

Category: Natural Resource Management

Section: Natural Resources Management - General

PC #: 31

Public Concern: The Forest Service should use multiple use as the guiding management principle.

Sample Statement:

Several people challenged the Forest Service choice to frame "ecosystem management" as the guiding framework, arguing that "multiple use management", as per the Multiple Use, Sustained Yield Act, should be the guiding framework, with "ecosystem management" as one of the supporting principles. (Agriculture Industry, No Address - #209)

Sample Statement:

"Multiple use" equals managing for multiple use values, equals "ecosystem management"! "Science should certainly be used but at best, it's probably less than 20 percent of all we need to know to manage the land." We should set "multiple use" as the goal, and let "ecosystem management" be one of the principles for getting us there. (Agriculture Industry, No Address - #209)

Sample Statement:

Montana state lands provide a good return to the public maybe its time to turn National Forest management over to the state. (Individual, Kalispell, MT - #506)

Sample Statement:

It appears to me that the PA aims at a "desired future condition" in which all merchantable timber has been destroyed, all motorized recreation is subjected to individualized permits, all recreation of any sort is permit-dependent, in sum, where all human activity is micromanaged while the landscape itself is not managed at all. (Multiple Use or Land Rights, Whitefish, MT - #721)

Sample Statement:

We were impressed with the Kootenai National Forest Desired Conditions document which can be viewed at http://www.fs.fed.us/kipz/ga/libby/dc/final_libby_ga_dcs.pdf (information source, CWS) If you were to take the desired conditions statements and apply them to areas that are suitable for these uses in the Flathead National Forest it would be awesome! (Recreational, Whitefish, MT - #966)

PC #: 28

Public Concern: The Forest Service should emphasize watershed and ecosystem values in the forest plan revision.

Sample Statement:

We hear the plaintive voice of the wood products industry whose bottom line is always and always 'profit' buttressed by arguments with the very human angle of mills shutting down, the forests being closed and people being put out of work. This hypocrisy is not lost on most of us. The cutting-edge voice of the environmentalists has been made to appear radical and unrealistic. Their actions taken to call attention to the plight of our forests and wildlife have been used out of context and made to appear ridiculous, e.g. tree sitting, blocking heavy equipment physically, etc. Again, most of us are well aware that protecting what little remains of our essential ecosystems is very, very important. (Individual, Arlee, MT - #39)

Sample Statement:

The goals this forest plan revision must meet are watershed protection, limiting motor vehicles to the 2600 mile forest road system, protecting the remaining roadless areas, and recommending wilderness protection for suitable areas of the roadless lands. These goals are fully compatible with maintaining a healthy and diverse ecosystem, fire protection for the urban interface, diverse recreation (including motor recreation), a timber sale program, and other multiple uses. Protecting the remaining roadless areas will go a long way towards meeting the goal of watershed protection. (Preservation/Conservation, Stevensville, MT - #612)

Sample Statement:

Suggestion to define ecosystem management in regard to various areas. (Place Based Groups, Missoula, MT - #826)

PC #: 358

Public Concern: The Forest Service should manage riparian areas.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

EM-F10-AI Use of unmanaged, overly wide, vegetative buffers along streams as called for in the INFISH directions is not the answer. Once again, healthy riparian areas will require some level of management to ensure they continue to provide beneficial attributes. (Individual, Trego, MT - #213)

PC #: 359

Public Concern: The Forest Service should consider effects of management on all land ownerships.

Sample Statement:

Finding FP-F5The forest plans should address how the forests will manage drainages with checkerboard ownerships to avoid adverse cumulative effects. In fact, this should be an important consideration when evaluating a range of ASQs. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

The Forest Service should manage their land despite Plum Creek's over harvest. (Place Based Groups, No Address - #821)

PC #: 357

Public Concern: The Forest Service should actively manage resources for ecological and economic benefits.

Sample Statement:

It was during a discussion of the Forest Products section of the Proposed Action Forest Plan Revision, that a difference in basic philosophies became most apparent. It was the traditional "logs to the mill" mentality and seeing the forest in terms of board feet of timber versus Ecosystem Management that caused the two concepts to come into focus. I suddenly realized that right here was the fundamental origin of "splitting of the minds" concerning the management of our nation's forests. There is a decided difference in what various individuals envision our forests to be and how they should contribute to our lives and our world. In order for our forests to survive we must refocus our forest management goals into that of maximizing the productive potential of the renewable wood fiber they contain, enabling them to provide the funding necessary to regain forest health, and to protect the environment and all living things dependent upon them. We must rethink what we used to consider as the "profit" motivation and simply consider the utilization of all forest product as a "relief to tax payers" and a means to finance the recuperation of our nation's forests. If conducted properly this can and should result in not only an esthetically pleasing, healthy forest but one that provides for the wildlife, the watersheds, and the environment that we all desire. In essence our forests are capable of financing their own hospitalization, recovery and continued sustainability. (Individual, Bigfork, MT - #519)

Sample Statement:

I am definitely for Ecosystem Management practices on our National Forests. I feel that this approach is long overdue, and had this approach been in practice years ago we would not have all of the problems we now face - everything from degraded landscapes to the litigation mess that confronts the organization on all sides. Keeping the sustainability and viability of our National Forests as well as surrounding lands is paramount to a strong, vital economy, lifestyle, and functioning landscape. (Individual, Condon, MT - #477)

Sample Statement:

[T]he new forest plan should be based on ecologically sound forest management. This type of management will not be supported by a system based on resources. Long- term ecological, social, and economic sustainability should be the central goals of ecosystem management, in that order. "New forestry" should readjust the management strategies of the previous forest plan, utilizing the latest scientific information. It should foster native diversity, scientific research and advocacy, public education, administrative partnerships, and timely, broad-based community participation. Finally, it should kindle trust and hope in a sustainable future. (Individual, Bigfork, MT - #475)

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Ecosystem Management : The following finding in the Proposed Action concerns us: "Since the current plans were adopted. our knowledge has advanced to the point that ecosystem management has become the overall scientific framework for implementing multiple use management, as required by the Multiple-Use Sustained-Yield Act (MUSYA). While the three forests in the zone have incorporated ecosystem management into planning and implementation where possible, there is a need to update our plans to fully incorporate ecosystem management principles...", i.e. the zone's proposed "sustainability" and "viability" as the underlying ecosystem management principles. The zone team has proposed to use these principles to provide for human needs and to conserve species for present and future generations. We believe the ecosystem is vitally important in that it supports all resources, uses and values. MUSYA requires the sustainability of all multiple uses. However, an ecosystem is not a "use", and to suggest otherwise assigns a subjective value that cannot be quantified. An ecosystem is the ecology of the landscape where "uses" can occur. Management activities must be accomplished in manner that in the long run does not significantly damage the vegetation, fauna, soil, and water resource, but management activities are necessary to maintain a healthy ecosystem. (Timber or Wood Products Industry, Kalispell, MT - #539)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

Ecosystem management is an attempt to use the best available science that wasn't possible in the original Forest Plan. We know more about where bears are, travel corridors, etc. You can integrate all the knowledge in the ecosystem management framework. You acknowledge that everything you do affects something else. Ecosystem management is a natural and suitable thing for the Forest Service because it means multiple use. Take care of all the values. There is no conflict. It's a recognition of all the values. F1, A1 Make multiple use the underlying ecosystem management principle. Keep sustainability and viability in the description. Keep people in the ecosystem management equation. If the Forest Service has been doing ecosystem management in the past six years they've been doing it all wrong. Some people seem to be worrying that it doesn't include multiple uses on the landscape. Some people think it put preservation as the dominant ethic. (Place Based Groups, No Address - #821)

Subconcern:

BECAUSE ACTIVE MANAGEMENT CAN REDUCE FUEL HAZARD.

Sample Statement:

As you revise the forest plan for Western Montana, I urge you to consider managing the forest in a balanced way. It's my opinion that timber harvest is an important tool in reducing fire danger. I also believe that timber harvest can help improve the health of the forest. (Individual, No Address - #587)

Sample Statement:

7) Forest Fire! You must actively manage the forest. If you do not you will never be able to control and minimize the negative effects of wildfires. (Individual, Columbia Falls, MT - #762)

Sample Statement:

The plan doesn't appear to recognize the intent of the Federal Healthy Forest Initiative which speaks to the benefits of a proactive approach to forest management. The benefits of forest management, as referenced, recognizes that forest health, species habitat and active rather than passive management should be our vision. In reality, the "balance of harms" provision indicates that the agency needs to analyze the impact of not pursuing active management options on listed species under the ESA. The goal should be to protect our forest, species and watershed now, not after the fires, which will certainly come. (State Agency or Official, Victor, MT - #777)

Sample Statement:

With proper management, the forest can provide wood products, economic development, healthy habitat for wildlife, great scenery, clean water, and recreational opportunities while reducing fire danger. Unfortunately the present course of action makes effective management impossible. The draft action plan is even worse with more restrictions, more studies and less forest management, all of which is done while the forest burns. Without roads it is not economically possible to provide effective fire suppression or long term sustainable forest fuel management, rehabilitation and restoration, thinning, and insect, disease and weed control. Without money from wood products, there is a constant drain on public money needed for education, self defense, infrastructure, etc. By default the strategy seems to be to lock the forest up and burn it. (Place Based Groups, No Address - #967)

Subconcern:

BECAUSE ACTIVE MANAGEMENT CAN PREVENT THE SPREAD OF I&D

Sample Statement:

The plan should actively manage the Bitterroot, Flathead and Lolo National Forest to prevent the spread of forest disease, insect infestations and wildfires. (Individual, Roosevelt, UT - #33)

Subconcern:

BECAUSE LONG-TERM SUSTAINABILITY CAN BE ACHIEVED

Sample Statement:

We look forward to working with you and your staff and the associated national forests to develop a plan that can meet the goals of ecological and economic sustainability for the next ten to fifteen years. (Preservation/Conservation, Missoula, MT - #157)

Sample Statement:

All activities will be conducted so that no significant damage or harm is done to wildlife, fish, or other forms of flora or fauna. No significant soil erosion or stream sedimentation will be allowed to occur. The key word used is significant. With all activities, some resource disturbance must always occur in the short term and even in the long term at times. Also, it is important to stipulate in all plans and projects that not all resource uses and values can be protected nor enhanced on every small unit of land. There are always these kinds of trade offs. (Individual, Paradise, MT - #158)

Sample Statement:

Action EM-F1-A1: Thinking of the future is just as important as meeting today's demands. We don't want to have future generations with astronomic management issues. Also, the use of "viability" give great regard to the natural world, while still meeting social/economic demands of humans. (Individual, Missoula, MT - #273)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Subconcern:

BECAUSE THE FS HAS RESPONSIBILITY TO THE ECONOMIC WELL BEING OF LOCAL COMMUNITIES

Sample Statement:

The Forest Service has a responsibility to the economic well being of the local communities- This includes all uses of the Forest, including timber harvest. If the Forest Service is ever get ahead of the wildfire problem, they must harvest at least the growth and mortality that is occurring on the Forest. Timber sales should be used as a tool to reduce the fuel loading of over crowded stands on the forest. (Individual, Columbia Falls, MT - #452)

Sample Statement:

Issues related to the management of natural resources have received most of the attention during the evaluation while socio-economic issues surrounding motorized access and recreation are largely ignored. This lack of adequate recognition has led to the creation of significant socio-economic issues affecting the quality of the human environment for motorized recreationists. Land management agencies must acknowledge that public land has significant meaning and socio-economic value to the public. We request that all significant issues involving the human environment for motorized recreationists be adequately considered during the evaluation and decision-making process. (Recreational, Helena, MT - #339)

PC #: 362

Public Concern: The Forest Service should incorporate other agency planning documents into management activities.

Sample Statement:

Though the NFS does not have jurisdiction on the private lands, management activities on the federal lands should support the ideologies in the North Fork Zoning District of Flathead County (document available from the Flathead Regional Development Office). (Individual, Columbia Falls, MT - #626)

PC #: 356

Public Concern: The Forest Service should protect and preserve all resources.

Sample Statement:

The Flathead Valley needs no forest management, but need some protection because of wildlife habitats. By managing the forest most migrating animals will leave many diverse areas on reservation and potential loss of native medicine plants. The forest already have to many roads and human impact. (Individual, Missoula, MT - #737)

Sample Statement:

I would hope that your management policies would maximize resource protection. (Individual, Missoula, MT - #738)

Sample Statement:

Action EM-F9-A1: First of all, I don't think there can be too much emphasis on protecting wildlife & fish habitat. Also, I think the last sentence of this action needs to include the biotic/ecological importance of animal species rather than the management for hunting & viewing (statement seems too anthropocentric). (Individual, Missoula, MT - #273)

Sample Statement:

I strongly urge you to protect as much of these lands a possible from future development, logging, mineral extraction and motor vehicle use. (Individual, Missoula, MT - #469)

Sample Statement:

Our forested land is far more valuable as a resource to Montana's and the US economy than as a timber source. Clean rivers, healthy forests and wilderness areas with abundant healthy wildlife provide a long term economic base beneficial to all. National forests should not be primarily road builders and timber suppliers to private industry. The forests belong to all Americans not just Montanans. Preserve our forests for the long term and intervene only for fire suppression and for forest health. (Individual, Clinton, MT - #605)

PC #: 363

Public Concern: The Forest Service should define restoration, restoration goals and restoration plans.

Sample Statement:

Action EM-F11-A1: No., Restoration means less use of our natural resources in all multiple use areas. and more protection of some. (Individual, Hamilton, MT - #233)

Sample Statement:

Somewhere in your discussion of the ecosystem you should state that you do not intend to restore the ecosystem to pre-Columbian conditions but only to a condition that is consistent with present societal values and needs. (Recreational, Columbia Falls, MT - #589)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

FP-F3: Salvage is not resource restoration. In most instances, particularly after fire, it significantly retards the natural recovery of the site, adversely affecting water quality, soils and wildlife. It may be acceptable in certain situations, but it is simply timber harvest and should not be called restoration. (Preservation/Conservation, Polebridge, MT - #705)

Sample Statement:

You also should consider adding fire hazard and fire protection (prevention) to Action EM-F11-A1: (Individual, Bigfork, MT - #621)

Sample Statement:

In utilizing the "restoration" direction, the Forest Service needs to review the historic changes in global weather patterns and the vegetative response, which has occurred over thousands of years. Our current composition of forest types and plant communities evolved during cool climatic conditions and we are now entering a warmer period. How does the agency, in some restoration effort, anticipate climatic changes in future decades and centuries and determine appropriate treatments for a desired future condition (which also incorporates human needs and desires) in order to achieve a perceived historic condition? The discussion on restoration needs to be clearly articulated as to time frame reference. (Preservation/Conservation, Missoula, MT - #624)

Sample Statement:

Action EM-F11-A1: Friends of the Bitterroot basically concurs with the proposed revision statements at EM-F11 and EM-F11-A1, but with some reservations as to what is exactly meant and proposed. To use an old phrase, "The devil is in the details". Hopefully the above statements can be further explored and defined during the continuing revision and public meetings processes. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

Action EM-F2-A3: Even though we fully support utilizing pre-commercial and/or commercial thinning projects, hazardous fuel reduction projects and timber sales, we caution the use of the word "restore." The National Preservation and Historical Society defines the term "restore" as an act used specifically to return land conditions to pre-human disturbance. Since the encroachment of man on the landscape, we cannot ignore man's presence or our need to economic viability. We support "rehabilitating" forest stands to a healthy condition, but one cannot "restore" stands to a historic condition. The National Forest Management Act of 1976 (NFMA) expressly states that the "land management plan adopted pursuant to this section, provide for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the Plan." Neither the MUSYA nor the NFMA, nor any subsequent legislation require any other of the multiple uses to be dominant over the expressed purpose for which the National Forests were established. (Timber or Wood Products Industry, Missoula, MT - #938)

Subconcern:

BECAUSE RESTORATION GOALS SHOULD FOCUS ON DAMAGED WATERSHEDS, RIPARIAN AREAS, AQUATIC AND TERRESTRIAL HABITAT.

Sample Statement:

While the Citizen reVision anticipates watershed and fisheries restoration work to proceed across the entire three forest area. These areas require comprehensive, major project restoration work. These are the South Fork Flathead watershed (Hungry Horse area excluding the reservoir and dam), comprising 204,981 acres, the Middle Fork Flathead watershed in the Skyland road area, comprising 10,126 acres and the upper Lolo Creek Watershed, comprising approximately 48,000 acres. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

Another priority is restoration of damaged areas such as streams (riparian areas) and roads. (Individual, Stevensville, MT - #524)

Sample Statement:

FWP suggests a proactive watershed restoration effort where needed and appropriate. Currently watershed restoration occurs in a drainage when a timber sale is planned in the vicinity. It would be better if watershed restoration was prioritized based on fish and aquatic/riparian system needs. Watershed restoration often includes replacement of undersized stream crossings, as appropriate. However, we would like to work with your fisheries biologists because in some instances it is desirable to maintain barriers at some crossing to protect native species from nonnative species invasions. (State Agency or Official, No Address - #694)

Sample Statement:

Make restoration a priority over extraction. Extraction for extraction's sake or to benefit private commercial interests is an inappropriate activity, especially when this is done at taxpayer expense. After nearly two centuries of use and abuse by non-native people, the forest regions of Montana have suffered greatly. Restoration is desperately needed on many parts of the National Forest. Investing in restoration activities is very appropriate, ecologically beneficial, and will, at this point in our history, produce greater economic returns than any extractive use. (Individual, Hamilton, MT - #551)

Subconcern:

BECAUSE RESTORATION CAN CREATE JOBS.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

I support the establishment of major project level restoration areas identified for the South Fork and Middle Fork Flathead watersheds. High-paying jobs would be created restoring damaged watersheds and decommissioning excess logging roads. (Individual, Ventnor City, NJ - #215)

Sample Statement:

Please establish the Wildland Restoration areas included in NREPA, which will create high-paying jobs restoring damaged watersheds, reclaiming excess logging road, and will help reestablish biological linkage corridors for the movement of wildlife and plants (Individual, Petaluma, CA - #418)

Subconcern:

BECAUSE ROAD REMOVAL IS THE WAY TO RESTORE WATERSHEDS.

Sample Statement:

Please prioritize road removal as a key component of forest restoration work. (Individual, Racine, WI - #358)

Sample Statement:

One of the most important and necessary steps for National Forest management for restoration work. Road removal, invasive species removal and riparian restoration should be prioritized in your forest plan. (Individual, Missoula, MT - #369)

Sample Statement:

Please restore and reclaim all segments of the Sapphire Crest Trail which have been vandalized by motorized use. This trail should be designated as non-motorized for its entire 100 mile length. (Individual, Helena, MT - #429)

Sample Statement:

Restoration-Promote restoration of wildlife habitat, watersheds and native fish habitat through road obliteration and culvert removal. Include standards that promote such restoration and prioritize it among the many multiple use demands on the National Forests. Prioritize WQLS watersheds, native fish habitat and grizzly habitat for road removal. (Preservation/Conservation, Missoula, MT - #543)

Subconcern:

BECAUSE TIMBER AND STEWARDSHIP CAN PLAY A VITAL ROLE.

Sample Statement:

Timber has a vital role to play in restoring stewardship to roaded, lower-elevation forests. We believe the plans should clarify this role. (Preservation/Conservation, Helena, MT - #526)

Sample Statement:

EM-F11-A3 (Place Based Groups, No Address - #822)

PC #: 361

Public Concern: The Forest Service should consider air quality.

Sample Statement:

Action EM-F2-A1: EM-F2-A1 and A2: I would suggest that fire is a solution in some instances but it should not be a cure all. It would certainly be more acceptable to me in wilderness but keep in mind cumulative effects of specie movement if implemented large scale. Also, where does air quality fit in not only in populated areas but for instance Glacier Park where it was just reported (true or not) that it is a threatened national treasure because of air pollution? I propose use of mechanical means to manipulate vegetation as much as possible including tree removal to reduce smoke. (Individual, Whitefish, MT - #811)

PC #: 371

Public Concern: The Forest Service should define sustainability and ecosystem management.

