

Subject: WATERSHED (PC #s starting with WAT)

Category: EMS

PC# WAT0052

The KNF should establish an independent EMS for riparian environmental conditions as a replacement for INFS.

(Letter #s: 266)

Category: Watershed Coeur d'Alene GA Desired Condition (IPNF)

PC# WAT0008

The IPNF should acknowledge and act on the National Academy of Science study of the relationships between forest management and downstream flooding by:

- analyzing past and proposed timber sales and forest cover removal, and updating watershed modeling tools;
- protecting and restoring the damaged forested watersheds of the Spokane River-Lake Coeur d'Alene system;
- coordinating management activities and funding with the EPA.

(Letter #s: 421, 422, 488)

PC# WAT0020

The FS should coordinate with the EPA on the issue of uplands management and the effects it has on Superfund cleanup efforts in the Coeur d'Alene Basin.

(Letter #s: 197, 421)

Category: Watershed Forestwide Desired Condition -- IPNF Watersheds

PC# WAT0001

The IPNF should consider the following additions to the Watersheds Desired Conditions:

- that management actions would include activities to establish recovery trends in 303(d) listed segments and water bodies that are consistent with approved TMDLs. For 303(d) listed streams without approved TMDLs, management actions would lead to improvement in parameters (pollutants) that resulted in the listing;
- the methodology that will be used to determine which watersheds will receive restoration, hydrologic improvements, native fish passage removals, or sediment source reductions;
- a goal to meet Tribal water quality standards.

(Letter #s: 197, 257, 430, 456, 468)

PC# WAT0002

The IPNF should include measures to protect water quality and native fish by:

- taking steps to protect and restore watershed forests in order to limit toxic runoff;
- requiring management buffers of 200 to 300 feet to protect rivers, streams, lakes and sensitive areas.

(Letter #s: 229, 513, 512, 485, 278, 173, 463)

PC# WAT0003

The IPNF should ensure land management practices maintain the water quality standards of the State of Idaho without limiting public land access under the guise of protecting water quality.

(Letter #s: 480)

PC# WAT0006

The KNF should consider revising the Watersheds Desired Condition to:

- address the cooperative agency processes described in the State of Montana's Nonpoint Source Management Plan - "Watershed and instream conditions, such as pool frequency, residual pool depth, pebble counts, stream temperature, large woody material, bank stability, lower bank angles, and bankfull width/depth ratios, are within hydrologic reference conditions for resilient channels. Management actions include restoration activities supporting recovery trends achieving reference conditions in Class II and III watersheds within the life of this Plan. For all 303(d) listed waters without watershed plans or approved TMDLs, management actions support recovery trends that substantially achieve Class I watershed conditions within the life of this Plan";
- encourage cost-sharing partnerships to accomplish fishery and water way restoration and rehabilitation;
- address road effects to water quality, watersheds, and aquatic habitat and species and that it is included somewhere in the LMP;
- be congruent with Clean Water Act requirements for water quality, by replacing the harm-avoidance language with an affirmative desired water quality condition plan - "Water quality meets or exceeds applicable state standards, sustains stream channel reference conditions, and supports native amphibians and diverse invertebrate communities";
- minimize the impact of legacy roads and trails through BMPs and decommissioning;
- include a reference the Montana Water Quality Standards Administrative Rules.

(Letter #: 257, 266, 293, 336)

PC# WAT0007

The FS should explain how the LMP will realistically improve watershed conditions without commitments and guarantees, when past management under strict operating standards failed to do so.

(Letter #: 387)

PC# WAT0009

The FS should develop a more realistic goal for effects to soil productivity for only minor and non-significant adverse effects, rather than "no sustained adverse effects".

(Letter #: 336)

PC# WAT0010

The FS should consider revising the Soil Desired Condition to:

- address the existing and potential cumulative effects of management on soil productivity and loss, particularly with regard to the effects of logging activities;
- include "reduction of earth slippage and downstream flooding outside the forest";
- include in the hydrologic functions in soil "living tree roots are in place to hold the soil and moisture to forestall erosion and flooding";
- include in the physical, biological and chemical properties "No sustained adverse effects on soil productivity or soil-hydrologic function are evident in IPNF watersheds, including loss of soil and water holding tree roots".

(Letter #: 506, 294, 434)

PC# WAT0011

The FS should consider revising the Watersheds (Water, Soil, and Riparian) and Aquatic Species Desired Condition for riparian habitat to:

- emphasize a goal of restoring and maintaining riparian habitat and stream conditions within the expected range of natural conditions;

- include a meso-scale watershed restoration element that says "In riparian conservation areas and active restoration watersheds, road densities are at a level that is favorable to water quality, bull trout, and westslope cutthroat trout. Roads within riparian conservation areas are designed, located, constructed and maintained to effectively trap and store sediment so that natural levels of sediment reach waterways".

