use a bigger part of the landscape to provide opportunities that lend a mosaic land use pattern instead of concentrating activities and values on small parcels that in turn lead us to reactive management vs. proactive management. (Individual, Whitefish, MT - #811)

### **PC #: 4**

**Public Concern: The Forest Service should use the Forest Plan Revision process as an opportunity to address emerging issues, as well as to reinforce the working qualities of the existing plans.**

Sample Statement:

The forest plan revision process is an opportunity to reinforce and expand some of the excellent qualities of the prior plan; develop new methods to address current wildlife, fisheries and habitat issues; expand the area conserved for quiet recreation to meet anticipated future demand; recover listed species and restore the forest. We stand ready to work with the Flathead NF to create a new plan substantively addressing these issues. (Preservation/Conservation, Missoula, MT - #157)

Sample Statement:

Overall I am pretty disappointed at the current effort to revise the forest plan. This is an opportunity for the USFS to lead rather than be led! With little exception, the USFS has cowed to popular belief and junk science rather than using the professional knowledge and experience gained from nearly 80 years of land management. The forest plan should be a document that inspires the agency and sets goals and objectives to improve the condition of our public lands. What I have seen so far is the same old document explaining what cannot be done and to expect even less in the future. (Individual,

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Trego, MT - #213)  
Sample Statement:

Since the current Forest Plan was adopted in 1987 the public attitude and expectations of National Forest lands has apparently changed. In earlier times the public accepted the fact that the forest was managed with a emphasis on resource extraction and job creation. Forest access and recreation do not appear to have been as important in planning as they are today. Along with this change is the increasing interest on the part of the public to be a part of this decision process in the planning phase. In addition, I see significant factors that must be considered such as the population trend in western Montana, the increasing influence of drought conditions persisting from year to year, and the uncertainty of adequate Federal funding to achieve objectives. (Place Based Groups, Corvallis, MT - #559)

**PC #: 20**

### **Public Concern: The Forest Service should keep more roads and trails open for motorized access.**

Sample Statement:

We live in this area and accept the economic compromises of living here so that we can access and recreate on our public lands. We are fortunate to have an abundance of public lands and there is no valid reason why we should not have reasonable opportunity to enjoy them. Our local culture is built on the foundation of access to visit and use these lands. Now travel planning and other initiatives are severely restricting that access and recreational opportunities...The impacts of lost opportunities on motorized recreationists are significant and irretrievable and irreversible... NEPA requires adequate evaluation and consideration of irretrievable and irreversible impacts. We request that the evaluation and decision-making adequately identify and address these impacts. NEPA also requires adequate mitigation of irretrievable and irreversible impacts. We request that the decision-making provide for adequate mitigation to avoid the irretrievable and irreversible impacts of lost opportunities on motorized recreationists. (Recreational, Helena, MT - #339)

Sample Statement:

The Forest Service looks out for the interests and needs of non-motorized interests and is willing to create many miles of new non-motorized trails as demonstrated by a number of projects such as the CDNST. We request the same cooperation between the Forest Service and a recreation group be extended to motorized recreationists. We request that the Forest Service provide the same attention to our needs. Now it is time for a route to be closed for exclusive use by motorcycles. We request that trails be closed for exclusive use by OHVs and that 100 miles of new motorized recreational opportunity be created as a demonstration of equal opportunity. (Recreational, Helena, MT - #339)

Subconcern:

#### **BECAUSE INFORMATION AND ANALYSIS WAS NOT ADEQUATE**

Sample Statement:

The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized access and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of a significant prejudice in the process. (Recreational, Helena, MT - #339)

Sample Statement:

a significant prejudice exists because the needs of non-motorized recreationists are given significant consideration without the requirement for inventories and identification of resources, i.e. non-motorized recreationists are not subjected to the same requirement to identify it now in order to keep it open in future use and generations. (Recreational, Helena, MT - #339)

Subconcern:

#### **BECAUSE IT HAS NOT ACCOUNTED FOR THE CUMULATIVE IMPACT OF ROAD CLOSURES**

Sample Statement:

The significant cumulative impact of multiple-use and motorized recreational closures (in acres of unrestricted area and miles of roads and trails) by all past decisions including plans, and the creation of wildlife areas, wilderness, wilderness study areas, roadless areas, monuments, national parks and non-motorized areas has not been adequately recognized. We have not seen the agencies tabulate the amount of motorized recreational opportunity lost during the past 35 ? years. We have experienced the significant cumulative loss first hand. We estimate that today's motorized recreational opportunities are less than 50% of the level available in 1970. This is a significant cumulative impact. (Recreational, Helena, MT - #339)

**PC #: 55**

**Public Concern: The Forest Service should recommend a backcountry management area designation that is less restrictive than Wilderness and Roadless designations and enhances recreation and resource management opportunities.**

Sample Statement:

The U.S. Congress should act on legislation establishing a federal designation that is less restrictive to recreational use than Wilderness and the Roadless designation. It should be called "Back Country Recreation Area" (<http://www.sharetrails.org/backcountry.htm> ). This designation should be designed to protect and, if possible, enhance the backcountry recreation opportunities on these lands while still allowing responsible utilization of these areas by the natural resource industries. This designation should be used for those areas currently identified by the federal land management agencies as "roadless" and thus currently under consideration for Wilderness designation. Areas considered may or may not be recommended for Wilderness designation or classed as Wilderness Study Areas...These non-Congressionally approved land classifications should be receive the Back Country Recreation Area (BCRA) designation. (Recreational, Helena, MT - #339)

## Section: Decisionmaking Process

**PC #: 682**

**Public Concern: The FS should not amend forest plans without public hearings and concurrence by local officials that there will be no economic impact.**

Sample Statement:

Conduct a public meeting with comments mandatory before any road closures are mandated. A majority vote should determine road status. List the reasons why a road is closed and review them once a year. If the need for closure is no longer valid, the road should be opened. Forest plans should not be amended without a public hearing process and concurrence by local elected officials that it will have no economic impact. Stop decommissioning roads and removing culverts. Remove all berms. Restore decommissioned roads and restore culverts or install rolling swales in place of them. Offer more timber sales with purchaser road maintenance. Close areas/roads/trails to all uses, not just motorized if wildlife security is critical. Do not split home ranges on ridge tops for bear security analysis areas. Split home ranges at access roads. No net loss for all recreational trails and play areas. If the Forest Service has to close anything they should replace it with equivalent quality and quantity of open use areas. (Place Based Groups, No Address - #967)

**PC #: 11**

**Public Concern: The Forest Service should better define the decision space and scope of the Forest Plan Revision.**

Sample Statement:

We must define the decision space so we [don't]spend time on issues outside of our control. (County Agency or Official, No Address - #69)

**PC #: 53**

**Public Concern: The Forest Service should consider changing recommended wilderness area boundaries as part of the Forest Plan Revision.**

Sample Statement:

He is concerned about the Lolo NF Plan. He said the current forest plan recommends one of his favorite places to ride snowmobiles as wilderness in a Management Area 12. He suggests that we change the boundary of an area near Hoodoo Pass. I think his main concern is that both the USDA Forest Service spokesperson and the local wilderness society people have told him that he cannot comment on that issue because it is outside the scope of plan revision. He believes a backroom deal has been done to place this issue off of the table. I told him the local forest supervisor has the authority to limit the scope of the analysis. He does not believe that. I also encouraged him to get involved and comment on his concerns. Sounds like someone in the environmental community gave him some bad information -- that changes to the 1986 forest plan, with regard to wilderness recommendations, would not be considered. I told him that it was a major revision topic and we would be looking at options from more wilderness to less wilderness and considering boundary modifications. So he seemed fine after we cleared that up. (Individual, Superior, MT - #65)

Sample Statement:

I consider all of the special designations we have today such as wilderness areas, roadless areas, hiking areas, etc. as political because they were designated to satisfy a political group. (Individual, Kalispell, MT - #506)

**PC #: 27**

**Public Concern: The Forest Service should develop a strategy that facilitates flexibility and provides management with options to be responsive to changes in conditions, use, and state of the science.**

Sample Statement:

The Plan Revisions are important, because the existing Plans are cumbersome, thus restrictive and ineffective. The Plan should be flexible, and written so that amendments, addendums and revisions may be done so long as they are completed according to the NFMA requirements and thus open to public involvement. All elements of the Plan should be general - not so specific and detailed so as to limit the Forest Service from management options. Otherwise activities may be open to undue censure or control by special interest groups, as is currently the case under the existing plan. Plans should be compatible with: 1. Fire Plans; 2. Catastrophic events; 3. Individual Ranger District needs; 4. Existing laws and needs (Place Based Groups, Paradise, MT - #258)

Sample Statement:

I also feel that the forest plan needs to be general enough to allow for site specific decisions by local officials. If we lock our forest officials into a box we will never get good things done on the ground. (Individual, Hamilton, MT - #558)

Sample Statement:

My concern is that we believe we understand that process completely while in truth we have much to learn. For example, all plant and animal species are energy transformers in that process, yet we do not know their full identity let alone their proper order of occurrence. (Individual, Missoula, MT - #210)

Sample Statement:

Somewhere in the Plan there must be a section that addresses how change of conditions and/or uses will be handled. It is impossible to predict all future events. Managers must have the flexibility to deal with these events without threat of litigation when they arise. (Individual, Columbia Falls, MT - #438)

Sample Statement:

The direction on management within urban interface areas must be clearly stated in the final draft to reflect current state of the art prescriptions that are effective in affecting fire behavior (i.e. Fiedler, Keegan, Covington). Also, the overriding influence community fire plans will have on the zoning effort in forest plans must be clearly stated and made clear to the public. Included in such clarification should be a built-in adaptive management or flexibility that allows the Forest Service to react to community fire plan modifications in a timely way. (Timber or Wood Products Industry, Seeley Lake, MT - #629)

Sample Statement:

Members feel strongly about the importance of our basing decisions on "good science", and being clear up front about the decision space surrounding each issue-and particularly the legal decision space. (Preservation/Conservation, Hamilton, MT - #200)

Sample Statement:

Plan revision cannot be just public involvement and relationships. We want results on the ground. (County Agency or Official, No Address - #69)

**PC #: 26**

**Public Concern: The Forest Service plan should provide specific management direction supported by strong standards.**

Sample Statement:

The forest plan should be viewed as a contract between the people who own national forests and those entrusted with their management. This contract must spell out-in the clearest possible terms-just how each national forest will be managed. (Preservation/Conservation, Helena, MT - #526)

Sample Statement:

Please develop plans for these three national forests that protects forest wildlife, aquatic species, and roadless and remote areas. The plans for these forests must have strong, enforceable standards that protect these values. (Individual, Roanoke, VA - #796)

Sample Statement:

...there are "standards" which are legally enforceable and "guidelines," which are suggestions. Will that difference continue? ...said the idea appeals but...has worries about abandoning structure. Education systems did that, and now want more structure back. In forest management, if we have problems, we should be able to work through them and come up with solutions. If there's a way to just stop things from happening, though, there's not much encouragement for folks to try to work out a solution. We tried to involve citizens, and the Forest Service stepped back and didn't keep us focused on goals. (Place Based Groups, Kalispell, MT - #828)

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Sample Statement:

The above discussion clearly demonstrates the need for clearly articulated, enforceable standards and guidelines regarding the management of aquatic/riparian systems and watersheds within the Lolo, Bitterroot and Flathead National Forests. Moreover, integration of the Aquatic Conservation Strategy with guidelines for old forest, roadless, and matrix areas provides the only assurance of adequate aquatic and riparian protection in the forthcoming EIS and in on-the-ground management practices. (Preservation/Conservation, Bozeman, MT - #706)

Sample Statement:

The BNF's proposals to modify, qualify, and/or discard existing Forest Plan standards is a step backwards which appears to be designed to increase targets and outputs, and does nothing to increase the flagging public/agency trust levels. Friends Of the Bitterroot maintains that the existing Forest Plan standards must not be altered or discarded unless there is a clearly demonstrated and scientifically-supported necessity for doing so. (Preservation/Conservation, Hamilton, MT - #720)

### **PC #: 25**

#### **Public Concern: The Forest Service should not allow national special interest groups to influence decision-making.**

Sample Statement:

We are concerned about the magnitude and influence of foundation funding to anti multiple-use organizations. The level of funding provided to anti multiple-use organizations from national foundations is tens of thousands of times greater than that available to individuals and local organizations representing multiple-use and motorized recreationists. This level of funding provides anti multiple-use organizations with significant staffing, management, and legal support. Local residents are closest to the land and should have a major say in the way that the land is managed but they cannot counter the influence of the organized environmental groups. (Recreational, Helena, MT - #339)

Sample Statement:

If nonsense like this becomes policy I feel that the FS has been taken over by the liberal, protectionist lobby. The Wilderness Society, the Sierra Club and others have become rich, arrogant and politically powerful. They are organized to the point that they take over meetings that are billed as public. This is a disruption of the public process that was supposed to empower the people. This is not right. (Individual, Clinton, MT - #44)

Sample Statement:

The biggest problems the FS will face is the megga bucks eco-freaks that will use them. Hand picked judges ... in hand picked courts will transform policy where legislation does not suit their opinion. (Individual, Clinton, MT - #44)

Sample Statement:

Environmental groups with substantial funding and paid staff are likely to provide substantial input to the process and to challenge the process through appeals and legal actions. This influence must be balanced by the public opinion which indicates that they are way out of line with the public's needs and interests. Issue: Agency decision-making is being driven by accepting actions that will not be challenged in court versus decisions that are in the best interests of the public or that would meet the public's needs. For example, the January 21, 2004 Missoulian newspaper quoted Lolo Forest Supervisor Debbie Austin "Then, too, it's probably not worth taxpayer dollars to propose a big-acreage, big-ticket salvage sale that's likely to be challenged in court, she said." The ethics of making decisions that are in the best interest of the public and that meet the needs of the public must be restored regardless of the dollar cost. Failure to base our government on these principles will be devastating in the end. The decision does not move in that direction and must be remanded. (Recreational, Helena, MT - #339)

Sample Statement:

I am moving back to Montana full time and would be so pleased to see that the Forest Service was taking care of our forests instead of working with various groups whose interests are not in the best interests of either Montana or its beautiful country, much less the people who live there. (Individual, Helena, MT - #501)

Sample Statement:

We request that the impacts associated with the pursuit of environmental perfectionism on the human environment be evaluated and that the cumulative impact of environmental perfectionism on the human environment be adequately considered. (Recreational, Helena, MT - #339)

### **PC #: 24**

#### **Public Concern: The Forest Service should not allow special interest groups to impede management of the Forest Service Lands for multiple use values.**

Sample Statement:

(I have become increasingly concerned however, that the agency has adopted some of the preservationists' demands, which have resulted in undermining policies meant to support scientifically based and universally accepted management practices. ..some foresters. have advocated that large unmanaged tracts of land should remain unmanaged and/or undeveloped with

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roads, appeals and lawsuits...delay sale offerings and delay needed management including silvicultural treatments, fuels treatment, and salvage and erosion control activities, and sometimes stop existing and active timber sales. (Individual, Paradise, MT - #158)

Sample Statement:

Several angry that FS failed to act immediately to evict protesting tree sitters within area of timber sale "contract". (Other, Victor, MT - #70)

Sample Statement:

Well-funded and organized non-motorized groups have systematically attacked and reduced economic and recreational opportunities associated with multiple-use of public land by ordinary citizens. This attack has included the introduction of an unreasonable expectation into all NEPA and land management processes. This unreasonable expectation is built around the concept that non-sharing of public lands is acceptable and that conversion of multiple-use public lands to non-motorized, narrow-use or defacto wilderness lands is acceptable. Non-motorized special-interests do not use the existing roads and trails as much as the public uses them for motorized access. Non-motorized special-interests simply do not want anyone using them or want to share them with anyone else. This is not a reasonable expectation, it is inequitable to the public and these unreasonable expectations must not be rewarded any further. It is not acceptable to reward people who seldom or never use a road or trail and allow them to shut out those that use them frequently. The endorsement of this unreasonable expectation by agency actions has significantly impacted multiple-use opportunities on public lands and the public in general. The cumulative impact of this unreasonable expectation is significant. Adequate recognition of this trend and mitigation must now be implemented in order to counter the inequities that have been created by allowing this unreasonable expectation to have so much influence on our land use decisions. (Recreational, Helena, MT - #339)

Sample Statement:

The final "negotiated" decision-making in these actions had nothing to do with science or public need. The final "negotiated" decision-making in these actions had everything to do with the amount of money and legal support that special interest environmental groups have available. These resources allow them to routinely pursue actions within the NEPA process and significantly influence the NEPA to benefit their special interests. Environmental groups are not representative of the overall public need yet their use of legal actions allowed only their perspective to be represented in a negotiating session. This inequity creates a serious flaw in the process. For example in the Bitterroot and Cave Gulch salvage harvest actions, the "negotiated" settlement conceded too many un-harvested acres (30,000 and 1,600 acres respectively) to wilderness oriented groups, was not based on sound technical information, and was not representative of the majority of public needs. The same sort of influence and "negotiated" settlement is repeated over and over in travel planning actions and has resulted in the closure of over 50% of the existing motorized roads and trails exceeding 50% in most cases. This "negotiated" decision-making has created a significant negative cumulative impact on multiple-use and motorized recreationists. (Recreational, Helena, MT - #339)