Sample Statement:

Finding EM-FI appropriately notes the growth of scientific knowledge about ecosystems during the period since the adoption of current forest plans. It states that the Multiple Use Sustained Yield Act of 1960 required ecosystem management to be assigned as the "overall scientific framework" for implementing multiple use management. I believe it was not the MUSY Act or even the National Forest Management Act of 1976 that imposed the requirement for ecosystem management on the US Forest Service. It was the National Environmental Policy Act of 1969, and nowhere else in the Proposed Action does the Revision Team refer to it. The Team followed this minor error (assuming I am not the one making the error) with a footnoted definition of sustainability that could be shoehorned into any poor excuse for "ecosystem management." I recommend a review of the various aspects of the concept contained in "A Draft Glossary for Ecosystem Management," USDA/FS, Pacific Northwest Region-Revision of May 1994. At various places in the four-volume "Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins," June 1997, the complex nature of

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

the concept of sustainability is presented (Individual, Bigfork, MT - #600)

Sample Statement:

Sustainable forests are the desired end product, and sustainable forest management is the means by which that ends in achieved," Helms 1998. Future drafts should reflect a more detailed and substantive definition and reference for "sustainability" and "viability" which may or may not be compatible. (Preservation/Conservation, Missoula, MT - #624)

Sample Statement:

the proposed alternative is built upon a tenuous foundation which assumes that: (1) various statutes require that ecological sustainability be the dominant consideration for all management of National forests; (2) sustained yield of various goods and services derived from the forests cannot be achieved without first achieving ecological sustainability; and (3) that ecological sustainability in all cases is the highest and best use of the forests for the American people. To be supportable, these assumptions would require significant legal, scientific, and economic data. As it is, such data has not been provided and these assumptions are false, therefore, the proposed alternative is flawed and should not be adopted. (Recreational, Helena, MT - #339)

Sample Statement:

While we generally support the concept of ecosystem management and the efforts to restore forests to conditions where large, old trees and open savanna habitat-type dominate, there are situations where this would not be good for certain native wildlife species. Two examples of this are breeding areas for blue grouse and wintering areas for white-tailed deer. Blue grouse require small thickets of young timber stands (1/4 to ? acre in size) during spring breeding activity. These thickets function as security from predators during the time when grouse are most vulnerable, and these same sites could be significantly reduced through ecosystem management. In addition a decrease in conifers of all size classes could reduce abundance and availability of lichen (an important winter forage species), coniferous forage and thermal cover for deer and elk. According to Baty et al. (1996, Intermountain Journal of Sciences, 2(1)), white-tailed deer used habitats with dense canopies during the winter and were most likely to be affected at the population level by typical ecosystem management prescriptions. (State Agency or Official, Missoula, MT - #697)

PC #: 360

Public Concern: The Forest Service should not manage for single species.

Sample Statement:

We must get away from single species management of Forest Land, i.e. management of areas for only Grizzly Bear, Lynx, and Old Growth. (Individual, Columbia Falls, MT - #452)

Sample Statement:

It appears that the Forest Service current management policies relate to single species management, grizzly bear, lynx, etc. We feel that a balanced approach rather than a piecemeal approach would be much more beneficial. (Place Based Groups, Columbia Falls, MT - #497)

PC #: 366

Public Concern: The Forest Service should use historic range of variation in setting management direction.

Sample Statement:

Ecosystem management is an important issue. The CRC is very concerned with both forest health issues and with maintenance and enhancement of biodiversity. The CRC does not think that the ecosystem management section of the proposed action is very clear in its direction. We support their stated direction of focusing the plan revision on providing ecosystem diversity based on a reference to historical disturbances. (County Agency or Official, Seeley Lake, MT - #538)

Sample Statement:

We note that the ICB Strategy indicates that direction developed in LRMPs should:* provide for re-patterning succession and disturbance regimes and achievement of sustainable landscape conditions, thereby contributing to reduction of events such as uncharacteristically large and severe wildland fires; * address ways to maintain and secure terrestrial habitats comparable to those classified by the science findings as "source" habitats that have declined substantially from historical to the current period, and habitats that have old growth characteristics; * address opportunities to re-pattern these habitats when and where necessary, maintain and guide expansion of the extent and connectivity of source habitats that have declined; * address the restoration of the important vegetation characteristics of these habitats (such as species composition, vegetation structure, snags and coarse woody debris) which various terrestrial species need to survive and reproduce. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

A management regime that sustains or effectively mimics a natural disturbance regime (e.g., allowing natural fires to burn or prescribing fires to emulate the natural frequency and intensity for that plant community) may be expected to have neutral effects on native biodiversity. Finally, a management regime that effectively restores natural patterns and processes that were disrupted by former human activities would have a net positive effect. (Preservation/Conservation, Boulder, CO - #137)

PC #: 369

Public Concern: The Forest Service should identify linkage zones.

Sample Statement:

I support finding EM-F5 and action EM-A1. These areas are very important for the conservation of large carnivores and many threatened or endangered species. (Individual, Missoula, MT - #548)

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) I believe linkage zones at the landscape scale are crucial for many species (Lynx, Grizzly Bear, also Fisher, Marten, Wolverine! Your broad land ownership adjustment strategy is an excellent idea. (Individual, Lolo, MT - #271)

PC #: 367

Public Concern: The Forest Service should develop a monitoring plan which is science-based and they can enforce, fund and adapt management for all activities.

Sample Statement:

"Monitoring and enforcement resources are not currently adequate under the existing situation particularly as recreation use, criminal -use (including illegal drug manufacturing), damage, and vandalism to national forest resources has increased." We ask that the Team elevate this issue to a level equal to the other issues. We also ask that the name or title of this section reflect broader agency commitment and be called "Monitoring, Evaluation, and Enforcement". Under Actions we request that the FS commit "to substantially increase enforcement and to fund monitoring and enforcement at a level commensurate with the task at hand." Elevating enforcement within the agency to the level required to protect resources will require a paradigm shift within the USFS. But times have changed. The public seems to care as much if not more about the recreational attributes of the national forests than it does about forest management, and forest resources, particularly wildlife resources. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

Action EM-F11-A1: We suggest that an item j. be added to Action EM-F11 A1 as follows, j. Incorporate appropriate programs for monitoring and assessment and adaptive management to measure effectiveness of restoration efforts and progress towards attainment of desired conditions. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

We recognize that the FS is already required to conduct certain monitoring activities. However, it does not appear that such monitoring efforts are being put to broad enough use. We recommend that the ES adopt the means for determining when land use activities are approaching the management threshold established in the plan to ensure resource sustainability and land management continuity are maintained. As such, integrated monitoring must be done on all resource activities, including grazing, mining, wildlife, vegetation management, air and water quality, in addition to oil and gas activities, to get a true picture of actual cumulative effects. It is crucial for the FS to avoid responding to new development proposals with knee-jerk reactions to halt all activity pending completion of a new environmental impact statement. With improved monitoring activities, the ES will improve its resource database and should not be taken by surprise. (Individual, Casper, WY - #343)

Sample Statement:

Actions ME-F1-A1: We propose that the forest plans develop new monitoring strategies that "Are conducted to answer specific questions." "Are done at the appropriate spatial and temporal scale to answer the questions." "Are done in collaboration with others." "Use the best available science to collect and evaluate the data." "Are feasible, realistic, affordable and adaptable." Focus more on outcomes (effectiveness) in addition to actions (implementation)." Emphasize evaluation as much as the collection of data support (Individual, Hamilton, MT - #233)

Subconcern:

BECAUSE MANAGEMENT STANDARDS AND MITIGATION NEED TO ACHIEVED.

Sample Statement:

I want the Plan to 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, Kalispell, MT - #348)

Sample Statement:

One member emphasized that there is a continual gradual degradation of Forest lands by activities. Examples are improved access to dams, and fire lines created during fire suppression activities. The areas need to be closely monitored to be sure the mitigation measures prescribed are effective at meeting the objectives. If they are not effective other corrective actions are needed. A positive example is the Bass Lake Dam access. It has been successfully rehabbed. A negative example is fire lines that have become routes for OHVs. (Place Based Groups, Stevensville, MT - #823)

Sample Statement:

Consistent monitoring and rehabilitation practices need to be put in place to ensure that unfavorable conditions in camping

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

areas can be corrected before they exceed LAC standards, thus avoiding the possibility of imposing designated campsites. (Recreational, Columbia Falls, MT - #43)

Subconcern:

BECAUSE ROADS, MOTORIZED USE, AND LOGGING AFFECT WATER QUALITY, SOILS, FISHERIES, AND WILDLIFE

Sample Statement:

We believe the LRMPs revision and EIS should include a strong, explicit commitment to monitoring, especially watershed/water quality monitoring, such as that in the Forest Service Pacific Northwest Region's Forest Monitoring and Evaluation Guide in which the Regional Forester stated, "All programs and projects should contain appropriate levels of monitoring funds in their costs - or they should not be undertaken." (USDA FS 1993). EPA supports linking the approval of projects tiered to the LRMP to availability of funding for conducting necessary monitoring and evaluation. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

Monitoring has long been something the Forest Service has promised but not delivered on, largely other than to carefully track how many board feet of timber have been offered, sold, and cut in a given year. It is high time equal emphasis is placed on monitoring wildlife, water quality, fisheries, and motorized vehicle use and abuse, among others. 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. (Preservation/Conservation, Kalispell, MT - #544)

PC #: 370

Public Concern: The Forest Service should provide more data and analysis in the AMS and Proposed Action.

Sample Statement:

Finding ME-F1: This section is simply very brief statements about problems that have been experienced with current monitoring plans. Why weren't these problems corrected by evaluation of monitoring as existing forest plans required? There is practically no disclosure or discussion of actual monitoring data or evaluations of monitoring data for any resource or issue discussed in the "Draft AMS" and "proposed Action." These evaluations along with new information and changed conditions is supposed to provide the basis or "need for change" in forest plan revisions. The Draft AMS and Proposed Action should be withdrawn and reissued when the required data and analyses have been completed as required by law. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

Finding FP-F5: If the principles of ecosystem management has taught you folks to "focus more on what is left on the landscape than on what is removed.", when are you going to start doing it? There is no focus on what is left on the landscape in this Proposed Action and AMS. No disclosure of current fire hazard conditions or current high risk habitat for insect outbreak. Not even a disclosure of current inventory and mortality data. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

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.) The lack of analysis of timber harvest as an agent of change and the role it has played shaping the current ecosystem condition along with analysis of fire and related access and suppression costs is additional proof of overt bias in the document and does not comply with NFMA (36CFR219) (Individual, Kalispell, MT - #780)

PC #: 368

Public Concern: The Forest Service should include the public to conduct and review monitoring.

Sample Statement:

Actions ME-F1-A1: In addition to the proposed actions there needs to be an established process of peer review of the data collected and evaluated. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

We also hope there will be a provision for monitoring the land to assure the integrity of the standards. As members of the Board of the Great Burn Study Group, we pledge our help in monitoring the area, educating others, and working with you in keeping wild lands wild. (Individual, Arlee, MT - #335)

Sample Statement:

We also request a monitoring program be provided by an unbiased third-party to assure that this correction occurs within our

lifetime. (Recreational, Helena, MT - #339)

Section: Timber Resource Management

PC #: 268

Public Concern: The Forest Service should abandon timber harvest as a method to restore vegetation conditions.

Sample Statement:

In summary, the Forest Service is widely distributing false propoganda to convince its employees and the public of the merits of "ecosystem management treatments" purported to remedy "forest health" problems by returning today's forests to their historic conditions by removing threes rather than roads. Behind the Forest Service's promise of tidier, healthier and better looking forests, however, lies its wealth of scientific evidence indicating these highly managed forests will neither be healthy nor function like the forest that existed historically in the American West. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

We would strongly encourage you to use fire rather than timber harvest in order to modify vegetative conditions. We also wonder if you will equally weigh vegetation, habitat and social goals when proposing timber harvest. (Preservation/Conservation, Missoula, MT - #566)

PC #: 277

Public Concern: The Forest Service should reconsider the reasons for increased tree mortality and lack of timber sales.

Sample Statement:

A finding of "significant tree mortality, combined with declining availability of commercial timber from NFS lands have led to increased public interest in salvage sales." Timber mortality and salvage sales are a by-product of declining forest access and timber sales as everyone knows except the WMPZ planning team and the Forest Supervisors who approved the issuing of this proposed action. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

We firmly believe that you are covering up the obstruction of reasonable forest management by special interest appeals and litigation by blaming "unrealistic budget projections", "large disturbance events", and "public controversy" for the lack of timber sales in the past decade. By not disclosing the cost and value of the timber sales obstructed and delayed to the public and to Congress, you are bias and overtly supporting those special interests. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 266

Public Concern: The Forest Service should use timber harvest as an appropriate and cost effective method to achieve desired future conditions where such activity is compatible with ecosystem management, ecological integrity, and sustainability.

Sample Statement:

Timber harvest is an appropriate and cost effective method to modify vegetation conditions where such activity is compatible with ecosystem management, ecological integrity and sustainability. (Individual, Condon, MT - #312)

Sample Statement:

We agree with the zone's statement that "Forest vegetation is dynamic." Which is why modification of vegetation conditions to achieve a desired future condition is necessary Timber harvest is an appropriate and necessary method in rehabilitating unhealthy stand conditions. In order to meet a desired future condition, entry into a Wildland Urban Interface, Inventoried Roadless Areas and management areas containing threatened and endangered species is not only appropriate and necessary, but is ultimately legal and must remain an active management tool. (Timber or Wood Products Industry, Kalispell, MT - #539)

Subconcern:

BECAUSE TIMBER HARVEST WOULD IMPROVE FOREST HEALTH

Sample Statement:

It is time to open up more land to logging. Our forests are sick and diseased from the lack of proper management. Meaning the lack of timber harvest to promote a healthier forest. I use the analogy of; when you plant a garden, you are constantly

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

going into it and pulling weeds. If you don't, the weeds grow out of control and you end up with a big mess, no good for anything and of no benefit to anyone. If you weed that garden, you are able to have a healthy crop and that benefits everyone. The same is also true of "OUR" national forest. If we don't take care of them, they will become choked and diseased, with no benefit to man nor animals. If logging were more prevalent our forest would be healthier, it would be an economic benefit to all people, and the wildlife would then have better food sources and a healthier place to live. (Individual, Columbia Falls, MT - #146)

Subconcern:

BECAUSE TIMBER HARVEST WOULD PROVIDE ECONOMIC BENEFITS

Sample Statement:

There only one natural resource component of the "ecosystem" that your agency has any direct ability to manage and that is the timber resource. All other components (climate, topography, soil, water, wildlife, fire, etc.) you have no direct control except through manipulation of the vegetation (fuel) density, age class structure, composition, and continuity. The timber resource is mandated by the Organic Act, the MUSYA, and NFMA to be managed to produce benefits for all other resource and forest protection issues on a sustained yield basis. Not only can the timber management produce and protect non-timber resources, it can generate the revenue to pay for the timber and non-timber benefits with excess money left for sale area improvements, support of local roads and schools, and the US Treasury (Fiedler, et.al., 2001. A Strategic Assessment of Fire Hazard in Montana, U. of MT.). Ecosystem management, (if that means there is going to be active management) has to be implemented through a cost effective timber management program if it will ever be successful. Economics and public benefits has to be considered in ecosystem management. The total lack of reference in this section to a sustained timber harvest program as a cost effective tool to achieve long term ecosystem management goals and public benefits again illustrates the bias of the proposed action relative to timber management and forest access. (Multiple Use or Land Rights, Bigfork, MT - #588)

Subconcern:

BECAUSE TIMBER HARVEST IS COMPATIBLE WITH WILDLIFE MANAGEMENT

Sample Statement:

FWP supports responsible timber harvest and salvage activities on public lands. Timber management and fish and wildlife management are compatible when proper planning, management practices and coordination are applied on the landscape. (State Agency or Official, Missoula, MT - #697)

Subconcern:

BECAUSE TIMBER HARVEST WILL REDUCE FIRE HAZARD AND AID IN FOREST FIRE CONTROL

Sample Statement:

Timber harvest must be used to thin stands to reduce fire hazard and improve forest health. Harvest must also be used to provide openings for wildlife, to aid in forest fire control and suppression, and to provide forest age class distribution from grass-forb through shrub, saplings, and on to mature stands. (Place Based Groups, Paradise, MT - #258)

PC #: 269

Public Concern: The Forest Service should encourage salvage logging following fire, insect and disease outbreaks or other forest disturbance.

Sample Statement:

All fire damaged, weakened, and insect susceptible timber should be harvested and areas rehabilitated. Any income from timber will help the local economy and help reduce forest fuel loads. Timber purchasers are required, to maintain haul roads, or to pay into a cooperative maintenance fund which aids the forest road maintenance budget. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

We fully support the zone's proposal to encourage salvage logging following fire, insect and disease outbreaks, or other forest disturbances. The Forest Service has recently received limited harvest categorical exclusions along with hazardous fuel reduction categorical exclusions as a tool for managing such events. Even though anti-harvesting groups have sought to strip the Forest Service of these management tools in the federal courts, the courts have not yet ruled and we therefore expect their continued use. As yet another catastrophic fire season is predicted, we would encourage the Forest Service to develop a specific and systematic response to salvage within the forest plans. (Timber or Wood Products Industry, Kalispell, MT - #539)

Sample Statement:

We support conservative use of salvage logging operations, but are mindful of recent studies showing that salvage logging can impede recovery from fire. We oppose using the spectra of fire danger as a sole justification for injudicious logging and fuel reduction. (Individual, Hamilton, MT - #292)

PC #: 534

Public Concern: The Forest Service should develop an active timber program.

Sample Statement:

We need an active timber sale program that effectively harvests the sustained yield of the land. The second objection to this proposed program will be endangered species, particularly the Grizzly Bear. I believe that roads do not keep bears from using an area. The bears main concern is food so lets concentrate on managing bear habitat by creating more food for the bear. This could involve planting non-native species. (Individual, Kalispell, MT - #506)

PC #: 270

Public Concern: The Forest Service should discourage salvage logging following fire because of the fragility of soils and watershed conditions on burned land.

Sample Statement:

You should not cut dead trees on burned sites if it is marginal for getting new growth as the dead, standing trees shade the ground enough to get new growth going. When the shade is gone the ground dries too much to get new trees growing much of the time this small bit of shade can make the difference between keeping a baby tree alive or not. (Individual, Corvallis, MT - #40)

Sample Statement:

Action FP-F3-AI should read, "We propose to discourage salvage logging following fire because of the fragility of soils and watershed conditions on burned land." (Individual, Darby, MT - #582)

Sample Statement:

I do not support salvage logging in the burned areas of the Lolo, Flathead, and Bitterroot National Forests. I am mainly concerned with how the salvage logging could negatively affect wildlife habitat and the forest ecology of the area. (Individual, Missoula, MT - #732)

PC #: 271

Public Concern: The Forest Service should manage National Forest System lands to generate forest products that help support the local forest industry.

Sample Statement:

The Montana Wilderness Association agrees that an economically viable timber industry must be maintained as a partner to help achieve management goals. However, the 'timber frontier' is over, and forest products should no longer drive the FS budget or managements. Forestlands should be managed at the landscape scale using best science, ecosystem management principles. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

The CRC agrees that the National Forest Lands should generate forest products that help support the local forest industry. (County Agency or Official, Seeley Lake, MT - #538)

Sample Statement:

I would like to emphasize the fact that the forest products industry is a very important industry in Western Montana. Every effort possible should be made to use timber harvest as the management tool of choice whenever possible for habitat enhancement, vegetation mgmt, and fuels reduction. Because a viable timber industry is now and in the future a very good partner with the Forest Service to accomplish mgmt goals on Forest Service lands. The Forest Service should make sure to provide a sustainable supply of timber to the industry. (Individual, Columbia Falls, MT - #673)

PC #: 272

Public Concern: The Forest Service should use temporary roads rather than permanent roads for timber production.

Sample Statement:

Temporary roads should become the new practice rather than permanent roads for timber product/biomass harvest. (Place Based Groups, Victor, MT - #560)

PC #: 267

Public Concern: The Forest Service should continue logging areas that already have roads, as long as it protects other resources and ecosystem integrity.

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

I am not opposed to continued logging of our areas that already have roads, as long as it is done in a sustainable and reasonably environmentally friendly way. (Individual, Missoula, MT - #246)

Sample Statement:

The timber management program also needs to maintain and restore water quality, protect streamside areas, promote recovery of T&E species and their habitat, and protect characteristics and values of roadless areas. The Forest Product Actions should more clearly identify this need to protect other resources and ecosystem integrity during timber management activities. Add language to Actions FP-F2-A1, FP-F3-A1, FP-F4-A1, FP-F5-A1 such as, "...and must be consistent with resource protection and ecosystem integrity goals" (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

The forests should also focus their commercial timber efforts on suitable timber growing sites in developed front country. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

Only do mechanical vegetative manipulation along existing roaded areas. There is plenty of this to keep you busy for years. (Individual, Thompson Falls, MT - #585)

PC #: 281

Public Concern: The Forest Service should strive for an even-flow of forest products with smaller timber sales.

Sample Statement:

The Forest Service should strive for a more even flow of forest products, smaller sales, spread out over a longer time period so local operators can compete effectively. "Small" might mean a sale size somewhere near the middle (average) of local processing capacity (probably less than 1 mmbf). We also need bigger operators for some situations, such as helicopter logging. Small sales mean smaller consequences if mistakes are made. Local operators are more sensitive to their reputations. We should tailor the timber program to small operators to the degree that we can. Sales that do not cause harm on the ground are not likely to be subject to procedural nitpicking (including appeals and litigation). (Place Based Groups, Darby, MT - #829)

PC #: 280

Public Concern: The Forest Service should not allow budget constraints to foster harvest of larger diameter trees to meet unrelated goals.

Sample Statement:

Action FP-F2-A1: (We propose to plan an integrated timber harvest program on: 1) land classified as suitable for timber production, and 2) land classified as not suitable for timber production, where harvest is used as a management tool to achieve vegetation, habitat and social goals. All harvest entries would be based on resource management goals and budgets.) Conclusion: We are concerned about the phrase "and budgets" in this action. While the phrase is intended to clarify to the public that the desired treatments will be limited by USFS budgets, it may inadvertently foster increased harvest of greater diameter trees to meet unrelated goals. For example, in order to fund such priorities as stream restoration, the USFS will be forced to cut larger diameter trees in order to make stewardship projects feasible. We would like it clear that one resource value will not take economic precedence over another. In particular, that increasingly larger dbh trees will not be sacrificed to provide funding for other, albeit badly needed projects. While this is a general concern of the group no consensus was reached on this action. (Place Based Groups, No Address - #825)

PC #: 274

Public Concern: The Forest Service should change the method used to calculate allowable sale quantity (ASQ).