(Letter #: 266, 336)

PC# WAT0012

The FS should consider revising the Aquatic Habitat Desired Condition to:

- include: "Stream banks are at least 90 percent stable in 80 percent of any stream reach. There is an absence of silt from timber harvest activity";
- disclose what methodology will be used to determine which watersheds will receive restoration, hydrologic improvements, native fish passage removals, or sediment source reductions;
- include wetlands as aquatic habitat and comply with Executive Order 11990;
- place additional emphasis on alpine and mountain wetland buffers;
- amend the language for large pools within streams to include "in reaches that have geomorphologic types where such conditions are expected";
- include more quantifiable estimates of desired condition levels as targets;
- identify watersheds that are population strongholds for listed, proposed, or endemic species, and to manage for the long-term stability, productivity and biological diversity of these areas per the Interior Columbia Basin strategy.

(Letter #: 173, 197, 257, 336, 428, 434)

PC# WAT0016

The FS should include additional species - westslope cutthroat and burbot - in Aquatic Species Desired Conditions.

(Letter #: 465)

PC# WAT0017

The FS should establish an ecologically sound Aquatic Conservation Strategy establishing broad scale goals and standards to ensure the level of planning is commensurate with the high degree of sensitivity of aquatic resources to human disturbance.

(Letter #: 422)

PC# WAT0018

The FS should consider the following additions to Watersheds Desired Conditions for each GA:

- describe road densities, their effects on ecosystem condition and objectives for road density reduction;
- identification of source water protection areas;
- descriptions and lists of conservation and restoration watersheds;
- list streams and stream miles with 303(d) listings, the pollution parameters causing exceedences, and measures for improvement;
- list TMDL streams and describe the objectives of the TMDL and how they are being implemented;
- a discussion and description of stream functionality, which includes classification factors, measures for improvement, and a description of watersheds and subwatersheds with restoration needs and those targeted for conservation of resources.

(Letter #: 197, 257, 458)

PC# WAT0035

The FS should consider restoring beaver to historic population levels as a possible key in restoring damaged watersheds by restoring their historic ability to capture, store and release water.

(Letter #: 422)

PC# WAT0053

The KNF should write an 'Aquatic Restoration Strategy' that:

- incorporates elements from the LMP strategy, design criteria and other LMP documents;
- adopts a multiple use strategy for restoration by involving all uses that contributed to the existing condition.

(Letter #: 266)

PC# WAT0055

The IPNF should create an MA for bull trout priority watersheds to help the forest meet its obligations with respect to the Endangered Species Act (ESA) for conservation and recovery.

(Letter #: 339)

PC# WAT0056

The FS should use benchmark analysis for watersheds.

(Letter #: 386)

PC# WAT0060

The FS should manage aquatic habitats where there are pure or potentially pure native fish populations for:

- riparian habitat protection for westslope cutthroat, interior redband, and white sturgeon by allocating these habitats to MA3 or lower;
- all bull trout core and nodal habitats, the MA allocation should be MA3 or lower, and encompass the entire watershed to the stream mouth.

(Letter #: 517)

PC# WAT0061

The FS should maintain high quality habitat for nonnative fisheries with high recreational values.

(Letter #: 517)

Category: Watershed Forestwide Desired Condition -- Riparian

PC# WAT0014

The FS should reconsider active management in Streamside Management Zones (SMZs) to reduce fuel loading and the risk of catastrophic fire.

(Letter #: 168, 38)

Category: Watershed Forestwide Desired Condition -- Soil

PC# WAT0047

The FS should emphasize soil as one of the fundamental building blocks of forest ecosystems, deserving of additional discussion in the LMP, including specific standards and requirements addressing detrimental disturbance erosion and other soil processes.

(Letter #: 339)

Category: Watershed Guidelines – Watersheds (general)

PC# WAT0013

The FS should consider revising the Riparian Areas Guidelines to include:

- criteria for the definition of "intact and functioning";
- Riparian Management Objectives in order to determine watershed condition and need.

(Letter #: 257, 468)

PC# WAT0015

The FS should explain how the LMP will manage aquatic habitat and species without the requirements in INFS.

(Letter #: 257, 468)

PC# WAT0042

The FS should analyze and address the potential for forestwide cumulative effects on aquatic resources from permitting 'short term' degradation through management activities.

(Letter #: 468, 428)

PC# WAT0043

The IPNF should consider revising Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Guidelines:

- Guideline 2 should provide different guidelines for 303(d) listed watersheds where TMDLs and water quality restoration plans have been adopted versus watersheds where TMDLs and water quality restoration plans have not been adopted in accordance with Idaho State law;
- Guideline 4 should require intergovernment coordination of activities within municipal watersheds in order to ensure local government and Idaho DEQ water quality requirements are met, and to ensure the requirements of the Safe Drinking Water Act are met;
- Guideline 4 for riparian areas should read "soil or snow mixed with soil";
- to ensure projects are conducted in a manner consistent with Idaho's Antidegradation Policy;
- to include a standard for ECA to minimize the effects of peak flows at the 4th HUC scale;
- to provide more comprehensive water quality and riparian protection;
- to include "Vegetation management practices such as timber harvest, salvage logging, and fuels treatments may be used in RCAs only to restore or enhance physical and biological characteristics of the RCA including watershed, riparian and aquatic habitat and aquatic species desired conditions";
- to include "Minimum impact fire suppression tactics should be used within RCAs";
- to include "Allow fuelwood cutting in RCAs only where it would not prevent or retard attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions";
- to include "Prohibit storage of fuels and other toxicants within RCAs. Prohibit refueling within RCAs unless there are no other alternatives. Refueling sites within an RCA must be approved by the FS and have an approved spill containment plan";
- to include "Wetlands should be flagged and marked on the ground and on maps to facilitate avoidance of disturbance to wetlands ."