**PC #: 13**

**Public Concern: The Forest Service should consider the total number of comments when making decisions.**

Sample Statement:

Concerned about our Proposed Action content analysis. He wants to be sure that the "preponderance of public opinion" on recommended Wilderness areas is reflected in our content analysis -- that is, if 3000 people say they favor inclusion of Area Q, and none are opposed, then he wants the decision makers to know that. (Preservation/Conservation, Missoula, MT - #608)

**PC #: 12**

**Public Concern: The Forest Service should not consider the total number of comments when making decisions.**

Sample Statement:

We are concerned with the way that comments are being used by agencies in the decision-making process. Agency management has said that the total number of comments received during the process is considered during the decision-making. There is a clear indication that decisions are being made based on those interests producing the most comments. We strongly disagree with a decision-making process using comments as a voting process where the most comments wins the most trails and recreation opportunities. (Recreational, Helena, MT - #339)

Sample Statement:

We have been told that motorized recreationists must participate in the travel management process and/or collaborative sessions in order to realize future motorized recreational opportunities. While we agree that motorized recreationists have the opportunity to participate in the NEPA process, the level and effectiveness of participation should not be the deciding factor when making decisions about who gets what recreational opportunities within public lands. NEPA does not identify the quality and quantity of individual and group participation as a decision-making criterion. (Recreational, Helena, MT - #339)

**PC #: 44**

**Public Concern: The Forest Service should change its underlying management structure to require community consensus and the collaborative process to resolve forest issues.**

Sample Statement:

Engage in, and encourage, collaborative processes when making management decisions. These processes allow people who have spent many years on the ground in the specific area being impacted/discussed, and their invaluable experience/input should not be ignored. (Individual, Missoula, MT - #731)

Sample Statement:

I also hope that you increase collaborative projects with regards to logging. Stewardship projects that involve community members from different sectors are greatly needed in USFS policy. Instead of large corporate logging projects, I would like to see local citizens become more involved in deciding the future of their forests. (Individual, Missoula, MT - #736)

Sample Statement:

To that end we submit the following observations and strategic suggestions. All of these might be contained under a seventh forest plan heading of "Management of USFS Administration." First Observation: Public divisiveness wastes significant time, money, personal energy and community good will. Some forest projects that might be worthwhile and make good sense, are jeopardized by this public divisiveness. We believe there is significant public consensus on these issues that is not being developed. Suggestions: 1. The public should be encouraged and included in a consensus and negotiation process to develop Management Area boundaries and preparation of management prescriptions. That is, use the consensus process to create Management Areas. 2. Rather than simply collect opinions from individuals with often extreme opposition, strive to find and develop common consensus. 3. A clear distinction needs to be made between "whether to" decisions and "how to" decisions. That is, for a given management area it should be clear what uses and prescriptions are, or are not, allowed. This would take away the debate of whether a particular project should be implemented, and focus the debate solely on how to achieve desired goals. Second Observation: In order for consensus building to be effective, the USFS administration must be managed with a strong commitment to community consensus. Suggestions: 1. The USFS administrative structure should be designed to search out, and efficiently implement, common agreement. With controversial issues, such as motorized vs. non-motorized uses, the USFS should be pro-active in encouraging diverse groups to find agreement. 2. Potentially controversial issues should be anticipated and monitored, and brought to the community consensus process for resolution, before they become divisive. 3. Pro-active implies that action is taken before civility and community good will is lost, and/or before environmental integrity is lost. (Multiple Use or Land Rights, Victor, MT - #698)

**PC #: 57**

**Public Concern: The Forest Service should evaluate economic and environmental factors in land management decisions.**

Sample Statement:

...natural resource decisions cannot and should not be made entirely on economic impacts. However, NEPA requires that both economic and environmental facts should be considered in the final land management decisions. The U.C. Berkeley study displays the fact that the full economic and social facts and impacts are not being adequately considered by the federal land management agencies. We request adequate evaluation of the economic and social impacts of this proposed action be considered in the analysis and decision-making. Additionally, we request that the cumulative impact resulting from inadequate evaluation of economic and social impacts in past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative impacts. (Recreational, Helena, MT - #339)

Sample Statement:

What are the relationships and priorities between forest beauty, natural resource economics, and natural resource sciences in this plan? I think forest beauty may be thought as a synonym for social values relating to the forest. (Individual, Missoula, MT - #229)

**PC #: 56**

**Public Concern: The Forest Service should weigh any decisions in favor of the economic effects of Forest Plan Revision on the local community.**

Sample Statement:

The plan must be written so that all decisions are weighed in economic terms. In other words what will a given decision do to decrease or increase the wealth of the local communities? Remember that most forest activities result in a net economic loss to the taxpayer. Emphasize those activities, like logging, that bring money into the community, and that increase the tax base. (Individual, Columbia Falls, MT - #762)

Sample Statement:

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any plan that you write, and any decisions that you make must be heavily weighted in favor of the good of the local economy and the local populace. The highest priority must be given to the PEOPLE who live and work in and around the National Forest. (Individual, Columbia Falls, MT - #762)

Sample Statement:

The plan should allow for a process to compensate any individual or entity physically harmed by federal actions, including negative impacts on the local government tax base. (Individual, Roosevelt, UT - #33)

## **Section: Public Involvement**

**PC #: 68**

**Public Concern: The Forest Service should disclose and analyze the cumulative effects of road and trail closures based on all existing roads and trails available to motorized users.**

Sample Statement:

The travel management process should be initiated with the scoping process and a full and adequate evaluation of all viable alternatives. All existing roads and trails available to motorized recreationists should be used as the starting alternative for all analyses and impact determinations. Establishment of this baseline alternative is crucial to the evaluation of all proposed impacts on motorized recreationists. Time after time the alternatives presented in the travel planning process do not include a reasonable motorized alternative. This seems to be a ploy to get the public to accept less right from the start. The process is prejudiced in that a minimal number of motorized access and motorized recreational opportunities are presented as the preferred alternative from the beginning when the needs of the public are just the opposite. We request that the process be restarted and that all existing roads and trails which are available for use by motorized recreationists be adequately identified as the baseline alternative. (Recreational, Helena, MT - #339)

Sample Statement:

Most of these projects have not adequately disclosed the true number of miles of roads and trails that were in use by the public and then closed to motorized use as part of their implementation. This lack of disclosure is not acceptable and we request that the lack of disclosure be addressed by establishing the true magnitude and cumulative effect of all motorized access and motorized recreational closures. When tabulated, this cumulative effect must be considered in the evaluation and decision-making for this action. Additionally, adequate mitigation must now be implemented to counter the negative cumulative effects that motorized recreationists have experienced. (Recreational, Helena, MT - #339)

Sample Statement:

We are concerned that the lack of accounting for the cumulative impact of all forms of motorized closures over the past 35 years is an undisclosed strategy to squeeze motorized recreationists into the smallest possible area. Once this is accomplished, then the agencies will take the position that the impacts on that small area left for use is significant and everything will be completely shut down. All of the plans, strategies, actions, and evidence support this concern. (Recreational, Helena, MT - #339)

Sample Statement:

If the present trend continues for a few more years, the loss of motorized access and recreation will be so significant that the collection of meaningful data will be precluded because motorized opportunities will be largely eliminated and motorized visitors will be permanently displaced (absent from public lands). Based on our observations, we estimate that motorized access and recreation opportunities have been reduced by at least 50% since the 1960's by the significant cumulative effect of wilderness designations, wilderness study areas, national parks, monument designations, roadless designations, non-motorized area designations, travel management, wildlife management areas and other restrictive management designations. (Recreational, Helena, MT - #339)

Sample Statement:

There was considerably more human activity in the project area during the period from 1870 to 1940 when mining, logging, homesteading, ranching, and pioneer activity was high. Therefore, there is considerably less human activity and human-caused impact now than during any period in the last 130 years. We request that this trend be included in the analysis. This trend also contributes to the significant cumulative impact of less access and less use of public lands. We request that the decision-making reverse the trend of less access and less use of public lands by including an adequate mitigation plan as part of this action to compensate for past cumulative impacts. (Recreational, Helena, MT - #339)

Sample Statement:

One agency cannot ignore the cumulative impact that another agency's actions are having on motorized access and motorized recreation. (Recreational, Helena, MT - #339)

**PC #: 59**

**Public Concern: The Forest Service should establish a standard set of documentation such as inventories of resource conditions and demonstrate analysis to support management conclusions and decisions.**

Sample Statement:

Positive impacts to the environment in areas such as fisheries, wildlife habitat, sediment reduction, and noxious weeds are largely based on personal judgment or predictive models. These models are not calibrated or based on data from the study area. All models are wrong, so honest modelers first report the expected uncertainty of the model and then the predictions. There are no case histories to back up any of the predictions. We request that sufficient background data be collected to quantify the existing conditions in the resource areas of interest. Then, if a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement to each resource area. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. Additionally, we request that the cumulative impact from all past actions based on inadequate documentation and accountability for improvements be determined. Again, if significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. (Recreational, Helena, MT - #339)

Sample Statement:

Finding AM-F2: The inventory data and your evaluation of that data to support this finding must be disclosed as required by 36CFR219.12(d). Contrary to the unsupported finding that "there is a need for consistent direction across forest boundaries", there is nothing in NFMA or the implementing regulations that require consistency...We consider the Regional Foresters' OHV amendment illegal and we have filed a lawsuit to see if we are correct. (Multiple Use or Land Rights, Bigfork, MT - #588)

**PC #: 60**

**Public Concern: The Forest Service should display adequate and accurate supporting information used in the Proposed Action.**

Sample Statement:

It is essential that the new Forest Plan display the growth and mortality on the forest on suitable, tentative suitable, and motorized roadless lands. The plan must then display how many acres need to be treated in total and those that need to be treated each year to meet the goals of the Healthy Forest Restoration Act There must also be a display showing what accomplishments (acres treated) might be expected at given budget levels. Managers must know what resources are available. Given the above information how will you display to the community the National Forests responsibility to provide for the economic stability and the needs of the community? (Individual, Columbia Falls, MT - #438)

Sample Statement:

Statements and decisions are made throughout the Forest Plan Proposal without peer review, current and accurate scientific data, monitoring and analysis information, and real facts. I feel bad about all the negative comments, but I truly feel this proposal is a disservice to the citizens of NW Montana and that no effort was made to have significant public input until this deadline date. (Individual, Bigfork, MT - #621)

Sample Statement:

You stress that your plan is directly along the lines of the Columbia Basin Study and what a great study it was, etc. How could this have been a study at all? They got all their information from the Forest Service Offices across the Country. So, if the information gathered was in error it was still written as the "gospel". So in fact, the information you are using is what you already had compiled, of which I think much of it is just plain wrong. (Individual, Corvallis, MT - #40)

Sample Statement:

Proposals in each forest district should be spelled out with inventories relative to such issues as: a. timber growth and accumulation of dead fuels b. recreation - documentation as to where and what significant damage has occurred and is continuing in specific areas c. grazing - documentation of significant damage, erosion, etc. in what specific areas d. wildlife - population trends by significant species and other significant information, such as habitat utilization and hunter success ratios. (Recreational, Bigfork, MT - #62)

Sample Statement:

Simply stated, federal land use planning isn't easy for the general public to understand and participation could be better if the FS provided supplemental information to the public. Suggestions to facilitate meaningful public input: a) Consider taking different approaches to communicate to the public about the planning process For example, consider alternative communication methods such as posting of major roads entering the Planning Area with notices and updates regarding the planning process .b) Consider posting roads and trails proposed for closure with signs stating "Road or Trail Proposed for Closure, for more information or to express your opinion please call xxx-xxxx or send written comments to xxxx." c) Consider a program to inform, educate, and increase the public's awareness of public land. management laws, regulation and policy, and improve the public's ability to work within both the NEPA process and the FS planning process. The lack of information education, awareness of the laws and regulations regarding public land .management contributes to ineffective public participation .d) Improve the information on the website1) The public may understand. FS's management

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requirements better if the website included a description of their legislative and regulatory roots. FS should include links to legislation and regulation establishing FS's management requirements.2) FS should include links to the complete definitions found in NFMA and the FS planning regulations (pause now, to enjoy subtle humor), with all of the mandatory steps outlined in law and regulations clearly laid out and explained.3) A discussion of FS's statutory and regulatory requirements.4) A index so that users could be guided to all of the references on an issue or requirement. Perhaps a word search process covering all statutory, regulatory, and manual and handbook material. (Preservation/Conservation, Pocatello, ID - #545)

Sample Statement:

[Cont. from comment 1]5) A complete definition of the mission of the Forest Service as it is set forth in law and regulations. FS seems to often be selective in quoting only part of the definition or of just referring to it with the assumption that everyone has the same definition in mind. This is obviously not the case, especially since it has been quoted selectively by many to promote their own agendas. Clearly setting forth the legislative and regulatory definition would be very helpful in having everyone operating from the same assumption.6) Law and regulation regarding livestock grazing. 7) Information regarding R.S. 2477, and how it does and does not apply to forest roads.8) FS should provide a complete discussion and definition of Recreation Opportunity Spectrum and how it is applied within each Forest Plan available to the public on their website.9) The FS should make the criteria for determining ROS inventories open for public review and comment.10) The FS should make inventories open for review and comment prior to the release of any Draft or preliminary Alternatives. Wildlife, vegetation, proposed wilderness, roadless ROS inventories are becoming increasingly subjective. The FS is strongly encouraged to make these inventories public and to request public review and comment on the inventories prior to formulating any Alternative.11) Receiving meaningful public comment on issues such as livestock grazing would be easier if the FS did a better job of informing the general public of the laws regarding livestock grazing, as well as the livestock permitting process. This will help the FS to better resolve the controversies surrounding livestock grazing. (Preservation/Conservation, Pocatello, ID - #545)

Sample Statement:

With no analysis of minimum management requirements, Current Direction, and production and economic potentials required by law it is difficult to understand and make substantive comment on all the undefined and arbitrary and capricious statements in the Ecosystem Management Section. We recommend Ecosystem Management be dropped as a public issue and instead substitute Fire Hazard, Local Economic and Social conditions, and Threatened and Endangered Species Recovery. (Individual, Kalispell, MT - #780)

Sample Statement:

I believe the Forest Service has not provided the public with enough information to critically comment on or offer informed suggestions on the Forest Plan Revision Proposed Action. (Individual, Paradise, MT - #42)

### **PC #: 202**

**Public Concern: The Forest Service should be sure that all revisions to existing forest plans are necessary changes, based on correct information, and in clearly defined terms.**

Sample Statement:

The blanket proposal to "expand the use of management ignited fire to include wilderness and recommended wilderness areas, and increase the area where natural ignitions are managed for resource benefits." is misleading and irresponsible. Current wilderness management fire plans for the Great Bear-Bob Marshall-Scapegoat already provides for management ignited fires. The Flathead National Forest Plan also provided prescribed burning direction to be developed for "other similar areas that are designated as wilderness or unroaded dispersed recreation ."(Flathead LRMP, Ch. II, Forest Wide Management Direction, O. Fire Management, Item (3)). (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

In Action EM-F2-A1 ("We propose to expand the use of management-ignited fire to include wilderness and recommended wilderness areas, and increase the area where natural ignitions are managed for resource benefits.") there is no stated consideration of the destructive effects of wildfire on the value of commercial timber stands. (Individual, Superior, MT - #37)

### **PC #: 61**

**Public Concern: The Forest Service should analyze the effect national foundation funding of environmental organizations has on motorized recreationists.**

Sample Statement:

We request the significant impact that national foundation funding to environmental groups has on motorized recreationists be adequately evaluated and considered including; (1) the impact that foundation funding has on the NEPA process, (2) the impact that foundation funding has on the decision-making, and (3) the impact that foundation funding has on the NEPA process through significant use of legal challenges to nearly every decision involving multiple-use proposals for public lands. In addition, the document and decision-makers should evaluate the significant cumulative impact national foundation funding has had on all past NEPA actions involving multiple-use and motorized recreation. (Recreational, Helena, MT - #339)

**PC #: 58**

**Public Concern: The Forest Service should use data sources for analysis of recreational activities that accurately represent the trail system and use patterns.**

Sample Statement:

A CNN poll (available upon request) asked the question "Do you think off-road vehicles (ORVs) should be banned from unpaved areas of natural forest land?" and found about 15% said yes and 85% did not think ORVs should be banned. Therefore, elimination of motorized access and recreation on public lands is not widely supported. We request that the document and decision-making reflect citizens' support for motorized access and recreation. (Recreational, Helena, MT - #339)

Sample Statement:

Quiet forest trails for the vast majority of recreationists needs to be of primary concern. The project analysis should conduct a public survey to determine whether the majority of users agree with increasing roads/trails within each national forest just for OHVs. Although the popularity of OHVs is increasing, this group seems to be "squeaky wheels" (and in my opinion a minority of users) wanting more usage areas when there already exists thousands of FS roads at their disposal. How many miles of FS roads are open in the summer for OHV use in all three national forests? The answer should tell the story and eliminate an unnecessary taxpayer expense. (Individual, Condon, MT - #638)

Subconcern:

**BECAUSE OHV USE IS OVER REPRESENTED**

Sample Statement:

Quiet forest trails for the vast majority of recreationists needs to be of primary concern. The project analysis should conduct a public survey to determine whether the majority of users agree with increasing roads/trails within each national forest just for OHVs. Although the popularity of OHVs is increasing, this group seems to be "squeaky wheels" (and in my opinion a minority of users) wanting more usage areas when there already exists thousands of FS roads at their disposal. How many miles of FS roads are open in the summer for OHV use in all three national forests? The answer should tell the story and eliminate an unnecessary taxpayer expense. (Individual, Condon, MT - #638)

Subconcern:

**BECAUSE OHV USE IS UNDER REPRESENTED**

Sample Statement:

We are very concerned that NVUM will be used to produce significant and unjustified cumulative impacts on motorized access and motorized recreation. We request that the data from NVUM be correctly interpreted to demonstrate the importance of motorized access and mechanized recreation to all public land visitors...The National Visitor Use Monitoring (NVUM) program has found that over 97% of the visitors to public lands enjoy multiple-use recreation associated with motorized access and motorized recreation yet SCORP and other documents have stated that motorized recreationists are insignificant. This is another example of the prejudice found in some evaluations and documents which is being used to support an agenda and pre-determined decisions. We request that the data from the Trail Users Study and SCORP not be used because it is inaccurate and prejudiced and that CTVA data and NVUM be used to demonstrate the overall importance of motorized access and mechanized recreation. (Recreational, Helena, MT - #339)

**PC #: 62**

**Public Concern: The FS should use the Biodiversity Legal Foundation's "Guide to Ecosystem Management" as a standard methodology.**

Sample Statement:

Our "Guide to Ecosystem Management" is intended to be used by both land use planners and conservationists in assessing, critiquing, and improving ecosystem management projects. As an advocate for the protection of the elements of biodiversity, it is also an expression of our organization's serious concern about the current application of ecosystem management techniques by the U.S. Forest Service. Please include this Guide as part of our formal comments on the revised forest planning process. (Preservation/Conservation, Boulder, CO - #137)

**PC #: 64**

**Public Concern: The Forest Service Analysis of the Management Situation (AMS) should adequately and accurately characterize the management situation.**

Sample Statement:

Page 4-3 AMS Table 5 does not accurately characterize the management situation. The table should include the following. Lolo Bitterroot Flathead General Forest 1352,758804# of trails, 477?, Open to OHV??? Miles, 46, ?? Single track, 16? Miles, 87??# of trails which can be connected to create a meaningful experience for a motorbiker (Individual, Missoula, MT - #217)

Sample Statement:

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Page 4-12, 4-14 and 4-18; Invasive plants is an inappropriate term. Noxious weed is appropriate. (Individual, Missoula, MT - #217)

Sample Statement:

Figure 5 graph characterizes truck and OHV numbers in Montana. Truck numbers are irrelevant to the analysis since most trucks are simply used as passenger vehicles. A look at OHV and snowmobile registration numbers reveals that numbers of both actually peaked between 1998 and 2000 in most areas. (Individual, Missoula, MT - #217)

Sample Statement:

Page 4-55, Reference implying that driving along forest service roads is the most popular recreational activity is without factual basis and should be deleted. (Individual, Missoula, MT - #217)

Sample Statement:

On page 4-70 we are told the national forest Roadless Areas Conservation rule "was signed by President Clinton." This is incorrect. The roadless area conservation rule was signed by the Secretary of Agriculture, not the President. It is a rule, not an executive order, established with more public involvement than any rule in your books. (Preservation/Conservation, Helena, MT - #526)

Sample Statement:

The AMS (Analysis of the Management Situation) should include discussion of the effects of litigation on Forest Service management. We should monitor the number of projects litigated, all associated costs, outcomes of cases, etc. (Agriculture Industry, No Address - #209)

### **PC #: 67**

#### **Public Concern: The Forest Service should clearly disclose all road closures in documents and maps.**

Sample Statement:

The document and decision must clearly disclose on maps and tables and summaries all existing areas, and existing roads and trails that would be closed to motorized access and motorized recreationists. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided and the public will not be informed and the public including motorized recreationists will not be able to adequately participate and comment. (Recreational, Helena, MT - #339)

Sample Statement:

The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails. (Recreational, Helena, MT - #339)

Sample Statement:

The maps used in the environmental document should be familiar and easily interpreted by all citizens. The public is most familiar with Forest Visitors Maps and other common visitors maps. The environmental document mapping should follow the guidelines required by 40 CFR 1502.8...Many visitors who traditionally use roads and trails in the project area may not comment during travel management process unless they understand which roads and trails are proposed for closure. This lack of understanding could lead to resentment and poor support of the closures by the community because a wide range of needs have not been adequately addressed. We request that mapping identify streams, road numbers, trail numbers, landmarks and key topographic features in a manner that all citizens can easily interpret. (Recreational, Helena, MT - #339)

### **PC #: 66**

#### **Public Concern: The Forest Service should provide clear definitions of terminology used in documentation.**

Sample Statement:

Please define "pests" in EM-F3-A1(We propose to use an integrated pest management strategy, which uses a combination of mechanical, cultural, chemical, biological control methods, and preventative measures that reflects new information and technology.). (Recreational, Columbia Falls, MT - #589)

Sample Statement:

What is the definition of "timber production?" What do we want the forest to look like 20 to 30 years from now? (Place Based Groups, Missoula, MT - #826)

Sample Statement:

FP-F5-A1 (expect less clearcut harvest) Suggestion that silvicultural treatment terms like clearcut, shelterwood, selection, etc. should be clearly defined in the plan as people have very different impressions of what they mean and why

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they are applied. Use of pictures may also be useful. Need to recognize each treatment is to achieve specific goal on the ground, therefore are tied to the objective, not the other way around. Clearcuts may still be used to achieve specific objects. (Place Based Groups, Hamilton, MT - #827)

Sample Statement:

...agreed on...:-Silvicultural terms should be defined in the plan. Use of photos or other illustrations should be used if possible. (Place Based Groups, Hamilton, MT - #827)

### **PC #: 50**

#### **Public Concern: The Forest Service should use education and volunteers as tools to help achieve the desired resource and recreational management objectives.**

Sample Statement:

An alternative to motorized closures in many cases would be to keep motorized opportunities open and use education on principles such as those found in the Tread Lightly program and Blue Ribbon Coalition Recreation Code of Ethics and Principles to address and eliminate specific issues associated with motorized recreationists. These efforts could include the use of pamphlets, information kiosks, and presentations. Education can also be used to address and eliminate issues associated with anti multiple-use recreationists by encouraging their use of reasonable expectations, reasonable tolerance of others, and reasonable sharing of our land resources. To date, educational measures have not been adequately considered, evaluated or implemented. We request that educational measures be incorporated as part of this proposed action and that the significant cumulative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities be addressed. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative impacts associated with inadequate use of education measures in past actions. (Recreational, Helena, MT - #339)

Sample Statement:

In terms of benefits to multiple resources, the Flathead was legally required by Fish and Wildlife Service to develop and implement along with Amendment 19 "a public information program on the positive effects of road closures for fish and wildlife, water quality, and other Forest resources." [29] In spite of written and binding assurances to FWS that it would develop a fact sheet describing the benefits of road closures and obliteration, the Flathead has never done so. [30] Rather than proactively demonstrating to the public the benefits of a road management program that is integrated to benefit multiple species and resources, the Flathead has instead placed itself in a defensive position and has worked alongside the Interagency Grizzly Bear Committee to eviscerate such a program. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

The group discussed limits on funding, and how user groups like the backcountry horsemen have supplemented FS funding with a great deal of volunteer work and user education. There were discussions that motorized users could learn and benefit from this model. If they could organize, then they would have a more effective voice. If they could self educate, self police, and possibly adopt some trails, etc, they might better assure their own interests are maintained. Agreed that now (FP revision) is a critical time for them to be organized and involved. (Place Based Groups, Hamilton, MT - #827)

Sample Statement:

Educate non motorized users via signage or trail map at trail heads regarding motorized use in the area to avoid encounters if they desire. Up to date maps that mark trail systems and closures (available online?) A liaison from the FS that would be available for OHV questions, comments, complaints, etc. preferable an individual who enjoys this type of recreation and is familiar with the Flathead National Forest. (Recreational, Whitefish, MT - #966)

Sample Statement:

FS should incorporate a vigorous recreational education program into all management alternatives. (Preservation/Conservation, Pocatello, ID - #545)

### **PC #: 48**

#### **Public Concern: The Forest Service should work cooperatively with private industry and local landowners.**

Sample Statement:

We understand the proposed action is the beginning of the initial dialogue with the public and although general in nature, offers a starting point for ongoing discussions through the process. Therefore, our comments at this time are from an overview perspective, offering professional guidance rather than detailed comments. SAF looks forward to reviewing more detailed drafts and alternatives which our members can digest and develop constructive criticism as the process moves forward. (Preservation/Conservation, Missoula, MT - #624)

Sample Statement:

He would like to see management done the way he suggested, with private industry laying out the projects. Right now the Forest Service is bottlenecked, without the capacity to get all the work done. using non-agency people on layout would take

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less time, and give more people an opportunity to make a living. Brent said a lot of loggers do that on private ground. Sometimes they do a little section of land, then show it to the landowners to make sure they're getting the desired results. Then adjust if necessary, and go on to do the rest. (Place Based Groups, Kalispell, MT - #828)

### **PC #: 22**

#### **Public Concern: The Forest Service should inform and involve the public in all roads and trails planning.**

##### Sample Statement:

The skeleton of a successful road removal program includes the following steps: public outreach, projects that take local needs into account, and creative funding sources both internal and external to the Forest Service, with partnership as a strong option. The first two components are especially important at the outset of the program, when the Forest Service is establishing the relationship between the program and surrounding communities. Public outreach, including clearly stated goals and methods of prioritizing projects, benefits to valued local resources, and opportunity for the public to voice fears and concerns, should start as soon as possible, preferably before the groundwork starts. Prioritizing work sites should include not only the engineering and ecological aspects of the project, but also take into account local use and needs in the area. Funding is what underlies the whole program. By examining all the possible benefits of removing roads, forests can identify funding sources, both internally and externally. Partnerships are an option to consider. They not only help build community ties but they can multiply funding and other resources beyond what the forest itself can provide. (Preservation/Conservation, Missoula, MT - #527)

##### Sample Statement:

The public should be involved in determining where the best "quiet" or motorized areas should be located. The Forest Service, however, needs to set strict parameters on both area and route choices and make it clear to the public what these parameters are. All routes, motorized or non-motorized must be consistent with laws and regulations and the Forest Plan standards and guidelines as well as management area prescriptions. The miles of routes and size of management areas should be designated within the capability of the Forest Service to adequately manage and maintain such routes. The responsibility of the public to properly use and stay on the routes should determine whether routes will need to be reduced to accommodate management capability levels. (Individual, Hamilton, MT - #536)

##### Sample Statement:

We do not understand why the public's needs do not carry any weight in the process. Why is it acceptable to make decisions that fly in the face of public need? It appears to be done as conscious and organized efforts to eliminate a sector of the public from public lands. The needs of the public are being ignored in favor of a management agenda that is contrary to the needs of the public. Priorities for management of public land have swung to this ridiculous extreme. We request that the hidden agenda of closure of motorized roads and trails which is so contrary to the needs of the public be addressed and corrected. (Recreational, Helena, MT - #339)

##### Sample Statement:

The forest, watershed and viewshed planning process tends to influence motorized access and motorized recreation in an undisclosed manner that is deceiving the public. For example, forest plans, watershed plans and view shed plans such as the Helena National Forest Plan, Beaverhead-Deerlodge National Forest Plan, Little Blackfoot River Watershed Plan, Tenmile Creek Watershed Plan and Scenery Evaluation Plan for the Rocky Mountain Front often set management goals for areas that will ultimately result in the elimination of motorized recreation yet motorized recreationists are unaware that these actions will ultimately affect them. This back door process does not meet the NEPA requirement for adequate public disclosure of the impacts of the proposed action. Adequate public disclosure in these cases would require direct means of communication with motorized recreationists to inform them of the potential changes that will result from the respective plan. This process of non-disclosure has been used to effectively eliminate many motorized access and motorized recreational opportunities and contributes to the cumulative impact of closures on motorized recreationists. We request that the cumulative impact of past planning actions on motorized recreationists be adequately evaluated and considered during the decision-making process. (Recreational, Helena, MT - #339)

### **PC #: 39**

#### **Public Concern: The Forest Service should facilitate public participation and involvement.**

##### Sample Statement:

The public input process needs to be advertised in such a manner that citizens will understand that they can and should have input into forest management issues even though they are not experts. For example, the news article on the Wedge/Roberts fire rehabilitation project got many people involved in a collaborative process that had never been involved before. The process needs to comply with existing laws and regulations so that everyone is notified of opportunities to participate and organized so that every person's input is considered with no advantage, given to the process experts. For example, a minority should not be able to veto components of the recommended plan. A minority report is a good way to express the views of the minority without marginalizing the majority. (State Agency or Official, Kalispell, MT - #329)

##### Sample Statement:

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Remember that the vast majority of people do not comment on these issues because they do not realize how they will be affected until it is too late, and they would rather be out there enjoying the forest instead of using their time to tell you what you should already know. (Individual, Kalispell, MT - #792)

Sample Statement:

Why use so many indirect attempts such as public meetings and open houses to gather feedback from motorized recreationists? Why not just go directly to motorized recreationists in the field and at club meetings and ask them? NEPA encourages direct coordination with the impacted public instead of a process tailor made for special-interest environmental groups. (Recreational, Helena, MT - #339)

Sample Statement:

Mailings and telephone interviews as done in past studies do not accurately locate the people visiting public lands...We request that effective methods be developed to involve and account for motorized access and mechanized recreationists. (Recreational, Helena, MT - #339)

Sample Statement:

We request that the process adequately meet public involvement requirements with respect to motorized visitors. The process should include methods of public involvement that effectively reach motorized visitors and methods to account for the needs of citizens who may not participate for diverse reasons. Some public involvement methods that would be effective include: (1) the use of trail rangers (who are motorized enthusiasts) to count and interview visitors using the travelways and distribute Travel Management materials to them, (2) publication in the newsletters of motorized association, (3) attendance at motorized club meetings, (4) posting of information packets at motorized trail head areas, and (5) mailings to OHV enthusiasts and owners. (Recreational, Helena, MT - #339)

Sample Statement:

We are distressed by the lack of effort to obtain public input in the planning effort to date. Although there appears to be a belated effort to get some public involvement, it comes too late to have any impact on the proposed action. We are aware of very different levels of public involvement on the other forests in this area and wonder why there is so little interest in what the public has to say on the Flathead. (Recreational, Columbia Falls, MT - #589)

Sample Statement:

The Forest Service should offer public educational meetings to enhance the Forest Plan revision process, rather than relying on the public to hold meetings & they just come as guests. Note: The lack of support for this policy statement does not reflect on the quality of the Forest Service personnel which we find to be excellent, but on the consensus process and the manipulation of the input and the result. Participants believe that legislation has been misguided, topics selected do not relate to the problems, and that the process is flawed. (Place Based Groups, No Address - #967)

Sample Statement:

I also want to complain about the utter failure of the Flathead National Forest to actively solicit genuine community involvement in the months leading up to the PA comment deadline of today. One pissy little open house didn't cut it. (Multiple Use or Land Rights, Whitefish, MT - #721)

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Thank you for hosting forest-wide working group meetings as a means to actively involve the interested publics. I believe it has been a worthwhile format for many. (Timber or Wood Products Industry, Kalispell, MT - #539)

### **PC #: 40**

#### **Public Concern: The Forest Service should ensure that community groups are diverse, fair, and open to the public.**

Sample Statement:

It has been duly noted that whatever collaborative groups were established mainly exist under the public radar. These meetings should have been publicized and OPENED TO THE PUBLIC under NEPA guidelines once they had been "legitimized" by USFS. It was only after constant hammering by local legislators and Montanans for Multiple Use that the Forest Service agreed to cooperate in establishment of a collaborative group that is intended to be filled by "regular people". I would expect that this group be treated appropriately and their input treated with respect, and furthermore integrated into the planning alternatives. (Multiple Use or Land Rights, Whitefish, MT - #721)

Sample Statement:

