



-- SUMMARY --

CONTENT ANALYSIS REPORT

Forest Plan Revision
Proposed Action

Bitterroot, Flathead and Lolo National Forests
October 2004



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Part 1: Introduction and Issues

Listening to and interpreting the voice of the public is an important step in forest plan revision. We received roughly 2,800 responses to the Proposed Action released in January 2004. This report is a summary of our understanding of what we heard, and the conclusions we have drawn.

The report is organized in two parts:

- Part 1: Introduction and Significant Issues
- Part 2: Compilation of “Statements of Public Concern”

What We Have Done So Far

In January, 2004, we (the Bitterroot, Flathead and Lolo National Forests) issued our Notice of Intent to update Land and Resource Management Plans for the Bitterroot, Flathead, and Lolo National Forests, and an accompanying Proposed Action. The comment period on the Proposed Action ran from January 23 to April 22, 2004. We received over 2,800 responses, including letters, e-mails, faxes, and verbal comments. We chose to do the content analysis ourselves rather than having it done by an outside contractor to ensure we were exposed to the full flavor of responses. While the analysis process has taken longer than expected, we have met our objective of gaining a more complete understanding of public issues and concerns and can now begin to develop alternatives that respond to these issues.

How We Did the “Content Analysis”

Our first step in content analysis was to number and log each response as it arrived in our office. This log allows us to link each individual response to the particular area (or areas) where it was categorized. In some cases we can trace responses directly to a particular Statement of Public Concern (PC Statement).

Once all the responses were in, we set about the task of assigning a Category Code to every single substantive “comment,” in every single “response.” In technical language, a “response” is the entire letter or other text we received, while a “comment” is an individual part of the letter, sometimes as short as a single sentence. The assigned Category Code allowed us to group similar comments together. For example, every comment that seemed to address management of noxious weeds was assigned to Category 62100, which is a sub-category of Forest Health (62000), within the general area of Natural Resource Management (60000). Each “comment” was carried forward as a complete statement, including as much of the original wording as necessary to make it as clear as possible what the respondent was trying to tell us. This was a long process, but it assured that we did not accidentally distort a respondent’s intentions by reducing comments to short phrases or bullet statements.

Once coding was completed, we hand-typed the coded comments into a computer database. Data entry was then carefully reviewed and cross-checked to minimize

mistakes. Next, we read the comments grouped within each category to arrive at statements of the main points we thought we were seeing. These are called Statements of Public Concern, and they are presented in total in Part 2 of this report.

The final task was to study all of the 830 PC Statements to identify those that represented concerns of significance that should be responded to in different ways, in different alternatives. The remaining PC statements either will be treated the same in every alternative, or may differ between alternatives but probably in ways that are not highly significant. We will explain our handling of these “other” PC Statements in Part 3 of the report.

Through this content analysis process, we tried to identify all relevant issues, not just those represented by the majority of respondents. The breadth, depth, and rationale of each comment were especially important. In addition to capturing relevant factual input, we tried to capture the emotion and strength of public sentiment behind particular viewpoints in order to represent the public’s concerns as fairly as possible.

It is important to keep in mind that many of the comments are very general and may have been submitted in many different ways, while others are quite individualized. Every comment has the same value, whether expressed by many, or by just one respondent. Analyzing the comments was not a vote-counting process. The outcome was not determined by majority opinion. The content analysis process we used ensured that every comment was read and analyzed, and will be considered during the decision process. Of course, Forest Supervisors and District Rangers are made aware of the relative numbers of responses that addressed particular issues, and they will incorporate that knowledge in their decision-making thought process in whatever manner they feel is most appropriate.

Public Concern Statements

We have organized the Statements of Public Concern (PC Statements) into the following major categories:

- **Planning Process:** the forest plan revision process, public involvement, and agency funding.
- **Laws, Acts and Policies:** NEPA and NFMA.
- **Environmental Values:** ecosystem management, soil, water, wildlife, etc.
- **Access and Transportation System:** roads and trails management.
- **Recreation:** motorized and non-motorized recreation, facilities, fees, etc.
- **Land Ownership and Land Designations:** land acquisitions and rights-of-way. **Special Land Designations:** wilderness and roadless area management.
- **Natural Resources Management:** timber resource, noxious weed, fire, and forest-private interface management, etc.
- **Social Values:** population and quality of life.
- **Economic Values:** commodities and the local economies.

