Subject: MONITORING (PC #s starting with MON)

Category: Monitoring comments not specific to a resource

PC# MON0001

The FS should consider the following for the monitoring guide:

- having the Plan set of documents that contain information on monitoring, evaluation and environmental management, available for review at the same time as the LMP, and include a summary of the monitoring and adaptive management program presented in the LMP;
- including the monitoring and evaluation guide as an appendix to the LMP.

(Letter #s: 257, 394, 456)

PC# MON0002

The FS should explain the following regarding monitoring and how it is funded:

- discuss in the LMP and the monitoring guide how future budget decisions may affect monitoring and evaluation;
- explain how limited monitoring appropriations will affect implementation of the LMP;
- make a strong commitment to funding monitoring activities, such as watershed/water quality monitoring, like the R6 Monitoring and Evaluation Guide (USDA FS 1993) states "All programs and projects should contain appropriate levels of monitoring funds in their costs--or they should not be undertaken".

(Letter #s: 257, 293, 387, 449, 453, 473)

PC# MON0003

The FS should describe benchmarks or data collection for monitoring in the document, or reference a separate document in which these items are defined or described.

(Letter #s: 465)

PC# MON0004

The FS should identify in the monitoring guide:

- criteria to effectively gauge success in management;
- questions that seek to evaluate the effectiveness of management activities to achieve the goals outlined in the desired future conditions.

(Letter #s: 293, 416)

PC# MON0005

The FS should commit to using reliable, valid, and verified models and assessment procedures while implementing the LMP; commit to a meaningful and informative monitoring program as required by NFMA; and should answer each of the Monitoring Questions as if they are being asked of the original 1987 Forest Plan's implementation.

(Letter #s: 294, 422)

PC# MON0006

The FS should provide enforceable requirements to monitor the effects of Plan implementation on water quality, wildlife and forests.

(Letter #s: 153)

PC# MON0007

The FS should include a section that clearly indicates the public will be able to engage in the monitoring activities relating to fisheries, watershed, and old growth issues and it should clearly describe the procedures by which the public can be engaged.

(Letter #s: 386, 389)

Subject: OTHER PRODUCTS (PC #s starting with OFP)

Category: Other Products Forestwide Desired Condition

PC# OFP0001

The FS should provide further analysis, discussion, and regulation on non-timber forest products to:

- assess the need for a stand-alone budget;
- recognize contributions of such products to local communities and economies;
- outline strategies that address and incorporate management strategies for non-timber forest products in conjunction with other forest management Planning in order to effectively protect and manage for these other products;
- include peer-reviewed scientific information.

(Letter #s: 422, 293, 294, 388)

PC# OFP0002

The FS should employ a non-timber forest product specialist to survey, manage, and develop non-timber forest products.

(Letter #s: 422, 388)

PC# OFP0003

The FS should revise the cost-benefit or economic analyses to account for the dollar value contributions of non-timber forest products.

(Letter #s: 422, 293, 294)

PC# OFP0004

The FS should provide additional opportunities for firewood gathering.

(Letter #s: 214, 208, 212)

Subject: PROCESS (PC #s starting with PRO)

Category: Access & Recreation Forestwide Desired Condition -- Mechanized

PC# PRO0029

The FS should base the travel Plan on the assumption that all system trails and roads are open to mountain bikes as they are to other nonmotorized travel forms. Do not limit mountain bikes to specified routes only.

(Letter #s: 64)

Category: Access & Recreation Forestwide Desired Condition -- Trails

PC# PRO0027

The FS should develop management options to deal with conflicts between users on trails by developing select strategies that resolve the problem while preserving high quality experiences. There are many management options short of separating or eliminating uses such as education, peer patrolling or alternating days, which can work to manage diverse uses compatibly.

(Letter #s: 64)

Category: Collaboration Public involvement concerns

PC# PRO0022

The FS should give equal consideration to those supporting Recommended Wilderness as those supporting motorized recreation and timber.

(Letter #s: 277)

Category: Decisionmaking and Planning process and methods

PC# PRO0001

The Forests should rely on the regional office to conduct forest-level Planning since the PLMP is so broad and reliant on Region 1 standards and guidelines.

(Letter #s: 339)

PC# PRO0002

The FS should establish clear standards for decision making within the FS.

(Letter #s: 297)

PC# PRO0003

The FS should do what the national headquarters are advocating to:

- take risks and make sure that the "right thing" gets done on the ground;
- take advantage of this opportunity to accomplish goals and move towards a desired future condition of improved forest health and public approval.

(Letter #s: 299)

PC# PRO0005

The FS should explain how it gets the power to make Wilderness out of non-wilderness land when Congress is supposed to be the only one to create Wilderness.

(Letter #s: 327, 432, 390, 429)

PC# PRO0008

The FS should use its budget to manage forest health and not pay for lawsuits.

(Letter #s: 306)

PC# PRO0012

The Forest Supervisors of the two Forests should work in coordination to manage areas of common interests such as the Scotchman Peaks.

(Letter #s: 192, 193, 231, 65, 88, 92, 93)

PC# PRO0014

The FS should consider in its decisionmaking:

- a way to balance protection of ESA species with all other uses;
- the needs and opinions of the public for multiple-use opportunities;
- creating a multiple-use review board to ensure the decision making reflects the multiple-use management goals and needs of the public;
- the needs of both the human and natural environment, not just the desires of large groups that have a lot of money and legal support;
- the needs of citizens who rely on the forest for their recreation and livelihoods.

(Letter #s: 355, 331, 154, 109)

PC# PRO0015

The FS should consider that motorized trail projects are not occurring because travel management Planning is underfunded and locked up in NEPA processes.

(Letter #s: 355)

PC# PRO0016

The FS should address whether the use of Categorical Exclusions will prevent site-specific NEPA from occurring.

(Letter #s: 506)

PC# PRO0018

The FS should consider that the [Montana] Congressional delegation has made it clear that:

- they will not support Wilderness designation without a broad base of support from surrounding communities;
- the current "Wild Lands" classification in the PLMP is an acceptable alternative.

(Letter #s: 413)

PC# PRO0020

The FS should consider training their employees to ride OHVs so they can ride with OHV users and better understand their needs.

(Letter #s: 355)

PC# PRO0024

The FS should recognize that people are in favor of sound management and have a strong desire to maintain the health of these forests to achieve many benefits such as clean water, abundant wildlife and recreational opportunities; however, this is not accomplished in the PLMP.

(Letter #s: 445)

PC# PRO0026

The FS should address how the Wild and Scenic Rivers classification recommendations for 15 streams in North Idaho are taken outside the context of the 1991 Memorandum of Understanding between the State and Federal agencies.

(Letter #s: 176)

Category: Editorial comment to the Plan.

PC# PRO0004

The FS should address in the Strategy section in Chapter 2, clear objectives and spending Plans for timber, recreation and road maintenance (like there is for fisheries, watersheds, wildlife habitat, and fuels treatments), which currently have disclaimers that allow too much flexibility in achieving goals-- these resource management considerations should be priorities and there should be stronger language in the final Plans.

(Letter #s: 299)

PC# PRO0007

The FS must address what the biological potential of the forest is or how desired conditions will be met in the LMP.

(Letter #s: 331)

PC# PRO0031

The FS should terminate all timber harvest, mining, and oil-gas activities.

(Letter #s: 475)

Category: MA - 1b Recommended Wilderness

PC# PRO0006

The FS should consider the following regarding changing the designation of Recommended Wilderness to Wild Lands that:

- changing the terminology of Recommended Wilderness to Wild Lands leads participants to think that none of their efforts really matter;
- changing the terminology is not acceptable to people that have been involved in the collaborative process or those that want Wilderness;
- the former Forest Supervisor was catering to a select group of individuals;
- the FS said the Starting Option for Recommended Wilderness would not change without further public involvement and that did not occur in the PLMP.