(Letter #: 197, 339)

PC# WAT0044

The KNF should consider revising the Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Guidelines:

- to include direction that maintains and protects existing high quality waters, and promotes restoration of impaired waters;

- with stronger language that promotes outcomes that are more likely to achieve the desired condition;
- to describe how the guidelines will be implemented;
- to include a guideline for ground-disturbing activities in unimpaired watersheds;
- to include "Ground disturbing activities in Class I or Class II watersheds will maintain water quality conditions providing full support for beneficial uses during the life of the Plan. Short-term or incidental water quality departures may occur where there is no threat or impairment of the watershed beneficial uses or where the activities support long-term benefits to aquatic resources";
- Guideline 2 should ensure consistency with approved TMDLs and associated water quality restoration plans with "Ground-disturbing activities in watersheds of 303(d) listed waterbodies with an adopted Water Quality Restoration Plan/TMDL will be consistent with water quality restoration measures and targets in the adopted TMDL and associated water quality restoration plans, including measures to restore full support of beneficial uses.";
- to include "Ground-disturbing activities in watersheds of 303(d) listed waterbodies without an adopted Water Quality Restoration Plan/TMDL will be consistent with achieving Class I watershed conditions within the life of the proposed ground-disturbing action or within the life of this Plan."

(Letter #: 257, 266, 309, 422)

PC# WAT0045

The FS should consider revising the Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Guidelines to include:

- stronger language that promotes outcomes that are more likely to achieve the desired condition;
- "When watershed and riparian conservation areas (RCAs) are intact and functioning at desired condition, then management activities will maintain or improve that condition";
- " When watersheds and RCAs are not intact and functioning at desired condition, then management activities will include restoration components that promote a substantial trend toward desired conditions";
- "Management activities in RCAs will not result in long-term degradation to aquatic conditions. Limited short-term effects from activities in the RCAs may be acceptable when they support long-term benefits to the RCAs and aquatic resources."

(Letter #: 266)

PC# WAT0046

The FS should consider revising the Soils Guidelines to:

- include greater retention of tops, limbs and down woody debris for soil improvement;
- avoid logging in areas with moderate to high mass failure potential (greater than 35 percent) by buffering;
- prohibit any ground-based skidding on slopes greater than 35 percent;
- quantify 'long' in the phrase "long tractor skids";
- include a limit of 5 percent compaction on logging units.

(Letter #: 146, 50, 293, 339)

PC# WAT0048

The FS should consider revising the Aquatic Species Guidelines to:

- include BMPs and stream crossing permits on the KNF to ensure the framework for RCA management consists of the Montana SMZ law;
- include protections equivalent to those of INFS such as pool frequency, water temperature, large woody debris, bank stability, bank angle, and sediment;

- say that stream crossing improvements should be prioritized by habitat value, status of the species, and species' genetics and be coordinated with other efforts within the watershed;
- clarify that suppression tactics refer to fire suppression;
- clarify and define "intact and functioning at desired conditions" with a criteria for a functioning and non-functioning determination;
- include temporary crossing structures with lower design standards;
- prohibit activities within a range of dates;
- to prohibit timber harvest in riparian areas that provides habitat security, diversity, stability, and long-term woody debris recruitment in bull trout core and nodal habitats.

(Letter #s: 254, 517, 460, 428, 336, 223, 339)

PC# WAT0049

The FS should consider the additional 'Sources of Other Design Criteria' and/or references:

- "Steps to Take to Incorporate Source Water Protection into Your Plans and Projects";
- Logan, R. 2001. Water Quality BMPs for Montana Forests. EB158, 2001. MSU Extension Publications, Bozeman MT 59717;
- compliance with Idaho Water Quality Standards be added to Guideline 1 under the "Watersheds and Aquatic Species" heading;
- Clean Water Act Water Quality Standards and State of Idaho Water Quality Standards and Regulation;
- draft document on EPA's Regional drinking water website, EPA Region 10 Source Water Protection Best Management Practices for USFS, BLM.

(Letter #s: 197, 336, 6)

PC# WAT0054

The FS should avoid excessive soil disturbance and compaction by limiting the use of excavators after harvest.

(Letter #s: 293)

PC# WAT0059

The FS should consider whether mitigation plans for at-risk watersheds:

- are working well enough to permit logging in at-risk areas;
- can be adequately funded.

(Letter #s: 482)

Category: Watershed Libby GA Desired Condition (KNF)

PC# WAT0019

The KNF should protect the Flower Creek municipal watershed, which is the public water supply for the city of Libby.

(Letter #s: 257)

Category: Watershed Monitoring – IPNF Watersheds

PC# WAT0022

The IPNF should coordinate their aquatic monitoring program with the Idaho Department of Environmental Quality and the EPA to promote consistency in monitoring and assessment methodologies and the indicators used for evaluation of beneficial use support; reference material is listed in comment letter #197.