Each category is further divided into sub-sections, where each PC Statement is supported by one or more sample comments that convey actual original wording

from people who provided input relevant to that Statement. For each sample statement, a letter number is provided, which makes it possible to track the comment back to the original response, if necessary. The purpose of listing the public concerns this way is to provide an overview of the voluminous comments in a condensed format that captures the main issues from the public's perspective. This listing ensures that those main issues are all carefully considered.

Alternative-Driving Issues

In the end, we arrived at what we believe to be the five alternative-driving issues reflected by the PC Statements. In the language of the National Environmental Policy Act (NEPA), these are known as *Significant* issues. Because not all public concerns were directly tied to these significant issues, we also used the following four additional categories to be sure that we could respond to all public concerns in the most appropriate way.

1. Concerns that are already addressed by laws, regulations, or National and Regional policies, and therefore, are outside our forest plan decision authority.
2. Concerns that could be addressed through mitigation requirements or standards in the revised forest plans.
3. Concerns that could be addressed through the analysis and display of the effects of implementing the revised forest plans.
4. Concerns that were either not strategic in nature and so would be addressed elsewhere, through site-specific project planning, or were outside the scope of this analysis.

Here is a list of the five alternative-driving issues. Note that each issue statement includes one or more questions that each Forest Supervisor will directly respond to in his or her final decision, followed by several bullet points that represent specific dimensions of that question that were raised as public concerns.

Issue 1: Access and Travel Management

- Where and what type of road and trail access should the Forest Service provide?
 - Access for particular activities: firewood, timber harvest, campsites, traditional gathering, etc.
 - Motorized recreational activities: driving for pleasure, OHV etc.
 - Non-motorized – quiet
 - Snowmobile
 - Bicycles (mechanized)
- How should the transportation infrastructure be managed?
 - Decommissioning, obliteration, culverts, long-term closure/storage, seasonal closure.
 - Road maintenance
 - User created routes (mechanized and motorized) created prior to Jan 2001

Issue 2: Vegetation Management

- How much, where, and what type of vegetative management would occur?
 - Salvage
 - Suitable for timber production
 - Old growth
 - Wildlife habitat
 - Economic and community vitality
 - Private Residential and National Forest Margin
 - Invasive species

Issue 3: Biodiversity and Ecosystem Integrity

- What is the proper balance of management activities to maintain biodiversity and habitat to support viable populations of native and desired non-native species?
- Which areas need what kind of management direction to support overall biodiversity as well as viability of species?
 - Historic Range of Variation
 - Habitat Connectivity
 - T&E species and habitat protection
 - Fire management

Issue 4: Roadless Area Management

- How much and where should acreage be recommended for wilderness designation?
- How much, where and how should inventoried roadless areas be managed?
 - Watershed integrity
 - Quiet recreation
 - T&E species and habitat protection
 - Road construction
 - Salvage harvest
 - Suitable for timber production
 - Fuels and fire management
 - Motorized use/ Winter motorized

Issue 5: Recreation

- Outfitter Guide Management in the Bob Marshall Wilderness
- Where should new development be prohibited?

Part 2: Statements of Public Concern

In this lengthy section of the Content Analysis Report Summary we present some sample pages of Statements of Public Concern (PC Statements), each followed by several examples taken directly from public response letters of the kinds of comments that we tried to summarize in that particular statement of public concern. The statements are organized according to the major categories noted above. However, in the final process of identifying the significant issues, we did not limit ourselves to particular categories when considering which PC statements were tied to which issues. Consequently, there is no direct correspondence between the PC statements in a particular category, and any particular significant issue. Also, please note that the PC Statements are not in strict numeric order; this is due to an annoying complexity in our computer database that we did not think warranted the cost to taxpayers that it would have taken to fix it simply for report display purposes.

The full compilation of all PC Statements can be found on our web site (www.fs.fed.us/r1/wmpz), broken into several files to assure shorter download times.