(Letter #s: 424, 300, 84, 302, 297, 322, 369, 375, 414, 452, 51, 55, 63, 66, 72, 37, 274, 69, 182, 270, 127, 144, 18, 183, 184, 19, 196, 205, 206, 114, 233, 258, 265, 26, 150, 261, 264, 387)

PC# PRO0011

The FS should respect the desires of the:

- larger public regarding Wilderness, not just opinions of Lincoln County;
- desires of Sanders County, which supports the Recommended Wilderness areas and believes its input was disregarded.

(Letter #s: 334, 320)

Category: MA - 5b Backcountry - Motorized summer and winter

PC# PRO0017

The KNF should reconsider the MA5b allocations because the chairperson of the ATV club said his members do not want to use these areas.

(Letter #s: 426)

Category: MA - 5c Backcountry - Nonmotorized summer, motorized winter

PC# PRO0023

The KNF should reconsider the addition of MA5c and the movement of 40,000 acres of MA5a into MA5c.

(Letter #s: 227)

Category: Project Level

PC# PRO0030

The FS should consider giving the analysis of roadless and unroaded areas equal priority as recommendations for wilderness because unroaded areas may be equally effective at preserving ecosystems yet may allow more diverse recreation opportunities.

(Letter #s: 159, 185, 427, 64)

PC# PRO0032

The travel management process should be initiated with the scoping process and a full and adequate evaluation of all viable alternatives. All existing roads and trails available to motorized recreationists should be used as the starting alternative for all analyses and impact determinations. We request that the process be restarted and that all existing roads and trails, which are available for use by motorized recreationists, be adequately identified as the baseline alternative.

(Letter #s: 355)

PC# PRO0033

Why are the extreme motorized closure alternatives presented and a middle of the road alternative based on existing routes plus new motorized routes needed to meet the public's need not presented? We are concerned that this demonstrates a significant predisposition in the current process.
(Letter #s: 355)

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

PC# PRO0021

The FS should be a leader on wildlife-related issues, by protecting the Cabinet-Yaak ecosystem.
(Letter #s: 243)

Subject: PROJECT LEVEL (PC #s starting with PRL)

Category: Access & Recreation Other

PC# PRL0010

The FS should consider limiting all recreation access to designated routes only in some areas of high use or sensitive habitat.
(Letter #s: 64)

Category: Project Level

PC# PRL0001

The FS should provide site-specific analysis and mapping for every road and trail so that the benefits of keeping each motorized travelway is adequately addressed and accounted for in the decision.
(Letter #s: 355)

PC# PRL0002

The FS should consider the following regarding travel management in the Coeur d'Alene River Ranger District:

- make an effort to better explain road closures--there are many areas that are NOT designated nor expected to become roadless areas, however, many roads in these areas have been closed lately to all motorized use, without any opportunity for comment (For example, in the Elk Mountain, and Beauty Saddle areas);
- consider expansion of the Fourth of July Park & Ski Area along Forest Road 614 to at least RoseCreek Saddle, and the Panhandle Nordic Club's proposal to develop skate ski, additional cross-country ski, and snowshoe opportunities in this expansion. The proposed expansion will create opportunities for backcountry skiing in the area to the south and west of Rose Creek Saddle and the exclusion of motorized winter travel will foster this use;
- exclude motorized recreation on all but Forest Road 614 during the snow free months. This area has been managed during winter months for cross-country skier use for sixteen years. Due to the exclusion of motorized traffic and the maintenance of the thoroughfares, the area also attracts hikers, mountain bikers and equestrians who wish to avoid motorized uses during the summer months; *consider late spring, summer and fall motorized use of only Forest Roads 614, 459 (Beauty Creek - Coeur d'Alene Mountain), 438 (Beauty Saddle Road) and 539 (Rose Creek Road) and closure of all other roads and trails to motorized use to create an area emphasizing hiking, mountain biking and equestrian pursuits.

(Letter #s: 123, 24, 49)

PC# PRL0008

The FS should consider preventing the Rock Creek Mine mining in and under the Wilderness. If it can not be avoided, the FS should consider the Montanore Mine on the Libby side as the less destructive alternative.

(Letter #s: 308)

PC# PRL0009

The FS should consider retaining the parcel of land in T30N, R31 W, Sec 2 and making it a Special Interest Area for multi-use recreation.

(Letter #s: 515)

PC# PRL0011

The FS should address the live stream crossing on Lightning Creek on the Sandpoint District that allows hundreds of cars a week to cross it, which impacts bull trout habitat.

(Letter #s: 153)

PC# PRL0012

The FS should consider permitting motorized use on the following roads and trails:

- Cemetery Ridge Road #226;
- Dot Creek Trail #111;
- St. Joe Divide trail #16 from Slate Creek Saddle to Kellogg Saddle;
- Moonshine Gulch trail #140 to Granite Peak;
- Trail #137 from Humbolt Gulch to Substation - Cooper Pass Road;
- Bronson Meadows Trail #44;
- Silver Hill Trail #16;
- Red Oak Gulch to Stevens Peak.

(Letter #s: 109, 160, 355)

Subject: REGULATORY (PC #s starting with REG)

Category: 2005 Planning Rule

PC# REG0001

The FS should consider providing enforceable, measurable, protective standards and guidelines in the LMP:

- and state that no standard may ever be exceeded;
- for components of the forest ecosystem such as streamside habitat, old forests, and water quality;
- to protect trails from logging and other vegetation management activities;
- because there is a lack of standards and guidelines which leaves management specialists in the position of interpreting the document and design criteria;

(Letter #s: 460, 415, 419, 428, 430, 44, 447, 453, 468, 493, 497, 506, 58, 64, 81, 96, 389, 87, 148, 410, 395, 134, 149, 153, 200, 206, 270, 292, 293, 294, 309, 339, 386, 387, 288, 117)

PC# REG0004

The FS should consider that meaningful cumulative effects should not be done on the project level alone, it needs to be done on a forestwide basis.

(Letter #s: 339)

PC# REG0005

The FS should consider that it must consult with the USFWS regarding the effects of LMPs on listed species.

(Letter #s: 339, 468, 44, 415, 428)

PC# REG0006

The FS should conduct NEPA analysis or produce an EIS on the LMP:

- for MA designations that change the amount of timber harvest or changes harvest from regulated to nonregulated;
- for changes to the use of motor vehicles on roads or trails;
- to develop a No Action Alternative so that the public and decision makers may reasonably compare and contrast other management alternatives;
- because the revision of a LMP can not be categorically excluded from NEPA analysis;
- because the LMP may have significant effects on the environment by weakening and eliminating substantive environmental protections, by containing controversial decisions, by potentially impacting T&E species, and by setting precedent for future actions with significant effects;
- because case law (California v. Block) is violated by having no alternatives to the wilderness recommendations;
- in areas where proposed management changes could affect populations of endangered species;
- because guidelines for managing threatened and endangered species are major land management decisions requiring a NEPA document;
- for lands suitable for timber production and suitable for timber harvest because the proposed actions significantly affect the human environment;
- to justify moving acres from production and/or harvest lands to some other designation;
- for areas that were previously recommended as Wilderness in the 1987 Plan because the original recommendations were made under NEPA analysis.

(Letter #s: 355, 468, 467, 44, 428, 418, 506, 394, 110, 339, 415, 151, 153, 254, 282, 294, 331)

PC# REG0007

The FS should consider and explain that if identifying Suitability of Areas sets forth that an activity should be consistent with the LMP and if the LMP predetermines the "suitability" of an activity, then isn't the decision predetermined through the LMP.