(Letter #s: 197)

PC# WAT0033

The FS should describe the treatments used to restore proper functioning condition.
(Letter #: 384)

Category: Watershed Monitoring – KNF Watersheds

PC# WAT0023

The KNF should coordinate their aquatic monitoring program with the Montana Department of Environmental Quality and the EPA to promote consistency in monitoring and assessment methodologies and the indicators used for evaluation of beneficial use support, including multiple indicators to account for complexity of chemical, physical and biological processes.
(Letter #: 257, 266)

PC# WAT0024

The KNF should make an explicit commitment to implement watershed monitoring:

- providing sufficient funding to assess both project outcomes and ecosystem benefits;
- including a detailed discussion of required elements and reporting timeframes;
- by providing the monitoring implementation guide as part of the LMP.

(Letter #: 330, 266)

PC# WAT0025

The KNF should consider the following additional Watersheds and Aquatic Species Monitoring Questions:

- Have management areas focused on the decommissioning of roads to improve watersheds, followed by stream restoration?
- How many watersheds have been restored and could this number be increased?
- Have management activities avoided impact to riparian areas?
- How many partnerships are being established with private groups interested in watershed rehabilitation?
- Has habitat for bull trout, native interior redband and westslope cutthroat trout increased as well as the populations of each species?

(Letter #: 293, 475)

Category: Watershed Monitoring – Watersheds (general)

PC# WAT0026

The FS should monitor all aquatic habitat.
(Letter #: 173)

PC# WAT0027

The FS should ensure that monitoring of TMDLs, sediment production and associated negative effects are not overestimated to the disadvantage of public use and motorized recreation.
(Letter #: 355)

PC# WAT0028

The FS should amend the objectives and include the 1987 Forest Plan commitment to specific water quality objectives for streams.
(Letter #: 200)

PC# WAT0029

The FS should include a soil monitoring component for plots in treated and untreated areas to provide data for the EMS and adaptive management.

(Letter #: 254)

PC# WAT0030

The FS should include accountability for fisheries protection and restoration at least equal to that in the existing Forest Plan by providing a framework for the INFS regulations or standards that require quantitative monitoring of high value fisheries streams.

(Letter #: 197, 266, 422, 465)

Category: Watershed Objectives – IPNF Watersheds

PC# WAT0031

The IPNF should consider revising the Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Objectives to include:

- Objective 2 for consistency with both existing and future TMDLs;
- combining functioning at risk (FAR) and not properly functioning (NPF) watershed objectives with the 303(d) objectives;
- describing the extent to which the proposed levels of watershed restoration will restore and delist 303(d) waters;
- a third bullet under Watershed Condition to ensure that habitat features identified in the desired conditions are more than 'aspirations';
- to define the 'risk factors'.

(Letter #: 197, 6)

Category: Watershed Objectives – KNF Watersheds

PC# WAT0034

The KNF should consider revising the Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Objectives to include:

- meeting the protocol under the new planning rule for 'measurable, time-specific outcomes';
- a comprehensive set of objectives based on budget realities, with those actions that are actually needed to attain desired conditions (especially those that are legally mandated);
- the concept of moving impaired waters towards full support of beneficial uses;
- maintaining the 11 percent of properly functioning watersheds, most of which lie in IRAs allocated to MA5;
- stronger language that promotes outcomes that are more likely to achieve the desired condition;
- showing substantial and sustained trends toward achieving reference conditions in Class II and III watersheds within the life of the Plan by indicating the percentage of Class II and III that would have impaired conditions mitigated or restored in five year intervals;
- prioritizing actions to achieve watershed desired conditions;
- minimizing the effects of legacy roads with mileage targets;
- riparian management objectives - "Support TMDL and water quality restoration plan development by working cooperatively with the State/EPA and local watershed groups to assess the causes and sources of conditions contributing to Class II and Class III watersheds, and within 1 year, prioritize all Class III and II KNF watersheds to substantially achieve watershed restoration during the life of this Plan";

- "Implement restoration and monitoring activities for the prioritized 303(d) listed waters to promote restoration of full support of beneficial uses, allowing removal of these waters from the 303(d) list during the life of this Plan. Approximately one third of the listed waters will have watershed restoration plan/TMDLs implemented within five years of forest Plan implementation, and approximately two thirds of the watershed's restoration plans will be substantially implemented within 10 years of KNF Plan implementation. All parameters of an impaired water may not be fully restored during the life of this Plan, but all waters will be making substantial progress to achieve full beneficial use support within the life of this Plan";
- "Work cooperatively with the State/EPA and local watershed groups to support TMDL and water quality restoration plan development. Assess and validate listings of impaired waters and prioritize all impaired waters on the KNF for restoration within the first 5 years of the planning period";
- "Implement restoration and monitoring activities to address the prioritized KNF restoration needs for 303(d) listed waters to promote restoration of full support of beneficial uses, thereby, removing waterbodies from the State 303(d) list during the planning period. It is recognized that all listed waters may not be fully restored during the planning period, but all KNF waters should be prioritized for restoration and put on a path toward long-term restoration of full support for beneficial uses".