Sample Statement:

The proposal for determining a maximum allowable sale quantity is exactly the approach the forests acknowledge in FP-F4 was a failure in the past. If maximum allowable sale quantities must be determined for forest plans it should be done judiciously. The forests should recommend a range of possible ASQs, rather than a single ASQ. The range should be based on a suite of varying assumptions regarding funding, recovery rates of impaired streams or populations of listed species, wildlife population goals, and other non-timber resources. ASQs could be based on whether the forests are also meeting or achieving measurable non-timber goals for ecosystem health -- water quality, fish, soil, wildlife, recreation, wilderness, etc. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

We strongly disagree with the zone's proposal to calculate a maximum allowable sale quantity and long-term sustained yield of timber that can be harvested on each forest from the new lands classified as suitable for timber production. Reducing the

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

ASQ, and confining harvest to a tree farm method on 50 to 60 percent less suitable base will accelerate deteriorating overall forest health. Compartmentalizing land management into smaller, more rigid management areas limits the Forest Service's ability to manage the broader picture. Rather, the Forest Service should be visualizing a watershed approach to land management that expands potential projects meeting resource and multiple-use needs implementing the principles of ecosystem management that focuses more on what is left on the landscape than on what is removed shifts the debate and ensures product realization. As long as the Forest Service continues to let the courts and your detractors define public policy the Forest Service's response historically is to shrink the suitable land base and the projected ASQ. We firmly believe that no matter what number the Forest Service assigns the new proposed suitable base or ASQ, the debate will not be over. (Timber or Wood Products Industry, Kalispell, MT - #539)

Sample Statement:

ASQ and the ensuing budget problems need to be revamped. Work toward rolling over income from management activities to fund the next project. Also think about large landscape (10,000 acre+ projects to ensure budget and supply of products to address infrastructure and investment issues. I think amounts of products produced can go up not down. (Individual, Whitefish, MT - #811)

PC #: 273

Public Concern: The Forest Service should establish an allowable sale quantity (ASQ) which provides for sustainable timber harvest that reflects existing timber growth on the capable and suitable lands and protects associated flora and fauna from significant negative impacts.

Sample Statement:

Present timber harvest volumes are far below present timber growth. This low harvest quantity has resulted in a backlog of mature timber in many areas of the forest and subsequent development of excessive fuel buildups and increases of diseased and insect ridden stands. Annual allowable sale quantity should be established which will provide for timber harvest that reflects existing timber growth on the capable and suitable lands. Sustainable yields of timber and all forest uses and values will adequately be provided while also protecting all associated flora and fauna from significant negative impacts of all activities. This direction will recognize that not all resource uses and values can be completely sustainable on all areas at the same time! The forest supervisor and staff will explain and support the fact that some values must often be reduced on small areas in the short run so that the total value of resources may be enhanced over a wide area over the long run. (Business, Paradise, MT - #50)

Sample Statement:

I am completely baffled by the statement that current budget restraints and manpower issues will be used to calculate ASQ. ASQ should be calculated on the biological and site potential of the land base to produce wood fiber. ASQ has already been severely reduced by reducing suitable timber acres. To further reduce ASQ because of inadequate money or personnel is counter productive. A better tact would be to project what the potential ASQ is based on productivity of suitable timber base as well as projected timber volume from vegetation management activities on other land classifications. Then use the calculated ASQ as JUSTIFICATION for why a certain level of personnel and budget is needed. (Individual, Trego, MT - #213)

Sample Statement:

Allowable Sale Quantities (ASQ) of timber for the three forests were developed many years ago and may have been rendered obsolete by far better science. We recommend that ASQ numbers be comprehensively revisited using the best available science, and in particular with regard to the habitat needs of bull trout, grizzlies, wolves, lynx, and each forest's "species of special concern." (Preservation/Conservation, Columbia Falls, MT - #525)

PC #: 276

Public Concern: The Forest Service should establish a minimum sale quantity.

Sample Statement:

Make Forest Plans a contract with the public on what to expect from the forest in the decade ahead. Set a Minimum Average annual harvest objective in acres of treatment and volume, as well as the maximum allowable harvest level in the revised Forest Plan. (Place Based Groups, No Address - #967)

Sample Statement:

The Allowable Sale Quantity (ASQ) should be realistic. In addition to ASQ, we believe a realistic minimum sale quantity, (MSQ) should be established as a Standard. The FNF should commit to making its best effort to achieving that Standard. The use of MSQ by FS would enhance local economies by allowing timber companies a better idea of what to expect for timber supply. The line officers of the USFS would be held accountable to achieve this MSQ. (Place Based Groups, No Address - #968)

Sample Statement:

We propose to calculate a minimum and a maximum allowable sale quantity and long-term sustained yield of timber that can

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

be harvested on each forest from the land classified as suitable for timber production, while protecting other resource values. (Place Based Groups, No Address - #822)

PC #: 275

Public Concern: The Forest Service should consider a harvest schedule that departs from its non-declining, even-flow policy.

Sample Statement:

If there was ever a reason for examining a base sale harvest schedule that departs from non-declining even flow due to high mortality losses this is the time (36CFR219.16). (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 294

Public Concern: The Forest Service should use helicopter logging to reduce road density.

Sample Statement:

Heli-logging reduces road density. (Recreational, Kalispell, MT - #268)

PC #: 289

Public Concern: The Forest Service should use a sensitive and visually appealing approach to harvest trees.

Sample Statement:

Most environmentalists psyche's are extremely sensitive to changes in the appearance of their environment. In the Missoulian this winter they interviewed a logger who practiced a method of taking trees that left the surroundings visually appealing. He believed if you took the trees in a visually appealing manner the appeals from the environmentalists would be reduced. Hiring a landscape expert (maybe even an environmentalist landscape artist) into forest service management to establish and supervise visually appealing logging practices could help eliminate some litigation. The forests don't look thinned, they look skinned. With the persistent drought conditions, a fixture of our times, combined with the gross amount of trees removed, dry winds and early, fast run-offs isn't erosion going to be a problem? Attractive logging would probably mean less trees removed per area, but more areas logged and may help with erosion and fire as well. Even training or hiring loggers with a goal of visually appealing logging would probably go a long way in appeasing the sensitive nature of environmentalists who are visually responding to the mountains like they would a wounded, dying animal. (State Agency or Official, Frenchtown, MT - #340)

Sample Statement:

Modification of vegetation conditions" is always "necessary to achieve resource values of management goals." Even-age management harvest units should be shaped and laid upon the land with concern for erosion potential; site protection; tree regeneration; and for the appearance from the valleys, recreation areas, highways, and urban areas - both business and residential. (Place Based Groups, Paradise, MT - #258)

PC #: 288

Public Concern: The Forest Service should use approaches other than burning to dispose of logging slash that cannot be used commercially.

Sample Statement:

Rather than burn timber debris that cannot be used commercially, it should be broken up, distributed and compacted on the ground to protect soil moisture, prevent soil erosion, retard invasive weeds, facilitate decomposition and return nutrients to the soil. Forests can be restored with active management in a few years. If Mother Nature recycles the forest on a catastrophic scale it can take decades or even centuries in some areas. (State Agency or Official, Kalispell, MT - #329)

Sample Statement:

Instead of burning, send the chips to Darby, allow wood gatherers to use wood, etc. (Individual, Stevensville, MT - #660)

Sample Statement:

Make firewood from slash piles available to public. Allow slash piles that are scheduled to be burned made available to the public for fire wood gathering prior to burning. Leave log landings open for one year following timber harvest. Sell firewood permits and maps to clean up. (Place Based Groups, No Address - #967)

PC #: 287

Public Concern: The Forest Service should use a full range of logging systems

based on impact to the ground.

Sample Statement:

Harvest methods - both inside and outside the WUI: Harvest methods will favor long line skidding by either ground lead or skyline methods, but will also provide for various forms of tractor skidding - all where soil and land form allow machines to operate and/or roads to be constructed with minimum impact. Helicopter harvest will be avoided if road building (permanent or temporary including roll-up roads) is feasible and appropriate. Helicopter logging will be the norm within the view shed as indicated by the Forest Visual Management Plans and Guidelines. (Business, Paradise, MT - #50)

Sample Statement:

Timber harvest can be done with minimal impact to the ground by using new light ground pressure equipment. (State Agency or Official, Kalispell, MT - #329)

PC #: 309

Public Concern: The Forest Service should reconsider the amount of trees and fiber left on the landscape.

Sample Statement:

The amount of trees and fiber left on landscapes needs to be recalculated in terms of waste and alternatives. When we see millions of acres of dead, dying, or burnt timber left unused due to bogus and unproven regulations and appeals, millions of dollars are wasted. (Individual, Kalispell, MT - #781)

PC #: 286

Public Concern: The Forest Service should manage old growth trees to perpetuate old growth attributes.

Sample Statement:

We are glad to see the recognition that old grow stands are not static and some type of vegetation management is necessary to perpetuate old growth attributes. (Individual, Trego, MT - #213)

Sample Statement:

Stands of older trees must receive stocking control and clearing out of younger, thriftier trees so the old trees are relieved of this source of competition for soil moisture and nutrients. (Place Based Groups, Paradise, MT - #258)

PC #: 285

Public Concern: The Forest Service should not harvest timber on steep, dry sites that are hard to revegetate.

Sample Statement:

You should not cut burned or green trees on dry sites that are hard to re-vegetate. The Forest Service has many thousands of acres of steep, dry sites that should never have been logged. (Individual, Corvallis, MT - #40)

PC #: 279

Public Concern: The Forest Service should not harvest or treat old growth.

Sample Statement:

Old growth should not be harvested or treated. (Individual, Columbia Falls, MT - #659)

Sample Statement:

You talk about cutting Old Growth stands to make them better. If you people think for one minute that cutting and burning in the Old Growth Stands is actually improving them You Are Wrong! You are really living in la-la land! Why don't you just say, "We are cutting these Old Growth Trees to get timber for the loggers?" Without these Old Growth stands the 'birds and animals that depend on them will die out, as will the rare plant life that grows there. (Individual, Corvallis, MT - #40)

Sample Statement:

You state that you are retaining Ponderosa Pine stands. This is absolutely not true with the Old Growth Pine. You have been cutting Old Growth Pine (green, healthy, not burned) like there is no tomorrow! (Individual, Corvallis, MT - #40)

PC #: 292

Public Concern: The Forest Service should schedule regeneration harvest for most stands of over-mature, decadent timber.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

Naturally growing ponderosa pine and western larch forests as well as other forest types supporting all trees common to western Montana, provide a diversity of habitats for a variety of wildlife, plant forms, and species in all the various stages of development - all interdependent and interacting with each other within the ecosystem, and changing over time. In the absence of fire or outside influence, forest stands mature and eventually become old and sometimes decadent, with many dying trees. Forest thinning is desirable in young, and some older, but immature stands. However while certain over-mature and decadent stands may be reserved for their existing values, most should be scheduled as to timing and place, for a regeneration harvest. (Place Based Groups, Paradise, MT - #258)

PC #: 284

Public Concern: The Forest Service should not use the clearcut silvicultural prescription.

Sample Statement:

It makes no sense to clearcut material that cannot be utilized. (Individual, Superior, MT - #37)

Sample Statement:

Seed tree and shelterwood cuts are another name for clearcuts. Thinning and group selection cuts should be the primary harvest methods, or as natural stand or tree replacement occurs. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

No more corporate logging! Shelterwood seedtree are better than clearcutting. (Individual, Darby, MT - #286)

Sample Statement:

Clearcutting adjacent to wilderness, wilderness study and roadless lands should be prohibited. Clearcutting should be done away with entirely. (Individual, Condon, MT - #638)

PC #: 282

Public Concern: The Forest Service should use a variety of silvicultural practices (both even and uneven-aged management practices) selected as appropriate to address site-specific needs and conditions.

Sample Statement:

Outside the wildland/urban interface: Appropriate silvicultural treatment should include all recognized systems and methods which protect the soil and water resource: understory and overstory removal, group selection, thinning from below or above, selection, and even age systems of clearcut, seed tree and shelterwood. (Individual, Paradise, MT - #158)

Sample Statement:

Hopefully management treatments to maintain or restore ecosystems or habitats for species at risk includes regeneration harvest, which is not listed. Many of the tree species at risk identified in the Northern Region Overview require full sunlight for regeneration, so thinning and burning alone are inadequate to restore those species. This would also be consistent with verbiage in other places that indicates a desire to use natural patterns and processes to guide management -- at the turn of the past century, the result of centuries of natural processes was a landscape that was nearly 40 percent trees less than 40 years old. (Individual, Superior, MT - #686)

Sample Statement:

A variety of silvicultural practices should be used, selected as appropriate to address site-specific needs and conditions. Both even and uneven-aged management techniques are employed. Clearcut prescriptions should be applied where necessary and appropriate to promote the regeneration and growth of species such as aspen, lodgepole pine, paper birch, western larch, western white pine, and other shade intolerant plants. A range of rotation ages, cutting cycles, and patterns based on natural disturbance events should be used to calculate timber yields and manage landscapes to appear and function more naturally. Soil disturbance and soil compaction are minimized. (Place Based Groups, No Address - #959)

PC #: 283

Public Concern: The Forest Service should apply clearcut prescriptions where necessary and appropriate to promote the regeneration and growth of species such as aspen, lodgepole pine, paper birch, western larch, western white pine, and other shade intolerant trees.

Sample Statement:

Prescriptions for clearcutting are valid for lodgepole pine and areas of other species with heavy dwarf mistletoe incidence. Where shelterwood and seed tree prescription are appropriate, and reserved trees are not infected with mistletoe, some leave

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

trees can be left for eventual mortality or a later rotation harvest, except for early seral species - western larch, ponderosa pine, and white pine which favor a more open sunlight condition for growth. Clearcutting is most appropriate for lodgepole pine, and Englemann spruce because leaving residual seed or shelterwood trees would often result in a mass blow down of the residuals. Clearcutting, seed tree, and shelterwood methods are all appropriate to harvest and regenerate western larch and western white pine so long as site preparation, including broadcast burning, is adequate, overstory trees are harvested after regeneration of the new stand, and stocking control is practiced throughout most of the rotation. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

Silvicultural treatment terms such as clearcut, shelterwood, selection, etc., must be better defined in the plan for general public understanding. Also agree that for certain tree species, clearcut is still a viable practice that must remain a management tool. (Place Based Groups, Victor, MT - #560)

Sample Statement:

The group generally agrees with this proposed action, but recommends the changes shown: We propose to reduce the application of clearcut harvest prescriptions and emphasize the use of seed tree, shelterwood, improvement, thinning, group selection; and salvage harvests from what previous forest plans projected. The clearcut prescription would still be applied, where necessary to promote the regeneration and growth of species such as aspen, lodgepole pine, paper birch, western larch, western white pine and other shade intolerant plants. Clearcutting would be prescribed only when necessary and determined to be best suited to achieve land management objectives, if clearcutting is prescribed, those projects will be laid out in a way that reduces adverse visual impacts through the creation of irregular or "feathered" edges on the clearcut units or through other appropriate design mechanisms. (Place Based Groups, Columbia Falls, MT - #565)

PC #: 293

Public Concern: The Forest Service should use extended rotation ages, but be cautious in its application.

Sample Statement:

A longer rotation age would result in a more natural appearing forest with some reduction in total annual yield. If natural "disturbance events" is to mean that even-age management would be practiced on a natural disturbance cycle of up to 300 years (300 year rotation) as nature may have practiced in our higher elevation, more mesic forests. That is too long: much mortality would occur after the first half of the rotation, and by the end, dead fuel development would be extreme. A maximum of 150 to 200 years would be more appropriate in these stands. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

[I really like Action] FP-F6-A1 (We propose to use a range of rotation ages, cutting cycles, and patterns based on natural disturbance events to calculate timber yields and manage forests that appear and function more naturally.) [because] ...increasing rotation ages and cutting cycles should give a more natural aspect to our forests. (Individual, Missoula, MT - #466)

Sample Statement:

Agree with action items FP-F6-A1 (We propose to use a range of rotation ages, cutting cycles, and patterns based on natural disturbance events to calculate timber yields and manage forests that appear and function more naturally). F6 will allow for longer cutting cycles producing larger diameter trees which will benefit small specialty mills and small logging operations. Stands at the upper end of the cutting cycle may also reduce the need for old growth set asides. (Individual, Kalispell, MT - #752)

PC #: 278

Public Concern: The Forest Service should use uneven-aged management techniques to retain larger trees, manage stocking levels, and improve forest health.

Sample Statement:

As a professional society we encourage the agency to expand the application of Uneven Aged Management techniques as described by numerous published researchers in peer reviewed professional journals. Clear cutting or seed tree harvest prescriptions remain appropriate for Western Larch and Lodge Pole Pine regeneration. The discussion on lengthening rotation ages may or may not be beneficial to the overall health of a forest ecosystem. Proposed action suggests the "biological lifespan of a tree species" be used as criteria is unrealistic at best. The desired direction is to incorporate the application of Uneven Aged Management in appropriate areas to retain larger trees, manage stocking levels and improve overall forest health. Reasonable extensions of rotation ages may be appropriate but requires far more in depth analysis and research to guide this issue. (Preservation/Conservation, Missoula, MT - #624)

Sample Statement:

Selective cutting can be used to thin the stands and allow the remaining trees to grow faster. New equipment makes it cost

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

effective to select cut rather than clear cut. (Place Based Groups, No Address - #967)

Sample Statement:

More un-even age (all age/multi crown level) management and harvest techniques should be incorporated by the USFS in trying to achieve an overall landscape management approach to the forest. We recognize there will be obvious exceptions to this, such as pure stands of Lodgepole Pine. (Place Based Groups, No Address - #968)

PC #: 291

Public Concern: The Forest Service should not include biomass for heating or power generation in the forest plan revision.

Sample Statement:

The Revised Plans must clearly state that these three Forests will not be relied upon provide biomass for power production facilities. We have, enclosed for the record the executive summary of a Biomass Fuel Power Plant Feasibility Study prepared by the Flathead County Economic Development Authority. It concludes "affordable production of biomass fueled power is not feasible" at this time and will remain so unless the American taxpayer provides a massive subsidy to expand the road system on the National Forests, to help finance these plants, and to subsidize the cost of the fuel and its transportation. Providing biomass fuel other than as a very limited and occasional byproduct would put these three Forests completely at odds with their duties to be managed as ecosystems in need of a reduction in road miles and other development impacts. Moreover, the Scandinavian model of forest and biomass management is absolutely the wrong model for the Northern Rockies, only partly because biomass production damages the long-term health of forest soils by depriving them of adequate organic matter, nutrients, etc. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

We strongly oppose the knee-jerk attraction to commercial biomass production. The use of forest biomass for heating or power generation should not be included in the Forest Plan revision and EIS. Only huge federal subsidies can make biomass power generation feasible. Damage to air and water quality, wildlife and fish habitat will only produce a net public loss in benefits, both dollars and other important non-commodity public values. (Business, Missoula, MT - #616)

Sample Statement:

We do not believe that the use of forest biomass for heating or power generation should be included in the Forest Plan revision. This type of use for forest products may sound like an appealing use of small diameter woody material removed from the wildland urban interface however, we believe there may be many unforeseen, detrimental impacts to forest ecosystems once the investment is made in such infrastructure. (Preservation/Conservation, Big Fork, MT - #708)

PC #: 290

Public Concern: The Forest Service should make a public commitment to a harvest program that includes very small diameter trees (biomass) so that private industry will be willing to make the necessary investments to utilize the material.

Sample Statement:

In addition to supplying commercial timber to local sawmills, there would also be a need for biomass to be moved from the forest to industrial uses such as electricity co-generation. The National Forest must be required to guarantee a supply of biomass fuel and commercial timber supplies in order to make it economically feasible for new investment in new efficient mills, and in milling equipment. These new investments would provide both a benefit to the community in terms of economic activity, and also provide needed fire protection. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

We need an active timber sale program that effectively harvests the sustained yield of the land. This harvest needs to include very small diameter trees which would be chipped for fuel for power plants. The forests need to make a public commitment to such a program so that private industry will be willing to make the necessary investments to utilize the material. From a national standpoint, we must begin converting our power plants from oil, gas and coal to renewable fuels. (Individual, Kalispell, MT - #506)

Sample Statement:

We propose to encourage the sale of small diameter timber for the purpose of stimulating an economic market for small diameter timber." Eleanor said she would like to see an additional action that encourages the timber industry to be more adaptable or to retrofit to use an increased variety of small diameter timber products. Matt said the industry has done a pretty good job of retrofitting as much as they can with the material that they have available to them. He suggested wording the statement to put more small material on the market. The group proposed and approved the statement. (Place Based Groups, No Address - #825)

Sample Statement:

It did prompt discussions about how much the wood industry, products, and utilization has changed over the last 15 years. Composite wood products are rapidly replacing dimensional lumber. These all change the premise for calculating an ASQ or predicting products and outputs in another 10 years. The plan should recognize and be adaptable to deal with these changes.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

One suggestion that, given the likely increase in marketability of small material, the plan should be forward thinking and adaptable enough to balance any new demand for "biomass" with ecological needs. (Place Based Groups, Hamilton, MT - #827)

Sample Statement:

Let people cut sub-merchantable trees and use for posts and rails instead of paying for thinning. Implement effective Biomass removal rules and procedures. Biomass is a way to go for a long term solution to fuel buildup! Biomass provides a market for the trees and debris that must be removed to restore the forest to low intensity fire conditions. (Place Based Groups, No Address - #967)

PC #: 295

Public Concern: The Forest Service should establish strategies for dealing with the effects of global warming on forest resources.

