

Subject: HERITAGE (PC #s starting with HRT)

Category: Heritage Forestwide Desired Condition

PC# HRT0001

The FS should consider an addition to the Heritage Objectives that would emphasize the importance of cultural resource properties as well as historic properties.

(Letter #s: 456)

PC# HRT0002

The FS should incorporate geocaching as a tool for interpretation of the heritage resource program.

(Letter #s: 448)

PC# HRT0003

The FS should amend the following Heritage Resources Guidelines:

- "Leave historic human remains undisturbed unless there is an urgent reason (e.g., human health and safety, natural event, etc) for their disinterment." Leave the word "historic" out of this sentence. [justification] - From an anthropological standpoint, this could imply that protohistoric and prehistoric human remains could be disturbed. The elimination of "historic" would simply say no human remains should be disturbed unless there is a very good reason.

(Letter #s: 457, 319)

Subject: INVENTORIED ROADLESS (PC #s starting with IRA)

Category: Inventoried Roadless Areas Sources of Design Criteria

PC# IRA0001

The FS should use the information in the Wilderness Needs Assessment for determining which IRAs should be recommended for Wilderness to achieve the objectives for under-represented habitat types on both forests and to benefit native plant species.

(Letter #s: 423, 339, 293)

PC# IRA0002

The FS should manage Inventoried Roadless Areas for protection of natural resources:

- including wilderness characteristics, wildlife, clean water and old-growth;
- which will improve local economic growth;
- in IRAs near the Bitterroot Crest, which serve as a corridor for the Selway-Bitterroot Wilderness, the Cabinet-Yaak ecosystem, and the Northern Continental Divide ecosystem;
- in all IRAs;
- close to cities;
- in the Cabinet/Yaak ecosystems.

(Letter #s: 481, 398, 400, 419, 401, 434, 475, 485, 506, 64, 66, 72, 356, 468, 256, 340, 107, 138, 140, 143, 182, 293, 301, 308, 322, 421, 328, 339, 153)

PC# IRA0006

The KNF should reconsider the following statement regarding management direction for IRAs as it appears decisional: On page 1-1, "Upon Plan approval, management direction of IRAs is determined by the Land Management Plan".

(Letter #s: 387)

PC# IRA0007

The FS should broaden IRA suitability in:

- some IRAs to include timber management, motorized recreation, and commercial resort development;
- all IRAs to include multiple use.

(Letter #: 336, 418, 354, 38)

PC# IRA0009

The FS should consider the following MA allocation changes for IRAs:

- in the Long Canyon IRA of the IPNF, the MA allocation should allow fire, insect and disease management on an as-needed basis without administrative review;
- change de-facto wilderness allocations to multiple use;
- in the Sheep Mountain IRA, the MA allocation should maintain the current roadless and unmotorized condition;
- on the KNF and IPNF, change portions of Scotchman Peaks to MA1e;
- for IRAs not currently designated as Recommended Wilderness, change to MA5;
- in the Revett Lake area, revise to ensure maximum protection;
- in Beauty Creek Canyon, revise to prohibit roading and logging;
- in the east and west branches of Bug Creek in Gold Hill, change to MA6 so the mature lodgepole pine stands can be harvested rather than burn;
- in the roadless areas surrounding the Cabinet Mountain Wilderness on the KNF, change to MA1d to protect productive middle and lower elevation wildlife habitat;
- Flagstaff Mountain IRA #690 should be allocated to MA5a or roadless/ nonmotorized as bighorn sheep winter range to a recovering herd, and because it is adjacent to the Kootenai Falls Wildlife Management Area;
- the east face of the Cabinet Mountain Wilderness and the areas to the south should be allocated to MA1b or MA5a as critical to grizzly bear recovery;
- the West Fork Elk IRA #692, Lone Cliff West #674, Devil's Gap #698, and McNeely #675 should be allocated to MA5a or roadless/nonmotorized because of their elk habitat security value;
- the Northwest Peaks, Buckhorn Ridge, Grizzly Peak, Roderick mountain, and Gold Mountain should be designated MA1b or roadless/nonmotorized due to their value for big game, grizzly bear, and furbearer habitat security in the FWP Purcell Mountain Elk Management Unit (EMU);
- the Alexander/Canoe Gulch IRA #696 should be allocated to MA5a or roadless/nonmotorized for big game winter range security;
- SEE ALSO Public Concern Statements: MGA0021, MGA0024, MGA0025.