(Letter #: 387, 336, 266, 257, 6)

PC# WAT0036

The KNF should reassess the objectives for achieving the desired conditions for 303(d) watersheds because quantifying the proposed mitigation and restoration shows that it will address the impairments of a limited percentage of watersheds that are not properly functioning or functioning at risk.

(Letter #: 266, 387)

Category: Watershed Objectives – Watersheds

PC# WAT0005

The FS should manage valuable water sources and their unique ecosystems for protection by:

- recommending these areas for Wilderness designation;
- recognizing and treating healthy ecosystems as irreplaceable ecological treasures;
- prohibiting any degrading management activities or uses.

(Letter #: 173, 422, 394, 339, 277)

PC# WAT0037

The FS should explain what is meant by 'treatment' for 303(d) watersheds, including miles and number of streams, and types of upland management that would benefit impaired water bodies.

(Letter #: 6)

PC# WAT0038

The FS should explain under Objective 1 for watersheds and aquatic species what the risk factors are that contribute to watershed impairment.

(Letter #: 6)

PC# WAT0039

The FS should identify the acreage objectives in different watershed objectives that are potentially redundant, particularly for objectives 1 and 2.

(Letter #: 6)

PC# WAT0040

The FS should explain how it determined that 400 acres was an appropriate treatment area for restoring soil quality and productivity.

(Letter #: 197)

PC# WAT0041

The FS should consider revising the Watersheds (Soil, Water, and Riparian Areas) and Aquatic Species Objectives to include:

- strengthening the objectives language for riparian conservation areas to ensure they are as binding and protective as those of INFS;
- using a more useful metric for habitat connectivity such as a number of projects that reestablish connectivity to high value habitats or species;
- making improvements such as bank stabilization, riparian planting, or placement of woody material on a specified quantity of riparian habitat;
- "activities over the life of the Plan will promote maintenance and attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions" to verify that activities promote maintenance or attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions.

(Letter #: 197, 257, 336, 421)

Category: Watershed St. Joe GA Desired Condition (IPNF)

PC# WAT0021

The IPNF should consider amending the Desired Condition for the St. Joe GA to include a:

- discussion of the bull trout Critical Habitat Rule;
- condition that mimics historic fire patterns in terms of providing different vegetation stages, while allowing for watershed recovery and maintenance.

(Letter #: 456, 465)

Subject: WILDLIFE (PC #s starting with WLF)

Category: Access & Recreation Forestwide Suitability

PC# WLF0020

The FS should provide data supporting motorized closures to improve habitat connectivity.

(Letter #: 355)

Category: Cooperation Forestwide Desired Condition

PC# WLF0005

The FS should consider partnerships to address wildlife management concerns with clubs in the Swede/McMillan area.

(Letter #: 129)

Category: Editorial comment to the Plan.

PC# WLF0009

The FS should include in the Desired Condition a framework describing the characteristics of ecosystem diversity in the LMP because:

- the characteristics are undefined and vague;

- it fails to provide for the diversity of plant and animal communities within the meaning of the National Forest Management Act (NFMA).

(Letter #: 460)

Category: MA - 1b Recommended Wilderness

PC# WLF0033

The KNF should protect mountain goats in the Scotchman Peaks by:

- prohibiting snowmobiles in goat habitat;
- abiding by the MOU between the FS and Montana Fish Wildlife and Parks;
- returning the MA5c area east of Savage Peak to MA1b.

(Letter #: 283, 305, 387, 424, 46, 460)

Category: Project Level

PC# WLF0041

The FS should consider interpretive signs along the St. Joe River and Hiawatha Trail for wildlife.

(Letter #: 465)

Category: Vegetation Forestwide Desired Condition

PC# WLF0004

The FS should consider the following for management of old-growth habitat:

- improve the current shortfall in old-growth habitat with scientifically sound old-growth protection and restoration policies;
- provide adequate inventory of its forestwide old-growth habitat;
- provide enforceable standards sufficient to insure old-growth associated species viability;
- provide information and issues relating to the viability of species that are dependent in whole or in part on adequate levels of old-growth habitat, well distributed across the Forest;
- consider relevant concerns from wildlife experts, including FS experts, and adopt wildlife protection "guidelines" with scientific support.

(Letter #: 294)

Category: Wildlife Coeur d'Alene GA Desired Condition (IPNF)

PC# WLF0038

The IPNF should amend the language in the Wildlife Desired Condition for the Coeur d'Alene GA:

- to read "Motorized summer use occurs on managed routes; motorized winter use occurs on managed routes and use areas. Both are managed in a manner that does not have significant adverse impacts on wildlife";
- deleting the last paragraph on page 1-41 as unrealistic;
- to distinguish between the effects of summer and winter motorized activities;
- to identify connectivity in the Lookout Pass area as a desired condition "The Idaho/Montana Divide [will] provide [secure] habitat (with minimal human-caused disturbance and development) [or would provide effective connectivity] for wildlife movement between the Salmon and Selway/Bitterroot Wilderness areas and Canada's potential source populations."