Sample Statement:

The forest Service must acknowledge global warming and establish strategies and contingencies for dealing with its effects on forest resources. (Individual, Columbia Falls, MT - #247)

Sample Statement:

Global warming will also change tree growth and site productivity conditions. (Preservation/Conservation, Kalispell, MT - #256)

PC #: 302

Public Concern: The Forest Service should consider cost-effectiveness of timber removal as a criterion for whether an area is included in the suitable timber base.

Sample Statement:

A criterion for determining whether an area is part of the "suitable" timber base should be cost-effectiveness of timber removal. If an area is allocated in the forest plan as suitable for timber production, it should not include stands that would require below-cost logging. It is appropriate, however, that the forests have flexibility to do timber management that does not require profitability. However projects that don't generate a profit must be justified first and foremost by an ecosystem management objective, such as reducing fuels for demonstrated fire-risk purposes. (Preservation/Conservation, Missoula, MT - #488)

PC #: 300

Public Concern: The Forest Service timber appraisal system should reflect market conditions.

Sample Statement:

USFS timber sale appraisals should reflect the poor market conditions to offer stumpage at the lowest price legally possible. Let the market forces decide how much to pay for the stumpage by competitive bid. Of course reasonable contractual obligations must also prevail. (Place Based Groups, Paradise, MT - #258)

PC #: 298

Public Concern: The Forest Service should reduce the acres classified as suitable for timber production.

Sample Statement:

We concur with the need to reduce the area classified as suitable timber. Lands assigned to the "Timber Base" must be managed under ecosystem management principles and not primarily for timber. Ecosystem management principles should apply to all land management decisions on timber base lands. (Preservation/Conservation, Kalispell, MT - #256)

Subconcern:

BECAUSE PEOPLE VALUE LOW ELEVATION WILDERNESS AND OLD GROWTH

Sample Statement:

The public desires low elevation wilderness areas as well as restoration of low elevation old growth that provides continuity of habitat across the landscape. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

Low elevation roadless areas and old growth are desirable by the public and in such short supply that they should be taken out of the timber base. Un-inventoried roadless areas should also be excluded. (Individual, Columbia Falls, MT - #534)

Subconcern:

BECAUSE PEOPLE VALUE WILDLIFE AND RECREATION MORE THAN TIMBER HARVEST

Sample Statement:

Given a shift in values away from timber harvest and towards wildlife habitat and recreation, we support the idea of revisiting Forest lands for their suitability for timber production and agree that the number of areas and acreage classified as suitable should be less than current forest plans. (Preservation/Conservation, Missoula, MT - #566)

PC #: 304

Public Concern: The Forest Service should include inventoried roadless areas in the suitable timber base.

Sample Statement:

It is an especially strong indication of bias for you to propose "to exclude inventoried roadless areas from the suitable timberlands". Another announced intent to promote defacto wilderness management outlined in the "Roadless Area Conservation Rule" which was declared illegal in Federal Court in July, 2003. How can you make such a proposal as if it is a viable alternative in January 2004 and expect the public to believe this is going to be a science based fair revision? The roadless area discussion in the AMS has no evaluation of resource capability, suitability, or manageability, or alternatives as required by (36CFR219.17). (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

I have no problem leaving inventoried roadless in suitable timber lands classification even though I know not all acres fit. But I also feel "closing the door" so to speak means actually "locking the door" to future vegetation management. (Individual, Whitefish, MT - #811)

PC #: 308

Public Concern: The Forest Service should consider the cumulative effects of adjacent private and industrial lands in determining individual forests' timber harvest programs.

Sample Statement:

Sustained yield must be independently determined, and the cumulative effects of adjacent private and industrial, private lands must be considered in determining the individual forests' timber harvest programs. (Preservation/Conservation, Kalispell, MT - #256)

PC #: 296

Public Concern: The Forest Service should classify National Forest System lands as suitable or not suitable for timber production based current laws, and site conditions outlined in the current (1982) regulations, without prejudging the results.

Sample Statement:

Determination of suitability for sustained, intensive timber management is first of all judgment about the physical landscape: rock presence; soil quality and depth; elevation; precipitation; aspect; and slope. Juxtaposition also has a bearing; otherwise suitable conditions for timber management over an area may, because of limited access potential be considered unsuitable, as may areas where visual resource attributes and management constraints override or foreclose timber management. Though physically suitable but without management potential, such areas, following resource-: inventory and analysis, may then be moved into the unregulated category. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

OK but be realistic, and first carefully read all the Acts cited under EM-F11-A1, then try to put them all together without forgetting the main purpose Of the National Forest System as spelled out in the Organic Act - to produce timber and water! Go to the Law first, only then look at the Regulations - they may conflict. Be careful not to load up suitability with other attributes and conditions. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

I have a concern over the process used to classify lands tentatively suitable for timber production as shown in the Analysis of the Management Situation Appendix D and map. It seems there is an obvious error in the logic used to identify unsuitable lands. On Superior Ranger District, for example, much of the land in the Mineral Mountain Creek and Trapper Cabin Creek drainages, the Brimstone Creek and Randolph Creek drainages, and the ridge between Dry Creek and South Fork of Little Joe Creek are shown as primarily unsuitable for timber production. These areas have extensive histories of timber harvest followed by timely, successful reforestation. To my knowledge there has not been any widespread degradation of soil or

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

water quality resulting from these activities. In addition, there are extensive areas shown as unsuitable along the stateline area. Based on existing forest types, habitat types and past timber harvest in many of these areas, I'd suggest the unsuitable area identified is perhaps twice as large as it really is. I haven't seen any consistent pattern in the LSIs, so I suspect errors in the PNV mapping. Some of those areas will be masked by management-induced unsuitability, but I still think we should try to get the physical suitability right first. (Individual, Superior, MT - #685)

Sample Statement:

Proposed changes in suitable vs. unsuitable land classifications is particularly alarming. The majority of the habitat types on the Lolo, Flathead and Bitterroot forests are highly productive suitable forestlands. Shifting suitable lands to unsuitable is confusing and it is our expectation that substantial outputs in commercial products will be generated if truly effective treatments are implemented. The subject of suitable and unsuitable needs more clarity and detail provided though definitions and anticipated outcomes. (Preservation/Conservation, Missoula, MT - #624)

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Suitable timberlands are defined as those lands where timber harvest is regulated. The first regional timber protocol group in 1998 discussed what timber production meant versus timber harvest in the context of NFMA regulations. Timber production objective refers to growing, tending, harvesting, and regenerating crops: of trees on a regulated basis to produce logs for industrial use and must filter through determination stages. As a result of this new classification, the number of acres classified as suitable for timber production will be drastically reduced. We find the zone's move towards a "tree farm" approach to timber production, and the correlated 50 percent reduction in suitable base grossly unacceptable. (Timber or Wood Products Industry, Kalispell, MT - #539)

PC #: 297

Public Concern: The Forest Service should maintain or increase the acres classified as suitable for timber production.

Sample Statement:

Our suitable timber bases have to be kept intact (all 670,000+ acres in the Flathead). There's no logical reason why the forests growth can't be harvested along with the dead and dying trees to reduce the biomass that is choking our forests. We need openings for shrubs & browse. Too much time has been lost to think that fire is the entire answer. (Individual, Columbia Falls, MT - #435)

Sample Statement:

The Suitable Timber Base of some 673,000 acres must not be reduced at all. The roadless areas that currently exist in the National Forest along with Glacier National Park and the Bob Marshall Wilderness provide more than enough pristine areas in our geographic area. Put more acreage into the Suitable Timber Base. (Individual, Columbia Falls, MT - #455)

Sample Statement:

We feel the areas that are currently being used for timber harvest, approximately 673,000 acres, should be maintained, or expanded, in any new proposed forest plan. Second, these areas should also be balanced in that more of those areas should be available for motorized recreation. (Place Based Groups, Columbia Falls, MT - #497)

PC #: 299

Public Concern: The Forest Service should manage the lands classified as suitable to achieve sustainable timber production goals.

Sample Statement:

Unless a concerted effort is made to perform the necessary harvest of the "suitable" forest component, harvest-will continue to fall far short of both growth and mortality. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

I urge you to set forth reasonable management of the part of the forest that is in the suitable timber base and not to close this land off to harvesting. (Timber or Wood Products Industry, Albuquerque, NM - #375)

Sample Statement:

We propose to plan an integrated timber harvest program on: 1) land classified as suitable for timber production, and 2) land classified as not suitable for timber production, where harvest is used as a management tool to achieve vegetation, habitat and social goals. All harvest entries would be based on resource management goals... (Place Based Groups, No Address - #822)

Sample Statement:

Within the suitable timber base there is a need to manage to be sustainable--suitable should be synonymous with sustainable. (Place Based Groups, Stevensville, MT - #823)

PC #: 301

Public Concern: The Forest Service should include current Management Areas 11, 11A, 11B, and 11C (Flathead National Forest) in the suitable timber base because they are not being managed for Grizzly Bears as intended in the current plan.

Sample Statement:

The areas set aside as management areas 11, 11A, 11B, and 11C in the current Forest Plan as Grizzly Bear Management areas should be placed back in the suitable timber base since they are not being managed as intended in the current plan. (Individual, Columbia Falls, MT - #438)

PC #: 303

Public Concern: The Forest Service should display and explain the rationale for its classification of suitable timber land.

Sample Statement:

The analysis displayed in the AMS apparently is intended to be the first step in determining timber suitability as required, and that is defining forest lands available and capable of timber production resulting in lands classed as "tentatively suitable". There is no discussion of the rationale for the criteria used for the various classifications listed in Appendix D of the AMS. For example the majority of physically unsuitable land is so classed because timber harvest on those landtypes would allegedly cause irreversible resource damage to soils, productivity or watershed condition. The scientific data and rationale for these classifications must be disclosed and subject to public review and comment. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

The calculation of forest roads 33 ft. wide as non-forest land and subtracting those acres from potential forest production is not supported by science. Trees along the edge of roads commonly develop limbs reaching 15-20 feet across the road thus making effective use of the growing space provided by the road. Research has demonstrated that the trees on each edge of the road have increased compensating growth and production compared to trees with more competition away from the road. This increased growth is due to benefits from extra light, water, and nutrients made available to road edge trees by presence of the road. No timber production is lost due to 33 foot wide forest roads. Studies of historic tree stocking levels before European settlement shows natural tree stocking to result in tree spacing of 33 feet or more. Subtracting acres from potentially suitable land base by calculating a total area represented by the road prism, and subtracting that area is just one more indication of the bias against timber management exhibited throughout the AMS and Proposed Action. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 305

Public Concern: The Forest Service should include the interface areas in the suitable timber base.

Sample Statement:

The lands along the private land interface are some of the most accessible and productive lands in the National Forests. Trees grow fast on these lands, and trees grow and die. Trees yield forest products. NFMA permits managers to decide on tree stocking levels and reforestation criteria needed to achieve multiple use objectives (36CFR219.27). Unless you are going to prescribe the area be permanently cleared of trees, there is no reason that these lands should not be classed as suitable and intensively managed for a fire resistant stand structure, tree density, and species composition while yielding forest products over the long term. You admit these lands will yield substantial forest products and if the suitability definitions (36CFR219.4) and requirements (36CFR219.12, 219.14, 219.15, and 219.27) are complied with, these lands would be classed as suitable. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

There is no need to exclude the interface from the timber base (FP-FI-A3). Simply include wording that exempts the area from stocking levels etc. (Recreational, Columbia Falls, MT - #589)

Sample Statement:

Any current suitable timber base lands should remain in the designation and not be changed to WUI or any other designation. What better place to educate the public and showcase the benefits of sustainable timber harvest than right next to their homes and communities. We can have it all (habitat enhancement, reduction of fuels, recreational opportunities) while emphasizing mgmt for commercial harvest, providing local jobs and helping to fulfill and ever increasing national demand for wood products. (Individual, Columbia Falls, MT - #673)

Sample Statement:

They believed that the interface area is of high value for timber production because it is easily maintained and accessible and should be part of the suitable timber base. (Place Based Groups, No Address - #967)

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

1. Interface lands should be kept in suitable land base if they meet the criteria. 2. Comment: why can't FS manage for timber and fire zones simultaneously? (Place Based Groups, Stevensville, MT - #823)

PC #: 306

Public Concern: The Forest Service should exclude inventoried roadless areas from the suitable timber base.

Sample Statement:

We commend you and support your proposal to exclude inventoried roadless lands from the suitable timber lands (Action FP-F1-A2). Unfortunately, even temporary road construction into roadless areas can reduce elk security. Once new access is established, hunters continue to use such areas causing long-term loss of elk security even after roads are removed from the land. We would like to work closely with the forest in the planning of any timber management prescriptions in any roadless security areas greater than 250 acres in size and more than 1/2 mile from closed or open roads. (State Agency or Official, No Address - #694)

Sample Statement:

We concur with the need to exclude inventoried roadless lands from the timber base. We would recommend that the FS exclude un-inventoried roadless as well, as these lands add significantly to core security wildlife habitat as well as to the non-motorized recreation base. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

We commend you and support your proposal to exclude inventoried roadless lands from those lands deemed potentially suitable for timber production. (State Agency or Official, Missoula, MT - #697)

PC #: 307

Public Concern: The Forest Service should harvest timber on lands not suited for timber production only by rare exception.

Sample Statement:

Action FP-F2-A1 (We propose to plan an integrated timber harvest program on: 1) land classified as suitable for timber production, and 2) land classified as not suitable for timber production, where harvest is used as a management tool to achieve vegetation, habitat and social goals. All harvest entries would be based on resource management goals and budgets.): o.k. for land classified as suitable for timber production, but what "social goals" do you envision for harvest on lands not suitable for timber production? If a social goal is served as an incidental effect of desirable or necessary vegetation or habitat manipulation, then in this rare occasion - perhaps o.k. This exception should be an exceptionally rare occurrence. (Individual, Bigfork, MT - #600)

PC #: 310

Public Concern: The Forest Service should construct fewer permanent roads than projected in current forest plans by emphasizing reconstruction and maintenance of existing roads. Roads constructed on suitable timberlands to support timber harvest should use best management practices.

Sample Statement:

Action FP-F7-A1: (We propose to construct fewer permanent roads than projected in current forest plans by emphasizing reconstruction and maintenance of existing roads. Some new temporary and permanent road construction would be expected to support timber harvest activities, primarily on lands classified as suitable for timber harvest. Best management practices would be used for road construction and maintenance to reduce their effects on water quality.)Makes sense. (Individual, Kalispell, MT - #781)

Section: Forest Health Management

PC #: 316

Public Concern: The Forest Service should incorporate fire into the landscape in both wilderness and proposed wilderness.

Sample Statement:

We are encouraged to note that the Forest realizes the importance of incorporating fire into the landscape and agree that it should be used as a tool in both Wilderness and proposed Wilderness. Consideration of ecosystems at risk and values such as safety; homes and communication sites when deciding when to reduce fire makes sense. (Preservation/Conservation,

Missoula, MT - #566)

PC #: 324

Public Concern: The Forest Service should perpetuate enough true wilderness to sustain a self healing earth.

Sample Statement:

[FORM 1 ADD'L COMMENT:]I am very much opposed to the attitude that extractive industries including mining and intensive and extensive logging and grazing are more important than perpetuating enough true wilderness to sustain a self healing earth. Wilderness is needed not only for the few who are able to enjoy it for recreation purposes but for the health of the planet, the resiliency provided by genetic diversity, and the contribution of forest to clean air and water. (Individual, Reserve, NM - #898)

PC #: 315

Public Concern: The Forest Service should use sustainability and viability as the underlying ecosystem management principles.

Sample Statement:

We strongly support the use of sustainability and viability as the underlying ecosystem management principles for Forest Plans. (Preservation/Conservation, Missoula, MT - #566)

PC #: 314

Public Concern: The Forest Service should manage bear management units where forest restoration would enhance bear habitat and reduce the threat of lethal wildfires.

Sample Statement:

The new Forest Plan must better address the issue of access within Grizzly Bear Management Units. Routine forest stewardship and restoration efforts are not easily accomplished under the current road restrictions imposed through the moving windows analysis and road density standards. Continued exclusion of management in BMU's does not make sense where forest restoration efforts would enhance bear habitat and reduce the threat of lethal wildfires. (Individual, Columbia Falls, MT - #438)

PC #: 313

Public Concern: The Forest Service should actively manage vegetation to perpetuate old growth attributes.

Sample Statement:

We are glad to see the USFS recognition that old growth stands are not static and some type of vegetation management is necessary to perpetuate old growth attributes. The rotation or staggering of stands into and out of the old growth category is a logical decision when conditions change; and as all foresters know the forest is constantly changing. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

PC #: 312

Public Concern: The Forest Service should manage tree density to maintain the health and vigor of forests and allow the safe and effective use of fire.

Sample Statement:

Especially disconcerting is the mortality of very large ponderosa pine 200 to 300 years old. The once healthy, unmanaged forest in the Thompson River area, and other areas of which I am familiar, are now very overcrowded and tree mortality is becoming heavy. Adjacent managed stands, although in need of thinning, are healthy and mostly still vigorous. (Individual, Paradise, MT - #158)

Sample Statement:

The newly established understory trees must receive stocking control treatments in order to maintain health and vigor of all trees in the stand, and to reduce fuel build up on the forest floor as well as to reduce ladder fuels. (Individual, Paradise, MT - #158)

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

How can fire now be effective or safe with so many millions of tons of biomass on our forest floors. Management needs to thin or harvest, leave some debris and try to clean up the mess of what's left on our forests. (Individual, Columbia Falls, MT - #435)

PC #: 311

Public Concern: The Forest Service should actively manage vegetation to improve forest health.

Sample Statement:

Action EM-F2-A2: (We propose to use values and ecosystems at risk as primary considerations when managing to reduce the hazard of large-scale insect and disease infestations and severe wildland fires. Examples of values and ecosystems at risk include but are not limited to such things as public and firefighter safety, homes, communication sites, municipal watersheds, and threatened, endangered, sensitive species habitat.) Not sufficient. Should be, we propose to reduce fuel loads through mechanical intervention in projects of sufficient scale that following prescribed fires can burn safely without escaping into other ownerships or risking existing important habitats. You should also propose to implement projects that integrate pre-burn commercial logging, a prescribed project fire, and post-fire commercial salvage. Your Action EM-F2-A3: "We propose to maintain or restore ecosystems or habitats for species at risk," is too namby pamby. (Multiple Use or Land Rights, Whitefish, MT - #721)

Sample Statement:

Harvesting agricultural value of our forest in a timely manner should be a top priority.(Since the USFS is a division of the USDA, we believe that the agricultural value of our forests should be a top priority and the economic value of the timber to local communities is vital to their health, both forests and communities.)Restore forest health by aggressively using science based forest management.(Healthy forests equal viable wildlife populations across the landscape, clean and healthy watersheds and fisheries. The citizens of the Flathead desire proactive forest management to restore forest health with priority on the science of forest management.)Maintaining all forest values (watersheds, wildlife, air and water quality, recreation) results from a healthy forest. Set a minimum timber harvest goal with a commitment to reach that target within 3 years. (To achieve healthy forests and watersheds requires an amount of wood fiber per acre be removed that equals the annual growth per acres plus the annual mortality per acre. The Forest Plan should use such a guideline for alternatives.) Implement the Healthy Forest Initiative immediately and inform the community of specific actions that result. (Place Based Groups, No Address - #967)

Sample Statement:

The health of the entire forest and the communities they surround should be the overriding mandate. (Individual, Whitefish, MT - #704)

PC #: 323

Public Concern: The Forest Service should revise its process for identifying and implementing vegetation management projects.

Sample Statement:

Jerry said he would like to see someone like Les--if he sees a parcel of land he thinks he could make it better, he could present to the Forest Service a plan for how to manage it (trees, streams, etc.) and the agency could approve going forward with the idea--maybe putting it out for a bid. Maybe the agency wouldn't have to lay out the timber sale. A private person could do it. If the work produced revenue, the contractor would pay the Forest. If it didn't produce revenue, the Forest would pay the contractor. Clarice asked if that would mean bypassing doing an EIS. Jerry said he didn't know about that. (Place Based Groups, Kalispell, MT - #828)

PC #: 318

Public Concern: The Forest Service should focus more of its resources on maintaining and restoring ecosystems at risk.

Sample Statement:

While we commend you for noting that you will not only maintain but restore ecosystems or habitats of species at risk, we remain concerned about the use of thinning as a management tool and are worried when we see closing statement about (Preservation/Conservation, Missoula, MT - #566)

Sample Statement:

[CONT'D]providing public goods and services. It has become apparent through the years that it is not always feasible to both restore ecosystems and provide public goods and services. We would argue that historically the Forests leaned too heavily towards providing those services, primarily in the form of excessive timber harvest, to the detriment of the of the wildlife and habitats upon which they depend. For this reason, we would hope that you would focus more of your resources on maintaining and restoring natural systems with a longer-term, more sustainable approach to providing goods and services.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

(Preservation/Conservation, Missoula, MT - #566)

PC #: 320

Public Concern: The Forest Service should carefully consider the use of forest management tools to achieve ecological sustainability, integrity and viability.