(Letter #s: 444)

PC# REG0012

The FS should consider revising Chapter 2, Objectives to include:

- objectives that should provide minimum targets rather then a fixed range (e.g., rehabilitate or restore a minimum of 30 acres of 303(d)-listed water bodies) to provide clearer direction on the expected accomplishment level, yet provide flexibility to capitalize on additional opportunities (as presented, the high end of the range appears to be a cap that may limit opportunities for greater accomplishments);
- describing the estimated yearly funding requirements that will be needed to measure the objectives associated with vegetation restoration, old growth, wildlife, and watersheds conditions that include fisheries habitat and habitat connectivity;
- the strategy for forest health to treat 250,000 acres over the life of the Plan is not enough treatment;

- showing the optimal level of objectives required to meet the Desired Condition for each resource area and provide an estimate of how long it will take to reach the desired conditions based on the proposed budget-based objectives.

(Letter #s: 38, 386, 168, 336)

PC# REG0014

The FS should consider that the 2005 NFMA regulations:

- will undermine natural resource conservation, ecosystem protection and wildlife safeguards;
- represent a significant departure from how the FS has developed and modified Plans since 1982, which is likely to result in inadequate protection for the natural features and resources on public lands.

(Letter #s: 339, 355)

PC# REG0017

The FS should emphasize that the desired condition should not be an endpoint, but a process, where natural forces define the character of wilderness and other undeveloped areas.

(Letter #s: 96)

PC# REG0018

The FS should consider whether technical guidance for project and activity decision making will be easily distilled from all the additional sources of design criteria under Chapter 3, Guidelines.

(Letter #s: 322)

PC# REG0022

The FS should address how standards have been abandoned under the new Planning rule, how many responsibilities (formerly components of the Forest Plan) have been subsumed into the FSM and FSH, and at what point (when & where) the public gets to comment on this aspect of USFS management policy.

(Letter #s: 387)

PC# REG0023

The FS should be including long-range Planning (not just short range up to 50 years) for protection of habitats, and for predicting sustainability.

(Letter #s: 173, 328, 473)

PC# REG0024

The FS should manage all Recommended and Designated Wildernesses under the 1964 Wilderness Act.

(Letter #s: 151, 153, 339)

PC# REG0025

The FS should consider the following regarding the LMP's proposed management of species under the Endangered Species Act:

- that protections for ESA-listed species are inadequate;
- the ESA specifically requires jeopardy opinions [from USFWS] to be issued based upon a proposed project's potential impacts on the entirety of a listed species--they should not incorporate on-listed subpopulations in jeopardy determinations.

(Letter #s: 219, 339)

PC# REG0026

The FS should consider that the LMP's reliance on regional or national guidance to provide management direction (i.e., FS Manual and FS Handbook) is misleading, imprudent, and contrary to federal laws.

(Letter #s: 339)

PC# REG0027

The FS should consider that the Wild and Scenic Rivers Act:

- requires the protection of the Outstandingly Remarkable Values of eligible river and stream segments until suitability has been determined;
- absence of an adequate analysis for eligible rivers fails to abide by the Wild and Scenic Rivers Act.

(Letter #s: 339)

PC# REG0028

The FS must explain in the LMP whether INFS and PACFISH will be dropped. If so, the Forests will have to assess the potential impacts of negative effects cumulatively, or will only be able to authorize projects if they are necessary to accelerate recovery--the replacement of INFS with Riparian Area Guidelines is insufficient to meet NEPA and ESA requirements.

(Letter #s: 294, 339, 506)

PC# REG0029

The FS should recognize that the 2005 Planning rule does not comply with NFMA or NEPA.

(Letter #s: 503, 506)

PC# REG0030

The FS should consider that the NFMA requires the FS to consider the following in Forest Planning:

- rotation age is set forth as the culmination of mean annual increment, also known as biological maturity;
- NFMA requires you to set the Allowable Sales Quantity;
- NFMA directs the Secretary of Agriculture to submit annual budget requests for the Forests at the level needed to fully implement the LMP;
- NFMA defines several limits on harvest levels--not included among these limits is the roaded or unroaded nature of the particular area of the Forest;
- NFMA requires that LMPs include a Plan for how the FS will return lands that are unsuitable for timber production to a condition where these lands are suitable for timber production.

(Letter #s: 503)

PC# REG0031

The FS's PLMP lists income as a major goal for the IPNF. The FS should recognize that none of the laws state that income generation should be a goal of National Forest management.

(Letter #s: 153, 447)

PC# REG0035

The FS should follow the proper interpretation of the 2001 Roadless Area policy which:

- did not close any roads or off-highway vehicle trails;
- does not ban motorized use from existing roads or trail.

(Letter #s: 251, 355)

PC# REG0039

The FS should consider that federal environmental justice compliance requirements as initiated by Executive Order 12898 (U.S. FS Departmental Regulation 5600-2 (http://www.usda.gov/da/5600-2.pdf)) should be applied immediately to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to.

(Letter #s: 355)

PC# REG0040

The FS states that the enactment of various other laws, including the National Environmental Policy Act, the Endangered Species Act, the Clean Air Act and the Clean Water Act "reinforce ecological sustainability as the first priority of National Forest system management"; this is incorrect - none of these statutes in any way change the mandates for the management of National Forests.

(Letter #s: 355)

PC# REG0041

The FS should reconsider revision topic #6 from the AMS, which says absolutely nothing about "Wild Lands", but clearly identifies Recommended Wilderness Areas; it also states that documentation recommending or not recommending further additions will be made.

(Letter #s: 387)

PC# REG0042

The FS should ensure that Desired Condition recommendations are not interpreted in site-specific management as standards:

- for the desired motorized/non-motorized condition;
- to avoid being seen as predetermined and predisposed.

(Letter #s: 355, 444)

Category: Access & Recreation Forestwide Desired Condition -- Motorized (summer)

PC# REG0037

The FS should recognize that policy direction from the FS's Washington Office calls for the FS to better manage the increasing demand for motorized recreation opportunities on our public lands. Better management should mean increasing not decreasing opportunities for these popular uses of the National Forests.

(Letter #s: 429)

Category: Editorial comment to the Plan.

PC# REG0008

The FS should include in the LMP definitions for "Desired Conditions", "Objectives", Suitability of Areas", "Special Areas", and "Guidelines" as clearly defined at 36 CFR 219 7(a)(2).

(Letter #s: 480)

PC# REG0009

The FS should explain why guidelines are not commitments (Chapter3, page 3-1).

(Letter #s: 456)

PC# REG0010

The FS should include in an appendix for each category that is covered in the Plan, all laws, policies, and regulations that guide the FS.

(Letter #s: 456)

PC# REG0011

The FS should consider that the statement, "While both Forestwide and management area descriptions are used to identify areas that are generally suitable for different types of management and use, they do not determine what uses will actually take place at any given time or location", is a very broad disclaimer that allows managers too much flexibility to change management on-the-ground.

(Letter #s: 456)

PC# REG0019

The FS should include in the Final LMP a section that describes how scientific specifications will be incorporated into the guidelines that apply to vegetation, old growth, watersheds, and fisheries.

(Letter #s: 386)

PC# REG0033

The FS should include under Page viii. Introduction, Relationship to Other Strategic Guidance, a reference to the statutory multiple use directives, and be consistent.

(Letter #s: 444)

Category: MA - 1b Recommended Wilderness

PC# REG0021

The FS should place greater emphasis on conservation and trusteeship for the future, especially with regards to recommendations for wilderness.

(Letter #s: 258)

PC# REG0036

The FS should permit mechanized use in MA1b because:

- mountain bikes do not impair wilderness values;
- banning mountain bikes from MA1b contradicts FSM 1923.03.