(Letter #: 146, 395)

Category: Wildlife Forestwide Desired Condition -- Habitat (general)

PC# WLF0001

The FS should protect critical components of wildlife habitat such as:

- security cover;
- connective corridors from motorized use.

(Letter #s: 479, 478, 387, 171, 283)

PC# WLF0002

The FS should protect habitat through Wilderness recommendation:

- of the Scotchman Peaks for black bear, bull trout, deer, elk, grizzly and mountain goats;
- of the eastern, western, and southern areas of the Selkirks for caribou and grizzly;
- of Cabinet Face East and West, Grizzly Peak, Whitefish Divide (Thompson Seton-Marston-Tuchuck), Portions of the Ten Lakes and Robinson Mt, for core grizzly bear habitat and strongholds of occupied historic habitat for either bull trout, or the westslope cutthroat trout and the interior redband trout;
- of the Northwest Peaks, Roderick Mountain, Saddle Mountain, Gold Hill West, Mount Henry, Buckhorn Ridge, Pink Mountain, the West Fork and Mount Robinson for grizzly bear, wolverine, lynx, wolves, bighorn sheep, moose, elk, mountain goats, trout and occasional woodland caribou;
- in the area as far south as Jeru Peak for protection of an intact ecosystem from motorized vehicles;
- of all the IRAs on the KNF, which include underrepresented habitats;
- to protect habitat corridors, including those between the USA and Canada;
- to buffer species' adjustments to climate change.

(Letter #s: 517, 79, 31, 511, 475, 424, 42, 37, 368, 296, 293, 28, 277, 26, 253, 228, 226, 192, 161, 92)

PC# WLF0003

The FS should change the Wildlife Desired Condition to place more emphasis on maintaining and improving habitat while allowing nonmotorized recreation.

(Letter #s: 22, 8)

PC# WLF0006

The FS should protect and enhance habitat:

- by minimizing development and limiting intrusions;
- by providing stewardship logging contracts for big game and upland bird habitat;
- as a top priority;
- for lynx, grizzly, and wolverine;
- by increasing uninterrupted blocks of habitat managed for wilderness characteristics to address the habitat loss described in the Analysis of the Management Situation (AMS);
- by limiting motorized access in roadless and other currently nonmotorized areas for big game security, in order to ensure continuation of the traditional five-week hunting season in Montana.

(Letter #s: 291, 295, 309, 339, 430, 453, 517)

PC# WLF0007

The FS should manage for native wildlife:

- in lieu of managing for game species to the detriment of rare species;
- including the small creatures that contribute to the ecological fabric.

(Letter #s: 447, 419, 434)

PC# WLF0008

The FS should reconsider management of groomed snowmobiles in lynx habitat because:

- the Northern Rockies Lynx Amendment does not require a "no net increase" in groomed snowmobile trails as stated in the desired conditions for Canada lynx;
- groomed snowmobile trails should be allowed where they will not affect lynx.

(Letter #: 444)

PC# WLF0014

The FS should increase snag recruitment:

- as habitat for cavity dwellers;
- by avoiding hazardous snags during timber harvest.

(Letter #: 66, 322, 419)

PC# WLF0015

The FS should eliminate special protection for grizzly bears because the population is healthy.

(Letter #: 442)

PC# WLF0016

The FS should prioritize the needs of wildlife over other resources:

- by using habitat security effectiveness as the unit of measure;
- in MA5c areas where spring snowmobiling disturbs animals emerging from dens.

(Letter #: 460, 453)

PC# WLF0018

The FS should protect and enhance habitat connectivity:

- by developing a new MA designation specifically for wildlife linkage corridors especially for wide-ranging animals such as elk and grizzly bear;
- with a desired condition for wildlife movement based on low density roads, wildlife habitat restoration, natural appearing environments and coexistence with adjacent private landowners. (The area would be suitable for nonmotorized recreation settings and experiences, not suitable for scheduled timber production, suitable for wildland fire use, prescribed burning and fire suppression, not suitable for the development of new sites or utility corridors, and suitable for other uses that are consistent with the designated purpose for that area. The area would also be especially suitable for restoration, collaborative work with wildlife linkage stakeholders (Dept. of Transportation, landowners, USFWS, etc), and wildlife coexistence efforts such as Bear Aware education programming, sanitation and education);
- by expanding the protected north-south corridor along Lake Koocanusa for wildlife movement;
- in a management plan for connecting wildlife corridors to maintain wildlife populations;
- including direction to consistently address connectivity across administrative boundaries;
- by developing a comprehensive linkage corridor program;
- by incorporating a wildlife connectivity map, an overlay, or other forest-wide spatial analysis of connectivity into the PLMPs;
- in the WUI;
- by tiering the design criteria for connectivity to a desired future condition and objective;
- for grizzly bear;
- by reducing disruptive management practices and permitted uses in these areas;
- in the Galena and Cataract areas which provide valuable habitat connectivity by designating them as MA1d;

- for the Mallard Larkins, the Upper St. Joe and other inventoried roadless areas near the Bitterroot Crest which serve as a vital linkage area for wildlife moving between the Selway-Bitterroot Wilderness, the Cabinet-Yaak Ecosystem, and the Northern Continental Divide Ecosystem;
- because project level analysis may fail to recognize forest-wide effects to this resource (connectivity).