Sample Statement:

Any actions taken should be assessed to be sure of ecological sustainability, integrity, and viability- There is concern about the kind of tools we use (i.e. spruce budworm spray program in the past). - What disturbances (insect outbreaks, fires, disease) are cyclic and which are endemic.- Why can't we use logging instead of fire--logging is not appropriate, economical in all areas; not all Mass allow logging.- Timber sales have been subsidized--all of the timber that was offered was not sold--fire is cheaper in the long run. Disagreement on proposed action--Majority thinks fire is a good tool in the right place. The minority thinks logging should be used instead and air quality preserved (it seems like we do more burning than logging). (Place Based Groups, Stevensville, MT - #823)

Sample Statement:

Use of prescribed fire in general and proposed use of ignitions within wilderness areas. General discussions on the use of prescribed fire included some disagreement with its use at all (don't need more smoke), some recognition that areas will burn sooner or later and we can choose the conditions that may produce less smoke than a wildfire, and questions on effectiveness. One member suggested that the Forest identify firewood collection areas as a means to reduce fuels. Discussed Action EM-F2-A1 (use of management-ignited fire in wilderness and recommended wilderness areas and increased area where natural ignitions are managed for resource benefits). Sue explained how wilderness boundaries often aren't conducive to managing either type of fire use (mid-slope boundaries, etc.). The proposal might allow fire use to cross those lines based more on natural terrain breaks, fuels, etc. instead of strict limits based on the political boundaries. The proposal might also allow management-ignited fires in designated wilderness areas. The subject had limited discussion with at least one member reluctant about the use of management ignitions inside the wildernesses. (Place Based Groups, Hamilton, MT - #827)

Sample Statement:

Everyone discussed the trade-off of doing prescribed burning in the spring months (short-term degradation of air quality) to prevent catastrophic wildfires in the summer months (longer duration degradation of air quality). Some members stated that socially and politically you won't be able to convince people that prescribed burning is better; it would take a very long time to get the fuels reduced enough to see a benefit from the prescribed burning. The public will not accept major prescribed burning. Larry Jakub said he does not believe the economics of small timber products will solve the problem of huge fires, either. We need to look at developing a large-scale program of using people to cut trees and brush to reduce fuels in the forests in the next 10-15 years (similar to the CCC program). He thinks the environmental community is not against thinning for environmental purposes, what they're opposed to is the old logging techniques, so most environmentalists would agree to thinning forests in the interface to reduce fuels. There was agreement among the group that a variety of these prescriptions (thinning, mechanical removal, logging, prescribed burning) needs to be used to fix the fire problem. The group agreed that changes need to be made educationally and politically before people will accept all of these fuel reduction methods. The perfect testing ground for these methods would be in the WUI. (Place Based Groups, Hamilton, MT - #827)

PC #: 319

Public Concern: The Forest Service should actively reduce fuels in the forest.

Sample Statement:

Finding EM-F2:But you should also point out that an utter lack of active vegetation management to remove or mitigate insects, disease and plain old fuel has exacerbated the effects of past fire exclusion. (Multiple Use or Land Rights, Whitefish, MT - #721)

Sample Statement:

The overall problem is fuel loading Forest wide. The urban interface is only a small part of the problem. (Place Based Groups, No Address - #821)

Sample Statement:

Caused by neglect (lack of forest management) the forests are in such an unhealthy condition they are loaded up to burn; and burn they will every summer. Fuel build up is of such high density that the fires cannot be put out once started. Drought and severe overstocking has impacted the tree stands causing huge kills by bugs and insects because of stress. Trees and underbrush are so thick that significant moisture cannot reach the ground. These dead and dying tree areas are so large that they can easily surpass the hundreds of thousands of acres killed by fires. The dead trees are a time bomb waiting for a match or a lightning strike! The Forest Service needs to be proactive and build fire breaks and reduce fuels in advance. This would allow some generation of economic value from timber to pay for the cost. Just burning the fuel build up is not only extremely dangerous but wasteful and destructive to the environment and health of people. Timber thinning and biomass harvest can help pay for the work that needs to be done now. Costs cannot be the excuse for doing nothing. If permitted, the forest can finance their own treatment. Comment by participant: "Is it a wise policy to waste natural resources and kill or injure thousands of animals while destroying their habitat for several years, by allowing forests to grow

old and unhealthy and become severely overstocked, and burn in a dry year? Or isn't it more sensible to use logging as a way of creating the same end result without the waste of resources, or animals, or animal habitat?" (Place Based Groups, No Address - #967)

PC #: 321

Public Concern: The Forest Service should consider impact to streams and waterbodies as values at risk.

Sample Statement:

EM-F2-A2 (We propose to use values and ecosystems at risk as primary considerations when managing to reduce the hazard of large-scale insect and disease infestations and severe wildland fires. Examples of values and ecosystems at risk include but are not limited to such things as public and firefighter safety, homes, communication sites, municipal watersheds, and threatened, endangered, sensitive species habitat.) Add as an example of values and ecosystems at risk "impacst to streams and waterbodies" (Place Based Groups, Stevensville, MT - #823)

PC #: 317

Public Concern: The Forest Service should combat non-native disease and insect infestations at every opportunity.

Sample Statement:

We feel that non-native disease and insect infestations should be combated at every opportunity. (Preservation/Conservation, Missoula, MT - #566)

PC #: 322

Public Concern: The Forest Service should prevent bark beetle populations from moving onto private land.

Sample Statement:

Compliments the FS on Grant Creek. Concerned about bark beetles on FS land that are now on private lands. (Place Based Groups, Missoula, MT - #826)

PC #: 331

Public Concern: The Forest Service should emphasize weed prevention to control weeds.

Sample Statement:

Research shows prevention is the best way to control weeds. We recommend that the following measures be adopted, at a minimum for Wildernesses, though the measures should apply to all national forests- Requiring pelletized feed. It is extremely difficult if not impossible for rangers in the field to inspect hay brought into the Wilderness and to ensure that it is certified "weed free." Moreover, there is a great deal of doubt that all certified feed is in fact Weed free. Pellets are a simple and proven-effective remedy.-Prohibiting stock grazing and/or use in areas that currently contain weeds until the weeds are eliminated. Stock grazing on weeds along trails or in meadows carry and deposit those weed seeds into other parts of the Wilderness. Even if horses or cattle are free of weeds when entering the Wilderness, they can still spread weeds if allowed to graze in areas that contain weeds.-Requiring that all assigned campsites, administrative sites, and airstrips will be made weed free within 5 years or those sites will be closed to public use until they are certified as weed free. Failure to keep a weed-free site would result in an automatic permit revocation or airstrip closure. (Preservation/Conservation, Moscow, ID - #509)

Sample Statement:

[Cont. from comment 7]-Implementing Wilderness-wide campsite standards (Frissel Class I and II) that will eliminate bare ground that serves as a ready site for weed invasion.-Quarantine of all animals for at least 48 hours prior to entering the wilderness. Having a quarantine corral established at all stock trailheads and have the trailheads staffed (especially during hunting season) and stocked with pelletized feed (weed-free hay isn't, people would be required to either bring in pelletized feed for the quarantine or purchase it from the campground host at the trailhead) is a start.-Require an inspection of all aircraft and boats (float boats on the Selway and South Fork Flathead) before entering the wilderness.-Use volunteers, permittees, prison crews and others in efforts to eradicate weeds in specific areas. (Preservation/Conservation, Moscow, ID - #509)

Sample Statement:

The Forests needs to do infinitely more to prevent spread of weeds before infestations become established. All kinds of ground disturbance including road work, logging, and cross country OHV use increase open soil needed for establishment of most weed species. Motor vehicles use, whether it is tracks on open roads, logging equipment, road machinery, or OHVs, are the primary vector of spread for many of our worst weeds, including, knapweed. There has been a problem in the North Fork with weed infested gravel starting new populations. This is totally inexcusable Road closures, closure to OHVs, and suitable

logging practices are the most effective way to control weeds. Highest priority for treatment should be: small and new infestations, trail heads, boat launches and other gateways into pristine areas, and identification and control of new species to the area. (Individual, Columbia Falls, MT - #534)

PC #: 326

Public Concern: The Forest Service should carefully evaluate the use of biological controls for weeds.

Sample Statement:

Invasive noxious weeds. Next to motorized recreation, we view this as the next most important issue. We support maximal efforts to prevent, eradicate, control and manage noxious weeds on all forest lands. We support efforts to restore native plant and tree communities. We support efforts and funding to assist landowners in areas adjacent to BNF control noxious weeds on their properties. We participated in such a project after the 2000 Blodgett Fire, and the results are well worth the cost! We are skeptical of claims that biological controls are without risk, and feel that application of these agents needs special scrutiny. (Individual, Hamilton, MT - #292)

PC #: 327

Public Concern: The Forest Service should reconsider its weed management rules and regulations to ensure they are not too restrictive.

Sample Statement:

Rules & Regs to restrictive. Example- working with lumber mills to have weed-free mill sites. Depending on how restrictive this is, I could consider this another attack on lumber mills, mainly small ones. (Individual, Hamilton, MT - #233)

PC #: 336

Public Concern: The Forest Service should not consider noxious weeds as an issue that affects long term land use alternatives.

Sample Statement:

The potential for noxious weeds was adequately covered in the EM section. It is not an issue that affects long term land use alternatives. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 335

Public Concern: The Forest Service should recognize the invasive plant issue is beyond control for many noxious species.

Sample Statement:

The invasive plant issue is stated in a misleading manner. The fact is that no Forest did the monitoring or weed control specified in the current forest plans in the 80s and 90s and now the situation is beyond control for many noxious species. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 334

Public Concern: The Forest Service should identify and take remedial action on weed vectors.

Sample Statement:

The Forest Plan should direct that site specific analysis and remedial action for vectors introducing weed seeds and disturbance that prepares the soil to allow weeds shall be done for any area that receives any treatment for control of weeds. Without addressing those factors 'weed control' becomes simply a temporary bandage and is a waste of time and taxpayer money. (Individual, Darby, MT - #582)

Sample Statement:

Off-road motorized travel and motorized trail use accelerate spread of weeds. Other vectors include domestic and wild animals, people. (Place Based Groups, Stevensville, MT - #823)

PC #: 332

Public Concern: The Forest Service should focus on noxious weeds rather than invasive plants because the authority for action is much stronger.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action-In Finding EM-F3, the Forest Service states that invasive plants are recognized as a major threat to native plant communities especially on disturbed sites and grasslands. Approximately 666,400 acres on the three forests are infested with invasive species. We agree that the potential for introduction and spread of invasive species is high in some areas, and that there is heightened awareness of the need for education, prevention and control. We support your proposal 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; however, we strongly caution the use of the term "invasive plants." Congress has given the Secretary of Agriculture specific line authority to eradicate "noxious weeds". In addition, Congress appropriates additional funds for noxious weed control because of the Secretary of Agriculture's authority. The Secretary of Agriculture does not have the same congressional authority to eradicate or control "invasive plants"; and therefore use of this terminology weakens the Forest Service over-all weed control program. (Timber or Wood Products Industry, Kalispell, MT - #539)

PC #: 338

Public Concern: The Forest Service should restrict OHV/ORV use to prevent the spread of weeds.

Sample Statement:

This is particularly troubling in light of the Forest Services Chief, Mr. Bosworth, has identified invasive species and unauthorized ORV use as the great dangers to public lands in the west. The two go hand in hand, and you do the land in your care no favor by expanding opportunities for ORVs to spread more weeds across the landscape. (Individual, Calabasas, CA - #915)

Sample Statement:

Lets do something about the tragic incursion of noxious weeds into our forests. There has to be a strong plan of weed prevention, and that means prohibiting ORVs in new areas, and turning them out of others. (Individual, Missoula, MT - #593)

PC #: 330

Public Concern: The Forest Service should be prudent in its use of chemicals for weed control.

Sample Statement:

I agree with this, with the condition that all such treatments, particularly chemical treatments, must be biologically sound. This means that they will not cause any secondary harm to the environment or to humans. There is a lot we don't know about how chemicals affect the environment and humans, so these treatments should be used prudently. (Individual, Bigfork, MT - #475)

Sample Statement:

Weeds are a serious and difficult problem, but what are the effects of repeat applications of poisons on wildflowers? For example, I'm fairly certain that the aerial application on Blue Mountain in 2003 killed a lot of Bitterroot flowers. I urge more study and caution in the use of herbicides. (Individual, Missoula, MT - #651)

PC #: 339

Public Concern: The Forest Service should work with adjacent landowners in controlling invasive species.

Sample Statement:

The FS needs to work with adjoining landowners in controlling invasive species. Wilderness, roadless and wilderness study areas should receive high priority to prevent the spread of noxious weeds into our most treasured areas. Discussion: Plum Creek lands in the Swan Valley are full of knapweed from poor logging and cleanup practices. Those weeds are spreading to national forest lands rapidly. (Individual, Condon, MT - #638)

Sample Statement:

Cross-boundary approach is needed, weeds are in private lands adjacent to forest, all aspects need to be addressed in an integrated fashion. (Place Based Groups, Stevensville, MT - #823)

PC #: 325

Public Concern: The Forest Service should implement an aggressive program of integrated weed management that uses a combination of all of the weed prevention and control tools.

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

We agree with Finding EM-F3 regarding the need to better address the threat of invasive plants, and use of an integrated weed management strategy (Action EM-F3-A1). (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

Noxious weeds and increaser shrubs, forbs, and grasses have consumed up to 80% of the grass, forb, and browse forage on many ranges. It is very important to quickly provide herbicide and/or mechanical treatment there, and on any and all bare or disturbed areas. Noxious weeds must be aggressively controlled along roads by mainly herbicide spraying. Treated areas should quickly be re-vegetated with grass and/or native vegetation, and then monitored and weeds controlled as necessary. Vehicles and equipment must be required to be thoroughly washed prior to entering on the forest. Horses hooves should also be washed and inspected to reduce weed seed spread. Of course, horses should be on a weed-free diet prior to entering into the forest as well. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

[Mineral County's] Goal: Eradicate to the extent possible noxious weeds within Mineral County, and eliminate any new infestation that may become established and/or exist in the county. (County Agency or Official, Superior, MT - #507)

Sample Statement:

Invasion of noxious weeds is a significant concern of the CRC. Weed invasions threaten the productivity; diversity, and integrity of forest ecosystems. We agree with the proposed action that this will need a coordinated and aggressive plan. (County Agency or Official, Seeley Lake, MT - #538)

Sample Statement:

Conclusions: The group noted that invasive species will disrupt the whole ecosystem including water quality and management plans. It must have greater emphasis in the plan, a higher priority, and be underpinned by additional funding for weed management (See "High Priority Issues Identified by the Chief of the Forest Service"). (Place Based Groups, No Address - #825)

PC #: 328

Public Concern: The Forest Service should consider the spread of invasive plants when managing roads.

Sample Statement:

Of the problem of spreading invasive species. Roads are one of the biggest contributors to spreading noxious plants. I believe the spreading of invasive plants should be a major criteria/thought when managing roads. (Individual, Missoula, MT - #273)

PC #: 337

Public Concern: The Forest Service should increase public awareness and identification of noxious weeds and enforce weed prevention measures.

Sample Statement:

[Proposed Additional] EM-F3-A3: We propose to increase public awareness and identification of noxious weeds through education and enforcement. (Place Based Groups, No Address - #822)

Sample Statement:

Suggest advertising campaign to control weeds, and educate the public. (Place Based Groups, Darby, MT - #829)

Sample Statement:

Partly a law enforcement problem (off-road motorized). (Place Based Groups, Stevensville, MT - #823)

PC #: 329

Public Concern: The Forest Service should fairly evaluate and balance weed management activities considering the natural ability of the weeds to spread versus human activities' contribution to weed spread. Weed control measures should be applied fairly across all users.

Sample Statement:

The transport mechanism for noxious weeds includes all visitors and uses of public lands including hikers, equestrians, and cattle grazing in addition to motorized recreationists. Many events including fire, floods, and the importation of invasive species also contribute to noxious weed problems. For the most part, vehicles do not have a surface texture that will pick up and hold noxious weeds seeds. Transport mechanisms based on hair, fur, manure, shoes, and fabrics are more effective than the smooth metal and plastic surfaces found on vehicles. Additionally, motorized recreationists practice the "Wash your Steeds" policy. However, closures due to noxious weed concerns are only placed on motorized recreationists. We have observed an equal amount of noxious weeds in non-motorized areas as there are in motorized areas. We request that the document make a fair evaluation of all sources and uses that contribute to the noxious weed problem including hikers,

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

mountain bikers, equestrians (non-use of weed-free hay), etc. The document should also fairly evaluate how natural processes and wildlife spread noxious weeds. The document should include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors and with a realistic representation of noxious weeds natural ability to spread versus a relative magnitude for every human activity's contribution. (Recreational, Helena, MT - #339)

PC #: 340

Public Concern: The Forest Service should include direction that herbicides, pesticides and other chemicals be used in a safe manner in accordance with label instructions and restrictions.

Sample Statement:

We encourage the WMPZ to include direction that herbicides, pesticides, and other toxicants and chemicals be used in a safe manner in accordance with Federal label instructions and restrictions that allow protection and maintenance of water quality standards and ecological integrity, and avoid public health and safety problems. (Federal Agency or Official, Helena, MT - #257)

Section: Fire Management

PC #: 194

Public Concern: The Forest Service should carefully consider all relevant factors when deciding which management tools to use for reduction of fire risk and excess fuels.

Sample Statement:

Among the information to consider and analyze are: 1) Normal fire return intervals and mortality levels from disease or insects; 2) Post-treatment landscape vs. desired forest age class, composition, structure (How far outside the natural range of variability and disturbance regimes are areas to be treated? What forest types (e.g., cold, moist, or dry), stand densities and species composition are to be treated? Do these vary from similar sites that have experienced natural disturbances? Are fuels treatments directed at density management, thinning from below, strategically placed treatment units, etc.); 3) Funding for fuels treatments (Are large trees being cut to fund fuels reduction? Are wildlife or restoration funds available to carry out fuels reduction to meet desired future conditions?); 4) Trade-offs of adverse water quality, fisheries, wildlife impacts of fuels treatments (Will fuels reduction require new road construction or reconstruction of roads? Will riparian areas, wetlands, and other important habitats be treated differently than the rest of the landscape?) 5) Monitoring (Is pre- and post-project monitoring proposed?). (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

Drought, over crowding, endemic bugs. (Individual, No Address - #272)

Sample Statement:

The fire condition class map for the forest is a place we can start a dialogue about what we want future forest conditions to be like. (County Agency or Official, No Address - #69)

Sample Statement:

Fire season 2000 and 2003 will forever be in my mind. As a long time Bitterroot valley resident, these years stand out as forest fire smoke inversion years that took tolerance to the breaking point. So much so that I must admit agitation, tempered with sympathy, whenever the Forest Service engages in management-ignited prescribed burns. Frankly, open burning, by the general public and ranchers, is cause for concern. However, given the vastness of Federal, State, and private land and the abundance of fuel and lack of funding for fuel reduction, I see no immediate solution other than to burn. (Place Based Groups, Victor, MT - #560)

Sample Statement:

Before large-scale thinning is done on these Forests impacts to migratory songbirds, threatened, sensitive and endangered species, big game summer and winter range, and closed canopy dependent wildlife and birds needs to be fully assessed. (Preservation/Conservation, Big Fork, MT - #708)

Sample Statement:

Values and ecosystems at risk should not be used as blanket excuse for wholesale logging that disregards' broader environmental' concerns, such as management for species at risk. (Individual, Bigfork, MT - #475)

PC #: 187

Public Concern: The Forest Service should carefully consider the situation before using natural or management ignited fires for resource benefits, even in wilderness and recommended wilderness areas.

Sample Statement:

I certainly agree with expanded role of fire in wilderness, recommended wilderness and for other resource benefits. I am only cautiously supportive of management ignited fire in wilderness because often the limits of fire under management are less than needed for the ecosystem.. i.e. cool fires will never rejuvenate riparian areas. I would agree with such ignitions only on boundaries where private lands may be threatened by natural fire. (Individual, No Address - #53)

Sample Statement:

When a fire burns in a limber area implement properly designed harvest methods immediately. These should be planned, prepared, and approved prior to the fire event. These should have simple mitigation measures not the ones developed for the fires of 2000. An immediate reinvestment of funds from the commercial harvest should be made in the affected forest areas as restoration or forest improvement. Treatment should be planned to recover as much value as possible of the burned areas. (Timber or Wood Products Industry, Stevensville, MT - #555)

Sample Statement:

Before the use of management ignited fires every effort should be made to harvest commercial timber from the area to be burned. (Individual, Columbia Falls, MT - #673)

Sample Statement:

ONLY UNDER COOL OR MOIST CONDITIONS: I support the use of management-ignited fires to better emulate natural conditions. I believe as a result of fuel buildup through fire suppression that some of the recent wilderness wildfires have burned at a much higher intensity than normal. Management ignited fire during the shoulder seasons and wetter years would maintain more of a healthy mosaic forest, which provides more diverse habitat and recreation opportunities. (Individual, Seeley Lake, MT - #517)

PC #: 189

Public Concern: The Forest Service should use both fire suppression and fire ignitions (natural and prescription) to help restore and maintain forest health.