(Letter #: 34, 460, 85, 59, 517, 514, 378, 35, 339, 26, 401, 355)

PC# IRA0010

The FS should reconcile its definition for a "road" for the purposes of identifying roadless areas, with the definition provided by Congress.

(Letter #: 506)

PC# IRA0011

The FS should limit the suitability of IRAs:

- for some management activities, including road construction, timber production and harvest, and mining;
- by prohibiting mechanized equipment in IRAs as incompatible with wilderness values and because they spread noxious weeds;

- by prohibiting motorized use in IRAs: * including snowmobiling in the Selkirk Crest, Northwest Peaks and Ten Lakes roadless areas, *in all IRAs, in those IRAs that are Recommended Wilderness, * in non-inventoried roadless areas, * including ATVs because the transportation system should be limited to single-track trails, *to protect grizzly bears;
- by maintaining existing nonmotorized designations;
- by prohibiting timber harvest, roadbuilding, and vegetation manipulation, because the ICBEMP science shows roadless areas are healthiest.

(Letter #s: 182, 277, 294, 339, 460, 473, 64, 94, 267, 66, 122, 222, 116, 131, 153, 173, 203, 185, 112, 114)

PC# IRA0012

The FS should reinventory roadless areas in compliance with NEPA, NFMA and the Wilderness Act.

(Letter #s: 153, 339, 506)

PC# IRA0013

The FS should allow natural processes to determine the future condition of roadless areas.

(Letter #s: 506)

PC# IRA0014

The FS should allocate large non-inventoried roadless areas and those adjacent to existing IRAs to MA5 and MA1b.

(Letter #s: 60, 94, 460, 114)

PC# IRA0016

The FS should explain how the new Roadless Rule guidelines for State input into IRA management will affect the uses and activities in different MAs.

(Letter #s: 257, 339, 197)

PC# IRA0020

The FS should consider the potential for skewed results in the roadless inventory and evaluation process due to lack of monitoring over the past Planning period.

(Letter #s: 153, 339)

PC# IRA0022

The FS should use a comprehensible rating system that generates consistent determinations of Wilderness Availability, Capability and Need in the Wilderness Needs Assessment in order to avoid appearing arbitrary.

(Letter #s: 339, 506, 153)

PC# IRA0024

The FS should reevaluate the Wilderness ratings in the Wilderness Needs Assessment:

- as they are contradictory to administrative and legislative direction;
- to take into consideration the mix of lands that best meet public needs;
- where the rating was based on presence of bull and westslope cutthroat trout, which conflicts with current inventories and best available science;
- for all criteria because the needs analysis fails to adequately consider the importance of large contiguous blocks of wildland and roadless areas;
- for availability, which fails to consider availability nationwide;
- for capability, where increased development and commercial activity occur;
- for suitability and capability, which are not clearly separated in the assessment;

- for all criteria to improve comprehensibility and more clearly connect the recommendations with the ratings;
- for all criteria for the Mallard-Larkins, Mosquito Fly, Sheep Mountain/State Line, Midget Peak, Pinchot Butte and Grandmother Mountain IRAs.

(Letter #: 339, 506, 64, 153)

PC# IRA0027

The FS should revise the Inventoried Roadless Areas Desired Condition and Wilderness, Wilderness Study Areas, and Wild Lands Desired Condition to emphasize active management of these areas within the constraints of the Wilderness Act.

(Letter #: 146)

PC# IRA0028

The FS should substantiate the scientific basis on which guidance for roadless area management is promulgated in compliance with NEPA.

(Letter #: 468)

PC# IRA0030

The IPNF should suspend new road construction in IRAs until the State has completed their petition for roadless area assessments.