Category: Planning Process

Section: Purpose and Need for Proposed Action

PC #: 2

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

Sample Statement:

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

Sample Statement:

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

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Sample Statement:

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

Sample Statement:

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

PC #: 8

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

Sample Statement:

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

Sample Statement:

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

Section: Use of Science in Decision making General

PC #: 125

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

Sample Statement:

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

PC #: 121

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

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Sample Statement:

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

PC #: 124

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

Sample Statement:

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

Sample Statement:

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

PC #: 126

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

Sample Statement:

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

Sample Statement:

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

Sample Statement:

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

Section: Fish, Wildlife, and Plants General

PC #: 551

Public Concern: The FS should protect and restore wildlife (and their habitats) for a variety of reasons including scientific study, moral and ethical obligations, aesthetics, hunting, and fishing.

Sample Statement:

According to the National Forest Management Act, the USFS must "maintain viable populations of native species in the planning area." We strongly value the protection of viable populations of wildlife in the Bitterroot, Lolo and Flathead National Forests for scientific study, moral and ethical commitments, and aesthetic reasons. We recreate in these forests, as well as enjoy the clean air and water regulated by the ecological systems preserved by wildlands. (Preservation/Conservation, Missoula, MT - #719)

Sample Statement:

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

PC #: 581

Public Concern: The FS should use local knowledge when choosing MIS for the forest plans.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.)Include local knowledge when picking indicator species. Overhaul the whole indicator species concept and define it. See if monitoring for healthy ecosystems can do away with indicator species as a monitoring tool. (Place Based Groups, Condon, MT - #349)

PC #: 566

Public Concern: The FS should modify INFISH to provide more management flexibility in RHCAs and to address fire risk.

Sample Statement:

Allow more site specific management of riparian areas than dictated by INFISH and PACFISH. (Place Based Groups, Stevensville, MT - #823)

Sample Statement:

Action EM-F9-A1: (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.)Also on National forest lands on the Swan Valley there is little or no management at all in the broad riparian areas of major streams and associated lowlands. These places need professional attention and help. (Individual, Condon, MT - #312)

Sample Statement:

Study Areas in a 'passive management" approach that effectively is a hands off policy. In December, 2003, the Healthy Forest Restoration Act was passed by Congress and signed into law by the President It is Law. Within the Act, there is a specific expectation of and analysis of "Balance of Harms" to be done by the agency in regards to T & E species. Nowhere in the various subsections of the analysis of the current management, findings or proposed revisions do I see ANY emphasis or acknowledgement of the concept of "Balance of Harms" Blind continuation of usage of "Infish Stream Buffers" for riparian areas on areas otherwise categorized as "suitable for timber management" fail to take into account future fire risks in the SMZs as experienced in the fires of 2000. The revisions fail to consider potential impacts of T & E species at risk to continuing mega fires such as those of the Bitterroot in 2000 in the "primitive" back country that is limited to only foot or horseback access in the fire seasons. Finally, the presumptions of the agency and select members of the public pertaining to "visual retention" management areas appear to me to propagate elevated fire risks that constitute a severe and real future risk to T & E species. (Business, Hamilton, MT - #239)

PC #: 567

Public Concern: The FS should validate the science that supports PACFISH and INFISH.

Sample Statement:

Action EM-F10-A1: (We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs.) INFISH and PACFISH need to be looked at again to see if the scientific information was not bias or lopsided for more regulation and elimination of public land from the tax base. (Individual, Kalispell, MT - #781)

PC #: 568

Public Concern: The FS should establish numeric sediment standards designed to protect aquatic species, particularly bull trout.

Sample Statement:

The Forest Plan revision must strengthen the standards contained in the Inland Native Fish Strategy (INFISH) and include a standard for sediment. since INFISH did not contain one. Forest Plans must include standards that recover this native fish species, not merely maintain the status quo. (Preservation/Conservation, Big Fork, MT - #708)

Sample Statement:

The current Forest Plans' Inland Native Fish Strategy (INFISH) Amendment failed to adopt specific, numeric standards at optimum levels for bull trout, which can have dramatic effects on bull trout reproductive success and recruitment. The failure to protect upwelling groundwater is also a serious deficiency in current Forest Plans. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

The Forest Plan revision and EIS must strengthen the standards contained in the InlandNative Fish Strategy (INFISH) and include a standard for sediment since INFISH did not contain one. Since INFISH was adopted the bull trout has been listed as a threatened species throughout its range in five states. INFISH is an "inadequate regulatory mechanism," for bull trout recovery, one of the factors which triggered its listing. Forest Plans must include bull trout standards that recover this native fish species, not merely maintain the status quo. (Business, Missoula, MT - #616)

PC #: 570

Public Concern: The FS should provide for passage of aquatic species and amphibians through culverts.