Sample Statement:

Use both fire suppression and the utilization of fire to support and expand multiple uses and achieve management goals. (County Agency or Official, Superior, MT - #507)

Sample Statement:

We agree with the need to restore fire as a natural disturbance process, and to address competing and unwanted vegetation and fuel loads, fire risk and forest health. (Federal Agency or Official, Helena, MT - #257)

Sample Statement:

In spite of pronouncements to the contrary, large landscape-scale fires clearly occurred in the past on the BNF, witness the Fires of 1910 and the 1898 Leiberg maps. The ecosystems recovered from these events and were healthy until efforts to contain fire led to unhealthy landscapes we have now. However, the realities of the early 21st century make it mandatory that fire management be revisited. We support maximal reintroduction of natural and prescribed fire into all areas of the BNF, including riparian areas. The drainages we have visited since the fires in Blodgett Creek, Mill Creek and the Upper East Fork all show robust and hardy re-vegetation, increased recruitment of large woody debris, and overall healthy conditions. We support efforts of the BNF to promote fuel reduction in the urban wildland interface. (Individual, Hamilton, MT - #292)

PC #: 185

Public Concern: The Forest Service should expand its use of naturally ignited and management ignited fires for resource benefits, including the use of management ignited fires in wilderness and recommended wilderness areas:

Sample Statement:

TO RESTORE HEALTHY FORESTS: Fire is a vital, natural component in the N. Rockies ecosystem. Prescribed burns allowing natural fires to burn would do much to help restore healthy forests. (Individual, Missoula, MT - #466)

Sample Statement:

TO IMPROVE HABITAT: Managed fire is an important tool to manage wildlife habitat. It was historically used in the Selway Bitterroot Wilderness before it was designated as a wilderness area. Suggest need to use prescribed fire in cirque basins to restore whitebark pine. (Place Based Groups, Stevensville, MT - #823)

PC #: 200

Public Concern: The Forest Service should conduct public education on the benefits and risks of fire, and provide incentives for landowners to apply best defensible space practices.

Sample Statement:

Education of the general public that all fire is not bad! (Individual, Darby, MT - #286)

PC #: 186

Public Concern: The Forest Service should NOT expand its use of naturally or management ignited fires for resource benefits, even in wilderness and recommended wilderness areas because of the associated risks, a belief that timber should be harvested and not burned, or because of a general aversion to prescribed burning.

Sample Statement:

Given increasing concerns over air quality, introducing additional smoke and particulate matter from management-ignited fire may not be the best solution to meet stated goals. Additional risk to fragile ecosystems and subsequent suppression costs associated with managed fire that goes out of prescription can quickly erase any perceived benefit. Consider other alternatives, even in wilderness areas to meet management objectives with lower overall risk to the ecosystem. (Individual, Trego, MT - #213)

Sample Statement:

I don't like 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.)because....Not comfortable with "prescribed burns" (Individual, No Address - #81)

Sample Statement:

No prescribed burns on any forest service lands!! Timber to be managed not burnt! Selective logging, thinning, & brush removal (possibly by controlled burning after logging & thinning). To control unwanted forest fires, thus improving this renewable resource & creating much-needed jobs for Montana. (Individual, Conrad, MT - #722)

PC #: 195

Public Concern: The Forest Service should apply other non-fire management tools for reducing fuels, instead of fire, in combination with fire, or before resorting to the use of fire.

Sample Statement:

Because of the relatively short window for broadcast burning, mechanical means of slash disposal will be necessary: dozer and/or grapple piling and chipping must be incorporated in order to safely get ahead of some of the burning requirements. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

Although prescribed fire may also be used to accomplish ecosystem management, it should be used where vegetative and/or mechanical treatments are impractical or otherwise inappropriate. (Timber or Wood Products Industry, Kalispell, MT - #539)

Sample Statement:

Given increasing concerns over air quality, introducing additional smoke a particulate matter from management-ignited fires may not be the best solution to meet stated goals or public desires. Consider other alternatives to managed fire whenever possible, even in roadless/wilderness areas, to meet management objectives with lower overall risk to the ecosystem. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

PC #: 211

Public Concern: The Forest Service should not conduct salvage operations in roadless areas or old growth.

Sample Statement:

On the issue of fuels management, I urge you to use appropriated funds much more wisely and honestly than you have in

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

recent years. The risk reduction through under thinning and prescribed fire should be a priority objective in the urban interface areas, and you should place much more emphasis on this need. Along the same lines, I urge you to discontinue logging old-growth trees, roading, and opening up roadless areas in the name of salvage, restoration, and fuels management. (Individual, Hot Springs, MT - #516)

PC #: 198

Public Concern: The Forest Service should include the forest-private interface in its lands designated as suitable for regulated timber harvest.

Sample Statement:

Include all of the National Forest//private interface in the suitable timber base. Exempt interface acres from re-forestation standards. (Place Based Groups, No Address - #967)

PC #: 197

Public Concern: The Forest Service should not use prescribed burning in then forest-private interface.

Sample Statement:

Do not use Prescribed Fire as a tool in the wildland/urban interface. (Place Based Groups, No Address - #967)

PC #: 604

Public Concern: The FS should aggressively manage weeds by focusing on prevention, early treatment, education, research, and access limitations.

Sample Statement:

I would like to know why have people of your generation chosen to discriminate against not only people of our generation but also all who may be handicapped of all generations by closing the public lands to motorized use-not only by gates and/or total obliterations of old established roads. (Individual, Superior, MT - #419)

Sample Statement:

Invasive species prevention should not decrease or limit public access except in the most unusual and critical situations - education and early treatment (including chemical and biological methods) are preferable to access restrictions. (Individual, Missoula, MT - #413)

Sample Statement:

Another goal in the current plan is to emphasize integrated pest management for weeds -- a very serious concern to our wildlife species, ecosystem and human values. However, any IPM Specialist will tell you that preventing weed establishment dispersal is much easier than managing weed infestation. The best prevention strategy is to avoid soil disturbance, as is clearly state in this plan. Therefore, reclaiming roads, protecting roadless areas and avoiding new road construction is the best way to avoid disturbance and the weeds that come along with it. To this end, no increase in the level of OHV use should be facilitated. (Individual, West Glacier, MT - #601)

PC #: 204

Public Concern: The Forest Service should not provide unreimbursed fire protection for structures in outlying areas.

Sample Statement:

I strongly support assessing homeowners the true cost of protecting their homes from wildfires. The homeowner is isolated from the true cost and risk of living in the woods. Wildfire protection districts should be created in the urban interface that would be responsible for full reimbursement of wildfire fighting costs in the district. (Individual, Missoula, MT - #46)

Sample Statement:

Forest Service's senior fire scientist, Jack Cohen's research shows that a structure's ignition zone is within 200 feet of the structures itself. In most cases residences and associated structures are located on private lands and are outside National Forest fire protection boundaries. Are the homes and associated structures that are located in forest fire prone areas ("wildland urban interface") within the fire protection boundaries of rural fire districts? Note - maps should be included in the plan revision showing the areas covered by rural fire districts.2. What residences and associated facilities are outside rural fire district and national forest fire protection boundaries? Note - maps showing location of such structures and facilities should be included in the forest plan revision. Where are they? What are the kinds of structures? Why aren't they included within rural fire district boundaries? When provision will be made for these properties to be included? If the fire protection responsibilities and actions of residents living within rural fire district boundaries is largely voluntary, then its not unreasonable to expect that the fire prevention, pre suppression and suppression actions. of the U.S. Forest service, in regard to private lands that are outside the USFS fire protection boundaries, should be voluntary and/or subject to full

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

financial reimbursement. The public should not be expected to assume the financial burden. (Individual, No Address - #824)

PC #: 196

Public Concern: The Forest Service should not suppress fires solely for the purpose of protecting structures.

Sample Statement:

We oppose placing wildland firefighters at risk with the sole goal of protecting private residences. (Individual, Hamilton, MT - #292)

Sample Statement:

If I decide as a homeowner to move way out in the woods, off-the-grid, so to speak, I really shouldn't expect taxpayers money to be used for the defense of my place. We need to recognize the risk when we move into the wild and be prepared. (Individual, Condon, MT - #638)

Sample Statement:

In the WUI the Forest Service should put the onus on property owners to protect themselves rather than managing for careless landowners. Emphasis should be placed on facilitating and educating for fuel reduction for landowners. (Individual, West Glacier, MT - #601)

PC #: 603

Public Concern: The FS should emphasize IPM, particularly on lands adjacent to other ownerships to prevent and eradicate noxious weeds.

Sample Statement:

Action 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.) Integrated pest management should become a priority, add more urgency than stated. Add an EM-F3-A3: Forest Service should put extra emphasis on lands adjacent to neighbors to work cooperatively with adjacent landowners to prevent and eradicate noxious weeds that have an ability to damage ecological integrity. (Place Based Groups, Condon, MT - #349)

Sample Statement:

EM-F3. We support a stronger emphasis on integrated pest management. We recommend new approaches to prevention be part of this. Prevention should ensure that any proposal for a new road include an evaluation for the risk of weed spread. The benefits of reduced weed spread should also be evaluated when the forests ponder road closures and road retirement. (Preservation/Conservation, Missoula, MT - #488)

PC #: 605

Public Concern: The FS should consider weeds when evaluating the need to close roads.

Sample Statement:

EM-F3. We support a stronger emphasis on integrated pest management. We recommend new approaches to prevention be part of this. Prevention should ensure that any proposal for a new road include an evaluation for the risk of weed spread. The benefits of reduced weed spread should also be evaluated when the forests ponder road closures and road retirement. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

--Ecosystem Management: I strongly agree with Actions 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) and A2 (We propose to incorporate weed prevention and treatment measures with management activities). Any areas that are disturbed by thinning, burning, road removal, etc. create disturbed sites which are ideal for establishment of invasive species.EM-F7-A1 (We propose to develop access management goals, objectives, and standards that would better address the needs of big game and other wildlife species, aquatic species, water quality, and invasive species. This direction would mainly focus on reducing the miles of road), I agree. Road removal needs to include weed treatment and reseeding. (Individual, Missoula, MT - #541)

PC #: 192

Public Concern: The Forest Service should quickly suppress all fires.

Sample Statement:

I am aware of no scientific data regarding the damaging effects of wildfire. Here I am referring to the widespread air pollution, subsequent erosion, and the destruction of public property in the form of commercial timber stands, resulting from wildfires. The USFS's failure to address the detrimental effects of wildfires renders all decisions and policies invalid and subject to litigation. Until there exists data to support a hands off approach to wild fires, the USFS must revert back to the pre-1978 policy of containing all wildfire before ten o'clock the next morning. (Individual, Superior, MT - #597)

Sample Statement:

Develop faster response plans for all forest fires until restoration returns the conditions to "Low-Intensity-Fire Conditions." (Three most important factors: Faster response, faster response, faster response) Use planes to fight fires, even if they are military planes. Fire Suppression: To effect faster fire response time, District Fire Managers should be given authority to contract with local fire suppression equipment operators who have suitable equipment on standby and know the area. Use all equipment available. (Erosion and run off will be many times worse if the fire takes thousands of acres. This is ridiculous. Use everything available, OPEN the roads). (Place Based Groups, No Address - #967)

Sample Statement:

I would urge that we continue to try and control fires on the roadless and wilderness areas as we need to maintain downstream water quality and our fisheries. (Individual, Kalispell, MT - #506)

PC #: 193

Public Concern: The Forest Service should not suppress any fires.

Sample Statement:

There needs to be no fire protection in these forests. Fire is a natural occurrence that provides a natural way for the ecosystem to regenerate and endure. (Individual, Missoula, MT - #742)

Sample Statement:

i would also ask that as much as possible, the forest fire policy should be to let fires burn in those areas. I realize that often circumstances will be such that this policy cannot be followed, but it should be a goal when possible. I realize that such a policy might mean that our cabin might burn, and I am willing to accept that risk. (Individual, Missoula, MT - #246)

PC #: 188

Public Concern: The Forest Service should actively manage to reduce excess fuels before severe fires occur.

Sample Statement:

Through years of misguided management policies we have watched our nation's 190 million acres of forest lands slowly deteriorate into masses of fire-prone vegetation and sick and dying timber. Each year they are increasingly being subjected to massive forest fires consuming all in their path including our treasured wildlife and their habitats, as well as our sources of human enjoyment, economy and industry. With the current revisions underway and new management directions, hopefully this new forest plan will provide the course of action we have been desperately seeking to correct the ongoing desecration of our forests. (Individual, Bigfork, MT - #519)

Sample Statement:

If you suppress fire for a hundred years, have a bad forest management, ie. Logging certain areas of Darby, Sula Ranger Districts in the 80's and 90's that were not burned, planted then. Did burn in 2000 because the lack of action in the past. (Individual, Darby, MT - #286)

PC #: 201

Public Concern: The Forest Service should integrate National Fire Plan direction into its revised forest plans.

Sample Statement:

The EPA is particularly interested in seeing the Plan revisions and EIS address and prioritize Forest and Management Area direction, prescriptions, land allocations, desired conditions, and associated goals, objectives, standards and guidelines, etc., to provide: Integration of National Fire Plan direction, including evaluation of the increased role of fire and other natural disturbance processes (e.g., insects, disease) and ecosystem processes (e.g., flows and cycles of nutrients and water) and their dynamics and smoke/air quality impacts and forest health (including weed management) in developing revised vegetation and fuels management strategies. (Federal Agency or Official, Helena, MT - #257)

PC #: 199

Public Concern: The Forest Service should limit its application of Healthy Forest Initiative provisions to the forest-private interface only.

Sample Statement:

- support of the Healthy Forests Initiative as far as making sure that Wildland Urban Interface areas surrounding communities should be maintained at a level suitable for fire protection but that this same level of management not be applied to further removed areas (Individual, Missoula, MT - #572)

PC #: 190

Public Concern: The Forest Service should not use prescribed fire as a management tool.

Sample Statement:

As to the so called Under burning, you of all people should know that these burns kill more trees than they are supposed to. In fact many of the burns get completely away and do much damage. These Under burns burn ground-nesting bird nests including Grouse. It burns the habitat of the little animals that feed the bigger animals. (Individual, Corvallis, MT - #40)

PC #: 203

Public Concern: The Forest Service should actively manage lands outside the forest-private interface zone to prevent fire starts that could burn into the FPI zone.

Sample Statement:

The National Forest and Private Land Interface Management goals are laudable, but as pointed out in the document resource management involves more than just fire and fuels treatment in the Wildland Urban Interface (WUI). And, in fact, active management must extend far outside the WUI to protect municipal watersheds and to treat disease and bug infestations (Timber or Wood Products Industry, Helena, MT - #334)

Sample Statement:

If the facts were presented honestly, the monitoring data would show that in nearly every case fires that affected the interface areas and destroyed and damaged private property originated miles from the private land. These fires did not "occur" or start in the interface area. The catastrophic fires were exported by firestorm winds from deep within the interior of the forest, often from wilderness or inventoried roadless areas, and they will continue to do so until the fire hazard is reduced in multiple use areas. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

We simultaneously need to be proactive outside of the forest-private interface zone also. Ignitions are going to occur there also and under current drought conditions managed areas adjacent to unmanaged are going to be over run in crown fires. In my view the ignition point and how it accommodates an initial quick attack is of most importance (Individual, Whitefish, MT - #811)

PC #: 216

Public Concern: The Forest Service should include the forest-private lands interface in the suitable timber base.

Sample Statement:

Action FP-F1-A3: (We propose to exclude the National Forest and private land interface near human development from the suitable timber lands. Management actions in the interface zone may result in limitations on regeneration, reductions in stocking levels and other actions not ordinarily compatible with the long-term production of timber. However, timber harvest would occur where it is the FP-F1-A3 states that the Forest Service proposes "to exclude" the interface lands "from the suitable timber lands", but then goes on to state "it is anticipated that these lands would produce a substantial amount and variety of forest products". [We question] the rationale and need for excluding the interface lands from the suitable base. Since it is anticipated that these lands would produce a substantial amount and variety of forest products, than it is highly appropriate, and necessary, for the interface lands to be included in the suitable base. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

Finding NF-F2: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.)Let me get this straight. 21 percent of private land is moderate to high

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

while 59 percent of NFS land is high, Action FP-F1-A3: (We propose to exclude the National Forest and private land interface near human development from the suitable timber lands. Management actions in the interface zone may result in limitations on regeneration, reductions in stocking levels and other actions not ordinarily compatible with the long-term production of timber. However, timber harvest would occur where it is the appropriate method of achieving objectives. It is anticipated that these lands would produce a substantial amount and variety of forest products.): This is absolutely nuts. WUI lands should be RETAINED in the WUI and those lands should be a SHOWCASE for active, best management practices. The time for hiding good forestry is long past. WUI lands are in far worse shape vis-a-vis fire risk and weeds, and should be the place where the public is shown how land should be managed. (Multiple Use or Land Rights, Whitefish, MT - #721)

PC #: 210

Public Concern: The Forest Service should cooperate with landowners, local and tribal governments, and other agencies in management of the forest-private lands interface.

Sample Statement:

Encouraging fuels management activities, fire risk reduction programs, and increased recreational opportunities are precisely what the American public is asking for as more people move into the forests fringe. The USFS needs to continually work with the local communities in developing effective Wildland Urban Interface Fire Mitigation Plans. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

Sample Statement:

The participants agreed that the private land contiguous to National Forest is indeed private land and should be treated as such without taking away property rights. The trust is not there for Forest Service personnel to order the land owners to pursue a certain course of action to mitigate fire danger. Their distrust is based on recent experiences with the inability of the fire crews to control fires and the fact that most fires start on the National Forest. The participants have high regard for local officials and people who have experience with the local forest and believe that there are many options available to mitigate fire danger. In some cases the area could be clear cut while in other cases the underbrush could be removed and the large trees thinned. The participants are willing and ready to do their part to reduce fire danger, but want to have input into the final decision as to how best to reduce the fire danger in their respective areas on both the private and public interface. The majority opinion was to remove underbrush and thin trees to prevent the fire from laddering and then traveling from crown to crown. (Place Based Groups, No Address - #967)

PC #: 212

Public Concern: The Forest Service should not establish a separate Management Area for the forest-private lands interface.

Sample Statement:

Current problems causing the interface issue is a direct consequence of the leadership and professional abilities of current forest managers. A special interface management area is not necessary to implement the management that is needed. We surmise the map only rated a small area (1/4 mile or so?) around inventoried dwellings. If that is true, the white area on the map should be rated "unclassified". To lead people to believe there is "No Risk" as labeled on the map is extremely unprofessional if not downright dishonest. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 214

Public Concern: The Forest Service should aggressively use all appropriate tools allowed under the Healthy Forests Restoration Act, with first priority on the forest-private lands interface.

Sample Statement:

The USFS should aggressively use all appropriate tools given to them in the December 2003 HFRA Bill to reduce fuels and the risk of wildfires, with the priority being, but not limited to, the Wildland/Urban Interface. (Place Based Groups, No Address - #968)

PC #: 215

Public Concern: The Forest Service should, when fire danger is high, restrict access and use within the forest-private interface sooner than in other areas of the forest.

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

During high fire danger, roads and OHV use in the interface should be closed earlier than in areas of the forest farther away. Our home in Columbia Falls is in the Forest interface and people's behavior driving nearby forest roads or riding ORVs terrifies us every fire season. Fires started by kids partying, sparks from ORVs and the numerous cigarettes flicked out the window can start a fire that will threaten homes within minutes. (Preservation/Conservation, Polebridge, MT - #705)

PC #: 208

Public Concern: The Forest Service should consider potential impacts on adjoining lands, both National Forest and private, when conducting fire management activities in the private-forest lands interface.

Sample Statement:

In some cases highly important and/or valuable cultural developments are adjacent or in immediate proximity to other National Forest lands and/or private forestland which may be negatively impacted by activities or lack thereof within the WUI. Additionally, private or National Forest developments may be at risk: dams, reservoirs, marinas, ski areas, and other private recreational developments. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

Another major concern for FWP will be how the Forest proposes to balance forest stand' conditions in areas that you may identify as urban interface areas or other "overstocked stands" when those areas overlap with important big game winter ranges for deer and elk. Big game winter habitat for deer, and in some cases for elk, depends on closed- canopy forests that intercept snowfall. Both fire risks in the urban interface and desires to manage forest stands in more "natural" stand densities threaten to decrease winter range habitat values. We have worked with Mike Hillis on regional forest planning efforts to identify some of our concerns relative to elk in deep-snow winter range areas. We would like to see modified management guidelines for elk winter ranges that receive heavy snowfall. FWP hopes that your plan will find a way to integrate forest health and fuel reduction needs with maintenance of forest habitat structure needed on many of these important big game winter ranges. (State Agency or Official, No Address - #694)

Sample Statement:

Fuels reduction on Forest Lands is not a priority issue. A few areas adjacent to private lands could use a little treatment in conjunction with landowner cooperative efforts on their own land. (Individual, Columbia Falls, MT - #659)

PC #: 209

Public Concern: The Forest Service should consider social, economic, and ecosystem factors together, and not give higher priority to social and economic factors when managing the forest-private interface.