(Letter #: 458)

Category: MA 1b - Recommended Wilderness

PC# IRA0008

The FS should allocate the following IRAs for Recommended Wilderness (MA1b):

- all IRAs;
- Gold Hill in the Yaak as the lowest elevation wilderness in Montana;
- all IRAs on the KNF;
- all IRAs in the Yaak ;
- IRAs adjacent to the Cabinet Wilderness for mid and lower elevation habitat;
- Northwest Peaks and southern Buckhorn Ridge on both the IPNF and KNF;
- Scotchman Peaks on the KNF and IPNF;
- those IRAs with the highest ranking in the Wilderness Needs Assessment;
- all roadless areas recommended under the Rockies Prosperity Act;
- to protect roadless areas from salvage sales;
- SEE ALSO Public Concern Statements: MGA0021 AND MGA0024.

(Letter #: 506, 419, 436, 450, 459, 460, 468, 493, 374, 517, 66, 68, 94, 392, 48, 277, 42, 37, 156, 171, 203, 26, 293, 294, 310, 322, 323, 334, 339, 153, 222)

PC# IRA0018

The FS should reevaluate Saddle Mountain, Buckhorn Ridge, and Grizzly Peak for Wilderness recommendation because the assertion of unmanageability due to road proximity is unsustainable.

(Letter #: 48)

PC# RA0019

The FS should reconsider the rationale for excluding the Grandmother Mountain IRA from Recommended Wilderness because neither the Wilderness Act or the Idaho/Arkansas Land Exchange include language restricting consideration based on past funding sources for trails, or reconsidering land management designations in forest Planning.

(Letter #: 339)

Subject: LANDS/SPECIAL USES (PC #s starting with LND)
--

Category: Lands Forestwide Desired Condition

PC# LND0001

The FS should ensure public access is maintained on all land exchanges between private and public entities.

(Letter #: 355, 280)

PC# LND0002

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

- On page 1-32, "The public's forest lands will not be sold to increase federal income and help alleviate budget problems. Land ownership is adjusted (acquired or conveyed) only to provide reasonable access."

(Letter #: 434)

PC# LND0003

The FS should include additional special use permit standards to:

- restrict locations for utility and communication corridors and access roads;
- prohibit right-of-ways in recommended wilderness, inventoried roadless areas, proposed wild and scenic river corridors, or in the habitat for threatened, endangered, or candidate species;
- require proposals for new special use permits to utilize existing corridors.

(Letter #: 339)

PC# LND0005

The FS should disclose impacts of the Energy Corridor Environmental Impact Statement on the PLMP.

(Letter #: 456)

PC# LND0006

The FS should maintain existing mountaintop communication towers/sites in order to serve the increasingly important wireless communication network.

(Letter #: 280)

PC# LND0007

The FS should address the need for consolidation and reduction of NFS lands in the Wildland Urban Interface.

(Letter #: 199)

PC# LND0008

The FS should consider adding monitoring questions for lands to:

- address miles of forest boundary reduced;
- address acres removed from the wildland urban interface;
- address acquired and conveyed acres.

(Letter #: 199)

PC# LND0009

The FS should disclose foreseeable actions for the land adjustment program:

- to include consideration of the benefits isolated parcels provide;
- because land base and ownership pattern are important considerations for all management activities over the life of the LMP.

(Letter #: 199, 465)

PC# LND0010

The FS should recognize the special use permit agreements between the FS and the Flathead Lutheran Bible Camp.

(Letter #: 499)

PC# LND0011

The FS should prohibit the sale of public lands, including lands in the Fisher GA.

(Letter #: 210, 280, 209)

PC# LND0012

The FS should acquire Plum Creek lands to:

- protect open space values;
- allow for timber production;
- prohibit development;
- maintain traditional public recreation use.

(Letter #: 280)

PC# LND0013

The FS should consider the following additions to Land Objectives:

- time limits for responding to easement requests;
- a quantifiable objective for reducing National Forest System land inholdings.

(Letter #: 336)

PC# LND0014

The KNF should address the increasing conflicts between outfitter use and allocation and non-outfitted users, which may indicate that outfitter use is compromising outstandingly remarkable fisheries values.