Flathead State Legislators\* and local officials sponsored a series of workshops (Flathead Community Forest Planning Group) to assist citizens in providing input to the Flathead National Forest Office so that they may have a reasonable range of viable, legal alternatives to evaluate for revision of the Land and Resource Management Plan (New Forest Plan). The meetings held at the Flathead County Fairgrounds May 13, May 21, May 28, and June 3, 2004 was widely advertised in newspapers, radio, and TV public service and news segments. The meetings were conducted in a workshop format, with emphasis on sharing and promoting public understanding of information. The Flathead National Forest was asked to provide information prior to the first three workshops on which they made presentations at the workshop and fielded questions from the participants. FS personnel did an excellent job providing information and answering difficult questions on the spot. They

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provided the right people at the right time. In addition, participants submitted questions and comments in writing on cards. Written input from participants provided policy statements to be voted on by participants before being included in the plan and submitted to the Forest Service. The voting was done to provide the Forest Service with the level of support of each statement presented by the public participants. As a result of the public participation process, the following summarizes the major findings from the public comments. The policy statement with the level of support is attached. Since all meetings were well advertised and made public, the attendance makeup varied from one meeting to the next. A sign in sheet was at the door, but not all people remembered to sign it. An attendance list by meeting is included as well as a master list of all who were involved. (Place Based Groups, No Address - #967)

Sample Statement:

We request that the use of public participation in decision-making for this proposed action be monitored to assure that it does not obscure the needs of all citizens who rely on this area for their recreation and livelihoods. Collaborative sessions are inequitable and a travesty if they do not meet a true cross-section of public needs. The needs of the public are best met by managing public lands for multiple-uses. Multiple-use includes motorized access and motorized recreation. We request that agencies conduct collaborative sessions that produce reasonable multiple-use outcomes. (Recreational, Helena, MT - #339)

Sample Statement:

existing Flathead groups (Flathead Forestry Project, Swan Valley, North Fork) are all biased toward "green" side and are, effectively, not "fair and open" groups. (Individual, Columbia Falls, MT - #303)

**PC #: 41**

**Public Concern: The Forest Service should work with existing community groups as well as new community groups in outreach and meeting logistics.**

Sample Statement:

There was considerable talk about the proper role of SEC; should they focus only on their traditional interest area, between Goat Creek and the Clearwater Divide, or should they expand their interest area to include the Swan Lake community, or even Bigfork? SEC prefers to remain focused on their traditional interest area, with many members willing to participate in, and perhaps help organize, a separate group that would address the northerly portion of the Valley/ Ranger District. Limiting pre-meeting publicity to the immediate Condon area left some people with the impression that this was a "secret" or "closed" meeting. Discussion seemed to clarify that the meeting was open to anyone, but that a combination of traditional group focus on a limited geographic area, and practical considerations (e.g. cost of newspaper announcements), had (and probably would in the future) limited public announcements to only the immediate area. (Agriculture Industry, No Address - #209)

Sample Statement:

Limiting pre-meeting publicity to the immediate Condon area left some people with the impression that this was a "secret" or "closed" meeting. Discussion seemed to clarify that the meeting was open to anyone, but that a combination of traditional group focus on a limited geographic area, and practical considerations (e.g. cost of newspaper announcements), had (and probably would in the future) limited public announcements to only the immediate area. (Place Based Groups, No Address - #821)

Sample Statement:

Thad asked Rob to highlight the most profitable uses of FFP's time in the planning effort. We've suggested a lot of projects in the past, but they weren't on the Forest Service's priority list...Brent suggested we try to work with the forest resource planning tools that Steve mentioned. Dave asked if cost data could be overlaid on the other data. Garry said you have to have some projects make money. Some traditional timber sales are needed as well as other projects...Clarice said we need to get to the point we can use the biomass. Steve asked about the financial requirement for implementing the Healthy Forest Initiative....Gary asked if the Flathead has the people in place to make the work happen...Gary said the high priority is the WUI. (Place Based Groups, Kalispell, MT - #828)

**PC #: 49**

**Public Concern: The Forest Service should recognize that public education, enforcement and funding of Forest Plans are essential to preserving the National Forest system.**

Sample Statement:

The following language is proposed: 1. Education of the public pertaining to all phases of the forest plan is fundamental to protecting and preserving the national forest system. One form of education would be to publish the completed forest plan in language easily understood by the general public. 2. Strict enforcement of current and proposed Forest Service regulations is stressed for protection of our forests. 3. Control and eradication of noxious weeds invading our National Forest system is given high priority. The infestation of noxious weeds is affecting all areas of forest mgmt at an alarming rate. These items do require substantial funding to be effective, necessitating increased funding for the Forest Service budget. The group reached consensus on assenting to this statement. (Place Based Groups, No Address - #825)

**PC #: 36**

**Public Concern: The Forest Service should involve the public in the development of desired future conditions for the Management Areas.**

Sample Statement:

On page 3-8 of AMS there is mention that there are already established desired future conditions in MAs. On page 3-5 item 3 indicates the forest will encourage collaboration with the general public in being involved establishing desired future conditions. When and where is the public actually going to be involved in establishing desired future conditions and a prescribed range of management tools for achieving these conditions? The implication seems to be that these desired future conditions have already been established without the publics' help in establishing them. This is not consistent with the stated procedure as referenced. (Individual, Missoula, MT - #217)

Sample Statement:

There was a brief discussion on the six categories of Management Area delineation proposed and how that maybe too broad. (Place Based Groups, No Address - #825)

**PC #: 14**

**Public Concern: The Forest Service should incorporate public involvement and laws into an open decision making process.**

Sample Statement:

All decisions should be made openly, with as much public involvement as possible. All laws and constitutional standards regarding open meetings and freedom of information should be adhered to during the Forest Plan development process and in all subsequent actions. (Individual, Hamilton, MT - #760)

**PC #: 43**

**Public Concern: The Forest Service should work with community groups in the management of the National Forest and Private Land Interface.**

Sample Statement:

As a group of interested citizens, not as the RAC there is interest in meeting in the future to address specific topics in revising the forest plan. Any public involvement we do should include local community meetings, interest group meetings, and broad open public meetings. The Forest will work to call another meeting this fall specific to a revision topic like fuels reduction and forest health. (County Agency or Official, No Address - #69)

Sample Statement:

...the revision process is a big project. The plan has been litigated and amended many times since it was adopted. To be productive, FFP needs to focus on something we can get done. In 1994 our initial goal was to restart the small-sale program on the Flathead. That was something we could get our arms around. We need to similarly narrow our focus on the plan revision, figuring out what we can effectively deal with in the time available...at the last meeting we talked [about] working on the forest/private lands interface, which might include opportunities for small sales. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

FFP has treated probably less than 1,000 since 1994. We've concentrated on doing small demonstration projects, to show what can be done-and then hoping the Forest Service would adopt and use those approaches on a larger scale. We did demonstrations to gain trust with other stakeholders. We didn't think in 1994 that there was enough trust to make it possible to do big stuff. We've used our projects to educate. We also stress that it's more important to put the emphasis on what you're leaving, not what your taking off the forest--fixing the structure of the forest. One of the things that was the biggest help was having on-the-ground loggers involved. We use as much of the science that's the newest and best that we can get. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

We haven't seen a lot of fuel removal occurring. We need to set a priority on saving the forest. The Healthy Forests Restoration Act (HRFA) addresses that. The work will create a lot of biomass, and there's a lot of potential in what you can use it for. Right now we don't have the plants to use it for electricity. Guys with pickups and chain saws could cut a lot of fuels. Brent said there still would have to be guidelines. Clarice said the agency needs to set the standards. That used to be the way they did business. People would abide by the rules. With old growth, for instance, the Forest Service needs to say which trees are sick, etc. and need to be removed. Forest Service people are the specialists, but too many of them are working on their computers instead of in the woods. We can't educate everyone in the public. Brent said we, the public, are the landowners. The Forest Service has acted as our agent, with the experts to advise us. That worked for a while, and then people began asking pointed questions about what was being done. The universities have been trying to help find answers. Clarice said the [sic.] came up with the fluffy "ecosystem" concept. Things were fine when we managed the forest. (Place Based Groups, Kalispell, MT - #828)

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Sample Statement:

The plan should be based on a community-based stewardship (Individual, Roosevelt, UT - #33)

**PC #: 3**

**Public Concern: The Forest Service should be responsive to public input in decision making.**

Sample Statement:

Many people who receive this mailing will ignore it, as I admit, I am inclined to do. The feeling of the public have been largely misused. (Individual, Arlee, MT - #39)

Sample Statement:

A statement that "We propose that cross-country wheeled motorized travel would continue to be prohibited." is another illegal, biased, totally inappropriate unsupported pre-analysis and pre-decisional statement supporting our evaluation of bias in the general planning process under INTRODUCTION section above. (Multiple Use or Land Rights, Bigfork, MT - #588)

**PC #: 42**

**Public Concern: The Forest Service should incorporate the perspective of the local community and results obtained through the collaborative process into the proposed action and alternatives..**

Sample Statement:

Local perspective is absolutely necessary in planning on National Forest lands. Professionals in the Forest service (staff people) are rarely locals. Regular transfers are part of Forest Service culture, so rarely do professionals get to settle into an area and become local. A forester born in a large city or in Nebraska or Kansas looks at trees very differently despite professional training. A local logger from several generations of loggers has a different perspective on the need to both protect and harvest trees. Taking too much harms his kids and grandkids; not thinning reduces yield. We need to really consider their perspective. (Individual, Kalispell, MT - #225)

Sample Statement:

Community: Too much outside influence. Forest Service: Local people lose out because they don't have time to develop persuasive arguments. Let's use this opportunity constructively to try to make the next plan better. Community: How much force does the community have if they present a united voice? Forest Service: All we can promise is you have a chance to improve the odds. It moves us in the right direction. Community: There are experienced seasoned folks in the valley. It's difficult to get a lot of them to speak up. Pluck information from real folks in the valley. Spend more time at Liquid Louie's. (Place Based Groups, No Address - #821)

Sample Statement:

Integrate community based landscape assessments wherever they exist. The Upper Swan Valley Landscape Assessment should be integrated into the revised plan. The proposed action lacks, in general, attention to collaboration with communities and other agencies and landowners. This should be incorporated throughout the proposed action. (Place Based Groups, Condon, MT - #349)

Sample Statement:

How would the groups have input into the development of alternatives? FFP has been doing that for over 10 years now, and it's one of the reasons we can come up with something useful. It always takes a little time to bring new participants up to speed on what we have been doing and the common understandings we have arrived at...one ground rule has been that if Forest Service people come to the meeting as "agency people," then they are used as resource persons. If they come as individuals, they have an equal part in the process, just as any other participant. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

The formation of citizen working groups such as the Hamilton Group, their discussions and comments should be made part of the record of comments to the Proposed Action. (Place Based Groups, Corvallis, MT - #559)

Sample Statement:

Discussion revealed interest in the following place-based topics that, depending on the group's level of interest, might be addressed in future meetings:-Timber management in the Great Burn (as a specific example of lodge pole pine management in general).-Snowmobile closures on the Hoodoo Pass Road, and in "west-end" areas, along the State Line -Management of the Mt. Bushnell inventoried roadless area (possibly as some sort of "multiple-use wild area"?).-Use of wildfire (and prescribed fire?) as a management tool, in the Mt. Bushnell area for example. (Place Based Groups, No Address - #822)

**PC #: 37**

**Public Concern: The Forest Service should not promote the collaborative process.**

Sample Statement:

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There is no bigger mistake than considering all opinions as equal in a public involvement process. Some voices at the table are simply more honest, more informed, more intelligent, more ethical, and more altruistic than others. What common ground will a conservationist find with an industry executive who cares only about short-term profits, or with a logger who shoots spotted owls and hangs their corpses on Forest Service signs? These attitudes and behaviors are not uncommon. People like this will be seated at the table as "stakeholders." The least common denominator of any such consensus process is unlikely to amount to substantial improvements in management. The real stakeholders--the nonhuman species that have the most at stake in ecosystem management decisions--will not fare well. One of the most critical roles of activists is to gain seats at the table for these real stakeholders by arguing in their behalf. (Preservation/Conservation, Boulder, CO - #137)

Sample Statement:

...expert-bashing has become a popular pastime among both opponents and proponents of ecosystem management. Experts are viewed by some as elitists or outsiders. A fundamental issue is that scientific expertise appears to clash head-on with the democracy of consensus-based decision making, stake-holder processes, and community-based conservation themes of ecosystem management. (Preservation/Conservation, Boulder, CO - #137)

Sample Statement:

It has been stated that motorized recreationists should participate in collaborative sessions with anti multiple-use groups in order to obtain motorized recreational opportunities on public lands. The agencies may think that the definition of a collaborative effort as "working together to develop a solution that reasonably meets the needs of all parties" but the dictionary definition of collaborate is "To cooperate treasonably, as with an enemy". (Recreational, Helena, MT - #339)

Sample Statement:

The group has serious concerns regarding the likelihood of outcomes from collaborative process. (Preservation/Conservation, Hamilton, MT - #200)

Sample Statement:

They do not want to get involved in an "endless process". (Preservation/Conservation, Hamilton, MT - #200)

Sample Statement:

The public involvement strategy cannot assume we will solve all the problems by just talking. (County Agency or Official, No Address - #69)

**PC #: 1**

### **Public Concern: The Forest Service should develop trust through working collaboratively in project planning and implementation.**

Sample Statement:

FFP has been important in establishing a trust factor. We did that by doing projects that were not in the back country and that used existing roads. Rem said prior to 1982, you had about 30% of the Flathead NF in the timber base, with about 70-90 mmbf allowable cut. Now we still have about 27% in the available base, but the cut has gone way down. The old plan was insufficient--relative to public concerns--to get the job done. We need to figure out what can get done. In FFP we have made friends with the neighbors of projects we did. You need to have a plan that the public supports and that hopefully won't stall out. We can't address all the fiber. We're always going to be living with fire. Nature develops a mosaic, and so can a logger. Because of the recent fires, people now want things done--but if we go 2-3 years without a big fire, they'll forget what they wanted. We need more structure to the process--laws and expectations of performance. We're about to go through a process with FFP that we've been through twice before. Stewardship contracting was an answer to some of our needs, and we helped make it possible. Steve told us we needed to treat larger acreages at Cedar Flats, and now that's being done by the Forest Service, after we did our demonstration. We need to pick a spot we can do something in the interface. We can't deal with everywhere there's one or two houses. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

I would like to see more collaboration when timber harvest takes place. I would appreciate it if more diverse interests played a greater role in this process. (Individual, Missoula, MT - #750)

Sample Statement:

What Flathead Forestry Project did on Cedar Flats is now helping the Forest Service get through the process more quickly on Cedar Spoon. People can see what it will be like. .... said the Forest Service is not in the education business, and FFP fell down on organizing enough field trips and otherwise showing people what can be done. .... said the fact that FFP got acres thinned without controversy tells that we have the ability to pull off bigger acreages. Are there performance standards relative to the number of acres to be treated under HFRA? (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

We also need to get private landowners involved in programs like the old Forest Improvement Program that help them manage their own land by paying for non-commercial thinning and other work. That led to good spacing and fuels on the ground. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

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asked to highlight the most profitable uses of FFP's time in the planning effort. We've suggested a lot of projects in the past, but they weren't on the Forest Service's priority list... suggested we try to work with the forest resource planning tools mentioned. asked if cost data could be overlaid on the other data. you have to have some projects make money. Some traditional timber sales are needed as well as other projects. we need to get to the point we can use the biomass. ...asked about the financial requirement for implementing the Healthy Forest Initiative....asked if the Flathead has the people in place to make the work happen... the high priority is the WUI. (Place Based Groups, Kalispell, MT - #828)

Sample Statement:

FFP has treated probably less than 1,000 since 1994. We've concentrated on doing small demonstration projects, to show what can be done-and then hoping the Forest Service would adopt and use those approaches on a larger scale. We did demonstrations to gain trust with other stakeholders. We didn't think in 1994 that there was enough trust to make it possible to do big stuff. We've used our projects to educate. We also stress that it's more important to put the emphasis on what you're leaving, not what your taking off the forest--fixing the structure of the forest. One of the things that was the biggest help was having on-the-ground loggers involved. We use as much of the science that's the newest and best that we can get. (Place Based Groups, Kalispell, MT - #828)

**PC #: 69**

**Public Concern: The Forest Service should integrate landscape frameworks into the Forest Plans.**

Sample Statement:

Integrate community based landscape assessments wherever they exist. The Upper Swan Valley Landscape Assessment should be integrated into the revised plan. The proposed action lacks, in general, attention to collaboration with communities and other agencies and landowners. This should be incorporated throughout the proposed action. (Place Based Groups, Condon, MT - #349)

Sample Statement:

MWA [Montana Wilderness Alliance] members spent six months last year developing a landscape framework for working as partners with Montana mills and loggers in managing watersheds. We continue to endorse those concepts and feel the forest plan would be an ideal place to put these concepts to work. (Preservation/Conservation, Helena, MT - #526)