Sample Statement:

Action NF-F1-A2: (We propose in the interface zone to emphasize social and economic needs over ecological components, where appropriate, due to human population density, development and use.): Change "interface" to "balance", and remove "where appropriate". There is no need to balance one over the other. Just work together with all values and risks on the table. (Individual, Condon, MT - #312)

Sample Statement:

Action NF-F1-A2: (We propose in the interface zone to emphasize social and economic needs over ecological components, where appropriate, due to human population density, development and use.): This action item should be re-written similar to the following: "we propose to consider social and economic needs as well as ecological components with appropriate consideration toward human density and development in the interface zone." The group agreed that social and economic needs should not preempt ecological components. (Place Based Groups, No Address - #825)

PC #: 206

Public Concern: The Forest Service should use values and ecosystems at risk as primary considerations when setting priorities for management of fire and fuels in the forest-private lands interface.

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). Protecting residential areas near cities and towns should be the top priority for fuel management activities, which is not stated here. (Individual, Missoula, MT - #510)

Sample Statement:

Using "values and resources at risk" to prioritize treatments is only common sense and should have been implemented years ago. (Multiple Use or Land Rights, Bigfork, MT - #588)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

The wildland-urban interface must be defined in a manner that is truly protective of homes and communities by focusing attention on preventative actions near homes, not miles from them. The Forest Service must emphasize education for homeowners about the risks of living in the wildland-urban interface. It also needs to better educate the public about the risks of wildfires and that, like hurricanes and earthquakes, these are natural events that are driven by weather conditions and drought. (Business, Missoula, MT - #616)

PC #: 205

Public Concern: The Forest Service should designate a forest-private lands interface zone that is large enough to afford protection from large advancing fires, but not so large as to invite unnecessary vegetation management in the name of fire hazard reduction.

Sample Statement:

The actual area designated as WUI must be wide enough to present a significant detriment to a moving wildfire. The width of the WUI would vary according to residences in the vicinity, prevailing winds, slope, aspect, and vegetation. Openings and fuel breaks should be developed to provide escape areas for firefighters and the public as well as to provide anchor points for fire suppression activities. Such openings will also allow development of shrub and tree regeneration to enhance the visual resource as well as desirable wildlife habitat and forest stand age-class distribution. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

The agency's efforts need to be prioritized on the interface lands directly adjacent to private property and private landowners need to do their part too. Claiming that the WUI requires continued commercial logging miles from the actual interface also does not increase the Forest Service's public credibility. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

WUI dimensions should be limited to 1/2 mile. Home Ignition Zone (200 feet) should be the highest priority focus for fire sating activities in the WUI zone. (Individual, Darby, MT - #582)

Section: Miscellaneous Forest Products

PC #: 220

Public Concern: The Forest Service should charge fees for commercial use of miscellaneous forest products, but should allow free harvesting for personal use.

Sample Statement:

Removal of landscape items etc. should be treated no different than the sale of timber products. Therefore, commercial landscapers, must be required to bid or purchase forest resources used in commercial ventures. Likewise, commercial harvest of miscellaneous products and mineral materials should be on a paid permit basis. As for general public harvest with no intent for commercial sale, no fees or very limited fees should be the norm unless such practice over populates the harvest area. (Place Based Groups, Victor, MT - #560)

Sample Statement:

Personal use of miscellaneous forest products and mineral materials should not be regulated. Unregulated personal use would not include gathering logs for a log house or gravel for a whole driveway. But it should include a few gallons of huckleberries or mushrooms, less than a pickup load of rocks or gravel, less than 10 cords of firewood. (Recreational, Columbia Falls, MT - #589)

PC #: 217

Public Concern: The Forest Service should identify Management Areas where, within the constraints of sustainability and ecosystem integrity, miscellaneous forest products and mineral materials can be harvested for both personal and commercial use.

Sample Statement:

Reword Action FP-F8-A1 to read: "We propose to manage miscellaneous forest products and materials within the constraints of sustainability and ecological integrity. Such ecosystems will be identified where this is an appropriate use. (Individual, Condon, MT - #312)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

Action FP-F8-A1: "We propose to manage miscellaneous forest products and mineral materials to meet multiple use values, support personal and Forest Service use, and contribute to the local economy. Management areas would be identified where this is an appropriate use." Support (Individual, Hamilton, MT - #233)

Sample Statement:

We support action FP-F8-A1: ("We propose to manage miscellaneous forest products and mineral materials to meet multiple use values, support personal and Forest Service use, and contribute to the local economy. Management areas would be identified where this is an appropriate use.") Sound management decision, good for all parties (Individual, Conrad, MT - #722)

PC #: 219

Public Concern: The Forest Service should regulate the harvest of miscellaneous forest products to prevent resource damage.

Sample Statement:

Miscellaneous forest products are a growing aspect of forest management. This area of management should be addressed assertively recognizing that it relates directly to habitat effectiveness issues, water quality, and (in the case of mushroom picking) may adversely affect the fungi on which tree regeneration depends. Mushroom harvest remains essentially unregulated. In addition, the long-term effects of 'clear-cut' mushroom harvesting must be tempered by set-aside areas. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

More needs to be learned about the long term effect of mushroom harvest on soil productivity and tree growth before large scale harvest continues. (Individual, Columbia Falls, MT - #534)

Sample Statement:

For example, the current impacts of large scale mushroom picking displace wildlife that may rely on these foods. The concentrated human activity may also create potential problems with garbage and other waste attracting bears and thus coming into conflict with humans. (Preservation/Conservation, Missoula, MT - #566)

PC #: 221

Public Concern: The Forest Service should prevent user conflicts by identifying personal use areas that are separate from commercial areas for harvesting miscellaneous forest products.

Sample Statement:

Action FP-F8-A1: "We propose to manage miscellaneous forest products and mineral materials to meet multiple use values, support personal and Forest Service use, and contribute to the local economy. Management areas would be identified where this is an appropriate use." Approve -- designation of management areas for say firewood and being picky should include protecting close areas which have been used by locals traditionally -- there are too many conflicts between locals and commercial users over berries, etc. Some areas should be set aside for local "recreationists" and native materials use. (Individual, Condon, MT - #606)

PC #: 588

Public Concern: The FS should consider fuel loading beyond the private land interface.

Sample Statement:

The forest-private interface is only a piece of the larger problem of excess fuels loading. We should be looking at the annual increase in fuels hazard across the entire forest. "forest products management" and "fuels management" could be synonymous. (Agriculture Industry, No Address - #209)

PC #: 218

Public Concern: The Forest Service should NOT single out particular Management Areas where harvest of miscellaneous forest products is appropriate.

Sample Statement:

Miscellaneous forest products is a site specific issue and not one that would have any effect on alternative land uses. It is misleading, perhaps more accurately dishonest, to imply that existing Forest Plans are "largely silent" on this issue and stating, "Uncontrolled removal of such products can severely impact forest resources." There are many standards and

management direction in current forest plans which in no possible way permit "uncontrolled removal". We think that most people know that permits are required for removal of most anything from the forest, including firewood, Christmas trees, and even mushrooms. (Multiple Use or Land Rights, Bigfork, MT - #588)

Section: Domestic Livestock Management

PC #: 223

Public Concern: The Forest Service should allow recreational grazing of pack and saddle stock.

Sample Statement:

In order to ensure the opportunity for extended pack trips, grazing of pack and saddle stock must be allowed. Grazing conditions need to be monitored regularly so that any problems can be addressed before LAC standards are exceeded. (Recreational, Bigfork, MT - #153)

PC #: 224

Public Concern: The Forest Service should maintain grazing allocations at present levels until range studies indicate that grazing lands are able to support higher levels of use.

Sample Statement:

The plan must maintain livestock grazing permits and grazing allocations at present levels until range-lands are improved and accurate range studies support an increase. (Individual, Roosevelt, UT - #33)

Section: Mineral Resource Management

PC #: 228

Public Concern: The Forest Service should NOT consider oil and gas leasing on these forests, especially not in the Bob Marshall ecosystem.

Sample Statement:

The Bitterroot, Flathead and Lolo National Forests should NOT be considered for oil and gas leasing and should be valued for their pristine condition. (Individual, Denver, CO - #337)

Sample Statement:

I have been very opposed to the drilling of oil and gas here on the "Rocky Mountain Front." Not only is it going to turn a wild country into just another piece of land and increase traffic in that fragile area, the road system that will have to be built will forever change the integrity of the land. Even after the petroleum companies leave, the scars of the roads will forever remain. This too must be considered in the travel plan. (Business, Choteau, MT - #614)

Sample Statement:

I understand that you are accepting comments as to the future of the Rocky Mountain Front. I want to go emphatically on record that I believe the Front should be ENTIRELY OFF-LIMITS TO ANY AND ALL OIL AND GAS DRILLING. The Front is an invaluable piece of landscape and life that humanity needs preserved. It would be IRREPARABLY MARRED by drilling for reasons that simply pale against our need to have such unique and sublime places for what they offer us spiritually-psychologically in a world that grows increasingly unfamiliar and humanity-alienating. The Bob Marshall Wilderness Complex needs to include the entire ecosystem if we are going to protect it from repeated attempted incursions. (Individual, Stockett, MT - #779)

Sample Statement:

Please prohibit or sharply limit mineral development, including oil and gas development on these national forests, especially in roadless areas, eligible W&S rivers, habitat linkage corridors, grizzly, gray wolf, lynx, bull trout and westslope cutthroat trout habitat. (Individual, Roanoke, VA - #796)

PC #: 225

Public Concern: The Forest Service should consider technical suggestions made by industry experts when designing its analysis of the effects of oil and gas leasing.

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Sample Statement:

I suggest the EIS planning for these forests include 1) A resource inventory for oil and gas 2) Consequential effects that surface management decisions might have on extraction of resources 3) Mitigation requirements for activities required to assess "prospectively" of the area, including seismic, exploratory drilling, etc. 4) Assessment of long-range impacts from an oil and gas development that is carried out in compliance with normal lease terms and conditions. (Oil, Natural Gas, or Coal, No Address - #573)

Sample Statement:

However, the FS often fails to consider that once a well is plugged, reclaimed and abandoned, it has no adverse effect on the environment. The key element which must be considered in determining what level of oil and gas activity will be allowed over the life of the plan is not the number of wells which could be drilled, but rather the net effect of surface disturbance and activities. We contend that this "net effect" approach will also have the added benefit of facilitating better land use planning and encouraging multiple-use activities, including oil and gas leasing, exploration and development, on federal lands. (Individual, Casper, WY - #343)

Sample Statement:

The effects on oil and gas opportunities from surface management is only tied to -- not limited to -- economic impacts. Access to public lands for purposes of exploring for and producing oil and gas resources must be considered a separate issue from economic impacts. It must be explained how surface management constrains the availability of public lands for leasing, exploration and potential development. Moreover, compliance with the various leasing laws that require all lands to be evaluated for lease is an access issue that has nothing to do with economics. (Oil, Natural Gas, or Coal, No Address - #553)

Sample Statement:

Valid existing lease rights cannot be changed by a new plan. Voluntary compliance to the new plan may be sought from lessees if activities are initiated. The planning documents should specify if and how valid existing lease rights could be impacted by new leasing decisions. Specifically, potential conditions of approval for operations and other changes must be identified. (Oil, Natural Gas, or Coal, Cody, WY - #805)

Sample Statement:

A comprehensive analysis of the socio-economic benefits of oil and gas development activities in the area should be included. A chart representing costs of administering the mineral program and industry's financial contributions to local, state and federal treasuries would also be appropriate. In addition, we would suggest the Forest Service review the BLM's White River Resource Area Plan (Meeker, Colorado Field Office), Chapter 3; "Social and Economic Conditions." This Plan has a beneficial template to use when conducting the socio-economic analysis for the plan revision. The BLM identified the actual cost of stipulations on industry projects, an innovative approach. In so doing, the Forest Service will have the data it needs to determine the effects of individual alternatives on industry. (Oil, Natural Gas, or Coal, Cody, WY - #805)

Sample Statement:

The plan should allow for the whole resource area to be open for mineral material disposal. (Individual, Roosevelt, UT - #33)

Sample Statement:

The FS must not make assumptions that industry can directionally drill in any situation. Generally, directional drilling is used for field development rather than exploration activities. Drilling of exploration wells is already a difficult and expensive undertaking because it is an attempt to determine where a structure may be without the added knowledge of data from previously drilled wells in the area. The technical limitations of directional drilling do not make it a reliable tool for most exploration wells. Safety factors may make directional drilling unacceptable for over pressured gas formations. These factors coupled with the exponential increase in cost could prevent many prospects from being drilled if directional methods are mandated, thus the benefits of drilling (energy supply and related revenues) would not realized by the state and nation. (Individual, Casper, WY - #343)

PC #: 227

Public Concern: The Forest Service should include oil and gas leasing as a major forest plan revision topic.

Sample Statement:

We are concerned that it appears the Forest Service does not plan to address oil and gas leasing during the process as a major issue. We note that you had been considering including oil and gas leasing as a top priority revision topic as late as last summer. Your July 2003 newsletter listed oil and gas leasing as a priority topic for the revisions. As we understand, the analysis of the management situation has been completed and you will be starting formal scoping for the new revisions and EIS. It is our belief that all mineral resources must be considered to truly address ecosystem management for the three Forests. (Federal Agency or Official, Billings, MT - #55)

Sample Statement:

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

On behalf of Public Lands Advocacy (PLA), following are comments' on the scoping notice for the, revisions of the above referenced LRMPs. PLA is a nonprofit trade association whose members include independent and major oil; gas producers as well as nonprofit trade and professional organizations that have joined together to foster environmentally sound exploration and production on federal lands. As such, we are particularly sensitive to the continually declining federal land base available for oil and gas activities. We are exceedingly disturbed that the Forest Service has failed to include future oil and gas leasing and development as an issue in the plan revision process for the Lolo, Bitterroot and Flathead National Forest Plans. As a multiple-use agency, the FS is responsible for assessing the potential for occurrence of oil and gas resources and to make responsible leasing decisions. It is most effective and cost efficient for these decisions to be made as part of the plan revision analysis process. The purported lack of potential or lack of current industry interest must not be considered a basis for failing to fully address oil and gas issues in the planning process closing lands or imposing constraint on future, development. It has been repeatedly demonstrated that levels of interest change over time, rendering an area previously considered to have low potential highly prospective due to new information, technology or economics. It is important that future opportunities to explore for and develop oil and gas resources not be indiscriminately foreclosed or delayed by exclusion of these issues in the planning process. (Oil, Natural Gas, or Coal, No Address - #553)

Sample Statement:

We plan to drill two wells this spring in Montana. While we currently do not have active plans for the foothills over thrust areas we definitely plan to consider Montana in the future. As a member of the energy industry, I feel personally there is a definite need for all forms of energy and that does include oil and gas, wind, solar, and energy from renewable sources (Business, Cody, WY - #641)

Sample Statement:

While we do not advocate elevating mineral resources above other values, it is critical that all resources be represented equitably not only in the planning criteria, but also in the factors which will be considered by alternative, effects to be addressed in the analysis of environmental consequences and determinations used to select a preferred alternative. 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. We strongly urge 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. Please reconsider your decision and include oil and gas leasing in your plans for the future. (Oil, Natural Gas, or Coal, Parker, CO - #873)

PC #: 230

Public Concern: The Forest Service should allow commercial stone quarries that are kept out of public view, and are used for improvement of National Forest lands only.

Sample Statement:

Stone quarries may be permitted on national forest, but only in backcountry and out of the public view - certainly away and out of sight from public roads and recreation areas. (Collaborative Group opinion) (Place Based Groups, Paradise, MT - #258)

Sample Statement:

No commercial quarries or pits should otherwise be permitted on the National Forest. (Place Based Groups, Paradise, MT - #258)

PC #: 229

Public Concern: The Forest Service should monitor to determine when land use activities are approaching thresholds, beyond which resource sustainability may be threatened.

Sample Statement:

We recognize that the Forest Service is already required to conduct certain monitoring activities. However, we would like to see broader monitoring efforts and would recommend that the Forest Service adopt the means for determining when land use activities are approaching the management threshold established in the plan to ensure resource sustainability and land management continuity are maintained. Integrated routine monitoring must be done on all resource activities, including grazing, mining, wildlife, vegetation management, air and water quality, in addition to oil and gas activities, to get a true picture of actual cumulative effects. It is of particular importance for monitoring to be done on areas of heightened activities on at least an annual basis. Annual monitoring of activities in these areas will give the Forest Service the opportunity to acquire critical information useful for daily and long-term management flexibility. With advance knowledge of when

thresholds are being approached, it will be possible for the Forest Service and project proponents to develop acceptable measures to mitigate or reduce potential effects to an acceptable level. Similarly, the effectiveness of mitigation measures can be tests. The White River RMP is an example of an effective monitoring plan. It is crucial for, the Forest Service to avoid responding to new developmental proposals with reactions that halt all activity pending completion of a new environmental impact statement. (Oil, Natural Gas, or Coal, Cody, WY - #805)

Section: Special Use Facilities Management and Permitting

PC #: 241

Public Concern: The Forest Service should conduct an assessment of historic and expected future uses and maintenance activities associated with wilderness dams.

Sample Statement:

Agreement was reached that: The first "action" under this finding (WRD-F4-A5) should be Conduct an assessment of uses served by the dams, history of dam maintenance (are users maintaining the dam up to standard), and how many users are willing to be assessed to maintain and reconstruct the dam when it is needed. The objective is to add validity, accountability, and credibility to the existence and expenses incurred from dam management. (Place Based Groups, Stevensville, MT - #823)

PC #: 240

Public Concern: The Forest Service should require wilderness dam owners to follow up any dam repair or maintenance with reseeding and weed control.

Sample Statement:

All maintenance should be followed by reseeding as needed and weed control. Dam owners should be required to control weeds around their dams. (Individual, Missoula, MT - #541)

PC #: 237

Public Concern: The Forest Service should assure that wilderness dams are not removed or dismantled.

Sample Statement:

Wilderness dams. These historical features play several crucial roles on the BNF. They are part of the historical tapestry of early non-Native American settlers, antedating any wilderness or even forest service designation, and should be recognized as so. They provide important recreational opportunities and also critical late season flows to lower reaches of the particular drainages. Therefore, we recommend that 1) No effort be made to remove or dismantle these structures. 2) Their historical value and legitimacy be formally recognized. 3) Necessary repairs and maintenance be allowed with the smallest overall impact on wilderness values. 4) Efforts be mounted to provide the relevant irrigation districts with funds to maintain and repair the structures. (Individual, Hamilton, MT - #292)

Sample Statement:

We support operation, maintenance and reconstruction of existing wilderness dams for agriculture, aquifer recharge, late season and in-stream flow. (Preservation/Conservation, Hamilton, MT - #957)

PC #: 236

Public Concern: The Forest Service should allow unrestricted use of mechanized means for accessing and maintaining wilderness dams.

Sample Statement:

The dams on the Bitterroot National Forest and in the Lolo National Forest Rattlesnake Wilderness predate the Wilderness Act, therefore adjustments should be made concerning access to the dams for all maintenance: access by helicopter, trail type motorcycle (or scooter), snowmobile, and ATV if the access trail is suitable. When major reconstruction is necessary, it should be acceptable to helicopter in or walk in heavy equipment. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

Action WRD-F4-A1: "We propose access to the dams for operation, maintenance; reconstruction and breaching activities

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

would be by primitive means such as stock and/or foot travel, whenever reasonable". Comment: This proposal is unacceptable. Access as determined necessary by in holders to meet their needs is guaranteed under federal law. Access by primitive means does not address the access needs of the dam owners and is not reasonable. This proposal fails to acknowledge present and future access needs, methods, time frames, and maintenance and upgrading of access routes for dam safety and operation purposes. Access is a given in modern and prudent dam management and is not a subject for debate to be allowed "whenever reasonable". (Utility, Corvallis, MT - #353)

Sample Statement:

" We propose mechanized access be allowed when analysis indicates this is the most appropriate means in a given situation. Mechanized access would be accomplished in ways that minimize impacts to wilderness values.": Again, who defines "reasonable?" As these dams predate either the Organic Act, the establishment of the National Forest, the Selway designation, and/or all three, reasonable should be only in the eyes of the rights holders and dam owners. If mechanized, motorized equipment is the most economic means of dam repair, maintenance, or improvement, then such equipment should be allowed without question, If USFS demands nonmotorized, nonmechanized means of work, then the agency should be responsible for every dime of the additional cost. Breaching proposals should only be presented by those holding the rights to the dams, not the agencies. Rights holders have rights, not subject to permission by postdated agencies. All references to breaching in this document and in future Plan documents should be eliminated. (Multiple Use or Land Rights, Whitefish, MT - #721)

PC #: 234

Public Concern: The Forest Service should NOT allow storage of dam repair and maintenance equipment on site.