(Letter #s: 373, 64, 216)

Subject: SCIENCE (PC #s starting with SCI)

Category: 2005 Planning Rule

PC# SCI0012

The FS should emphasize in the document that cumulative effects will be fully addressed at the project level with an outcome that ensures projects will meet Desired Forest Conditions at the landscape level.

(Letter #s: 465)

Category: Access & Recreation Forestwide Desired Condition -- Roads

PC# SCI0024

The FS should consider the impacts that proposed motorized road and trail closures will have on fire management, firewood cutting, and timber management.

(Letter #s: 355)

Category: Access & Recreation Forestwide Suitability

PC# SCI0010

The FS should base suitability of areas and trails for motorized use:

- on data rather than perceived social desires;

- considering factors such as wildlife habitat, water quality, fisheries and nonmotorized recreation.

(Letter #s: 460)

Category: Adaptive Management

PC# SCI0033

The FS should use an adaptive management approach to make needed adjustments over time in both a biologically and socially defensible manner, with detailed monitoring that describes benchmarks for measuring success and improving on projects.

(Letter #s: 465, 453)

PC# SCI0034

The FS should avoid endpoint conditions such as desired condition and consider a more ecological approach to allow natural processes to shape the future of the IPNF, especially the wilderness, roadless and less developed areas.

(Letter #s: 153, 506)

PC# SCI0037

The FS should consider the following regarding recreational needs:

- managers should be adaptive to recreational needs as vegetation conditions change on the ground;
- managers should avoid overly restrictive management prescriptions that could limit the ability to respond to changing recreational patterns.

(Letter #s: 304, 355)

Category: Decisionmaking and Planning Process and Methods

PC# SCI0011

The FS should provide an estimated annual budget for meeting NFMA biological requirements.

(Letter #s: 389)

PC# SCI0016

The FS should provide strong language in the LMP to guide active management for the next two decades.

(Letter #s: 299)

Category: Editorial comment to the Plan.

PC# SCI0022

The FS should clearly disclose on maps, tables and summaries:

- all existing areas, roads and trails proposed to be closed or opened to motorized access and motorized recreationists;
- current status of roads and trails closed or open to motorized and nonmotorized recreation.

(Letter #s: 355)

PC# SCI0023

The FS should reevaluate how sustainability is defined whether:

- "sustained yield" mandates of MUSYA and NFMA require "sustainability";
- all sustainability must be predicated upon ecological sustainability;
- ecological sustainability, as the primary focus of forest Planning, best meets the needs of the American people.

(Letter #s: 355, 128)

PC# SCI0026

The FS should consider allowing flexibility with protective guidelines on a site-specific basis.
(Letter #s: 413)

PC# SCI0036

The FS should maintain the ability to engage in active management:

- including mechanical vegetative treatments, prescribed fire, logging and other human manipulation in the effort to restore a more natural ecosystem;
- to reduce trends in deteriorating forest conditions.

(Letter #s: 384, 427)

Category: MA - 1d Wild Lands

PC# SCI0027

The FS should explain why the acreages of Wild Lands (MA1d) in the PLMP do not match the acreages in the CER table found on page 1-1.
(Letter #s: 374)

Category: MA Suitability and Desired Conditions - general

PC# SCI0019

The FS should use Plan amendments if proposed changes in acreages for MAs are analyzed through NEPA and ESA separately.
(Letter #s: 465)

Category: Use of best science/ Adequacy of Analysis

PC# SCI0001

The FS should consider additional science cited in the Scientific Assessment for the ICBEMP regarding:

- vegetation and fuels;
- effects of climate on fires;
- effects of logging, roading and vegetation manipulation on roadless areas.

(Letter #s: 153)

PC# SCI0002

The FS should consider additional science from Sierra Nevada Framework, ICBEMP, DellaSala et al (1995 and 1995a), and Henjum et al. (1994) regarding the effects of logging on fuels.
(Letter #s: 506)

PC# SCI0003

The FS should consider studies on trail use:

- including impacts of various types of trail use on erosion prior to prohibiting trail use to specific uses;
- regarding the safety of mountain bike use on trails and trail users.

(Letter #s: 64)

PC# SCI0005

The FS should consider the science in the final EIS for Roadless Area Conservation:

- regarding the importance of large contiguous blocks of wildland and roadless areas;
- as they relate to conservation Planning for important wildlife species.

(Letter #s: 153, 422)

PC# SCI0008

The FS should consider the best available science regarding:

- the effects to ecosystem diversity, wildlife and wildlife habitat from logging old growth trees;
- the amount of old growth and old growth characteristics needed on the IPNF to sustain viable populations of old growth dependent flora and fauna;
- logging in stands that contain old growth trees (Lesica, Peter, 1996. "Using Fire History Models to Estimate Proportions of Old Growth Forest In Northwest Montana, USA", Biological Conservation 77, p. 33-39).

(Letter #s: 386, 449)

PC# SCI0009

The FS should include information comparing historic human-caused impacts with human-caused impacts today.

(Letter #s: 355)

PC# SCI0013

The FS should describe how the best available science applies in the guidelines for all resources.

(Letter #s: 468)

PC# SCI0014

The FS should allow scientific discussion in the public involvement process.

(Letter #s: 87)

PC# SCI0015

The FS should consider what "best available science" is and should include information from independent, credible scientists whose opinions diverge from the FS.

(Letter #s: 326, 389, 355, 294, 386)

PC# SCI0017

The FS should consider other science that examines:

- different timeframes to determine desired conditions (see Walder 1995 and Johnson et al. 1994);
- whether ecological conditions must be within the range of those prior to European settlement in order to achieve ecological sustainability (legitimate multiple use activities such as timber harvest and mining rarely occurred on a large scale prior to European settlement);
- whether it's truly feasible to base Planning and management around a range of variability which can never be definitely determined.

(Letter #s: 355, 506)

PC# SCI0020

The FS needs more data to assess whether needs of motorized recreationists are being met.

(Letter #s: 355)

PC# SCI0021

The FS needs to provide information on how values such as "high social, cultural, and economic values" and "desired" levels were established. For example, a particular species may have a high social value to a particular segment of the population, but a low social value to another.

(Letter #s: 355)

PC# SCI0025

The FS should explain how the science from ICBEMP was used in the development of the PLMP; the 2002 MOU requires the FS to incorporate the science from ICBEMP and consult with USFWS.
(Letter #s: 428, 468)

PC# SCI0028

The FS should provide the science that verifies the effects of:

- motorized recreation on wildlife before closing roads, trails, and snowmobiling areas for those reasons;
- various nonmotorized recreation activities on wildlife.

(Letter #s: 64, 355, 234)

PC# SCI0029

The FS should emphasize use of actual visitor data to establish public need and multiple use recreation resource allocations.
(Letter #s: 355)

PC# SCI0030

The FS should consider the National Academy Science recommendations for the Coeur d'Alene River Basin.
(Letter #s: 421)

PC# SCI0031

The FS's impact analysis in all resource areas should 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.
(Letter #s: 355)

PC# SCI0032

The FS should not use public opinion to discount the resource capability assessments conducted by specialists that identify areas demonstrating a need for wilderness protection.
(Letter #s: 37)

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

PC# SCI0004

The FS should consider technical assistance from USFWS or the regional office to develop a consistent approach to identifying wildlife linkage areas and corridors. Also consider information from the wildlife linkage conference at http://www.cfc.umt.edu/linkage.
(Letter #s: 1)

Subject: SOCIAL/ECONOMICS PC #s starting with SOE)

Category: Access & Recreation Priest GA Desired Condition (IPNF)

PC# SOE0013

The FS should address off-trail riding experiences in the Priest Lake GA.
(Letter #s: 110)

Category: Decisionmaking and Planning Process and Methods

PC# SOE0001

The FS should disclose actual budgets in comparison to the necessary budget needed to fully implement the LMP.