(Letter #: 517)

Subject: MANAGEMENT AREA (PC #s. starting with MGA)

Category: Access & Recreation Other

PC# MGA0096

The FS should take no action within 10 miles of the Canadian Border that would limit or interfere in any way with the ability of our Homeland Security Agencies or military agencies to patrol and protect our border. In this vein, we urge opening of the "Bog Creek" Road to enhance the national security interest and allow public enjoyment of that route from Bonners Ferry to Priest River.

(Letter #: 514)

Category: MA - 1a Wilderness

PC# MGA0001

The FS should allow natural processes to determine the future condition of Wilderness areas.

(Letter #: 153, 410)

PC# MGA0002

The FS should limit Wilderness to existing designations:

- so that the remainder of the forest can be managed for forest health;
- because the areas now under consideration for Recommended Wilderness are only marginally qualified.

(Letter #s: 132, 405, 500, 98, 491, 439, 408, 326, 307, 299, 289, 208, 252)

PC# MGA0003

The management direction in the PLMPs regarding Wilderness suitability should adhere more closely to the Wilderness Act with:

- regards to agency-ignited fire, structures such as bridges and repeaters, gathering firewood and special forest products ,which are considered generally unsuitable;
- an emphasis on maintenance of wilderness character as the overriding mandate for Wilderness.

(Letter #s: 153, 294, 506)

PC# MGA0004

The FS should consider revising the Wilderness, Wilderness Study Areas, and Wild Lands Desired Condition to include that future congressional designation could allow motorized and mechanized uses.

(Letter #s: 444)

PC# MGA0007

The FS should consider the following additional objectives for Wilderness (MA1a):

- the number of sites needing restoration and the percentage being addressed;
- targeting real achievements such as restoring natural fire, managing outfitters, trail maintenance, and measuring human impact.

(Letter #s: 146, 456)

PC# MGA0008

The IPNF should work to ensure uniform and coordinated management of Wilderness for those areas that cross jurisdictions by consolidating management of:

- Scotchman Peaks under one Forest;
- Grandmother Mountain under one agency.

(Letter #s: 378)

Category: MA - 1b Recommended Wilderness

PC# MGA0005

The FS should manage Recommended Wilderness (MA1b):

- for both public and administrative uses while protecting wilderness values;
- ensuring the management criteria are less restrictive than those for MA1a;
- in order to avoid managing these areas as de-facto wilderness.

(Letter #s: 146, 7, 110, 355, 327)

PC# MGA0013

The FS should increase the amount of Recommended Wilderness (MA1b) beyond what was proposed in the Starting Option:

- to balance use by motorized and pedestrian recreation users while protecting the capability of the land to provide clean water, productive trout streams, big game and endangered species habitat;
- to 10% of the KNF land base;
- by designating all IRAs as Recommended Wilderness;

- by proposing an IPNF Wilderness of 2,742,312 acres;
- to include all alpine, forest, and mountain areas;
- by increasing the acres of Recommended Wilderness within the Scotchman Peaks IRA on the IPNF to improve access to the underserved nonmotorized users;
- for the Cabinet Mountains Wilderness "All 5a and 4a recommendations contiguous with or within any MA1a and/or MA1b proposals. All of the Rock Creek drainage above the gate on Road 150A in Section 2 of T26N, R32W. The MA6b designation adjacent to Orr Creek Road 2285 in Sections 11 and 12 of T26N, R32W. The MA6b designation south of Engle Lakes in Section 19 of T26N, R31 W. All of Sections 6 and 7, at Green Mountain, in T25N, R31 W. All of Section 17 and all MA5b in Section 18, south of Green Mountain, in T25N, R31W. All MA5a, MA5b and MA2 designations in the Galena, Allen Peak, and Barren Peak Inventoried Roadless Areas. All MA5b lands contiguous with the east front and the north end of the Cabinet Mountains Wilderness (CMW) with the following exceptions: * Existing primitive road or trail access to patented mining claims. It is recommended, in the event such patented mining claims become part of the public domain, and if such acquisitions should take place before any anticipated official Wilderness additions, that the forest Planning language be written to anticipate such occurrence, so that such parcels might be automatically designated as MA1b, Recommended Wilderness. *Road access to the Leigh Lake and Granite Lake Trailheads. It is recommended that all other roads in the aforementioned MA5b lands, contiguous with the east front and the north end of the CMW, be allowed to revegetate or be maintained as wilderness trails. We further ask that the USFS recommend, as Wilderness, the MA6b lands found along the east front of the CMW in Sections 6,7,18, 19 and 30, and portions of Sections 29 and 32 in T29N, R3 1 W."