**PC #: 21**

**Public Concern: The Forest Service should ensure that the public involvement process presents an equal burden to the various user groups.**

Sample Statement:

a significant prejudice exists because the needs of non-motorized recreationists are given significant consideration without the requirement for inventories and identification of resources, i.e. non-motorized recreationists are not subjected to the same requirement to identify it now in order to keep it open in future use and generations. (Recreational, Helena, MT - #339)

Sample Statement:

Motorized recreationists are being required to identify and inventory all of the routes important to them. This procedure puts an insurmountable burden on motorized recreationists and at the same time there was no such requirement for non-motorized recreationists. On top of all this the process was started with a proposal to close about ? of the existing roads and trails making it impossible for motorized recreationists to get routes added back into the process. This biased procedure was done on purpose in order to put motorized recreationists at a disadvantage. NEPA requires consideration of all reasonable alternatives and all of the existing routes should have been considered as a reasonable alternative and as the starting point. (Recreational, Helena, MT - #339)

Sample Statement:

The process used puts the average citizen at a great disadvantage. The process is inordinately confusing, cumbersome and intimidating to the members of the public who are not organized or experienced which is the majority of the public. The process is inordinately demanding of participation and has unreasonable expectations for the involvement of individuals and families. A 300+ page draft EIS and finally a 300+ page final EIS is too much for the general public to understand and participate in. Coupled with the current number of other ongoing actions shown in Table 1 the situation is overwhelming. Just because the public cannot digest all of this paper does not mean that the agencies are free to ignore the needs of the public. NEPA never intended for the process to take away the quality of human life for individuals and families but because the process is so overwhelming it is doing just that. Given these conditions, it is not reasonable to expect the level of unorganized public participation to be high. Given these conditions, the needs of the overall public must be carefully determined. The most equitable alternative to meet the public's needs would be a reasonable multiple-use alternative. (Recreational, Helena, MT - #339)

Sample Statement:

All of the motorized routes that are important to the public cannot be identified by clubs and individuals. Everyone that visits

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our public lands has a special road or trail that they like to visit. Getting everyone to participate and identify all of these routes is neither practical nor reasonable. All of the existing routes exist because they are important access and recreational opportunities. Therefore, all existing routes without significant environmental concerns are considered as the preferred alternative. Additionally, all available mitigation measures must be adequately considered for those routes with environmental concerns. (Recreational, Helena, MT - #339)

Sample Statement:

The efforts to involve motorized recreationists in the process using unique methods as required by the environmental justice regulations have not happened. The process must allow for and accommodate the needs of citizens who, for the most part, act and live independently and are not organized to the level of environmental organizations. Thomas Mendyke, Outdoor Editor for the Independent Record made the following statement in his article on November 20, 2003 "Outdoor enthusiasts frequently find themselves at odds with big money interests. Generally speaking, people who pursue outdoor interests tend to be an independent lot. Sporting groups usually are poorly funded, loosely organized and ill-prepared to match the financial and legal power their adversaries often possess." (Recreational, Helena, MT - #339)

**PC #: 65**

**Public Concern: The Forest Service should allow public review and comment of the Analysis of the Management Situation.**

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Although we recognize the Proposed Action has evolved from the Analysis of the Management Situation (AMS), and is a place to start public discussion, we believe the public should have first been given an opportunity to review and comment on the AMS. It is difficult to dissect and address concerns within the Proposed Action when the AMS is fundamentally flawed. (Timber or Wood Products Industry, Kalispell, MT - #539)

**PC #: 63**

**Public Concern: The Forest Service should incorporate by reference public comments and hearing records on roadless area management and conservation from 1998 to present.**

Sample Statement:

Please incorporate by reference all public comments and hearing records on roadless area management and conservation from the March 1998 public hearings in Missoula, Helena and Libby to the most recent USDA Federal Register notices on roadless area conservation. (Preservation/Conservation, Helena, MT - #526)

**PC #: 38**

**Public Concern: The Forest Service should utilize the public forum hearing as the standard format for public meetings.**

Sample Statement:

Montanans for Multiple Use is a nonprofit organization that represents a wide range of National Forest users. We want to express dissatisfaction with the format and management of public meetings. We have participated in too many "open house meetings", "consensus meetings" and others where we are shuttled off to a staff person or small groups with staff officers or paid facilitators. All the input is consolidated, filtered, restated and summarized by these facilitators, with no direct communication with the responsible official. We believe that public input from these processes is not fully and accurately reported to or understood by the responsible official. The open house format is only useful if it is followed by a public forum. We believe there should be some real "public forums" where people can make public statements directly to the responsible official concerning management of public assets. Most public officials and governments use the public hearing format, which we endorse. We are very interested in a true in depth "community collaboration!" where the planners share and interpret the monitoring data, the inventory data and maps, and other science that supports the "proposed actions" or that will be used to evaluate alternatives. This should be done throughout the forest in small working groups interacting with forest officials, issue by issue. (Multiple Use or Land Rights, Kalispell, MT - #59)

Sample Statement:

Any past meetings did not comply with the law and Forest Service Regulations (#219.6 Public Participation). "Formal public participation activities will begin with a notice to the news media and other sources which includes, the following information 1) description of the proposed planning action 2) description and map of geographic areas affected 3) issues expected to be discussed 4) the kind, extent and method(s) of public participation to be used 5) times, dates, and location scheduled or anticipated for public meetings 6) name, title, address, and telephone number of the FS official who may be contacted for further information 7) location and availability of documents relevant to the planning process 7d,f,h,j, etc. An open house is not a public forum. (Individual, Bigfork, MT - #621)

Sample Statement:

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I have learned that forest-planning meetings on several Lolo National Forest districts will be of the type where the audience will view a TV or 'Power Point' presentation and/or an in-person presentation, then will be put into small groups to discuss the plan. Presumably each group will later present their findings to the body of participants. (consensus process?) Many people I have talked with resent this meeting format. Personally, I find it frustrating and completely unsatisfactory. Please reconsider this meeting format. I am urging you to conduct an open forum meetings where, following the initial presentation, participants may then ask questions and present their own thoughts and concerns. In that way everyone can share their ideas and benefit from sharing ideas of others'. I consider these planning meetings quite important - a really big deal! You, being the responsible official, should be interested in hearing directly from the meeting participants as well. (Individual, Paradise, MT - #49)

Sample Statement:

I am disappointed in the overall drafting of the Forest Plan Proposal, and the wording of the "actions." The Tally Lake District, Kootenai NF, Bitterroot and Lolo NF had public forums to address forest issues. I had previously written a letter requesting a public forum for the Flathead NF, and all we got was an open house with a pre-planned agenda. (Individual, Bigfork, MT - #621)

Sample Statement:

The general public and community deserves a more in-depth Public Forum, with the Forest Service presenting their proposals followed by an open discussion (perhaps two or three minutes per person) with the audience. (Recreational, Bigfork, MT - #62)

Sample Statement:

It is apparent from the announced schedule of Forest Plan revision meetings, that the Flathead is not providing the same opportunity for public participation that other Forests provide by offering only one meeting. This effectively discourages participation from some of the communities (e.g. Condon, West Glacier-Hungry Horse, Whitefish-Olney) that are most affected by the proposals. (Multiple Use or Land Rights, Kalispell, MT - #59)

Sample Statement:

Please have the presenters address these questions and issues in an open forum at Plains and other upcoming meetings, and be prepared to answer questions from the participants. (Individual, Paradise, MT - #42)

## **Section: Collaboration with Other Government Entities**

**PC #: 29**

**Public Concern: The Forest Service should coordinate across ownership boundaries to reduce bear-human conflicts.**

Sample Statement:

Action EM-F6-A1: (We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.) And to coordinate these with the landowners and managers of tribal, state, private and other government agencies. (Place Based Groups, Condon, MT - #349)

Sample Statement:

Action EM-F6-A1 (We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.) Add: Collaborate with all entities, i.e., the public, state, private landowners, tribes, etc. (Individual, Condon, MT - #638)

Sample Statement:

EM-F6: The Forests also need to be actively involved in mitigating or reducing bear-human conflicts on private land adjacent to National Forest. Cooperation with other agencies on education and prevention is needed. Easements or purchase of private land in prime grizzly bear habitat adjacent to USFS land should be pursued. (Preservation/Conservation, Polebridge, MT - #705)

**PC #: 45**

**Public Concern: The Forest Service should work cooperatively with State and County governments and local officials.**

Sample Statement:

Eliminate most of the studies and paper work. Local people, local elected officials and common sense should carry the most weight in making management decisions, especially for the crisis situations we now face. Opinions by the US Fish and Wildlife should carry no more weight than any other agency whether it is federal, state, county or city/local jurisdiction. Mitigation of the concerns of USFW should be a factor, but they should not have veto power. (Place Based Groups, No Address - #967)

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Sample Statement:

Make land management decisions compatible with the heritage, customs and culture of adjacent communities and include input from local elected officials. Make the Forest Service accountable to the Montana State Government which should use the power to override Forest Service policies. Make a change then analyze the effects of that change, instead of making a lot of changes, then wondering what did what. Do not use the term "ecosystem" in place of "Flathead National Forest" in the Forest Plan. Cut unnecessary paperwork. If access roads exist, dead and diseased trees should be salvaged with no paperwork. Eliminate some of the environmental impact studies. Local officials can use common sense on deciding the impact on the environment. It takes too much time because of government bureaucracy to make a decision. End the 1973 ESA and develop a new ESA under updated data from many sources, not just "Best Available Science." Require public support and open peer review for all potential Endangered Species Listing. Lobby Congress to modify laws that prohibit reasonable management. Use common sense management, involving elected officials in the process. Include deer, elk and moose in management indicator species. Terminate use of Equal Access to Justice Act for environmental lawsuits. Opinions by the US Fish & Wildlife should carry no more weight than any other opinion and to the best degree possible their concerns should be mitigated. (Place Based Groups, No Address - #967)

Sample Statement:

MFWP would like to work with the Forests to develop a process to review fish and wildlife population data, hunter harvest trends, etc. to help predict potential positive or negative impacts on fish and wildlife management efforts when use/allocation decisions are made. We believe this is already provided for under the 1995 and 1997 versions of the "Fish, Wildlife and Habitat Management Framework for the Bob Marshall Wilderness Complex" which were prepared jointly between our agencies and adopted by the BMWCM group. (State Agency or Official, Missoula, MT - #338)

Sample Statement:

We ask that Krause Basin, an area first closed seasonally to motorized use in 1988, be closed yearlong to motorized use other than on roads left open for such use after adequate protection of wildlife security and other forest resources has been provided. Indeed, we ask that all three Revision Forests follow the lead of the Montana Department of Natural Resources and Conservation and the Montana Code Annotated by prohibiting the use of motorized vehicles other than on open roads. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

"State and local governments should be consulted and approve public roads to be decommissioned. " (Place Based Groups, No Address - #967)

Sample Statement:

Whether or not you or your team agree with Fred's politics and manner of doing business he has put together thoughtful comment on the plan. I am hopeful that you will consider his comments reflective of the County Commission. That is our wish. (Multiple Use or Land Rights, Kalispell, MT - #552)

**PC #: 47**

### **Public Concern: The Forest Service should work with the counties to benefit local communities.**

Sample Statement:

I really like Action NF-F1-A4 (We propose to work cooperatively with counties, homeowner groups and other groups to address infrastructure needs such as roads and utility development) because you need to work with groups and individuals, and you need to prevent a very few from controlling/stopping the process. (Individual, Whitefish, MT - #500)

Sample Statement:

There should be more specific language in having communities and Counties to "Shape" what we want the Forest to look like. We don't want the County governments telling the Forest Service what they should do. Forest Service decisions carry a lot of weight...they could work with the Counties. The Bitterroot National Forest is doing a lot of active work with the communities. They're working well together. (Place Based Groups, Missoula, MT - #826)

Sample Statement:

you should also consider much more collaboration with local groups, county government groups, state government/groups and citizens in the affected adjacent areas to forest plan area changes because these individuals governments and groups are the most affected in their everyday lives and livelihood (Individual, Kalispell, MT - #226)

Sample Statement:

Action NF-F2-A1 (We propose to concentrate fuels management activities in the interface near areas of moderate and high hazard to wildfire. Live and dead fuels would be managed to reduce likelihood of high-intensity wildland fire threatening values at risk and firefighter safety). The forests should establish a goal to work with counties - and provide appropriate incentives such as telling them fire suppression in the interface isn't always going to be a top spending priority in enacting planning tools that discourage inordinate private development in fire-prone areas. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

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Made a suggestion to work cooperatively with other jurisdictions to control fires. Also, it sounds like the Forest Service would be subsidizing private government, the way it's stated. (Place Based Groups, Missoula, MT - #826)

**PC #: 46**

### **Public Concern: The Forest Service should grant cooperating agency status to government agencies.**

Sample Statement:

Cooperating agency status be granted to the counties and water districts adjacent to the resource area, and the States. Cooperating agency status SHOULD NOT be considered for non-government agencies. (Individual, Roosevelt, UT - #33)

Sample Statement:

All Federal agencies are actively considering designation of Federal non-federal cooperating agencies in the preparation of analyses and documentation required by the National Environmental Policy Act (NEPA), and to ensure that Federal agencies actively participate as cooperating agencies in other agency's NEPA processes. (County Agency or Official, Superior, MT - #507)

Sample Statement:

This plan should meet a consistency review with the County(s) and State(s) plan. (Individual, Roosevelt, UT - #33)

Sample Statement:

A county-wide resource action committee should be established to help the forests manage the land as most appropriately fits each county. (Place Based Groups, Paradise, MT - #258)

## **Section: Relation to or Consistency with Other Plans, Directives, etc.**

**PC #: 6**

### **Public Concern: The Forest Service should revisit existing Forest Plan decisions and amendments before incorporating into the Forest Plan Revision.**

Sample Statement:

Current forest plan amendments are to NOT be carried forward. The entire forest plan is subject to change. (Place Based Groups, No Address - #968)

Sample Statement:

Historically, the Swan Front drainages of Six Mile Mountain, Bond Creek, North And South Lost Creek and Soup Creek. were designated as MA2B - Primitive Motorized Recreation. These areas were popular destinations for snowmobilers and offered many miles of riding that did not impact lower level recreations like skiing and snowshoeing; did not disturb winter wildlife habitats that move to the lower valley during times of heavy snow and decreased food supplies; and provided an economic stimulus for local businesses. The recent ruling closing four of these five riding areas was a result of a negotiation between the USFS, MWA and MSA. Information provided by various individuals that lead to this closure decision, was incomplete and erroneous in several instances. We respectfully request that the USFS revisit this closure by reevaluating and confirming or disallowing claims made by the parties involved. In particular: a) the soft science used to determine upper elevation winter wildlife population density) the exaggerated allegations regarding illegal access by snowmobilers to wilderness areas from the above mentioned drainages) the understated usage of mid to high elevations by snowmobilers in the Swan area, d) the financial motivation of specific individuals in supporting the reclassification of the above mentioned drainages, closing those in the south and reopening those in the north portion of the Flathead Forest. (Recreational, Bigfork, MT - #557)

Subconcern:

#### **RELATED TO A-19**

Sample Statement:

Amendment 19 should be omitted from the new plan. It was processed through NEPA as an EA with a Finding of No Significant Impact. We all know now that there has been a very significant impact on local economies, timber management, recreation, fire and insect management, public access, and forest health in general. Most studies have shown that roads have had little impact on Grizzly Bear movement. Also, man caused mortality of grizzlies has not been linked to open roads. Road obliteration and removing culverts has proven to do more harm to fisheries than benefit the bears. The last point I want to make about amendment 19 is that the Grizzly Bear is recovered. Kate Kendall's Greater Glacier Bear DNA Study identified 367 bears with one year's data not yet analyzed. This is 2/3 of the required bears in just ? of the Northern Continental Divide Ecosystem. (Individual, Polebridge, MT - #656)

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Subconcern:

### **RELATED TO ROCK CREEK WATERSHED**

Sample Statement:

I believe the Rock Creek watershed should not be divided between the Lolo and Deerlodge forest plan revision processes. I don't believe coordination will bring sufficient credibility with the public. Rock Creek watershed should be entirely within one analysis and revision. History of the watershed should be helpful. For over 30 years Rock Creek has been the focus of public and agency attention. The FS has spent lots of time and dollars addressing the controversy. In the mid 70-s there was an official USDA advisory committee established. Two Supervisors spent many days over several years at advisory committee meeting. The minutes for the meeting fill about 1 file drawer. The 1984 or 85 forest draft plan had to be redone to include a common chapter on Rock Creek in both forest plans. Then in the 90s there was moratorium on new planned (salvage was excluded) timber sales. I may have the dates slightly off. I am sure you are well aware of Rock Creek's national following with fishery / wildlife, and water quality advocates paying close attention to ever agency move. (Individual, Missoula, MT - #434)

Sample Statement:

Rock Creek, its roadless tributaries, great habitat, quiet trails and outdoor traditions merit a comprehensive "blue ribbon" conservation plan adopted by all three forests. (Preservation/Conservation, Helena, MT - #526)