Sample Statement:

Action WRD-F4-A5: "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." COMMENT: It is recommended that storage of equipment or the building of any type of temporary or permanent structure not be allowed in or near any dam structure. This storage or storage structure should also not be allowed inside or outside the wilderness boundary. This would violate the spirit of the wilderness with the primitive and non improved setting which is currently in place. Maintaining this wilderness character is absolutely essential. Allowing storage or storage structures at dam sites may start to set a precedent as to allow the public and outfitters to start a process to allow "legal" caches of items inside or outside of the wilderness. Use or storage of watercraft with motors should be prohibited for dam maintenance, with the exception of a temporary emergency, and that must be evaluated on a site specific basis, and usage would be supervised by USFS and use limited to the very shortest time possible. (Individual, Hamilton, MT - #230)

Sample Statement:

There should be no structures or caches allowed at any camp areas or dams. (Individual, Stevensville, MT - #364)

Sample Statement:

Action WRD-F4-A5: "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." I see no reason that a **cach** of any kind is NEEDED for the safe operation of these water facilities. I realize the dam users always say otherwise but a cache is nothing more than a convenience. (Individual, Hamilton, MT - #807)

PC #: 231

Public Concern: The Forest Service should balance the intent of the Wilderness Act, the rights of private dam owners, and dam safety requirements when managing wilderness dams.

Sample Statement:

Wilderness Dams: "The Bitterroot Forest Plan currently provides little direction on how these dams are to be managed Direction will need to balance protection of national forest lands and resources, maintain the integrity and purpose of the Selway Bitterroot Wilderness designation, and recognize "the legal rights and responsibilities of the dam owners to access, operate and maintain their dams efficiently and in compliance with dam safety standards. There is a need to provide some overall direction in the forest plan on these topics, so that the management approach will be more consistent through time and more visible to dam owners and the general public" I agree completely with this statement but it is important that your public understand the total picture. (Individual, Missoula, MT - #513)

Sample Statement:

We support access to Wilderness dams by stock and foot travel, and limited use of helicopter access when analysis indicates it is the most appropriate for the given situation. We support efforts to insure all dams are safe and can be maintained with minimal cost and effort. We believe there are ways both to maintain Wilderness dams and protect the Wilderness. (Preservation/Conservation, Stevensville, MT - #612)

PC #: 233

Public Concern: The Forest Service should allow storage of dam repair and maintenance equipment on site.

Sample Statement:

Incompatibility of modern dam safety standards and wilderness minimum tools analysis. Dam safety standards often require large equipment, not primitive tools and power. Need to keep safety equipment and supplies on site. (Multiple Use or Land Rights, Stevensville, MT - #192)

Sample Statement:

Action WRD-F4-A5: "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." Comment: This proposal is unacceptable. The dam owners' ability to store maintenance and emergency equipment is not a topic for analysis and debate, it is an important and known aspect of prudent dam maintenance and operation. (Utility, Corvallis, MT - #353)

Sample Statement:

Action WRD-F4-A5: "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." This section is in conflict between what Dam owners need and what the Forest will agree to. This is not what Dam owners will accept. This whole section on Dams is unacceptable. (Agriculture Industry, Victor, MT - #773)

PC #: 235

Public Concern: The Forest Service should favor primitive means for accessing and maintaining wilderness dams, allowing mechanized means only when analysis indicates they are most appropriate for a given situation.

Sample Statement:

We propose use of light motorized tools such as chainsaws, motorized drills, compressors as well as explosives, generally not be allowed on the dam structure and impoundment for the purpose of maintaining, operating, reconstructing or breaching the dams. However if it is not possible to complete needed work with traditional tool the Forest Service will authorize use of motorized equipment and/or explosives subject to *could impose* [delete] reasonable restrictions on such use to reduce impacts to the Wilderness resource *values.* [delete]. (Individual, Missoula, MT - #513)

Sample Statement:

We support access to Wilderness dams by stock and foot travel, and limited use of helicopter access when analysis indicates it is the most appropriate for the given situation. We support efforts to insure all dams are safe and can be maintained with minimal cost and effort. We believe there are ways both to maintain Wilderness dams and protect the Wilderness. (Preservation/Conservation, Stevensville, MT - #612)

Category: Social Values

Section: Social Values Management Actions

PC #: 251

Public Concern: The Forest Service should designate quiet use areas in the forest plans.

Sample Statement:

Help to maintain quiet user areas for the future of Flathead Forest. (Individual, Kalispell, MT - #463)

PC #: 248

Public Concern: The Forest Service should consider protection and maintenance of local customs, culture, and history in its decision making processes.

Sample Statement:

*Respect Native American traditions, culture and rights of the Bob Marshall Country (Individual, Helena, MT - #568)

Sample Statement:

Make management policies that take into consideration the heritage, customs and culture of communities adjacent to, and with historic economic dependence on the national forests. (Place Based Groups, No Address - #967)

Sample Statement:

The use of the existing network of motorized roads and trails is part of local culture, pioneer spirit, heritage and traditions. All of these values have ties to the land. Visitors to public lands benefit from all of the motorized roads and trails that exist today. The quality of life for the multiple-use public is being impacted by the cumulative effects of all motorized and access closures...We request that the criteria for high standards of living and a wide sharing of life's amenities include the preservation of motorized roads and trails based on the recognition of the values (ties to the land) that they provide to local culture, pioneer spirit, heritage, traditions, and recreation. (Recreational, Helena, MT - #339)

PC #: 243

Public Concern: The Forest Service should use both value judgments and objective data when assessing and responding to social concerns.

Sample Statement:

..conflicts over values are likely to be more important in determining the direction of ecosystem management than any questions about the science. I applaud Cortner and Moote's suggestion that ecosystem management should be normative: "Primary weight can be given to judgments based on ethical choices between competing values; normative viewpoints can be incorporated into analysis." The classic, most oft-cited normative statement that applies to ecosystem management is Aldo Leopold's canon from the land ethic: "A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise." Social scientists Cortner and Moote agree: "Ecosystem management, with its emphasis on maintaining and restoring ecological functions and protecting biodiversity, will require a more biocentric or life-earth centered perspective that redefines the relationship between humans and nature." If all participants in ecosystem management shared these sentiments, there would be few arguments about basic goals and approaches, only minor disagreements over the details. (Preservation/Conservation, Boulder, CO - #137)

Sample Statement:

Action AM-F5-A1: "We propose to have access management within Northern Continental Divide Ecosystem (NCDE) grizzly bear recovery zones better integrate social concerns with recovery needs of the grizzly bear." We disagree strongly with the position that social concerns must be elevated in this particular way or otherwise singled out. This approach represents a blatant concession to the motorized access lobby and does not truly address "social concerns". Procedural fairness requires that the FS and the Team measure social concerns using objective criteria based on a peer-reviewed model. The USFS will maintain its professional standing and public trust only if it: a) asserts its legal authority to manage national forest lands, and b) does so based on scientific methods. The Montana Wilderness Association asks that the USFS develop procedures that insulate local decision makers from inappropriate social pressure, such as threats, bullying, and non-scientific criteria. Certainly models exist in the social sciences that allow for public input while protecting those who need to make the hard decisions. We believe that the USFS must acknowledge that limits do exist where social pressure is counterproductive to their resource management and protection mission. (Preservation/Conservation, Kalispell, MT - #256)

PC #: 250

Public Concern: The Forest Service should estimate the effects its decisions will have on the society, economy, and ecosystems of the future.

Sample Statement:

Please use this revision process as an opportunity to look forward to the future of the West, where human societies and wild places can coexist while still maintaining vibrant, healthy communities. (Individual, Missoula, MT - #531)

Sample Statement:

I have treasured the Lolo area, and as my husband was raised in Hamilton, MT in the heart of the Bitterroot Valley, I am deeply troubled at the thought of our losing these incredibly beautiful, unspoiled areas, to say nothing of the wildlife which will become more endangered than ever, as a result of the plans as they stand. (Individual, Camano Island, WA - #877)

Sample Statement:

Having lived in Montana all our lives and having enjoyed these great lands, we want them preserved for our children and their children. These areas are unmatched in the U.S. and once compromised, there will be no restoring their beauty and uniqueness and their source of pleasure, recreation and solace so many of us derive from them. (Individual, Missoula, MT - #473)

PC #: 253

Public Concern: The Forest Service should discourage any further development of the Rocky Mountain Front.

Sample Statement:

My wife, Sharon and I have lived on our ranch here on the "Front" for 45 years. We have introduced this beautiful country to thousands of folks from literally all over the world. We have tried to be good stewards of the land, and now in our later years, we find it devastating to think that our great land will be roaded, pipelined, taken over by ATV's and reduced to just another part of the country that is no longer special. This country is just too great. (Business, Choteau, MT - #614)

PC #: 255

Public Concern: The Forest Service should provide challenge routes for motorized road and trail users who prefer an extreme recreational experience.

Sample Statement:

National Forest officials have stated that all challenging motorized roads and trails would be eliminated due to their concerns about hazards on those routes. For many of us, these are the very routes that we consider to have the greatest recreational value...this is another example of prejudice and discrimination...Discrimination becomes illegal when choices made limit the possibilities of some groups or some individuals. Other forest visitors and their recreation opportunities are not subjected to this criterion. For example, this concern has never been used to limit the opportunities for hunters, fisher folks, woodcutters, equestrians, river floaters, campers, hang gliders, rock climbers, hikers, skiers, anyone driving anywhere in the forest, etc. We request that this unreasonable and discriminatory criterion be dropped immediately from the process and that the process be restarted without this criterion. (Recreational, Helena, MT - #339)

PC #: 256

Public Concern: The Forest Service should consider possible safety issues connected with reallocations of motorized use opportunity.

Sample Statement:

Swan Lake is a very recreation based community with extensive winter use of the national forests. Snowmobiling is a very family oriented activity during the long winter months. Our families and children have developed a series of trails on existing roads that allow snowmobile use around the community and access to the back roads in our area. A major area of concern in your proposed amendment is the Bond Creek Trail. For many years we have used the lower portions of the trail to allow safe winter access to the buck roads such as Lost Creek, Porcupine, Cilly and Soup Creek Roads. Not allowing for this continued access will force our children, as well as ourselves, to ride illegally in the barrow pits or along the highway in an effort to connect to riding areas. Safety is a concern for our entire community as we find increased and faster traffic on Highway 83 and through our community. (Individual, Bigfork, MT - #356)

Sample Statement:

Because of safety issues, it is important to keep motor and mechanized vehicles on separate trails from foot traffic, both human and horse or mule. (Individual, Stevensville, MT - #364)

PC #: 245

Public Concern: The Forest Service should stop the trend toward shutting people out by maintaining current levels of access and motorized use.

Sample Statement:

The overarching trend of the last 35 years has been to remove people from the land. This trend has occurred as a result of many different factors including creation of national parks and monuments; creation of wilderness, non-motorized, and roadless areas; policies of the Forest Service and Bureau of Land Management; influx of dollars for conservation easements and land trusts; decline of farming and ranching; and decline of mining and timber harvests. People still have the same need and desire to work and recreate on the land but they no longer have the same opportunity. The cumulative effect of the different trends that have removed people from the land is so significant now that any additional impacts must be avoided. Additionally, because the cumulative effect is so significant, adequate mitigation measures must be included as part of all future actions. (Recreational, Helena, MT - #339)

Sample Statement:

The existing level of motorized access and recreation was developed by the community through years of involvement in direct relation to the need for motorized access and recreational opportunities. The community is accustomed and relies on this level of access and recreation. We request that the project area remain open to multiple-use and the public and that a reasonable preferred alternative be based on the existing level of motorized access and motorized recreation. (Recreational, Helena, MT - #339)

Category: Economic

Section: Economic Values - General

PC #: 246

Public Concern: The Forest Service should consider maintenance of economically and socially viable local communities is one of its major goals.

Sample Statement:

Finally, the USFS is mandated to ensure economic viability of forest resources. Please make it a requirement to meet the needs of the communities relying on this resource. This is my children's future and right also. (Individual, Kalispell, MT - #36)

Sample Statement:

EM-F2: Over the past decade, woods and sawmill workers have been put out of work, and local mills have been closing. Rules and procedures developed by Congress and the Secretary of Agriculture subsequent to the passing of the Creative Act of 1891, and the Organic Act of 1897 and subsequent rulings and congressionally mandates: "The U. S. Bureau of Land Management and the United States Forest Service protect the economic and community stability of those communities and localities surrounding the National Forests and BLM lands." a) Society, economy and culture will not be sustained nor made more viable under the 'Plan' as proposed! b) Prescribed burning of our forest stands should be used only where timber harvest would be inappropriate. Prescribed burning will not, however, promote or improve on these requirements of the Organic Act cited noted above. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

These examples clearly illustrate that Congress intends National forests to be a driving force in promoting and sustaining state and local communities and governments, both economically and socially. The multiple use and sustained yield of several goods and services mandate of MUSYA and NFMA reinforce this concept. Accordingly, the proposed alternative should give more weight to these concerns. Economic and social impact analysis should be mandatory at all levels of forest planning and management. (Recreational, Helena, MT - #339)

PC #: 263

Public Concern: The Forest Service should assess the potential adverse economic effects of establishing habitat linkage zones.

Sample Statement:

Action EM-F5-A1: "We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange." I don't like this because it gives the forest service a ticket to buy private land. This will have a negative effect on the right of private citizens to own property. Also it will take one more source of revenue for the ever growing government away by the loss of taxes. (Business, Essex, MT - #569)

PC #: 262

Public Concern: The Forest Service should allow timber processors to capture the economic value in burned areas.

Sample Statement:

There are tens of thousands of acres of burnt timber that has no economic value because nothing was done. There are thousands of acres of beetle killed timber, mistle toe and forest thickets that need to be managed. These have huge economic values to this very valley we want to enjoy. (Individual, Hamilton, MT - #817)

Sample Statement:

[Swan Group "Agreement" as qualified by note on response #961: Make economic use of the removed material coming out of fuel reduction treatments; maximum utilization of all wood fiber (dead and down and thinned trees). (Place Based Groups, Bigfork, MT - #961)

PC #: 260

Public Concern: The Forest Service should assess the social and economic benefits of oil and gas development activities.

Sample Statement:

It is necessary for a comprehensive analysis of the socio-economic benefits of oil and gas development activities in the area to be included in the review. In addition, the ES should take a look at the BLM's White River Resource Area Plan (Meeke, Colorado Field Office), Chapter 3; "Social and Economic Conditions" because it is a beneficial template to use when conducting the socio-economic analysis for the plan revision. (Individual, Casper, WY - #343)

PC #: 259

Public Concern: The Forest Service should provide sufficient timber supply to sustain the sawmills needed to make it possible to meet the agency's vegetation management goals.

Sample Statement:

Forest planning needs to include the sawmills and re-manufacture's like ourselves. We are in desperate need of one of our natural resources. Last year as a homeowner and a native Montanan I was devastated to watch so much of it burn up with no use for any of us. We need a sustainable yield forest for our mills to keep them alive. (Timber or Wood Products Industry, McMinnville, OR - #446)

Sample Statement:

Please keep Montana economy going by letting the sawmills use this resource before it goes up

In smoke again. (Timber or Wood Products Industry, Hamilton, MT - #378)

Sample Statement:

We all need to remain cognizant of the fact the USFS absolutely needs a viable forest products industry infrastructure in order to implement management objectives. ASQ is a very important number when local industry is looking at economic viability of an area. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

PC #: 254

Public Concern: The Forest Service should use revenues from associated commercial products and opportunities as a means to help pay for land management activities.

Sample Statement:

She recommended adopting a statement from a Colorado plan: "Residents expect to encounter National Forest visitors and management activities, but such uses will not have undue impacts on them." She said the Forest Service should use such commercial activities to improve the roads affected by the operation, and should enforce its grazing regulations. (Place Based Groups, No Address - #825)

Sample Statement:

...OHV recreationists in Montana generate total state and federal annual gas tax revenue on the order of \$8 million and a present worth over the past 30 years of about \$150,000,000. This level of funding would be sufficient to fund expanded and enhanced OHV programs in Montana but this objective requires an equitable means of returning off-road gas tax to OHV recreationists. The amount of gas tax being returned to Montana OHV recreationists through State Trails Program (STP) and

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

Recreational Trails Programs (RTP) is on the order \$200,000 per year (References 3 and 4) or about 3% of the actual state and federal gas tax paid by OHV recreationists. This small percentage of return is not equitable. We request that revisions be made to state and federal programs in order to return to OHV recreationists the full amount of gas tax paid by OHV recreationists in the form of funding specifically earmarked for enhanced and expanded OHV Programs. (Recreational, Helena, MT - #339)

PC #: 249

Public Concern: The Forest Service should consider the social and economic effects of declining timber supply on local communities.

Sample Statement:

I submit that it is imperative that mills in Western Montana be privy to a consistently adequate timber supply---not just because it would be a positive health factor for the national forests, but also because a large number of workers will stay employed on jobs that can support a family. I urge you, most ardently, to consider the health of your national forests, our communities and our production facilities that rely on timber when you consider your management plans. Multi use of our lands has always been a priority and I submit, multi use including healthy forest harvesting and thinning, is a win-win proposition only for the people that retain jobs in the industry, but for those who abhor the thought of massive uncontrollable fire which we have seen over the last few years. (Timber or Wood Products Industry, Medford, OR - #433)

Sample Statement:

My third concern is that the Forest Plans give little consideration to economics. The National Forests are a wonderful asset, which provide multiple benefits to the public. Up until 20 years ago they also provided enough income to completely cover all Forest Service costs and still provide money for local schools and roads plus a return to the Federal Treasury. The big return however, was the employment that was created by timber sale programs and other commercial forest uses. Those people paid local, state and federal taxes and supported the local economy. Economic studies show that wages from extractive industries, where the product is sold outside the local community, circulate through the community 7 times. When you look at what has happened to the extractive industries which were the economic backbone of the Montana economy, you can understand why Montana has the lowest per capita income in the nation. This has created enormous problems for funding local government services. Western States generally have a much higher percentage of government land compared to fee land than other parts of the U.S., therefore it is imperative that these lands create enough income to cover management costs and give a reasonable return to the Federal Treasury. (Individual, Kalispell, MT - #506)

Sample Statement:

There's more to it than the "timber industry making money." There are receipts that towns, communities and schools all benefit from. (Place Based Groups, Missoula, MT - #826)

PC #: 244

Public Concern: The Forest Service should consider the social and economic costs and benefits of motorized use (including snowmobile use) in its decision making process.

Sample Statement:

Motorized recreationists are the only group to lose in every action on local, regional and national levels, yet the cumulative effect of this significant negative impact has never been tabulated or addressed. This obvious prejudice must be adequately addressed. The magnitude of these undisclosed cumulative impacts on multiple-use interest including motorized recreationists has increased to the point where the livelihood and recreation of nearly everyone has been significantly impacted yet an adequate assessment has not been conducted nor included in the decision-making. The burden of establishing the cumulative effect of all motorized access and motorized recreational closures should not fall on motorized recreationists. Table 1 is a partial listing of projects that have had a negative impact on motorized recreationists. All of these actions and others must be included in the tabulation and evaluation of cumulative effects on motorized recreationists. (Recreational, Helena, MT - #339)

Sample Statement:

Evaluations and decisions have been limited to natural resource management issues. Issues associated with motorized access and motorized recreation must be adequately addressed during the evaluation and decision-making including social, economic, and environmental justice issues. There are more than just natural resource management issues associated with access and recreation on public land. Agencies cannot pick and choose the issues to be evaluated. Montana ranks very low for social conditions (44th state per Fordham Institute for Innovation in Social Policy,) and social issues are relevant to this action. Additionally, motorized recreation is a healthy social activity. These types of issues are associated with motorized access and recreation in the project area and these issues must be adequately addressed. Social issues must be adequately evaluated per the SOCIAL IMPACT ANALYSIS (SIA): PRINCIPLES AND PROCEDURES TRAINING COURSE (1900-03) (<http://www.fs.fed.us/emc/nepa/includes/sia.html>) and Environmental Justice issues per Departmental Regulation 5600-2. The evaluation and resulting decision must adequately consider and address the social and economic impacts associated with the significant motorized access and motorized recreational closures. (Recreational, Helena, MT - #339)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report

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 - #455)

Sample Statement:

Reduced Winter Economy: A. History: i. Prior to the closure of the Swan Lake drainages, the majority of snowmobile activity took place south of the village of Swan Lake. As most users were from the Flathead Valley, it was convenient to stop at one of the four businesses for refreshment on there way north and home. ii. The proposed Swan Lake Ski Touring Area has seen increased usage each year, with visitors from as far away as Spokane and Great Falls. These backcountry skiers, although wanting a quiet experience, understood that there was the off chance of encountering motorized traffic. Both skiers and snowmobilers utilized dining, lodging and other services in Swan Lake. B. Present: i. With the majority of visitor snowmobiling now taking place north of Swan Lake at Six Mile Mountain, a dramatic decrease in snowmobiler generated dollars has been witnessed by Laughing Horse Lodge, Swan Bar and Grill and Swan Lake Trading Post. Loaded snowmobile tow vehicles do not find it convenient to head south; instead they stop into businesses in Ferndale and Bigfork. ii. With the increase in snowmobile activity at lower elevations, the peace and quiet sought by visiting skiers and snowshoers is no longer present. Although this has not had a dramatic affect on business during this recent winter, there were numerous complaints from skiing visitors about noise and snowmobile traffic on trails. For a business, such complaints are a bellwether for the future and should not be ignored. iii. Winter recreationists have many options to choose from around Montana and the Pacific Northwest. If Swan Lake and Swan Valley cannot provide a pleasant experience, they will go elsewhere - whether they recreate on machines or on foot. (Recreational, Bigfork, MT - #557)

-END-