Sample Statement:

Finding EM-F7. We recommend changing item 3 ("Many culverts are barriers to fish passage") to include more than fish, since recent evidence suggests that culverts block the movement of amphibians and other aquatic organisms, as well as fish. (State Agency or Official, Missoula, MT - #697)

Section: Forest Transportation System

PC #: 611

Public Concern: The FS should recognize legitimate OHV trails as defined in the R1 OHV decision, RS-2477, agency maps, historic maps, and visitor maps.

Sample Statement:

In an attempt to close as many existing roads and trails and possible, non-motorized interests keep trying to confuse the issues by suggesting that we are asking for illegally created trails. We are not. We are asking for continued use of trails that are legitimately recognized by the agencies including those defined by the: 3-State OHV decision, RS-2477 access laws, all agency mapping including current travel plan mapping and historic and current visitor mapping. (Recreational, Helena, MT - #339)

PC #: 637

Public Concern: The FS should reestablish or relocate trails and roads disturbed by other actions, such as timber harvest, mining, and livestock grazing.

Sample Statement:

[CONT'D]19. Agencies are encouraged to develop OHV programs that address more than law enforcement needs. OHV programs should actively promote the development, enhancement, and mitigation of OHV recreation opportunities. 20. Agencies are encouraged to develop and use State Trail Ranger Programs similar to Idaho's program through the State OHV Fund, as well as volunteer trail maintenance programs.21. Agencies are encouraged to clear trails early in the year to insure maximum availability and reduction of diversion damage caused by routing around obstacles.22. Agencies are encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. In fact, some of the areas more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife. 23. Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife. 24. Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.25. Agencies are encouraged to re-establish and/or relocate all trails and roads disturbed by other actions such as timber harvest, mining, and livestock grazing. (Recreational, Helena, MT - #339)

PC #: 612

Public Concern: The FS should recognize the importance of driving for pleasure and recreational activities that are associated with it.

Sample Statement:

Almost all visitor use surveys including NVUM and those sponsored by Fish, Wildlife and Parks have found that a category defined as "driving for pleasure" is the largest activity within public lands. This category includes all sorts of off-highway use including ATV, camping, fishing, firewood and food gathering, hunting, RVs, motorcycling, picnicking, rock climbing, rock hounding, target shooting, and wildlife viewing. The importance and need for primitive roads and trails to support these and other activities must be recognized in the analysis and decision-making. (Recreational, Helena, MT - #339)

PC #: 556

Public Concern: The FS should stop closing roads, and keep them open for public access, fire fighting, timber harvest, recreation, and other uses.

Sample Statement:

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

Sample Statement:

Comment 29 continued: Require Forest Service to keep and maintain roads. This can be done by the forest products industry if the Forest Service will only put up timber sales. Require that the entire public forest is open. Make roads built for logging permanent not temporary. Publish for public comment and open process all proposals to close roads. No instantaneous closing of roads. Stop all decommissioning of roads. Roads need to be maintained (either gated closed or open) to have access for fire fighting, human emergency, logging, recreation, etc. Spend funds on other priorities other than on decommissioning roads which is counterproductive. It would be wiser to spend the \$7000 per mile to decommission roads on other important issues such as fighting fires, etc. We spent \$3 million so far and now we have another \$3 million to spend to decommission another 379 miles. Yet we hear Forest Service has no funds for other projects (i.e. trail maintenance, forest fires).Do not decommission any roads without evaluating the use of the road for fire control and prevention, economic and recreational use. Roads: Do not rip out roads; gate or barrier if you must. Identify a system of roads necessary for interface fire protection. Identify roads most valuable for recreation and forest management and administration that is most effective with road maintenance dollars. (Place Based Groups, No Address - #967)

PC #: 572

Public Concern: The FS should restrict ATV use to make hunting more fair.