(Letter #s: 456)

PC# SOE0008

The FS should resist pressure from big business, local interests, or the current administration in Washington to:

- avoid catering to interests at the detriment of forest resources;
- prevent the sale of NFS lands and resources.

(Letter #s: 185, 471)

Category: Social/Economics Forestwide Desired Condition

PC# SOE0002

The FS should manage the Forests to maximize benefits to the FS, surrounding communities, and the entire country to:

- return revenues from resource sales to the public and FS;
- promote and sustain State and local communities and governments;
- protect communities, jobs, and timberlands.

(Letter #s: 502, 404, 305)

PC# SOE0005

The FS should consider revising the Social and Economic Systems Desired Conditions to include:

- recognizing economic benefits of ecosystem services;
- considering the economic benefits of and impacts on tourism and recreation;
- considering the economic benefits of wilderness;
- the following language for the IPNF - on page 1-33, "2nd paragraph: Some outputs and values are a result of the natural environment, such as opportunities for quiet solitude, experiencing and studying nature in its historical condition, and (spiritual) and scenic values.. .. The IPNF contributes to the local economy through the generation of jobs and income provided by maintaining a forest environment that will bring tourists and recreation seekers from afar, as well as industries/business hunting proximity to nature, while creating products for use, both nationally and locally.; On page 1-33, 3rd paragraph: The IPNF protects the public's land for succeeding generations. The outputs and values provided (by the IPNF) contribute to the quality of lifestyles in the Plan area and healthy (stable) communities. Open space is a significant.. ..contributes to the rural character of communities. It is an important consideration for industrial/commercial site seekers who can provide new, good-income jobs. Economic value exists in the scenic, amenity, and recreational resources that attract visitors, and in the resources that can be extracted from NPS lands (e.g. minerals, timber, and other Plant material)."

(Letter #s: 64, 68, 55, 492, 436, 434, 345, 187, 339, 110, 188, 189, 190, 226, 294)

PC# SOE0006

The FS should provide additional social and economic effects analysis and objectives to:

- assign economic benefits to natural amenities and unlogged forests;
- reflect present conditions;
- incorporate data missing for Lincoln County;
- assess potential economic impacts to Lincoln and Sanders Counties;

- include non-monetary objectives;
- clarify vague language in the objectives;
- remove qualifiers that negate meeting objectives;
- address how the PLMP benefits communities and local government;
- disclose timber values gained and lost annually, to assess the economic feasibility and sustainability of the LMP;
- consider FS employee participation in local communities;
- explain FS contributions to the timber economy and resulting contributions to the social and economic systems;
- address social and economic issues related to recreation and motorized access;
- provide equal consideration as that given to the ecological analysis;
- address potential negative impacts on other resources resulting from increased logging;
- directly correlate mill closures and board feet harvested to rural economic impacts;
- include a timber supply and demand trends analysis;
- disclose timber resource impacts on the wood products industry;
- explain how IRAs, Wilderness and Wild Lands benefit the local culture and economy.

(Letter #s: 456, 223, 331, 387, 379, 355, 339, 433, 322, 284, 152, 254, 170, 168, 282)

PC# SOE0007

The FS should prioritize and disclose methods for maintaining and preserving forest health, visuals, wildlife, headwaters, and flora in consideration of the economic benefits of maintaining these resources and the resulting tourism.

(Letter #s: 161, 191)

PC# SOE0009

The FS should address the socio-economic issue of closing areas to motorized use:

- based on wildlife corridor concerns;
- including the economic cost of reduced motorized opportunities on motorized users, and the cumulative effects of travel management decisions contributing to social and economic impacts on motorized recreationists.

(Letter #s: 355)

PC# SOE0011

The FS should implement a more aggressive timber sale program to:

- reverse downward social and economic trends for employment, personal income, and school enrollment;
- allow timber harvesting/thinning to provide local employment and economic opportunities.

(Letter #s: 413, 5, 4, 3, 2)

PC# SOE0012

The FS should prohibit the use of taxpayer dollars to subsidize timber sale program activities and require logging companies to build their own roads, restore and replant logged areas, and compensate fisheries for logging-generated pollution.

(Letter #s: 185)

PC# SOE0014

The FS should consider the following additional Social and Economic Systems Monitoring Questions:

- to determine the number of stewardship contracting opportunities;

- to determine the social and economic benefits of inventoried roadless areas, wilderness, and other wildlands;
- to evaluate all major forest resources as related to each social and economic question;
- to quantify or qualify non-monetary aspects of social and economic benefits;
- "How many stewardship contracting opportunities have been pursued that will directly contribute to local employment and local allocation of resources?";
- "How much do IRAs, Wilderness areas, and other wildlands on the forest benefit the social and economic aspects of the area?"

(Letter #s: 293, 444, 456)

Subject: TIMBER (PC #s starting with TBR)

Category: Editorial comment to the Plan.

PC# TBR0038

The FS should propose more active forest management to:

- provide for maintenance of road systems;
- maintain visual resources;
- enhance grizzly bear habitat;
- prevent the decline of forest health and resulting insect and disease outbreaks;
- account for high mortality levels;
- sustain the current stands of old growth;
- sustain local economies;
- maintain access;
- reduce fuel loads;
- increase forest health;
- reduce the risk of catastrophic fire in the WUI and areas of high recreational use.

(Letter #s: 289, 299, 321, 350, 413, 418, 425, 466, 502)

PC# TBR0046

The FS should define "long-term."

(Letter #s: 434)

Category: Timber Forestwide Desired Condition

PC# TBR0002

The FS should continue to provide or should increase timber harvesting to:

- address forest health problems;
- enhance habitat for wildlife;
- reduce fire risks;
- provide for recreation uses;
- include heavy clearcutting and logging;
- address public desires for additional logging;
- support local industry and economy;
- be consistent with forest health improvement objectives;
- ensure local government viability;
- sustain the forest products industry;
- recognize the importance of timber harvesting to the FS as an agency and to Idaho communities;

- to utilize stewardship contracting or the green-slip program to achieve harvest levels;
- include increased timber production opportunities in the Libby GA.

(Letter #s: 467, 406, 411, 413, 73, 418, 223, 466, 485, 496, 387, 445, 208, 280, 336, 168, 211, 213, 240, 284, 306, 307, 125)

PC# TBR0003

The FS should practice restoration forestry to:

- provide healthy forests;
- mandate the removal of trees in overstocked forest stands;
- meet wood products needs through an aggressive harvesting program;
- reduce the risk of catastrophic fire.

(Letter #s: 403)

PC# TBR0017

The FS should modify the timber supply analysis to correct conservative calculations and ambitious targets.

(Letter #s: 384)

PC# TBR0024

The FS should report long-term sustained yield timber harvest volumes and related timber projections in board feet instead of cubic feet to:

- align with industry standards;
- clarify the conversion factor;
- provide consistent and comparable measurements throughout the document;
- clarify if annual timber sales have been well below the long-term sustained yield capacity.

(Letter #s: 336, 465, 434, 362, 254, 197, 379)

PC# TBR0025

The FS should remove constraints from long-term sustained yield calculations for the suitable timber base:

- to display how volume is reduced due to budgetary and other constraints;
- because long-term sustained yield should be based on biological capacity without budgetary constraints;
- to base the LMP on sound, sustainable forestry;
- to increase harvest levels and avoid declining forest conditions and increased wildfire and wildfire suppression costs;
- to quantify what constraints are costing the public in terms of lost resources.

(Letter #s: 254, 413, 408, 384, 336, 282, 223, 170, 331)

PC# TBR0032

The FS should disclose the deficiencies associated with using timber harvesting as a tool to replicate forest fires and disclose the inadequacies and impacts of regeneration and salvage cuts.