### **PC #: 17**

#### **Public Concern: The Forest Service should operate under a less restrictive management framework that is not necessarily consistent with federal laws, policies and directives.**

Sample Statement:

Make land management decisions compatible with the heritage, customs and culture of adjacent communities and include input from local elected officials. Make the Forest Service accountable to the Montana State Government which should use the power to override Forest Service policies. Make a change then analyze the effects of that change, instead of making a lot of changes, then wondering what did what. Do not use the term "ecosystem" in place of "Flathead National Forest" in the Forest Plan. Cut unnecessary paperwork. If access roads exist, dead and diseased trees should be salvaged with no paperwork. Eliminate some of the environmental impact studies. Local officials can use common sense on deciding the impact on the environment. It takes too much time because of government bureaucracy to make a decision. End the 1973 ESA and develop a new ESA under updated data from many sources, not just "Best Available Science." Require public support and open peer review for all potential Endangered Species Listing. Lobby Congress to modify laws that prohibit reasonable management. Use common sense management, involving elected officials in the process. Include deer, elk and moose in management indicator species. Terminate use of Equal Access to Justice Act for environmental lawsuits. Opinions by the US Fish & Wildlife should carry no more weight than any other opinion and to the best degree possible their concerns should be mitigated. (Place Based Groups, No Address - #967)

Sample Statement:

In my view, had the Roadless Rule remained in effect, it would have impossible for the USDA Forest Service to implement the Healthy Forests Initiative and actively manage the vast majority of National Forest System lands in the Intermountain Region. The Intermountain Region includes Utah, Nevada, Western Wyoming and Southern Idaho. Again, I thank you, not only for this response, but for your long arid diligent work in bringing the facts surrounding the Roadless Rule to light. (Individual, Roy, UT - #682)

### **PC #: 16**

#### **Public Concern: The Forest Service should make management decisions that are consistent with existing federal laws, regulations and policies.**

Sample Statement:

The Alliance for the Wild Rockies believes all forest plans should follow existing federal laws and be based on the science of conservation biology and sustainable economics. (Preservation/Conservation, Helena, MT - #712)

Sample Statement:

We believe it is particularly important for Findings and Actions to promote restoration of water quality to support designated beneficial uses where water quality is currently impaired or designated beneficial uses are not fully supported. The focus of the Clean Water Act is on achieving water quality that supports beneficial uses. We believe forest management direction should promote project planning, design, and implementation to address existing pollution sources on National Forest lands contributing to impairment of Clean Water Act 303(d)-listed waters to reduce pollutant loads and restore support for designated beneficial uses. EPA is interested in having Forest Plan direction consistent with the EPA Interim Air Quality Policy on Wildland and Prescribed Fires. EPA also supports the need to update LRMPs to reflect national fire management strategies and policies. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

In my opinion we should throw out all legislation that has been passed in the last 75 years and let the professionals in the

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Forest Service run the Forest Service, based on the old Organic Act. Now I know this isn't going to happen so lets try and do something within the framework that fate and liberal politicians have decreed is the law of the land. (Individual, Kalispell, MT - #506)

Sample Statement:

The efforts to involve motorized recreationists in the process using unique methods as required by the environmental justice regulations have not happened. The process must allow for and accommodate that needs of citizens who, for the most part, act and live independently and are not organized to the level of environmental organizations. Thomas Mendyke, Outdoor Editor for the Independent Record made the following statement in his article on November 20, 2003 "Outdoor enthusiasts frequently find themselves at odds with big money interests. Generally speaking, people who pursue outdoor interests tend to be an independent lot. Sporting groups usually are poorly funded, loosely organized and ill-prepared to match the financial and legal power their adversaries often possess." (Recreational, Helena, MT - #339)

Subconcern:

### **AS RELATED TO THE ENERGY POLICY AND CONSERVATION ACT**

Sample Statement:

The three National Forests are located, at least partly, within the boundaries of the Montana Thrust Belt Study Area analyzed for the recent study mandated by the Energy Policy and Conservation Act Amendments of 2000 (the EPCA study). According to the EPCA study, there are 4,285 acres within the Bitterroot National Forest, 204,559 acres within the Lob National Forest, and 898,175 acres within the Flathead National Forest in that analysis area that are not available for oil and gas leasing due to the lack of land use plans meeting the requirements for oil and gas leasing. We urge you to reconsider plans not to include an oil and gas leasing analysis in these revisions. Completion of such an analysis with the revisions would directly contribute to the goals of the President's energy policy. (Federal Agency or Official, Billings, MT - #55)

Sample Statement:

The omission of energy minerals in the plan amendment process is even more disturbing given the fact that in response to the President's National Energy Policy, the Forest Service (FS) developed a strategy for Implementation of the National Energy Plan (NEP). Specifically chapter 3 of the NEP requires the FS "to expedite permits and other federal actions necessary for energy-related project approvals on a national basis..." (Oil, Natural Gas, or Coal, No Address - #553)

Subconcern:

### **AS RELATED TO THE FOREST SERVICE ROAD POLICY**

Sample Statement:

In terms of system roads alone, each of the WMPZ Forests has far more miles of road than it, has the budget to maintain - six times as many in the case of the Flathead! (See WMPZ AMS, at 4-2). While the Forest Service adopted a new Roads Policy under Chief Dombeck, aimed at determining the necessary minimum road system and reclaiming the rest, Forests like the Flathead are instead renegeing on their road reclamation programs and ignoring their inability to maintain the current road system. (Preservation/Conservation, Kalispell, MT - #544)

**PC #: 5**

**Public Concern: The Forest Service should honor prior Decisions, Forest Plan Amendments, and other Agreements.**

Sample Statement:

Integrate community based landscape assessments wherever they exist. The Upper Swan Valley Landscape Assessment should be integrated into the revised plan. The proposed action lacks, in general, attention to collaboration with communities and other agencies and landowners. This should be incorporated throughout the proposed action. (Place Based Groups, Condon, MT - #349)

Sample Statement:

MWA [Montana Wilderness Alliance] members spent six months last year developing a landscape framework for working as partners with Montana mills and loggers in managing watersheds. We continue to endorse those concepts and feel the forest plan would be an ideal place to put these concepts to work. (Preservation/Conservation, Helena, MT - #526)

Sample Statement:

I have also had a long association with the Rock Creek drainage east of Missoula. There the Lolo NF and the-then Deerlodge National Forest recognized the conservation/recreation importance of Rock Creek and created what I believe was the only place in the nation where 2 forests shared the same management plan for managing a drainage where management was shared. This was a creative and very useful solution. I urge you to retain this approach and certainly to continue placing Rock Creek's water quality as the top management priority. (Individual, Missoula, MT - #783)

Subconcern:

## **RELATED TO WILDERNESS DESIGNATION**

### Sample Statement:

In 1992, the Flathead National Forest participated in the North Fork Steering Committee, set up after a recommendation by the International Joint Commission that the U.S. and Canada define appropriate levels of development and management strategies in the North Fork. The Conceptual Strategy that the Committee developed (and that the Flathead Forest signed off on) calls on the Flathead National Forest to "Recommend congressional approval of the Mount Hefty-Tuchuck and Thompson-Seton areas ...for wilderness designation." Designating maximum wilderness in the North Fork is the single most effective measure we can take to both protect the drainage and send a message to the Canadians that we are managing the North Fork to protect its world class values, and that we expect them to do the same (Individual, Columbia Falls, MT - #534)

### Subconcern:

## **RELATED TO WILDERNESS MANAGEMENT**

### Sample Statement:

At the 2002 Bob Marshall meeting, there was widespread agreement there should be ONE plan for "the Bob"-ecosystem based, rather than fragmented, with clear standards that would keep all the Bob intact and preserve traditional uses over time-including the Rocky Mountain Front, Monture, Middle Fork and Swan Range wildlands. In 1995, four forest supervisors and three Fish, Wildlife and Parks Regional supervisors signed a joint memorandum of understanding (MOU) pledging to coordinate management of the "Bob Marshall Wilderness Complex Ecosystem" defined as "contiguous wilderness areas and ecologically associated non-wilderness," covering roughly 3 million acres. (1)This framework uses patterns of fish and wildlife use to define the Bob Marshall ecosystem, USFS lands within the Bob Marshall Wilderness Complex ecosystem are located within Highways 2, 200, 83 and 89.MWA has repeatedly asked forest managers to use the joint definition to build a unified plan for Montana's Bob Marsh wilderness ecosystem. The greater "Bob" plan would be incorporated into each of 4 respective forest plans, rather than having four plans divide management for one Bob Marshall ecosystem. (Preservation/Conservation, Helena, MT - #526)

### Sample Statement:

The Bob Marshall Wilderness Complex [BMWC]-including parts of four national forests-has been managed cooperatively with interested citizens and MT Fish Wild life and Parks for the past 17 years. This is a credit to all involved including the dedicated wilderness and district rangers. Some believe that citizen involvement in "the Bob" has waned in recent years and needs to be beefed up. (G Pershing, BMWC newsletter) A prime example is predetermining the issues and scope of forest plan revision. (Preservation/Conservation, Helena, MT - #526)

### Subconcern:

## **RELATED TO OHV MANAGEMENT**

### Sample Statement:

All public lands were largely open to motorized access prior to the 1960's. Many existing roads and trails were created by legal logging, mining and public access during this period. Nearly all of the roads and trails in the project area have been in existence for many years with many dating back to the turn of the century. The term "unclassified road or ghost road" may give the impression that these roads evolved illegally. We request a clarification in the document that travelways with these origins are legal travelways as recognized by the 3-States OHV ROD. We are very concerned that the agencies are not honoring this agreement and decision. Additionally, we request that these roads and trails continue to provide recreation opportunities for motorized visitors and that mitigation measures be used, as required, to stabilize or address any environmental concerns. (Recreational, Helena, MT - #339)

### Sample Statement:

Another example of prejudice in the current setting includes the fact that motorized recreationists endorsed and accepted millions of acres of area closure under the 3-State OHV decision as a positive action to control impacts but we have not been given credit for that action and have only been penalized for our past cooperation and initiative. The preferred alternative must adequately consider that past cooperation and it must move in a direction that gives motorized recreationists credit for their cooperation and the environmental improvements that resulted. (Recreational, Helena, MT - #339)

### Sample Statement:

The USFS-BLM "OHV Management Strategy of 2000" provides specific direction for OHV management. User developed trails should be studied so that those that provide access to desired locations or viewpoints may be incorporated into the official trail system. Sanctions should be adopted if the physical location is on an acceptable grade and avoids fragile areas; Steep areas should be re-routed and/or water-barred, graveled, or otherwise made passable and erosion controlled. All trails should be open to all uses unless there is significant reason to close them. (Timber or Wood Products Industry, Kalispell, MT - #539)

### Sample Statement:

Forest Plan direction and standards regarding ORV use in the Lolo were never enforced or complied with. The Lolo Supervisor finally ordered ORV use closures on MA 11 lands in June 2003 in the Stony Mountain RA. Closure orders have never been Issued and signed closures have never, been placed in the Sapphire WSA and Roadless Areas. (Preservation/Conservation, Hamilton, MT - #720)

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### Sample Statement:

The USFS-BLM OHV Management Strategy issued in December 2000 provides direction for OHV management. Although that direction is overly restrictive in some cases, it does provide goals to be striven for: 4-wheeled ATVs are only allowed on roads or on trails designed for their use, and are not to be allowed on single track trails; noise standards are to be developed and enforced; no travel off existing roads or trails designed for the specific vehicles is allowed except to make camp a short distance from the designated route. Horses should also be so restricted. (Place Based Groups, Paradise, MT - #258)

### Subconcern:

#### **RELATED TO FLATHEAD AMENDMENT 19**

### Sample Statement:

In addition to Forest Plan requirements to maintain and improve water quality and habitat for fisheries, the Flathead in 1995 adopted Amendment 19 to its Forest Plan in order to secure grizzly bear habitat via road closures and road reclamation. Amendment 19 was established as an integrated program that would also benefit water quality and fisheries by requiring that all stream-bearing culverts be removed from all reclaimed roads. [17] Amendment 19 further requires that measurable road density and grizzly bear security objectives be met on a 5- and 10-year implementation schedule clearly divorced from the Flathead's timber sale program. [18] (Preservation/Conservation, Kalispell, MT - #544)

### Sample Statement:

Flathead National Forest's efforts to abandon road reclamation comes at a time when presidential initiatives have been launched to reduce the road system on the National Forests to a size that can be adequately maintained in order to restore ecosystem integrity. Although previously allowed to spend up to 5% of its road maintenance budget on road reclamation, the Flathead allocated no maintenance dollars for reclamation prior to being awarded funds earmarked specifically for that purpose under the new national initiatives in fiscal year 1999. [26] As mentioned earlier, watershed improvement funds carried 95% of the Flathead's road reclamation program prior to FY 1999. While the Flathead has issued decisions to reclaim another 344 miles of road, the work has yet to be accomplished. [27] As a result of inadequate priorities, planning, funding and implementation, the Flathead has fallen far short of its mandatory Amendment 19 5-year implementation objectives and has asked Fish and Wildlife Service for more time to accomplish those objectives. [28] (Preservation/Conservation, Kalispell, MT - #544)

### Sample Statement:

The PA proposes to change access management to, "better integrate social concerns with recovery needs of the grizzly bear," even though grizzly bear are to be given highest management priority due to their threatened status (PA at 3). Moreover, the NCDE Interagency Grizzly Bear Committee Subcommittee already submitted such a proposal for peer review and it was flatly rejected in favor of the existing Flathead Forest Plan Amendment 19 approach. (Preservation/Conservation, Kalispell, MT - #544)

### Sample Statement:

The Flathead has proposed authorizing snowmobiling up until June on some 52,000 of essential grizzly bear habitat in its pending Amendment 24! This in spite of Flathead Amendment 19 requiring motorized use end March 15 to protect grizzly bear emerging from their winter dens - and after the neighboring Lolo's Amendment 29 set a closure date of April 1 for similar reasons. Hence, the PA on page 2, at AM-F2-A3, calls for not changing either of these snowmobile amendments while at the same time calling for consistent management across Forest boundaries! (Preservation/Conservation, Kalispell, MT - #544)

### Sample Statement:

In terms of benefits to multiple resources, the Flathead was legally required by Fish and Wildlife Service to develop and implement along with Amendment 19 "a public information program on the positive effects of road closures for fish and wildlife, water quality, and other Forest resources." [29] In spite of written and binding assurances to FWS that it would develop a fact sheet describing the benefits of road closures and obliteration, the Flathead has never done so. [30] Rather than proactively demonstrating to the public the benefits of a road management program that is integrated to benefit multiple species and resources, the Flathead has instead placed itself in a defensive position and has worked alongside the Interagency Grizzly Bear Committee to eviscerate such a program. (Preservation/Conservation, Kalispell, MT - #544)

### Subconcern:

#### **RELATED TO REGIONAL ECOSYSTEM MANAGEMENT**

### Sample Statement:

We want to draw your attention to the Interagency Memorandum of Understanding between the Forest Service, BLM, EPA, USFWS, and NMFS indicating that the Forest Service will implement the Interior Columbia Basin Strategy on National Forest lands (referred to as the ICB Strategy). (Federal Agency or Official, Helena, MT - #257)

### Sample Statement:

EM-F5: The Canadian Flathead is one of the most important linkage zones for the Northern Continental Divide Ecosystem. The Flathead Forest needs to be actively involved in cooperative efforts to ensure that management of the Canadian Flathead is consistent with the unsurpassed natural values of the area. Current threats of coal and coal bed methane development would be devastating to the Flathead National Forest. This may necessitate unprecedented steps, including involvement of the State Department and Legislative Branch. In addition, all actions across the border must be bilateral. If

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we are asking the Canadians to treat the drainage with special care, all management of the Flathead National Forest in the North Fork must be done with the strictest ecosystem management principles. To this end, designation of North Fork wilderness is imperative. The cooperatively developed Conceptual Strategy for the North Fork that the Forest participated in developing and signed off on should be incorporated into the Forest Plan. (Preservation/Conservation, Polebridge, MT - #705)

Subconcern:

### **RELATED TO ROCK CREEK WATERSHED**

Sample Statement:

The proposed Forest Plans for the Lolo and Deerlodge (Beaverhead-Deerlodge) must develop coordinated chapters with specific management direction and standards for the Rock Creek Drainage Ecosystem. To fail to do so, after including coordinated chapters in the earlier pre-ecosystem management era, would be arbitrary and capricious. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

I have also had a long association with the Rock Creek drainage east of Missoula. There the Lolo NF and the-then Deerlodge National Forest recognized the conservation/recreation importance of Rock Creek and created what I believe was the only place in the nation where 2 forests shared the same management plan for managing a drainage where management was shared. This was a creative and very useful solution. I urge you to retain this approach and certainly to continue placing Rock Creek's water quality as the top management priority. (Individual, Missoula, MT - #783)