Sample Statement:

In regards to hunting I think the use of ATVs insults the principles of fair-chase. I encourage restrictions on their use & their access options. (Individual, Whitefish, MT - #427)

PC #: 606

Public Concern: The FS should consider the effect of road closures and reduced access on recreation opportunities.

Sample Statement:

as a Baby Boomer approaching old age, I am very concerned that more closures will reduce my enjoyment of the national forests to main roads and sparse trails. At this point I can still hike up to some of the peaks, but I doubt that my arthritis will allow for this much longer. (Individual, Whitefish, MT - #224)

PC #: 607

Public Concern: The FS should develop reasonable limits on forest access for grizzly bear protection, based on the best resource and social science.

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.)Therefore we would request that this finding be restated to emphasize this balance, and read as follows:" Action AM-F5-A1: We propose to establish reasonable limits to forest access within the three forest zone. [drop reference to the NCDE because access management is not just about grizzly bears.] These reasonable limits will be determined based on best resource and social sciences. The USFS' legal responsibilities require the Service to protect and manage forest resources for the long-term health of the land and renewable resource base. Access will be provided consistent with the Service's ability to protect and manage those multiple resources. (Preservation/Conservation, Kalispell, MT - #256)

PC #: 609

Public Concern: The FS should develop a travel management plan that meets the needs of the public in terms of roads and trails for recreation, and provides reasonable environmental considerations.

Sample Statement:

Forest planning including travel management projects should be a process to quantify and address the needs of the public for motorized access and motorized recreational opportunities. Instead, it is approached in just the opposite direction as a closure process that ignores the needs of the public for motorized access and motorized recreational opportunities...A travel planning process has never resulted in increased recreational opportunities for motorized recreationists. The travel management process as currently practiced is not equitable because: (1) it does not adequately address the needs of the public for multiple-use recreational opportunities including motorized access and motorized recreation, and (2) it is deceptive to represent the process as a travel management process that will address the needs of the public when it is really just the opposite, i.e., a closure process that does not fairly and adequately address the needs of the public. We request that the process either be renamed to "Travel Closure Process" in order to end the deception of the public OR (as we strongly prefer) that the process be redirected to meet the needs of the public for a functional network of motorized roads and trails for access and recreation with practical and reasonable consideration of the environment (Recreational, Helena, MT - #339)

PC #: 610

Public Concern: The FS should consider existing road and trail networks for motorized use.

Sample Statement:

As OHV use becomes concentrated in smaller areas because of closures or restrictions, the frequency of encounters between motorized and non-motorized trail users increases dramatically. Resource damage can also results from use concentrated in smaller areas. Certainly with the acceptance of millions of acres of area closure by motorized recreationists, the use of the existing network of roads and trails including spurs for camping and exploring is reasonable. Additionally, we have seldom asked for any new routes and the level of use would justify many new routes. (Recreational, Helena, MT - #339)

Section: Recreation Types: Non-Commercial, Dispersed, or Unspecified

PC #: 378

Public Concern: The Forest Service should restrict OHV use to established roads.

Sample Statement:

Forest trails should be managed for traditional non-motorized uses. Motor vehicles should be restricted to roads. I love to hike and camp in the Lolo and am very concerned that within a few years wild habitat and quiet trails will be consumed by ATV roads, weeds, and motor vehicles. If this is allowed to happen, we will all be diminished plus the wildlife and plant life we supposedly value. (Individual, Saint Regis, MT - #355)

Sample Statement:

Cars and other motor vehicles should remain on existing roads. A forest-wide standard to protect and manage remaining forest trails for traditional non-motorized uses is an essential part of the forest plan. (Individual, Hickory, NC - #407)

Sample Statement:

Traditional recreational uses of the roadless areas of our forests are hiking, backpacking, horse travel, fishing, hunting, berry and mushroom picking, skiing, snowshoeing and canoeing; all quiet pursuits. Motorized recreationists don't have a god given right to travel off road. I believe that motor vehicles of any type should be limited to roads only. Off road travel degrade trails and the landscape and spread weeds. (Individual, Whitefish, MT - #622)

PC #: 416

Public Concern: The Forest Service should prohibit motorized use in roadless areas and other wildlands.