(Letter #s: 392, 338, 343, 378, 387, 395, 436, 1, 66, 332, 475, 301, 293, 277, 272, 267, 222, 203, 138, 198, 328)

PC# WLF0021

The FS should provide adequate habitat goals for woodland caribou and grizzly bear, as species with special habitat needs, in compliance with Departmental Regulation 9500-4.

(Letter #s: 339)

PC# WLF0023

The FS should outline in the Desired Condition the limiting conditions for the gray wolf within the context of caribou recovery.

(Letter #s: 110)

PC# WLF0024

The FS should reassess blanket management prohibitions for individual endangered species in relation to other resources, which would develop some management flexibility to meet additional resource needs such as forest health and caribou habitat.

(Letter #s: 168, 38, 382, 110)

PC# WLF0025

The FS should protect grizzly bears by:

- providing linkages between grizzly bear recovery zones;
- linking the IRAs in the Selkirks with the Salmo-Priest areas, and the Cabinet-Yaak through the Northwest Peaks IRA with the Canadian Purcells through Wilderness recommendations;
- providing functional linkages between the Cabinet and Yaak ecosystems;
- extending the active bear year by 2-4 weeks in the spring and fall to limit disturbance;
- restricting snowmobiles to winter only;
- reducing open and overall road densities;
- implementing on the KNF the Amendment 19 management standards developed by the Flathead National Forest;
- improving bear education to limit habituated and problem bears;
- protecting the IRAs on the KNF.

(Letter #s: 14, 453, 419, 339, 322, 293, 94, 283, 17, 163, 135, 131, 120, 114, 11, 251)

PC# WLF0026

The FS should articulate the scientific basis for the Grizzly Bear Desired Condition with regard to:

- bear management unit core block size and effects of activities on sows during spring emergence;
- existing bear distribution and population.

(Letter #s: 468, 428, 154, 307)

PC# WLF0031

The FS should clarify the language in the Caribou Desired Condition statement to:

- correctly state the range of lichen in the southerly Selkirk Mountains;
- recommend habituating caribou to human contact in order to reduce negative effects;

- restrict snowmobile access and seasons.

(Letter #: 473, 444, 451, 465)

PC# WLF0032

The FS should include additional guidelines for Species of Interest and Species of Concern from the Statewide Wildlife Conservation Strategy for bird species of concern and habitat management projects.

(Letter #: 465)

PC# WLF0034

The IPNF should coordinate wildlife management with the Idaho Department of Fish and Game (IDFG):

- to facilitate achieving the IPNF goals and objectives;
- in order to meet the requirements of the IDFG/USFS MOU.

(Letter #: 465)

PC# WLF0035

The FS should include in the Bats Desired Condition surveys for possible roost habitat forest-wide. Some unoccupied mines that are thought to be suitable should be gated and left as available habitat for night roost and seasonal roost use (hibernaculum and maternity roosts).

(Letter #: 465)

PC# WLF0036

The FS should manage now for species likely to be listed in the foreseeable future:

- including post-fire habitat dependent species such as the black-backed woodpecker;
- in order to avoid future litigation under the ESA.

(Letter #: 419)

PC# WLF0060

The FS should include additional language in the Wildlife Desired Condition that conforms with the Conservation Recommendations in the Forest Plan Amendment for Motorized Access as follows:

- The Forests should work cooperatively with the USFWS to identify linkage areas that may be important in providing landscape connectivity within and between geographic areas, across all land ownerships for grizzly bears and Canada lynx;
- Within linkage areas, the Forests should provide for landscape connectivity by participating in the development and implementation of a management plan to protect and restore habitat connectivity within these areas on federal land;
- The Forests should plan for recreational development, and manage recreational and operational uses to provide for grizzly bear and Canada lynx movement, and to maintain effectiveness of grizzly bear and Canada lynx habitat.

(Letter #: 293)

PC# WLF0061

The FS should cooperate and coordinate with the Tribes regarding wildlife management.

(Letter #: 456)

PC# WLF0063

The FS should include in the Wildlife Desired Condition more discussion of total biodiversity including understory habitats.

(Letter #: 456)

PC# WLF0064

The FS should meet the goal of no net change in herd numbers for big game with a goal of no net change in hunter numbers, which justifies the existing level of motorized roads and trails.

(Letter #: 355)

PC# WLF0065

The FS should define wildlife priorities and funding to provide a clear picture of what can be accomplished and where there are opportunities to partner with IDFG for mutual benefit.

(Letter #: 465)

PC# WLF0066

The FS standards for wildlife should focus on the maintenance of viable wildlife populations and the ability of wildlife populations to move around their habitats.

(Letter #: 297, 157, 173)

Category: Wildlife Guidelines

PC# WLF0049

The FS should use additional sources of design criteria for the grizzly bear because the:

- Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet/Yaak grizzly bear Recovery Zones, adopted by the Kootenai, Idaho Panhandle and Lolo National Forests in 2004 and the conclusions in the 2004 Biological Opinion were not based on the best available science, as required by the ESA;
- guidelines will fail to recover the Cabinet-Yaak grizzly bear population.