(Letter #s: 419)

PC# TBR0034

The FS should consider revising the Timber Desired Condition to include:

- emphasizing treatments, such as small diameter harvests and wood fiber production, in the wildland urban interface;
- limiting the use of even-aged management;

- successfully managing the existing timber base before proposing additions to the Wilderness System;
- addressing how timber harvesting levels can be achieved while meeting the goal to maintain the productive capacity of forest and range ecosystems;
- mandating progressive, ecologically sensitive ways of harvesting and utilizing timber products;
- clarifying that where sustainability is not assured that timber harvest should only be conducted to restore forest health;
- considering sustainability and public opinions in lieu of harvesting timber exclusively for economic reasons;
- prohibiting timber harvesting in the St. Joe Geographic Area.

(Letter #s: 338, 299, 66, 423, 322, 302, 288, 267, 185, 254, 469, 222, 293)

PC# TBR0035

The FS should consider the following regarding long-term sustained yield calculations (LTSYC):

- provide information regarding the allowable sale quantity;
- calculate long-term sustained yield on a drainage basis (or other smaller unit), rather than a forestwide basis;
- disclose if the calculations considered current forest inventory, growth, yield, and mortality;
- disclose standing sawtimber volume, annual growth rates, and annual mortality;
- specify if calculations reflect limitations based on reduced harvests from Riparian Conservation Areas and protection for endangered species;
- keep volume yields separate in order to disclose the true sawlog Timber Sale Program Quantity (TSPQ) and long-range sustained yield capacity;
- do not remove budgetary constraints when calculating long-term sustained yield;
- revise timber targets according to general forest allocations;
- address impacts of the Endangered Species Act, Clean Water Act, Clean Air Act, and the National Environmental Policy Act on the timber sale program and long-term sustained yield calculations.

(Letter #s: 218, 465, 418, 386, 384, 254, 197, 331)

PC# TBR0051

The FS should correctly identify all acres where timber harvest could occur within identified geographic areas since the TSPQ and LTSYC are based on acres available for harvest.

(Letter #s: 254)

PC# TBR0060

The FS should consider logging salvage trees from wildfire areas.

(Letter #s: 306, 110)

PC# TBR0062

The FS LMP should look at projects that pay for themselves by:

- providing products from the forest to the industry infrastructure that remains in the area;
- considering stewardship contracts and timber sales to help achieve goals and provide the necessary funding to do the work.

(Letter #s: 269, 348)

Category: Timber Forestwide Suitability

PC# TBR0005

The FS should prohibit post-fire salvage sales in the backcountry or inventoried roadless areas.
(Letter #s: 293)

PC# TBR0037

The FS should differentiate areas suitable for commercial timber production from areas suitable for timber harvest and:

- meet other resource objectives;
- remove "unsuitable" and "not suitable" references from the final document;
- follow requirements in the Multiple Use Sustained Yield Act and National Forest Management Act;
- remove the term "generally" from suitability discussions;
- reclassify lands where "responsible officials determine harvest is appropriate as a tool" as "suitable" timberlands;
- clarify the total acres available for timber harvests;
- allow more active management where guidelines can be used to protect resources.

(Letter #s: 254, 467, 418, 384, 336, 282, 170, 331)

PC# TBR0045

The FS should limit or prohibit leaving cut timber on site in areas suitable for timber harvest or in recreation areas.
(Letter #s: 470)

PC# TBR0047

The FS should remove inventoried roadless areas from potential timber harvest or production because even salvage harvesting can be detrimental to forest regeneration.
(Letter #s: 436)

PC# TBR0050

The FS should classify lands previously logged as suitable for commercial timber production.
(Letter #s: 308)

Category: Timber Guidelines

PC# TBR0014

The FS should provide additional timber management standards and guidelines above regional and FS handbook direction to tailor management to specific resource conditions.
(Letter #s: 339, 470)

PC# TBR0043

The FS should include information on CMAI (culmination of mean annual increment) and clarify if areas that have not reached CMAI will be logged.
(Letter #s: 506, 386)

PC# TBR0044

The FS should disclose and further address opening sizes.
(Letter #s: 506)

Category: Timber Monitoring

PC# TBR0054

The FS should require more precise monitoring during timber harvesting activities in lieu of discovering problems upon harvest completion.

(Letter #s: 322)

PC# TBR0055

The FS should consider revising the Timber Monitoring Questions to:

- address if mortality has been harvested in a timely manner;
- disclose if ecosystems are fully functional at specified harvest levels;
- explore available markets for forest products;
- determine if the timber program is conducted in a manner that reduces conflict.

(Letter #s: 218, 293)

Category: Timber Objectives (harvest levels, Total Sale Program Quantity - TSPQ)

PC# TBR0009

The FS should consider the following regarding the timber sale program quantity (TSPQ):

- clarify the management objective for harvest volumes;
- disclose rationale for the reduction in the allowable sale quantity or acres deemed suitable for timber production since the 1987 Plan;
- specify a TSPQ for the first three decades;
- include a biomass section or clarify that a diameter limit was imposed on the biomass component in lieu of a green ton measurement;
- clarify if harvesting above the sustainable level is permitted;
- consider the unsustainability of past logging programs when developing commitments to timber production levels;
- establish individual targets for green tree harvest and mortality salvage for economic and forest health benefits;
- provide information to identify and address ASQ issues as related to FS directives;
- designate minimum harvesting levels to commit to local communities;
- display the TSPQ without budget constraints.

(Letter #s: 152, 382, 456, 389, 336, 294, 168, 254)

PC# TBR0023

The FS should revise the annual volume of timber harvested and Timber Sale Program Quantity (TSPQ):

- to better align the suitable timber base acreage with the board feet it could support;
- because annual board feet lost to mortality and resulting biomass accumulation is unacceptable;
- because timber outputs are grossly understated due to Management Area designations;
- to provide more active forest management and resulting forest health improvements;
- because the TSPQ is unrealistic and will raise false expectations and increase hostility;
- to base the TSPQ on desired conditions not past performance or budget constraints.

(Letter #s: 362, 336, 73, 470, 467, 152, 321, 223, 218, 413)

PC# TBR0026

The FS should clarify how many years it will take to meet Desired (future) Conditions based on annual harvest rates to consider how healthy forest conditions will be met without harvesting growth and mortality.

(Letter #s: 306, 331)

PC# TBR0031

The FS should consider eliminating qualifiers that would prevent achieving a sustainable supply of forest products:

- to ensure sustainability over the long-term; such as "The estimated volumes may change due to project-level data, unforeseen events, or modified conditions";
- because such qualifiers are not used for other resources desired conditions in the LMP.

(Letter #s: 168, 325)

PC# TBR0042

The FS should provide for additional pre-commercial thinning of existing Planted stands to remove production pressure from less suitable lands and Inventoried Roadless Areas.

(Letter #s: 332)

Category: Watershed Guidelines – Watersheds (general)

PC# TBR0041

The FS should consider revising the guidelines for Riparian Conservation Areas to:

- limit operations to those needed for safety needs or to attain/maintain riparian and aquatic habitat;
- prohibit regeneration harvest because it can result in mass wasting;
- include direction for mandatory annual inventory and maintenance of culverts, including culvert removal on roads that are not annually maintained;
- include direction for lower standard crossing structures that are free of fill and pose no risk to riparian habitat for ATVs and snowmobiles.

(Letter #s: 517, 197)

Subject: TRIBAL (PC #s starting with TBL)

Category: Tribal Forestwide Desired Condition

PC# TBL0001

The FS should include the Coeur d'Alene Tribe in the list of "Legal and Political Relationships."

(Letter #s: 319)

PC# TBL0002

The FS should prohibit special treatment for cultural and sacred tribal activities because there is no basis in law for this treatment.