(Letter #s: 252, 424, 66, 475, 471, 436, 103, 173, 157, 143, 105, 324, 332)

PC# MGA0014

The FS should permit motorized use in Recommended Wilderness (MA1b):

- to the extent wilderness values are not compromised and to maintain traditional opportunities;
- because there is no legal mandate to prohibit these uses in MA1b or MA1c;
- because prohibiting snowmobiles is contrary to the 2005 OHV rule;
- because managing these areas as de-facto wilderness is contrary to law and congressional intent.

(Letter #s: 446, 454, 474, 480, 491, 494, 64, 109, 444, 500, 439, 431, 427, 393, 391, 390, 312, 110, 306)

PC# MGA0016

The FS should prohibit motorized and mechanized uses in Recommended Wilderness (MA1b) for administrative purposes.

(Letter #s: 107, 153, 359, 401)

PC# MGA0018

The FS should reexamine the LMP Wilderness recommendations to ensure that only areas without roads are being recommended.

(Letter #s: 377, 233)

PC# MGA0019

The FS should consider revising the Desired Condition for Recommended Wilderness (MA1b) and base it on ground conditions rather than number of acres.

(Letter #s: 444)

PC# MGA0020

The FS should use non-commodity, long-term benefit values rather than resource needs and income-based values in the Wilderness Needs Assessment.

(Letter #: 434)

PC# MGA0021

The KNF should allocate the following areas to Recommended Wilderness (MA1b):

- as originally described in the Starting Option;
- where the allocation has been changed from MA1b to accommodate motorized use;
- all IRAs on the Forest;
- Tuchuck, Galena, Upper East Blue Creek, Zulu, Allen Peak, Chippewa, Willard-Estelle, Roberts, Mt. Henry, Mt. Robinson, Pink Mountain, Thompson Seton, Mount Hefty, and Cataract areas;
- Roderick/Saddle/Grizzly Complex, Buckhorn Peaks, Scotchman Peaks, and Northwest Peaks and Gold Hill of the Yaak for grizzly and furbearer habitat, as low elevation wilderness, and as a transition zone to the Fisher River;
- Cabinet Face East and West, McKay Creek, Trout Creek, East and West Forks of Elk Creek, to protect grizzly;
- all IRAs adjacent to the Cabinet Wilderness for mid and low elevation habitat;
- Buckhorn Ridge and Northwest Peaks for remote alpine scenery;
- Savage Mountain area in Scotchman Peaks as critical goat habitat;
- Winton Weydemeyer as part of a wildlife corridor to Canada;
- all IRAs and the unique ecosystems in the Yaak;
- the area south and east of Billiard Table because this change is not justified in the LMP or the CER;
- in areas that are readily accessible from nearby cities and towns;
- SEE ALSO Public Concern Statement MGA0099.

(Letter #: 396, 372, 99, 374, 314, 375, 376, 381, 385, 39, 55, 397, 398, 399, 400, 404, 407, 41, 414, 419, 42, 387, 335, 422, 317, 318, 32, 322, 324, 328, 329, 33, 315, 334, 37, 338, 341, 345, 349, 351, 358, 360, 361, 363, 366, 333, 77, 53, 63, 65, 66, 69, 70, 71, 72, 74, 56, 76, 54, 80, 83, 84, 86, 9, 90, 91, 93, 26, 313, 75, 455, 424, 426, 428, 43, 434, 435, 436, 438, 443, 62, 452, 423, 46, 475, 48, 495, 507, 51, 510, 511, 517, 52, 450, 184, 159, 16, 161, 164, 165, 166, 169, 173, 177, 206, 183, 147, 19, 195, 196, 198, 20, 201, 203, 204, 205, 18, 12, 261, 311, 10, 100, 102, 103, 104, 106, 112, 150, 114, 15, 120, 122, 126, 127, 13, 131, 137, 139, 144, 143, 113, 293, 276, 310, 31, 281, 283, 285, 286, 288, 29, 273, 291, 277, 297, 298, 301, 302, 303, 308, 309, 215, 138, 290, 232, 217, 220, 221, 222, 224, 225, 226, 28, 231, 270, 233, 239, 262, 245, 246, 251, 253, 259, 260, 241, 228, 268, 265)