(Letter #: 428, 468)

PC# WLF0050

The FS should ensure that the guidelines for grizzly bear will achieve the time frame requirements stipulated in the 2004 USFWS Biological Opinion for the Amendments with regards to road densities and core habitat.

(Letter #: 468)

PC# WLF0051

The FS should amend guidelines for caribou:

- to include that if any caribou are located on the IPNF, that efforts to habituate the animals to snowmobile or other use should be undertaken, to avoid negative "disturbance";
- Guidelines 3 & 4 should each add the word "negative" to describe disturbance, as not all contacts or disturbances are negative to the species.

(Letter #: 444)

PC# WLF0052

The FS should reconsider the non-binding guidelines for wildlife, because with no-compliance criteria there is a probable effect to listed and unlisted species.

(Letter #: 339, 468, 422)

PC# WLF0053

The FS should amend Guideline 6 for Species of Concern to address all sources of effect, rather than single out one use.

(Letter #: 444)

PC# WLF0054

The FS guidelines should require evaluation of caves and mines for Townsend's big eared bats prior to any closure.

(Letter #: 329)

PC# WLF0055

The FS should reassess Guideline 2 for big game because studies have shown that elk habituated to human activity and not hunted are more alarmed by pedestrians than motorized vehicles.

(Letter #: 355)

PC# WLF0056

The FS should include guidelines for elk management to improve high quality winter range forage.

(Letter #: 425, 465)

PC# WLF0057

The FS should continue to follow the sensitive species direction in the FSM.

(Letter #: 387)

PC# WLF0062

The FS should include design criteria (guidelines) targets for forage, cover, and security, maintaining a minimum of 60 percent canopy cover on big game winter range for whitetail deer and elk.

(Letter #: 517)

Category: Wildlife Lower Kootenai GA Desired Condition (IPNF)

PC# WLF0039

The IPNF should amend the language in the Wildlife Desired Condition for the Lower Kootenai GA to emphasize the importance of McArthur Lake as an important part of the corridor between the Selkirks and Cabinet/Yaak such as "The IPNF will work with other agencies and local citizens to restore wildlife linkage in the McArthur Lake wildlife corridor."

(Letter #: 339, 395)

Category: Wildlife Monitoring

PC# WLF0012

The FS should clarify in the Snags [and Down Wood] Design Criteria how monitoring of snags in old growth and for wildlife will be accomplished.

(Letter #: 329)

PC# WLF0013

The FS should clarify the Wildlife Design Criteria, specifying how monitoring the effects of open road density on wildlife will be done when there are no standards for open road densities.

(Letter #: 329)

PC# WLF0043

The FS should conduct additional monitoring for wildlife of:

- human encroachment and usage in designated Wilderness;
- human/animal relationships in order to identify areas needing protection for wildlife;
- motorized and non-motorized recreation to assess effects on wildlife;
- mule deer habitat for food, cover and winter yards.

(Letter #: 322, 173)

PC# WLF0044

The FS should consider the following additional Wildlife Monitoring Questions:

- Have management activities served to recover threatened species on the Kootenai National Forest, if not why?;
- Have management activities served to prevent further listings of threatened and endangered species?;
- Have management activities improved connectivity and linkage across the landscape and not only at the project or district level?;
- Have management activities allowed for large blocks of contiguous habitat to provide for safety of threatened and endangered species and their prey?;
- Have management activities increased the number of large snags available to cavity nesters?;
- Have management activities or the absence thereof met Plan objectives?;
- Has the forest identified key connectivity corridors?;
- How are private activities on adjacent lands affecting connectivity areas and Plan objectives?;

Are the Wildlife Desired Conditions realistic and achievable?

(Letter #s: 218, 293, 387, 434)

Category: Wildlife Objectives

PC# WLF0045

The FS should change the Snags objective (in Wildlife Objectives) because it is unclear how it would be implemented, and it is unnecessary--instead establish project level snag retention requirements (as in the Snag-associated Species Guidelines) and leave green trees as snag recruits in the harvest units that do not meet the targets.

(Letter #s: 336)

PC# WLF0046

The FS should consider the following additional Wildlife Objectives:

- TES objectives for wolf and lynx; for Species of Concern, especially goat and wolverine populations in the Cabinet Mountain Wilderness and the Scotchman Peaks;
- recovery goals for listed species.

(Letter #s: 294, 456, 387, 394)

Category: Wildlife Pend Oreille GA Desired Condition (IPNF)

PC# WLF0040

The IPNF should amend the language in the Wildlife Desired Condition for the Pend Oreille GA to further specify the importance of the Clark Fork area for wildlife connectivity such as "The Clark Fork area along the Montana/Idaho border would provide effective connectivity for wide ranging wildlife species."

(Letter #s: 395)

Category: Wildlife St. Joe GA Desired Condition (IPNF)

PC# WLF0042

The IPNF should recognize Snow Peak Cooperative Wildlife Management Area as a unique feature in the St. Joe GA, and provide additional protection to the security and habitat effectiveness of the area by designating it a Special Interest Area (MA3) prohibiting road construction and motorized use.

(Letter #s: 465)