**PC #: 111**

**Public Concern: The Forest Service should adequately budget its road maintenance.**

Sample Statement:

In terms of system roads alone, each of the WMPZ Forests has far more miles of road than it, has the budget to maintain - six times as many in the case of the Flathead! (See WMPZ AMS, at 4-2). While the Forest Service adopted a new Roads Policy under Chief Dombeck, aimed at determining the necessary minimum road system and reclaiming the rest, Forests like the Flathead are instead renegeing on their road reclamation programs and ignoring their inability to maintain the current road system. (Preservation/Conservation, Kalispell, MT - #544)

**PC #: 110**

**Public Concern: Correct AMS, page 4-70. "The roadless area conservation rule was signed by the Secretary of Agriculture."**

Sample Statement:

On page 4-70 we are told the national forest Roadless Areas Conservation rule "was signed by President Clinton." This is incorrect. The roadless area conservation rule was signed by the Secretary of Agriculture, not the President. It is a rule, not an executive order, established with more public involvement than any rule in your books. (Preservation/Conservation, Helena, MT - #526)

Subconcern:

**THE FOREST SERVICE SHOULD REDUCE THE AMOUNT OF ROADLESS AREA IN FAVOR OF MORE MANAGED FOREST.**

Subconcern:

**THE FOREST SERVICE SHOULD ANTICIPATE HOW GLOBAL WARMING WILL AFFECT ENDANGERED SPECIES.**

**PC #: 112**

**Public Concern: The Lolo National Forest needs to enforce its standards regarding ORV use.**

Sample Statement:

Forest Plan direction and standards regarding ORV use in the Lolo were never enforced or complied with. The Lolo Supervisor finally ordered ORV use closures on MA 11 lands in June 2003 in the Stony Mountain RA. Closure orders have never been Issued and signed closures have never, been placed in the Sapphire WSA and Roadless Areas. (Preservation/Conservation, Hamilton, MT - #720)

**PC #: 114**

**Public Concern: The Forest Service Plans should use many of the goals of the 2001 OHV Management Strategy. Horse use should be treated similarly.**

Sample Statement:

Action AM-F2-A1: (We propose that user-built routes would not be recognized as designated routes as part of the Forest Service trail system unless they have been validated as system routes through site-specific analysis, or permitted under special-use permits.)The USFS-BLM OHV Management Strategy issued in December 2000 provides direction for OHV management. Although that direction is overly restrictive in some cases, it does provide goals to be striven for: 4-wheeled ATVs are only allowed on roads or on trails designed for their use, and are not to be allowed on single track trails; noise standards are to be developed and enforced; no travel off existing roads or trails designed for the specific vehicles is allowed except to make camp a short distance from the designated route. Horses should also be so restricted. (Place Based Groups, Paradise, MT - #258)

**PC #: 115**

**Public Concern: The Forest Service should have a clear conservation policy for roadless public lands.**

Sample Statement:

Every Federal land managing agency in Montana has clear conservation policies for roadless public lands-except the US Forest Service This needs to change. (Preservation/Conservation, Helena, MT - #526)

**PC #: 113**

**Public Concern: The Forest Service should follow National Laws and Policies.**

Sample Statement:

We believe it is particularly important for Findings and Actions to promote restoration of water quality to support designated beneficial uses where water quality is currently impaired or designated beneficial uses are not fully supported. The focus of the Clean Water Act is on achieving water quality that supports beneficial uses. We believe forest management direction should promote project planning, design, and implementation to address existing pollution sources on National Forest lands contributing to impairment of Clean Water Act 303(d)-listed waters to reduce pollutant loads and restore support for designated beneficial uses. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

EPA also supports the need to update LRMPs to reflect national fire management strategies and policies. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

EPA is interested in having Forest Plan direction consistent with the EPA Interim Air Quality Policy on Wildland and Prescribed Fires. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

The Organic Act established our National Forests for the express purpose of having a sustained or continued flow of water and timber. The Multiple Use, Sustained Yield Act and the National Forest Management Act require sustainability of the multiple uses. Neither these acts, nor any subsequent acts, require any other of the multiple uses to be dominant over the expressed purpose for which the National Forests were established. a) How can these subsequent laws be used to curtail timber harvest far below the natural and sustained growth of timber volumes? b) How can these laws be used to allow forests to suffer widespread tree mortality and build-up of forest fire fuels? (Individual, Paradise, MT - #42)

Sample Statement:

Even though the three Montana National Forests have not been identified as priority energy forests, it does not mean that the Service has been given the option of ignoring its obligation to address energy resources and leasing in these plan revisions. Clearly, as indicated above even those Forests that have not been assigned high priority status are important to help meet the nation's need for energy resources. As such, it is crucial for the agency to fully comply with the processes laid out in the National Energy Policy and at the regulations at 36 CFR 228 Part 102(c), (d) and (e) forest-wide analysis and leasing decisions that include both the lands availability and specific lands decisions, respectively. The agency must make both of these decisions during planning to avoid the unnecessary and costly supplemental NEPA (National Environmental Policy Act) documents that were required after the first round of land use planning was completed. Only by incorporating these requirements in the plan revision process will the FS comply with the National Energy Policy. (Mining Industry, Denver, CO - #554)

**PC #: 116**

**Public Concern: The Forest Service should only allow motorized vehicles on open roads.**

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Sample Statement:

We ask that Krause Basin, an area first dosed seasonally to motorized use in 1988, be closed yearlong to motorized use other than on roads left open for such use after adequate protection of wildlife security and other forest resources has been provided. Indeed, we ask that all three Revision Forests follow the lead of the Montana Department of Natural Resources and Conservation and the Montana Code Annotated by prohibiting the use of motorized vehicles other than on open roads. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

[FORM 1 ADD'L COMMENT:]Vehicle use causes more damage than anything else ruining the wilderness. There is so little wildland left. There needs to be places where wildlife habitat and ecosystems can exist undisturbed. (Individual, Dundee, OR - #883)

## **Section: Trust and Credibility**

**PC #: 117**

**Public Concern: The Forest Service should not have prejudiced proposals eliminating motorized access.**

Sample Statement:

The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized access and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of a significant prejudice in the process. (Recreational, Helena, MT - #339)

Sample Statement:

The process is prejudiced right from the start. The existing level of access and motorized recreation is a reasonable starting position and alternative. An even fairer position given that this should be a travel plan seeking to address the needs of the public for motorized access and recreation would be an alternative based on an enhanced level of opportunity. However, a starting position of massive closures is completely unreasonable and tells us a lot about where the process is heading. This strategy is outrageous because it forces the public to fight to get every inch of motorized road and trail added back into the preferred alternative. This strategy is designed so that motorized recreationists are destined from the outset to lose big time. The damage has been done as we hear many people saying "what's the point of participating, the process is rigged and the Forest Service has already made up its mind". We request that this strategy be corrected by presenting a starting alternative that addresses the need for multiple-use access and recreational opportunities. (Recreational, Helena, MT - #339)

Sample Statement:

It is not reasonable that the burden of inventorying all existing motorized access and motorized recreational opportunities should fall on the shoulders of motorized recreationists when inventories for all other groups and resources are accounted for by the agency as part of the process. We are concerned that this burden demonstrates a significant prejudice in the process that must be addressed. (Recreational, Helena, MT - #339)

**PC #: 119**

**Public Concern: The Forest Service should not set management goals that will eliminate motorized recreation without adequate public disclosure.**

Sample Statement:

The forest, watershed and viewshed planning process tends to influence motorized access and motorized recreation in an undisclosed manner that is deceiving the public. For example, forest plans, watershed plans and view shed plans such as the Helena National Forest Plan, Beaverhead-Deerlodge National Forest Plan, Little Blackfoot River Watershed Plan, Tenmile Creek Watershed Plan and Scenery Evaluation Plan for the Rocky Mountain Front often set management goals for areas that will ultimately result in the elimination of motorized recreation yet motorized recreationists are unaware that these actions will ultimately affect them. This back door process does not meet the NEPA requirement for adequate public disclosure of the impacts of the proposed action. Adequate public disclosure in these cases would require direct means of communication with motorized recreationists to inform them of the potential changes that will result from the respective plan. This process of non-disclosure has been used to effectively eliminate many motorized access and motorized recreational opportunities and contributes to the cumulative impact of closures on motorized recreationists. We request that the cumulative impact of past planning actions on motorized recreationists be adequately evaluated and considered during the decision-making process. (Recreational, Helena, MT - #339)

**PC #: 118**

**Public Concern: The Forest Service should monitor the number of projects litigated.**

Sample Statement:

Our AMS (Analysis of the Management Situation) should include discussion of the effects of litigation on Forest Service management. We should monitor the number of projects litigated, all associated costs, outcomes of cases, etc. (Agriculture Industry, No Address - #209)

## Section: Use of Science in Decision making General

**PC #: 125**

**Public Concern: The Forest Service should use independent scientists in all aspects of planning, broad based assessments, local analysis and monitoring.**

Sample Statement:

Independent scientist should review and participate in all aspects of planning, broad-based assessments, local analysis, and monitoring. Scientists may come from within federal or state agencies, or the general public, and may hold a variety of important and influential positions. The study team should: 1)require minimum standards and criteria for qualifications which must be met before a scientist can be deemed an "expert"; 2)provide minimum standards and criteria for determining when a scientist may be deemed "independent"; and 3)provide a minimum amount of public notice and opportunity to object whenever any such scientist is considered for such participation, whether such position is permanent or temporary, full time or part time, voluntary or compensated. Such notice should include the qualifications of the individual, the role which the individual will have in such participation, and the type and duration of the position. Review and participation by independent scientists is a good thing, provided the process require standards which assure that such scientists are in fact qualified and independent, and provide the public the opportunity to review such factors. (Recreational, Helena, MT - #339)

Subconcern:

**THE FOREST SERVICE SHOULD MANAGE WITHIN THE STREAM BUFFERS.**

Subconcern:

**THE FOREST SERVICE SHOULD NOT HARVEST WITHIN THE RIPARIAN BUFFER.**

Subconcern:

**THE FOREST SERVICE SHOULD AVOID MOST PESTICIDES WITHIN RIPARIAN AREAS.**

**PC #: 121**

**Public Concern: The Forest Service should utilize research to determine the extent and type of trail management needed.**

Sample Statement:

Action AM-F2-A1: (We propose that user-built routes would not be recognized as designated routes as part of the Forest Service trail system unless they have been validated as system routes through site-specific analysis, or permitted under special-use permits.)Further research must be completed in a variety of forest types and conditions for the wildlife species concerned to ascertain the extent and type of trail management deemed desirable. Management restrictions must be made based on the findings of these studies. (Place Based Groups, Paradise, MT - #258)

**PC #: 124**

**Public Concern: The Forest Service should compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts in environmental analyses.**

Sample Statement:

We request that all impact analyses in all resource areas compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts or management actions such as the "Let it burn" policy. Impacts should be evaluated in a fair and unbiased manner and with a relative sense of magnitude. For example, if natural events including floods, wildfires, and their associated impacts are natural and acceptable as stated by some agency personnel and environmental groups, then (in order to be consistent and equitable) impacts from OHV recreation should be compared in relative magnitude to the impacts associated with floods, wildfire, and other natural events. This comparison should include the impact of floods, wildfire, and other natural events on all resource areas including noxious weeds, deforestation, erosion and sediment production, loss of organic material, loss of recreation and economic opportunities and other socio-economic impacts. (Recreational, Helena, MT - #339)

Sample Statement:

Proposed Wilderness We request that the three forests evaluate the impacts and benefits of designating all existing IRAs as proposed wilderness per the Citizen ReVision. We also request that another alternative be analyzed intermediate between

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the initial USFS proposal: for the designation of proposed wilderness and the Citizen reVision that would designate the following roadless areas as proposed wilderness based on their contribution to bull trout habitat maintenance/restoration, large and meso-carnivore connectivity, large native ungulates and quiet recreation: Lolo NF Hoodoo (Great Burn) plus Landowner addition of contiguous unroaded; Petty Mountain; Ward/Eagle; Gilt Edge; Sheep Mountain; Illinois Peak; Mt. Bushnell; Cube Iron-Silcox; Stark Mountain (except the vista/fire lookout and access route); Burdette Creek; Meadow Creek; Cherry Peak; Cataract; McGregor/Thompson; Slide Rock; Siegel; Teepee-Spring Creeks; Quigg Peak; Bob Marshall/Scapegoat Addition IRAs; N. Lolo Peak- Selway Bitterroot Addition 01794 Bitterroot Sapphire WSA; Stony Mountain; Balsam; Allan Mountain; Blue Joint Flathead Tuchuck-Mt. Hefty; Thompson Seton; South Whitefish Range IRAs (including Demers Ridge unroaded area); Swan-Jewel; All Swan Range IRAs Analysis of an alternative embodying this intermediate amount of wilderness is reasonable and will illuminate the multiple benefits to increased proposed wilderness management. (Preservation/Conservation, Missoula, MT - #543)

### **PC #: 126**

#### **Public Concern: The Forest Service should use science and fair rules to balance forest health and motorized access.**

Sample Statement:

There needs to be a solid basis of accurate scientific data and a fair set of rules to establish a healthy balance between forest health and motorized access. (Individual, No Address - #396)

Sample Statement:

Science-based total road and motorized trail and access density standards must be developed. Closed roads do not effectively limit motorized travel, as you would realize if adequate monitoring of the situation were considered. In this age of increasing motorized travel capacity, a forest plan without quantifiable limitations would be severely inadequate. (Preservation/Conservation, Missoula, MT - #521)

Sample Statement:

Our forest should be managed in a way that creates a balance of wildlife health and motorized use. (Individual, No Address - #396)

### **PC #: 127**

#### **Public Concern: The Forest Service should establish baseline historic range of variability (HRV) and base standards on scientifically determined acceptable deviations from HRV.**

Sample Statement:

The FS must finally determine baseline conditions (pre-human development) for watersheds, wildlife populations, riparian integrity, terrestrial habitat connectivity, old growth, and soil productivity, and base RFP standards on scientifically determined acceptable deviations from these baseline 1evels. (Preservation/Conservation, Missoula, MT - #521)

### **PC #: 128**

#### **Public Concern: The Forest Service should establish standards that will enable the removal of all water bodies and species from impaired, threatened, and endangered status. These standards should be monitored.**

Sample Statement:

Overall, we urge the Revision Team to establish clear, non-discretionary standards for the management of these three Forests so both the Forests themselves and citizens can monitor for compliance with those standards. These standards must be established at levels that will accomplish the on-the-ground conditions that will warrant the removal of all water bodies and species from impaired, threatened, and endangered status. (Preservation/Conservation, Helena, MT - #712)

### **PC #: 120**

#### **Public Concern: The Forest Service should make management decisions based on the best available science.**

Sample Statement:

The agency must make it clear that it will still make management decisions based on solid scientific knowledge and recognized sound management practices. (Individual, Paradise, MT - #158)

Sample Statement:

I look forward to continued involvement in this plan revision process. I especially look forward to the analysis that justifies the proposed action. Repeatedly in your document, new science and new information have been cited as reasons for certain proposals. I hope that this new science will be provided for public review, it would go a long way towards generating support

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for a proposal. It is a sad situation when the public can no longer afford to take the word of the USFS as being indication of sufficient reason. Please help us rebuild our confidence in the agency by providing good science, analysis and justification for your proposals. (Individual, Trego, MT - #213)

Sample Statement:

EM-F2-A3: (We propose to maintain or restore ecosystems or habitats for species at risk, and utilize management treatments such as thinning and prescribed burning to emulate ecosystem patterns and processes while providing public goods and services.) This sounds fine, but must be done using only the very best available science. Unfortunately, supposedly "needed management treatments" are often used as an excuse for logging. The current Healthy Forest Management Act is a prime example of this. (Preservation/Conservation, Polebridge, MT - #705)

### **PC #: 122**

**Public Concern: The Forest Service should prove that closing motorized routes will not have a significant impact on the human environment relative to improvements to the natural environment.**

Sample Statement:

The document and decision makers must prove by use of facts and data and without reasonable doubt that the claimed improvements to the natural environment are significant enough to justify the significant impact on the human environment associated with the closure of motorized routes. There must be a measurable and significant improvement. (Recreational, Helena, MT - #339)

### **PC #: 123**

**Public Concern: The Forest Service should not base planning and management around historic range of variability.**

Sample Statement:

In order to achieve ecological sustainability as the proposed alternative defines it, the ecological condition of the project area must be within the range of those found prior to European Settlement. 1. This standard is illegal and inappropriate under applicable law. First, legitimate multiple use activities such as timber harvest and mining rarely occurred on a large scale prior to European settlement. Thus, to achieve ecological sustainability, such activities must be excluded. This is a violation of the Organic Act, MUSYA, and NFMA. 2. Second, no statutory authority exists which mandates that ecological conditions of any kind must reflect pre-European settlement conditions. 3. Third, the assumption that ecological conditions prior to European settlement are better than conditions at any time since then is a purely subjective value judgment, and is not appropriate to consider during the planning process. 4. Finally, the scientific evidence which suggests what ecological conditions were like prior to European settlement is highly speculative. Basing all planning and management around a range of variability which can never be definitively determined is illusory, arbitrary and capricious and violates the Organic Act, MUSYA, and NFMA. (Recreational, Helena, MT - #339)