(Letter #s: 480)

PC# TBL0003

The FS should include a Desired Condition for tribes.

(Letter #s: 456)

PC# TBL0004

The KNF should disclose that the Bull and Yaak Geographic Areas include Coeur d'Alene Tribe aboriginal territory.
(Letter #s: 456)

PC# TBL0005

The FS should consider an objective to develop individual cultural use policies and tribal treaty rights for each tribe within their respective aboriginal territories.
(Letter #s: 457, 60)

PC# TBL0006

The FS should revise the Heritage Resource Objectives to allow for more management flexibility.
(Letter #s: 319)

PC# TBL0007

The FS should continue to provide tribal access and hunting and fishing rights.
(Letter #s: 60)

PC# TBL0008

The FS should include the following guideline for Tribal relations:

- "Work towards a Memorandum of Understanding with the Coeur d'Alene Tribe."

(Letter #s: 456)

Subject: VEGETATION (PC #s starting with VEG)

Category: Editorial comment to the Plan.

PC# VEG0004

The FS should conduct ecological or restoration forestry.
(Letter #s: 157)

PC# VEG0047

The FS should re-title Chapter 1, Table 3 to "Snag and snag recruitment levels."
(Letter #s: 218)

Category: Fire Forestwide Desired Condition -- Wildland Fire Use

PC# VEG0030

The FS should quantify stand-replacing fire prevention assumptions.
(Letter #s: 506)

Category: Timber Forestwide Desired Condition

PC# VEG0014

The FS should provide further analysis for the timber and vegetation resource to:

- provide rationale for reducing timber harvest levels;
- include empirical evidence that harvest treatments reduce insect and disease damage;
- disclose impacts from past logging activities;
- compare desired future conditions with current conditions;
- include a scientific analysis of present and future desired conditions;
- determine timber management suitability based on an unbiased study;
- address the appropriateness of modeled estimates in determining logging levels;

- address the assumptions and potential shortcomings of the timber models.

(Letter #s: 339, 418, 506, 197)

PC# VEG0038

The FS should quantify how timber harvesting and other methods Plan to improve forest health.
(Letter #s: 482)

Category: Use of best science, Adequacy of Analysis

PC# VEG0005

The FS should have all silvicultural discussions peer reviewed by professional foresters and incorporate science in timber production estimates.
(Letter #s: 218, 430)

PC# VEG0011

The FS should consult the following researchers and report findings related to the importance of forests for carbon dioxide sequestration: Ron Nelson, USFS, Corvallis, OR; Steve McNulty, USFS, Raliegh, NC; and Mike Apps, Victoria, B.C., email mapps@nrcan.gc.can.
(Letter #s: 501)

PC# VEG0013

The FS should address the issue of global climate change to:

- address the impacts on insects, wildlife, trees, and forest fires;
- clarify how desired conditions will be maintained during climate change;
- account for global warming impacts on indigenous flora;
- assess potential impacts of climate change on viable species of trees for timber.

(Letter #s: 506, 501, 430, 309)

PC# VEG0081

The FS should incorporate best available science (Graham et al.) into coarse woody debris requirements.
(Letter #s: 339)

Category: Vegetation Forestwide Desired Condition

PC# VEG0006

The FS should consider the following with regards to Vegetation Desired Condition:

- revise wording to clarify that there "will be" occasions where it is desirable or necessary to depart from vegetative desired conditions" (instead of "may be");
- avoid tendencies to create "park-like" conditions that remove too much undergrowth;
- disclose historical data used to determine desired conditions to identify natural structural conditions baseline data and to identify how disturbance factors are accounted for in historic range analyses;
- calculate the total number of acres requiring forest health and fuels reduction treatments before considering historical and current funding levels;
- provide a non-managed category for desired conditions to allow natural processes to occur;
- thin overstocked stands to protect resources and communities;
- reduce understory vegetation;
- disclose additional information regarding understory vegetation in the vegetation analysis;
- consider recruitment of over- and under-represented size classes when calculating composition changes;

- align desired conditions with budget and resource constraints;
- provide evidence that current insect and disease levels are at an all-time high;
- address insect and disease concerns in the vegetation desired condition for warm/moist settings (VRU 4-6);
- reduce desired percentages of Lodgepole pine;
- enhance the heath of the forest ecosystem though thinning, scarification, and approved canopy adjustment methods;
- revise direction that leaves mature white pine in stands partially harvested because this does not result in white pine resistance to disease and insects;
- categorize Western White Pine and Douglas-fir as intermediate in tolerance;
- clarify intended actions and budget requirements needed to address forest health restoration and fire mitigation issues.

(Letter #s: 434, 212, 467, 506, 465, 456, 447, 426, 342, 293, 254, 218, 248)

PC# VEG0008

The FS should maximize timber volume harvested to:

- improve condition class;
- restore ecosystems;
- bring biological functions under a regime of sustainability.

(Letter #s: 254)

PC# VEG0009

The FS should revise the old growth definition to:

- align with the North Idaho Zone definitions in Green et al.;
- disclose that restoration activities reduce rather than increase old growth.

(Letter #s: 339, 434)

PC# VEG0016

The FS should require logging companies to replant areas following harvest activities to maintain forest contributions to global carbon cycles.

(Letter #s: 185)

PC# VEG0017

The FS should provide further analysis on noxious weeds to:

- provide closures on transport mechanisms other than motorized recreationists;
- recognize that noxious weeds are in non-motorized areas;
- address how wildlife and natural processes spread noxious weeds;
- apply mitigation measures impartially to all forest visitors;
- disclose motorized recreation impacts on spreading noxious weeds;
- address potential impacts from authorized and unauthorized trails in inventoried roadless areas;
- disclose noxious weed goals and progress in achieving those goals.

(Letter #s: 387, 413, 385, 355, 482)

PC# VEG0018

The FS should revise terminology used to evaluate forest fragmentation because developed areas should not include forested landscapes with harvest units and typical NFS roads.

(Letter #s: 418)

PC# VEG0020

The FS should ensure it will achieve its vision for vegetation management:

- to avoid bending to administrative politics;
- to focus on caring for the land and not profit generation;
- because personnel have lost common sense and contact with the land.

(Letter #s: 387)

PC# VEG0021

The FS should prohibit the use of Vegetation Response Units (VRUs) because VRUs do not correlate with agency studies on habitat and fire types.

(Letter #s: 506)

PC# VEG0022

The FS should revise Chapter 1, Table 1 to clarify that the table does not apply to lands in the wildland urban interface.

(Letter #s: 218)

PC# VEG0024

The FS should consider revising the Rare Plant Species Desired Condition to:

- preserve all native Plant habitats likely to contain rare, sensitive, and disjunctive species;
- preserve all peat lands in their native state;
- include a botanical assessment of the Priest Lake Basin;
- select more appropriate desirable species;
- provide sufficient habitat for sustainable populations of rare and threatened native Plant species.

(Letter #s: 423, 362, 419)

PC# VEG0026

The FS should consider the following regarding openings:

- provide more openings to prevent Douglas-fir monoculture;
- provide more openings to regenerate Western Larch and Ponderosa Pine;
- provide more openings to promote seral tree recruitment;
- disclose intended size and frequency of clearcuts and the resulting impacts of such activities.

(Letter #s: 434, 168, 38)

PC# VEG0027

The FS should revise and disclose methods for achieving desired future age class conditions to:

- recognize that twenty percent is more adequate and appropriate for old growth;
- provide for wildlife habitat needs;
- reduce the amount of forest as representative of old growth.

(Letter #s: 152, 254, 379, 418)

PC# VEG0040

The FS should emphasize protection of mature forests in roadless areas and waterways.