Sample Statement:

We should fully protect all of the Lolo wildlands with the current policies against motorized use. This standard should remain in any new forest plan. (Individual, Missoula, MT - #251)

Sample Statement:

I also strongly support the expansion of these protected areas and stronger enforcement of non-motorized travel restrictions. The complete restriction of motorized traffic from the wild lands in both the Lolo and Bitterroot forests is essential toward maintaining their pristine beauty for generations to come, as well as for the health and welfare of the wildlife that makes these areas their home. (Individual, Missoula, MT - #440)

Sample Statement:

There should be no ATV's, no MOTORBIKES, or other motorized vehicles any of the forest lands adjoining these areas. Off road vehicles cannot be properly managed and they are in direct conflict with many, many other important values. They are a huge threat to the ecosystem and often have severe conflict with other users, wildlife and scenic/aesthetic values that Americans hold so dear. There are thousands of miles of roaded areas. Do not let our last wild lands be ruined by this selfish, uncontrollable and very damaging activity. (Individual, Choteau, MT - #768)

PC #: 374

Public Concern: The Forest Service should use the ROS system to determine recreation use.

Sample Statement:

Mark helped define that a motorized "challenge" route means top speed would be 1-4 mph. to navigate the terrain. These "challenge" routes mean cars would look at them and say "no way!" There are steep hills with extremely rough terrain. There can be rocks as high as your belly button. The machines can climb a 45 degree decent and never spin a tire. ATVs will go slow on these trails due to driver fatigue from the steepness and rough terrain. An example would be Car others near Anaconda on Beaverhead-Deer Lodge National Forest. The Curlew Mines area outside of Victor was an ideal location, but for some reason three of the four legs were closed to motorized vehicles. The F.S. needs to look at experiences wanted by each type of user, ROS designation, etc., when determining possible OHV areas. (Place Based Groups, Hamilton, MT - #827)

PC #: 407

Public Concern: The Forest Service need to recognize aviation as a legitimate use of National Forest Lands and keep backcountry airstrips open.

Sample Statement:

I would not like to see any further restrictions for snowmobilers, motorcyclers or ATV's. I feel that there are enough restrictions and regulations already in place to handle these uses. I also feel the same way about aviation. The backcountry airstrips in the Flathead: Spotted Bear, Meadow Creek, Schafer, Condon, and Wurtz should remain open without restrictions for airplanes. Additionally the Nine Mile airstrip on the Lolo should be opened for use without restrictions. There should also be no new over flight restrictions. (Individual, Plains, MT - #90)

Sample Statement:

Aviation is not mentioned in the plan; perhaps this is intentional, and the Forest Service hopes to make airplanes and airstrips go away. This is not realistic. Aviation has lower impact on the forest than horse travel, for example. Esthetically, wilderness groups prefer horses to planes, but a pack of 15 horses outfitting a group of rafters has significant effects on the trails and meadows, in addition to potentially spreading exotic seeds in their feed and droppings. Aircraft users should be given the same consideration that other users, and ignoring them in planning for the next 20 years is poor planning. (Individual, No Address - #372)

Sample Statement:

There is no reference to aviation, either in support of U. S. Forest Service use of aircraft in land management roles or other aviation interests in the use of aviation for recreational purposes and National Forest access. The pilot community does not wish to be ignored in the forest planning process. We do not want to be told in the future: "it's not in the plan, so we cannot consider your concern." Interest in and use of recreational aircraft is growing, and the Forest Service needs to recognize the existence of this activity as well as the requirement for expanded recreational opportunities on Federal lands. There is one aviation publication, "Pilot Getaways", that is solely devoted to articles on both urban and backcountry destinations for pilots. Most other aviation periodicals have at least one article per issue on pilot destinations. From a personal experience of flying over the past forty-plus years, I have seen a growth in demand for backcountry landing sites for recreational endeavors. Your forest plan should reflect ideas and actions to meet this demand just like it should for other forms of recreational use. (Individual, Polson, MT - #406)

PC #: 414

Public Concern: The Forest Service should allow motorized use on user created trails.