PC# MGA0022

The FS should refrain from recommending Wilderness (MA1b) in the following areas:

- the Winton Weydemeyer area;
- anywhere on the KNF or IPNF;
- Roderick IRA, the Cabinet Additions, and the Yaak;
- Scotchman Peaks on the IPNF because it would be too restrictive to the majority of current users;

(Letter #: 484, 486, 490, 492, 57, 67, 252, 483, 59, 446, 433, 429, 427, 354, 242, 129, 470, 411)

PC# MGA0024

The IPNF should allocate the following areas to Recommended Wilderness (MA1b):

- as recommended in the 1987 Forest Plan;

- as described in the Starting Option to balance motorized and nonmotorized recreation, and maintain critical wildlife habitat;
- as proposed in HR 1204;
- where the allocation has been changed from MA1b to accommodate motorized use;
- IRAs in the northwest corner of the IPNF that are currently allocated to MA3 or MA5;
- Northwest Peaks and southern Buckhorn Ridge on both Forests;
- Yankee Peak, Snow Peak/Canyon Creek, Foehl Creek, and Little North Fork;
- Sheep Mountain, Midget Peak and Mosquito-Fly Creek to protect clean water and habitat;
- roadless portions of Bad Bear and Spotted Lewis Creeks as home to one of Idaho's largest goat herds;
- Grandmother Mountain, Marble Creek and Lost Lake complex for their mountain hemlock forests, wolves, high lakes, and pristine trout stream;
- Selkirks, Continental Mountain, Saddle Mountain, Willard-Estelle and Salmo-Priest Inventoried Roadless Areas as "backyard" wilderness;
- Upper North Fork as critical bull trout habitat;
- headwaters of the St. Joe River with ecologically unique St. Joe Lake with its native fish;
- part of Scotchman Peaks surrounding Lightning Peak where lower elevation passes are vital wildlife corridors and microclimates for native Plant communities;
- Scotchman Peaks IRA on both Forests to protect caribou, mountain goat, grizzly bear, and wolverine;
- Pinchot Butte to protect rare bogs with unique Plant species.

(Letter #: 475, 481, 479, 478, 424, 476, 485, 473, 464, 462, 487, 447, 80, 42, 410, 452, 82, 96, 402, 95, 103, 93, 92, 513, 83, 493, 81, 65, 512, 506, 501, 497, 88, 147, 179, 178, 175, 153, 401, 200, 148, 174, 145, 134, 117, 115, 108, 111, 149, 365, 378, 150, 367, 229, 36, 359, 346, 337, 255, 244, 236, 235, 230, 341, 371)

PC# MGA0025

The FS should change the following Recommended Wilderness (MA1b) allocations:

- Salmo-Priest and the Selkirk Crest IRAs to MA1e or MA5 to permit existing snowmobile access;
- all MA1b designations to MA1e to allow motorized summer and winter use without detracting from future inclusion as Wilderness;
- Selkirk Crest to MA1e, MA3 or MA7 because it is too narrow for effective wilderness and should continue to serve the public in its current capacity;
- Scotchman Peaks to MA6, MA5, or MA3 because it is too small to be effective wilderness;
- Parker Canyon to MA6;
- Salmo-Priest area to MA6;
- IRAs currently allocated to 'Backcountry' allocations in order to meet the requirements of the federal habitat conservation strategy for grizzly bear, such as the East Cabinets, because in the multi-agency enumeration of NCDE grizzly bear populations and monitoring strategies for future potential delisting, it is assumed that management of these critical grizzly habitat areas will not change;
- SEE ALSO Public Concern Statement MGA0099.