### **PC #: 130**

**Public Concern: The Forest Service plans should have the flexibility to incorporate new scientific findings.**

Sample Statement:

[F]lexibility should be built into the new forest plan, in order to incorporate new scientific findings. This was a weakness of the previous plan. For example, recent logging in the Good Creek area, planned several years ago, did not take into consideration new findings on lynx ecology. Consequently, the lynx population in a newly logged area (Timber Sale #43) has been displaced. A plan that would better safeguard the welfare of species at risk would have the ability to modify timber sales and treatment prescriptions when necessary to better protect these species. Assessment of a need for modification of management strategies would be made on a case-by-case basis as individual timber sales and treatments are planned. (Individual, Bigfork, MT - #475)

### **PC #: 129**

**Public Concern: The Forest Service needs to devise plans and strategies for dealing with global warming and its effects on forests and their resources.**

Sample Statement:

Regardless of the lack of understanding of sound scientific data, the Forest Service approaches the idea of global warming with the objectivity of bag of cement The Forest Service needs to acknowledge global warming and devise plans and strategies for dealing with global warming and its effects on forests and their resources. (Individual, Trout Creek, MT - #417)

Sample Statement:

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Global warming, regardless of its cause, is now a scientifically documented fact. It can be expected to cause problems of water quality and quantity, more frequent and severe fires, and potential food declines or failures for species from elk to grizzlies. (Preservation/Conservation, Columbia Falls, MT - #525)

Sample Statement:

It is past time for the Forest Service to deal with global climate change. Though some people argue about what causes it, in spite of the weight of science, no-one can deny that our climate is changing. We already see it dramatically in our steam flows and wildfires. The Forest Service needs to plan for it and anticipate how it will affect endangered species and vegetation and what changes are needed in management. (Individual, Whitefish, MT - #481)

Sample Statement:

the Forest Service staff includes scientists and others that appreciate the fact that global warming is upon us. Therefore you should be developing long range policies that consider and cope with the problems resulting from this phenomenon. (Individual, Somers, MT - #774)

Subconcern:

### **THE FOREST SERVICE SHOULD RESTORE OR RETAIN NATIVE VEGETATION ALONG ROADSIDES.**

Sample Statement:

Most people are aware that our climate appears to be getting warmer and drier, and the public is beginning to appreciate the fact that our National Forests have a heavy load of dead and dying timber ready to burn. They have witnessed the uncontrollable fires throughout the west over the past several years, and may soon come to realize that active management is necessary to help reduce the fuel loads that contribute so greatly to the increasingly high resistance to fire control. I think the public would approve of reducing the acreage of unmanaged roadless areas in favor of more acreage of managed forest. (Individual, Paradise, MT - #511)

**PC #: 131**

**Public Concern: The Forest Service should limit vehicle use.**

Sample Statement:

Science-based total road and motorized trail and access density standards must be developed. Closed roads do not effectively limit motorized travel, as you would realize if adequate monitoring of the situation were considered. In this age of increasing motorized travel capacity, a forest plan without quantifiable limitations would be severely inadequate. (Preservation/Conservation, Missoula, MT - #521)

Sample Statement:

2. Use science-based decision-making Make use of a prioritize all available scientific research on the impacts of roads and off-road vehicles on land, water, wildlife, and flora. Finding AM-F2 (We propose that user-built routes would not be recognized as designated routes as part of the Forest Service trail system unless they have been validated as system routes through site-specific analysis, or permitted under special-use permits.), appears to recognize the concern that off vehicle use "is creating a number of undesirable impacts that often have the greatest adverse effects on water quality and wildlife habitat." (Preservation/Conservation, Missoula, MT - #527)

Sample Statement:

The Revision must develop road management standards based on the best available science for all resources. These standards must be non-discretionary and integrate the provision of wildlife security with the protection and restoration of water quality, fisheries and watersheds as a whole. As the enclosed critiques of the IGBC access management proposal show, there will need to be a strengthening of Flathead Forest Plan Amendment 19 and a greater reliance on road reclamation, not a return to the wholesale use of largely ineffective gates. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

Please reconsider any actions now that could change the emphasis for future decisions to be escalated against good wildlife management, serenity and solitude in the forest. Once you go down that road(sanctioned ATV usage increases)it can ONLY lead to more and more decisions against wildlife and nature. (Individual, Martin City, MT - #766)

## **Section: Agency Organization and Funding**

**PC #: 132**

**Public Concern: The Forest Service should more effectively monitor and enforce motorized restrictions.**

Sample Statement:

If we are going to permit ORV use, we must provide for more effective monitoring and enforcement of that use. It's terrible

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what riders are getting away with and how much destruction has been done in just the few short years of the popularity of these types of vehicles. (Individual, Missoula, MT - #593)

Sample Statement:

Action AM-F2-A3: (We propose to continue recently developed snowmobile direction such as Flathead NF Amendment #24 (Winter Motorized Recreation, preferred alternative) and Lolo NF Amendment #29 (Management Area 11 Snowmobile Use Areas). Current forest snowmobile management would continue, however, there would be changes in some areas.) Add: Enforcement must be effective with severe enough penalties to deter future unauthorized use, e.g. large enough fine first offense and confiscation of vehicle second time. Effective enforcement requires additional rangers to monitor and enforce restrictions. Adequate funding is needed. (Individual, Condon, MT - #638)

Sample Statement:

The Forest Service needs to enforce closures to motorized vehicles and provide budget for enforcement vehicles should be prohibited from areas used by wildlife, from leaving trails and roads, from new routes, and from all roadless areas. (Individual, Whitefish, MT - #481)

## **Category: Laws, Acts and Policies**

### **Section: Relation to Laws, Acts, Policies - General**

**PC #: 136**

**Public Concern: The Forest Service should not build new roads in areas important to wildlife.**

Sample Statement:

On the issue of endangered species, please change course and take a firm stance on following the law to protect endangered species habitat - particularly the lynx (reference destruction of habitat in the Swan Valley), grizzly bear, and bulltrout. Please, NO NEW ROADS in areas important to wildlife use. (Preservation/Conservation, Hot Springs, MT - #702)

**PC #: 133**

**Public Concern: The Forest Service should keep Revised Statute 2477 travelways open.**

Sample Statement:

Most of the motorized roads and trails in the project area have served as important public access routes since the turn of the century. This is demonstrated by the number of historic mines and structures that are located along these routes. We have observed that these travelways are currently significant recreation resources for motorized visitors in the area including ATV, motorcycle, and four-wheel drive enthusiasts. Many of these travelways have right-of-ways as provided for under the provisions of Revised Statute 2477. These roads are shown on older mapping sources including: aerial photographs, 15-minute USGS quadrangle sheets, and older county maps. The cut and fill sections and obvious roadbed indicate that these roads were constructed and used by the citizens for access to the forest. RS 2477 was created to provide adequate access to public lands. Now this public access is being eliminated. We request that these travelways remain open based on; (1) their history of community access, (2) the access that they provide to interesting historical sites, and (3) their importance to community access. We request that the document evaluate all of the issues surrounding RS 2477 including the significant cumulative impact of all past closures of RS 2477 routes. (Recreational, Helena, MT - #339)

Sample Statement:

Action AM-F2-A1 (We propose that user-built routes would not be recognized as designated routes as part of the Forest Service trail system unless they have been validated as system routes through site-specific analysis, or permitted under special-use permits.): You cannot control, block or otherwise interfere with user built routes that belong to the public as granted by Revised Statute (RS) 2477. The proper planning action that should be undertaken is for each Forest to work cooperatively with other Federal Agencies, State and local governments, Tribes and affected public to determine which routes on National Forest System lands are RS2477 public Rights Of Way. (Multiple Use or Land Rights, Bigfork, MT - #588)

Subconcern:

**THESE PRINCIPLES NEED TO PROVIDE FOR HUMAN NEEDS**

Subconcern:

**ECOLOGICAL SUSTAINABILITY MUST OVERRIDE SOCIAL AND ECONOMIC SUSTAINABILITY**

**PC #: 134**

**Public Concern: Forest Service restoration strategies should only include as a minor consideration the goal of improving social and economic conditions.**

Sample Statement:

[Action EM-F10-A1: We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs. Action EM-F11-A1: (We propose that each forest develop restoration strategies that :a. Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration .b. Are flexible with changing resource conditions and new information .c. Maintain areas having high ecological integrity d. Integrate aquatic, riparian, upland forest, shrub land and grassland components. e. Consider disturbance processes and patterns such as fire, insects, disease, wind throw and invasive species .f. Improve social and economic conditions .g. Contribute to recovery of listed species .h. Integrate State Total Maximum Daily Load (TMDL) programs .i. Facilitate collaboration with external partners.)]Actions EM-F10-A1, F11-A1We are interested in seeing which of the interim management guidelines contained in 1NFISH and PACFISH, the Forests plan to adopt, as well as being informed of the specific modifications that you propose to make. We strongly support efforts to restore aquatic, riparian and upland ecosystems and agree but feel that it is unrealistic to require that each restoration strategy meets all of the goals listed, particularly "improve social and economic conditions". We feel that this should be a consideration but not a required component for restoration. (Preservation/Conservation, Missoula, MT - #566)

**PC #: 135**

**Public Concern: The Forest Service should not limit road access because of grizzly bear.**

Sample Statement:

Please look into revoking Amendment 19 and excluding it from new forest plan. As you know a judicial decree mandated Amendment 19 and amended (ASQ) on the basis of a uncompleted S.F. Grizzly Bear Study completed in 1997. The above study had no conclusion or recommendations for road destruction. (Individual, Wolf Creek, MT - #657)

Sample Statement:

Current grizzly bear access management standards are illegal because they effectively canceled the allocated land use or replaced the prescribed land use without proper public disclosure. Critical grizzly security areas that cannot have road access to implement forest protection and management because of grizzly bear requirements must be disclosed at the beginning of the planning process. The grizzly bear habitat minimum management requirements (the basis or floor from which legal alternatives can be formulated) for grizzly bear habitat must be defined, analyzed, and the costs disclosed in Analysis of the Management situation as required by 36CFR219.12. (Multiple Use or Land Rights, Bigfork, MT - #588)

**PC #: 138**

**Public Concern: The Forest Service should permit camping for the duration of the hunting season.**

Sample Statement:

My concerns are the current rule that states you can only camp in one place for a maximum of 14 days. This ruling is in affect for family camping, hunters, and anyone else that is enjoying the national forest. I have attached 2 USFS brochures that allow people picking mushrooms and rock pickers to have a permit for an extension of the 14 day rule. The brochure that was used at the Bitterroot National Forest in 2001 was one that was pieced together and too large to copy. I know that there were extended stay permits issued in 2001 for the mushroom pickers in the Bitterroot and other national forest land. My main concern is the people that set up a hunting camp. The hunting season in Montana has been a 5 week season for many, many years. I have been setting up a hunting camp since 1965. Some years the camp has been up for the entire season and sometimes only a week. It always depended on hunting success and the weather. I would like to see the Forest Service extend the number of days that a person could camp to the length of the hunting season. That would be from the last week of October to the weekend after Thanksgiving. At this time of year with snow on the ground, there would be less impact to the forest. (Individual, Stevensville, MT - #472)

Sample Statement:

I personally believe that the law enforcement division of the USFS is wasting too much time and money on enforcing the 14 day rule during the hunting season. With a permit system in place for the hunting season, the enforcement people could be used in a more productive manner in other places where there are problems. (Individual, Stevensville, MT - #472)

**PC #: 137**

**Public Concern: Error--Letter 33 comment 12 was addressed in PC#4.**

**PC #: 140**

**Public Concern: The Forest Service needs to address the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation.**

Sample Statement:

The environmental document should be an issue driven document as required under NEPA and the Council on Environmental Quality guidelines. The driving issue is the development of a reasonable travel management alternative that addresses the needs of the public. NEPA requires that agencies "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated" [40 CFR 1502.14(a)]. We request that the environmental document adequately addresses the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation. (Recreational, Helena, MT - #339)

**PC #: 139**

**Public Concern: The Forest Service should evaluate the cumulative loss of miles, acres, and quality of motorized recreation access.**

Sample Statement:

We request an adequate evaluation of the significant cumulative loss in miles, acres, and quality of motorized recreation and access opportunities within public lands as required under 40 CFR 1508.7 and 1508.25, and guidelines published by the Council on Environmental Quality "Considering Cumulative Effects Under the National Environmental Policy Act". (Recreational, Helena, MT - #339)

**PC #: 141**

**Public Concern: The Forest Service is biased shown by its lack of commitment to produce public benefits.**

Sample Statement:

NFMA's implementing regulations require the planning process, analysis, and evaluation to be structured in a way so the Forest Plan decision will maximize net public benefits (36CFR219.1(a), 219.3, and 219.12 (c)). We find the lack of commitment or reference to any effort to produce public benefits in this issue and throughout the Proposed Action document another glaring example of bias. (Individual, Kalispell, MT - #780)

**PC #: 144**

**Public Concern: The Forest Service should modify INFISH & PACFISH.**

Sample Statement:

We favor making modifications to INFISH & PACFISH but we think some of the needed modifications might not be considered minor...What is the point of leaving dead trees 100 to 300 feet from a stream, as INFISH requires, if they can be removed using winter logging or some of the newer light on the land logging techniques, especially in a flat riparian zone where erosion is not much of an issue? (Recreational, Columbia Falls, MT - #589)

Sample Statement:

Action EM-FI 0-AI: (We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs.) The last sentence of this proposed action, "We propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs" is too vague and leaves room for a wide array of interpretations. I would like to see more specificity in this proposed action. (Individual, Bigfork, MT - #475)

Sample Statement:

My next area of concern is the condition of our streams. I am in favor of present policies that limit activity on streamside areas but I think they have been overdone. I am observing to many cases of too many trees falling into the stream and creating diversions that widen the stream bed thus creating shallow warmer water. When logging an area, I believe it is warranted to closely look at every streamside zone and determine if some improvements can be made rather than arbitrarily saying no activity within 200 feet of the stream. (Individual, Kalispell, MT - #506)

**PC #: 147**

**Public Concern: The Forest Service should identify areas that will be available for oil and gas leasing.**

Sample Statement:

We feel it is crucial for the Forest Service to comply fully with the process laid out in 36 CFR 228 Part 102(c), (d) and (e). This would include identification of those areas that will be available for oil and gas leasing, together with identification as to terms and conditions and possible constraints that will require lease stipulations. Having these decisions made during planning will avoid unnecessary and costly supplemental National Environmental Policy Act documents required after the first round of land use planning has been completed. (Oil, Natural Gas, or Coal, Cody, WY - #805)

**PC #: 143**

**Public Concern: The Forest Service should respond to those issues raised at the Ninth Circuit Court of Appeals on the Lolo Project (Civ. #03-35995) in the forest plan revision.**

Sample Statement:

We refer the FS to the issues raised at the Ninth Circuit Court of Appeals on the Lolo Project (Civ. #03-35995), and specifically request the FS respond to those issues in the forest plan revision process. (Preservation/Conservation, Missoula, MT - #521)

**PC #: 146**

**Public Concern: The Forest Service should implement the Clinton Roadless Rule.**

Sample Statement:

First and foremost in any planned revisions to the Forest Plan should be the inviolability of each and every acre that is contained in the 50-odd million Roadless Acres so designated by President Clinton. No boundary revisions. No management philosophy changes. And most of all, NO ROADS. (Individual, Somers, MT - #774)

**PC #: 145**

**Public Concern: The Forest Service should not implement the Clinton Roadless Rule.**

Sample Statement:

We are adamantly opposed to implementing the Clinton Roadless Rule in this forest plan until all legal actions are resolved and Forest Service Rulemaking is complete (FP-FI A2). Until then, the current legislation of RARE II should govern activities in inventoried roadless areas.[Action FP-F1-A2: (We propose to exclude inventoried roadless areas from the suitable timber lands. However, timber harvest would still be allowed as one tool for achieving ecosystem health as outlined in the Roadless Area Conservation Rule.)] (Recreational, Columbia Falls, MT - #589)

**PC #: 142**

**Public Concern: The Forest Service should recognize that it is not the intention of the Endangered Species Act to restore all of the original habitat once occupied by the species, but only the amount needed to conserve the species.**

Sample Statement:

The plan should recognize that it is not the intention of the Endangered Species Act of 1973 to restore all of the original habitat once occupied by the species, but only the amount needed to conserve the species. (Individual, Roosevelt, UT - #33)

Subconcern:

**THE FOREST SERVICE SHOULD MANAGE ALL SPECIES UNDER ONE PLAN, RATHER THAN SINGLE SPECIES MANAGEMENT**