Sample Statement:

I really don't like Action AM-F2-A1 (We propose that user-built routes would not be recognized as designated routes as part of the Forest Service trail system unless they have been validated as system routes through site-specific analysis, or permitted under special-use permits) because I want the ability to fully utilize the national forest lands in my jeep, truck and motorcycle in a responsible manner. (Individual, Whitefish, MT - #500)

Sample Statement:

Very opposed to our change in policy re. user-built trails", to closed unless put on the system. (Individual, Hayden, ID - #311)

PC #: 377

Public Concern: The Forest Service should eliminate OHV use from National Forest System Lands.

Sample Statement:

Ban ORV use!!! (Individual, Boulder, CO - #594)

PC #: 415

Public Concern: The Forest Service should not attempt to meet the demand for OHV use.

Sample Statement:

Action AM-F1-A1: (We propose to identify areas with the highest potential for OHV motorized use. Actual changes to existing designated routes would not occur until after future site-specific project level analysis was completed.) Including recognition of ecosystem carrying capacity. While OHV use has increased, the amount of motorized trails for OHV use has not kept up with the demand. Demand may have already exceeded sustainable ecosystem carrying capacity (Individual, Condon, MT - #312)

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Sample Statement:

It's important to mention that the Forest Service should not feel obligated to meet the lion's share of Montana's OHV "demand." Only one-third of the state is public land. OHV recreation could theoretically occur on the other two-thirds of the state, perhaps through access fees with private landowners. If private landowners aren't offering this "opportunity," even when they can profit from it, the Forest Service should ask why. It's probably because OHV use is very destructive. If private landowners don't want OHVs on their lands, then the forests should think long and hard about how much this use is then appropriate for public land. (Preservation/Conservation, Missoula, MT - #488)

PC #: 375

Public Concern: The Forest Service should not use ROS as a basis for determining recreation use.

Sample Statement:

We recommend the Revision Team abandon the use of Recreation Opportunity Spectrum (ROS) classifications and come up with something more meaningful and trustworthy. Continued use of ROS only promises more debate and conflict over where different types of uses are legally allowed, especially in terms of motorized use. (Preservation/Conserv, Kalispell, MT #544)

Sample Statement:

Recreational Opportunity Spectrum Class (ROS) is proposed as a tool to guide management and references certain categories without disclosing the recreational implications of those terms. More qualification is needed in the discussion on increasing day use activities and dispersed recreation. The Rattlesnake National Recreation area has specific legislated goals established and requires additional management direction. Also, designated wild and scenic river corridors, research national areas, botanical areas, etc. - need additional consideration of intensity and amount of recreation that should occur in each area. (Preservation/Conservation, Missoula, MT - #624)

PC #: 837

Public Concern: The forest service should prohibit cross country travel, emphasize enforcement and keep mountain bikes on designated routes that take advantage of existing trails and roads

Sample Statement:

Action AM-F4-A1: (We propose to limit bicycle travel to designated routes and prohibit cross-country bicycle travel.)
Regarding Action: AM-F4, You should also consider: Not just stating that routes shall be designated, as it's not merely a good idea to have designated routes, but that routes "shall be designated" and there shall in fact be created designated routes. These routes shall preferably be encouraged or allowed upon or within currently used routes such as existing cross-country ski trails, former logging roads and other existing roads. (Business, Essex, MT - #569)

PC #: 717

Public Concern: The forest service needs to identify and encourage mountain bike travel in appropriate areas with high potential for designated trails and cross country travel

Sample Statement:

Finally, LIMB urges the Lolo, Bitterroot and Flathead national forests to identify, new areas with high potential for future' mountain bike trails. Appropriate areas for responsible free riding could greatly reduce the illegal construction of free ride trails. (Recreational, Missoula, MT - #522)

Sample Statement:

Isn't it a wonderful thing that mountain bikes have grown in popularity and Americans are using them to experience the National Forests? User conflicts and a very small amount of resource damage is occurring, but at levels that are below acceptable levels. Bicycle travel should be encouraged, promoted further developed. I disagree with the proposal to limit travel to designated routes: Mountain bikes should be allowed cross country travel, especially for scenic viewing, hunting or to assist in removing legally harvested game and wildlife. Also, wheel carts should be allowed for assisting hunters in removing legally harvested big game. (Individual, Dickinson, ND - #535)

Sample Statement:

Action AM-F4-A1 (We propose to limit bicycle travel to designated routes and prohibit cross-country bicycle travel.):...the proposal to limit bicycles to designated routes is a violation of NFMA and MUSYA, is not a major public issue, should not affect formulation of alternative land uses, and is not supported by credible data and inventories. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 835

Public Concern: The forest service should provide dual use on some trails (hikers and mountain bikers) and separate conflicting uses on others (horses and motorized use).

Sample Statement:

AM-F4: Mountain bike recreation and exercise is here to stay and is a wonderful sport and activity. Therefore designated routes must be developed and shared with other users. I would propose that mountain bike and hiking trails (quiet activities) share trail systems as is allowed/appropriate. I am in agreement with concerns voiced by equestrian trail users and the conflicts they have had on trails with mountain bikers doing gravity descents where they can come flying around blind turns and spook horse and mule trains. This is dangerous and easily solved by limiting mountain bike activities on "some" trails that are reserved mostly for hikers rather than equestrians. (Place Based Groups, Victor, MT - #560)

Sample Statement:

[Action AM-F4-A1: (We propose to limit bicycle travel to designated routes and prohibit cross-country bicycle travel.)]
Action AM-F4-AI: We commend the National Forests for recognizing that mountain bike use may be resulting in resources damage and user conflicts. We agree that cross-country travel should be prohibited and limited to designated routes. We would also encourage the forest to consider reviewing existing trails and determining that some existing routes should be limited to foot travel or horse traffic only. (Preservation/Conservation, Missoula, MT - #566)

PC #: 838

Public Concern: The forest service should recognize the growing demand for low elevation trails and trail heads, identifying areas near communities, with high potential for quiet recreation that is segregated from motorized use areas

Sample Statement:

Our National Forests have lost many miles of low elevation, traditionally quiet non motorized trails in the past forest plans. The Forest Service should restore this recreational resource particularly in areas near communities and enforce the non motorized restrictions I see being violated in the area of the North Fork. (Individual, Columbia Falls, MT - #247)

Sample Statement:

Action AM-F1-A1: (We propose to identify areas with the highest potential for OHV motorized use. Actual changes to existing designated routes would not occur until after future site-specific project level analysis was completed.)
New Finding AM-FI: Demand for traditional, quiet, non-motorized recreation has increased dramatically over the life of the current forest plans. This demand is expected to grow as the Flathead valley population grows and citizens seek refuge from urbanization, congestion, and the ubiquitous internal combustion engine. The public will demand areas of quiet solitude that are easily accessible from low-elevation, major highway routes, as well as trail heads at higher elevations along forest roads.
New Action AM-FI-AI: We propose to identify areas and trail heads with the highest potential for traditional, quiet, non-motorized recreation. These areas will be identified in the context of the total access management situation on each forest, but will emphasize increasing the availability of this resource and the segregation of this resource from motorized recreation. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

There is more demand for quiet trails especially at low elevation and near towns. Access to these trails and areas should be maintained and it is important that they be non-motorized. (Individual, Whitefish, MT - #481)

Sample Statement:

Past forest plans have already given away many miles of low-elevation, traditionally quiet, non-motorized trails. The Forest Service should act to restore this recreational resource. It benefits hikers like us, but more importantly, it provides secure areas for wildlife. (Individual, Missoula, MT - #529)

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:

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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 #: 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:

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.

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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 local 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)

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.

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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 #: 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.

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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)

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 #: 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 thicket's 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 #: 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, Mcminville, 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 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.

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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)

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)

WMPZ Forest Plan Revision Scoping Phase Content Analysis Report -- SUMMARY

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 snow mobilers utilized dining, lodging and other services in Swan Lake. B. Present: i. With the majority of visitor snow mobiling now taking place north of Swan Lake at Six Mile Mountain, a dramatic decrease in snow mobiler 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 snow shoers 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)

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