(Letter #s: 173)

PC# VEG0043

The FS should provide additional discussion and effects analysis on old growth stands to:

- identify the location and distribution of stands to be managed for old growth;
- indicate old growth areas that have a high priority for logging activities;

- identify how old growth targets were established;
- provide evidence that logging benefits old growth habitat;
- disclose the effects of old growth manipulation on dependant wildlife;
- describe how a one percent increase in old growth will be accomplished;
- include a goal for maintaining old growth with forest management prescriptions.

(Letter #s: 386, 428, 456, 465, 468, 506, 336)

PC# VEG0046

The FS should prioritize fire protection over woody debris retention in Chapter 1, page 1-9, paragraph 3, change the last half of the last sentence to read "fire risk reduction in the Wildland Urban Interface will require reducing the recommended coarse woody debris to lower levels."

(Letter #s: 218)

PC# VEG0053

The FS should provide improved noxious weed management direction to:

- provide access for weed control;
- educate the public;
- eliminate introduction, intensification, and spread, not just reduce these things;
- protect pristine backcountry areas;
- prioritize weed prevention during management activities;
- reduce existing infestations;
- explore the use of biological control methods;
- ensure water contamination from herbicide use is fully evaluated and avoided;
- provide guidance and additional analysis on the use of herbicides and pesticides and consider preventing the use of untested poisonous sprays or aerial spraying of herbicides to protect wildlife, watersheds, and humans.

(Letter #s: 419, 465, 453, 436, 426, 420, 401, 339, 322, 185, 423, 171, 294, 197, 211, 212, 213, 214, 257, 293)

PC# VEG0057

The FS should consider the following with regards to fire regime condition classes:

- disclose methods for achieving historic fire regimes conditions while only treating minimal acreage annually;
- implement a progressive action Plan to treat fire regime condition classes;
- treat condition class 3 lands within 10 years and remaining condition class 2 lands within 25 years;
- establish threshold values, target basal areas, trees per acre by species, and size class composition for each fire regime condition class.

(Letter #s: 331, 342, 470, 254)

PC# VEG0063

The FS should maintain shrub fields to provide wildlife forage.

(Letter #s: 465)

PC# VEG0083

The FS should disclose mitigation measures to address the increased threat of large scale fires and address how measures will compete with available resources.

(Letter #s: 384)

PC# VEG0084

The FS should include harvest prescriptions that mimic the frequency and severity effects of natural fire regimes.

(Letter #s: 170)

Category: Vegetation Guidelines – Old Growth

PC# VEG0035

The FS should provide additional management direction for old growth to:

- mimics natural disturbance events and increases/protects old growth and large size classes;
- reduce fragmentation and edge effects;
- protect what little old growth remains;
- allow activities once old growth stands are moved out of "suitable" or "generally suitable" timber production categories;
- prevent reduction in the acreage of old growth;
- eliminate or minimize road-related impacts on old growth;
- retain old growth management units;
- reduce the diameter guideline of retaining live trees over 54 inches in diameter because few trees are that large;
- include a guideline that addresses recruitment of additional old growth to replace old growth lost through management activities or natural causes;
- prohibit timber harvesting of old growth forests;
- allow timber harvest in old growth stands identified as Condition Class 1, 2, or 3.

(Letter #s: 512, 423, 434, 436, 453, 475, 476, 229, 487, 422, 513, 66, 482, 138, 293, 133, 419, 168, 254, 331, 338, 339, 38, 384, 389, 332)

PC# VEG0076

The FS should consider the following guidelines for ancient cedar groves:

- reclassify ancient cedar grove guidelines as standards and protect those that meet old growth standards from logging, road construction, or other forms of disturbance;
- define "ancient cedar grove" and include ancient cedar grove discussions in the old growth analysis.

(Letter #s: 339, 384)

PC# VEG0077

The FS should reclassify selected guidelines as standards to ensure the:

- "no new roads in old growth habitat" guideline is a standard;
- "ten percent minimum old growth habitat" guideline is a standard.

(Letter #s: 339)

PC# VEG0080

The FS should include the following guidelines to prevent noxious weeds:

- reseed and replant sites where soil disturbance has occurred;
- limit ground cover removal in logging projects to 10-15 percent to inhibit the spread of noxious weeds, including limitations on excavator piling and increasing hand piling, jackpot burning, and lop and scatter;
- require contractor equipment to be inspected and washed prior to entering the Forest;
- prohibit stock grazing in areas containing weeds;

- enforce weed-free livestock feed objectives;
- prohibit ORVs from trails that contain weeds;
- require all administrative sites and campgrounds be made weed-free within five years;
- quarantine stock animals prior to entering the Forest;
- prioritize treatment methods for noxious weed infestations and include evaluation and mitigation measures;
- clarify that chemicals will be used as a last resort for treatment.

(Letter #s: 339, 419, 506)

PC# VEG0082

The FS should adopt the "Forest Restoration Assessment Principles" (DellaSala et al. 2003) as an integral part of design criteria.

(Letter #s: 294)

PC# VEG0087

The FS should consider adding to the guidelines for plant species of concern, and species of interest "Activities should protect documented populations of species of concern and species of interest"

(Letter #s: 387)

Category: Vegetation Monitoring

PC# VEG0042

The FS should consider the following regarding monitoring of old growth:

- provide additional monitoring programs to determine the effectiveness of activities intended to increase or improve old growth;
- indicate if the public will be able to review old growth surveys associated with new stands that will be managed for old growth.

(Letter #s: 449)

PC# VEG0065

The FS should consider the following additional Vegetation Monitoring Questions:

- Have management activities salvaged tree mortality in a timely manner?
- Have management activities taken into account any annual changes in rare/sensitive plant classification made by the Idaho Conservation Data Center?
- Are the BMPs used to control noxious weeds/invasive species effectively keeping the levels of noxious weeds at our below the current levels within the forest?
- Is the spread of noxious weeds contained or are they spreading to new areas, since adoption of the Forest Plan?

(Letter #s: 384, 423, 218, 197, 293)

Category: Vegetation Objectives

PC# VEG0067

The FS should consider revising the Vegetation Objectives, Timber Objectives and Fire Objectives to:

- increase restoration targets;
- increase old growth targets;
- include prevention of noxious weeds;
- include continual monitoring regarding the effectiveness of thin/burn treatments.

(Letter #s: 384, 434)

PC# VEG0068

The FS should require surveys for threatened, endangered, and proposed plant species prior to ground-disturbing activities.

(Letter #s: 339)

PC# VEG0071

The FS should clarify the differences between Forest Health and Vegetation Restoration Objectives by:

- correcting apparent discrepancies between Forest Health Objectives, Vegetation Restoration, increases in the size of old growth timber stands, and improved condition classes;
- clarifying if forest health treatment acreage is in addition to the Vegetation Restoration objectives' acreage.

(Letter #s: 467, 336)

Category: Vegetation Yaak GA Desired Condition (KNF)

PC# VEG0062

The KNF should maintain or recover a full range of vegetative and backcountry diversity in the Yaak GA to include old growth spruce.

(Letter #s: 48)

Category: Watershed Forestwide Desired Condition -- IPNF Watersheds

PC# VEG0059

The FS should manage for natural evolving ecosystems in lieu of perpetuating artificial ecosystems to prevent soil erosion and degradation.

(Letter #s: 506)

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

PC# VEG0023

The FS should consider revising Wildlife Desired Condition to:

- reflect realistic and practical conditions in warm/moist settings;
- allow natural processes to shape the landscape.

(Letter #s: 218)

PC# VEG0036

The FS should continue management direction that increases and protects habitat for cavity dwellers, Canadian lynx, and wolverines.

(Letter #s: 338, 436, 138)

Category: Wildlife Yaak GA Desired Condition (KNF)

PC# VEG0061

The KNF should address the loss of porcupines in the Yaak Geographic Area.

(Letter #s: 48)