(Letter #: 110, 60, 514, 470, 444, 418, 336, 35)

PC# MGA0028

The IPNF should allocate the area around the Selkirk crest to General Forest (MA6) or Backcountry (MA5).

(Letter #s: 470)

PC# MGA0032

The IPNF should move the boundary of the Long Canyon area to the historic line of ridgetop to ridgetop.

(Letter #s: 514)

PC# MGA0093

The FS should not propose any management changes in the Long Canyon area that would jeopardize the core grizzly bear habitat.

(Letter #s: 60)

PC# MGA0094

The FS should extend the Wilderness boundary of Long Canyon, Parker Canyon, and the roadless portion of Fisher Canyon to the West Side Road, to encompass an entire drainage.

(Letter #s: 473)

PC# MGA0099

The FS should recommend areas with wilderness characteristics for Wilderness designation:

- to focus management of some areas on preservation and education in lieu of recreation and access;
- to benefit habitat and rare Plant species;
- because of benefits to local economies through hunting, fishing and tourism;
- because eliminating Recommended Wilderness eliminates multiple use;
- to protect clean water;
- because "manageability" is an invalid reason for alternative allocations;
- to protect these areas from development;
- to protect existing and potential old-growth;
- to protect the few remaining areas embodying the values outlined in the LMPs;
- because Congress only designates Wilderness from areas recommended for Wilderness by the FS;
- because other allocations are vulnerable to pressure from special interests;
- because they have been assessed for capability, suitability, and need in the Wilderness Needs.

(Letter #s: 27, 424, 274, 87, 257, 247, 226, 151, 423, 267)

PC# MGA0101

The FS should make recommendations for Wilderness designation on a site- specific rather than programmatic basis.

(Letter #s: 444)

PC# MGA0105

The FS should consider the following guideline across Region One for travel management in MA1b: "Travel is strictly nonmotorized, except for administrative or permitted uses" which complies with FSM 1923.03 by preserving wilderness values in these areas.

(Letter #s: 444, 216)

Category: MA - 1c Wilderness Study Area

PC# MGA0035

The FS should prohibit motorized use in the following Wilderness Study Areas (MA1c) in:

- all WSAs;
- the Ten Lakes WSA because according to law, WSAs are to be managed as wilderness;
- the Grandmother Mountain area because it's incompatible with maintaining an untrammelled condition.

(Letter #s: 339, 394, 506)

PC# MGA0037

The FS should eliminate the Wilderness Study Area (MA1c) allocation.

(Letter #s: 132)

Category: MA - 1d Wild Lands

PC# MGA0023

The FS should use management area designations that have clearly defined legal meaning, such as the "backcountry" and "wildlands" designations are descriptive phrases for a current condition rather than legally grounded terms.

(Letter #s: 250, 88, 45)

PC# MGA0039

The FS should change the following Wild Lands (MA1d) allocations:

- To MA1b - the Ten Lakes area because of its importance as a wildlife corridor and caribou habitat; the Scotchman Peaks so management is consistent with the IPNF, and to protect it from winter motorized recreation; the Cabinet Mountains Addition, Roderick Mountain, Scotchman Peaks, and the Whitefish Divide to provide for long-term stability, productivity, biological diversity, and protect population strongholds; Swamp/Goat/McKay Creeks adjacent to the Cabinet Wilderness; the Selkirks to protect caribou; and Five Lake Butte on the IPNF because it meets all the wilderness criteria;
- To MA1c - the Ten Lakes Area;
- To MA1e - in the Ten Lakes Area to permit winter motorized use; for all MA1d to reflect community suggestions;
- To MA3 - in the Ten Lakes Area because it is too small for Wilderness eligibility;
- To MA5b or MA5c - in the Dry Creek area to permit snowmobiling; to MA5b in the Roderick IRA to permit use of existing motorized routes; in the Cabinet Mountain Additions to keep them open for recreation;
- To MA6 - or change the boundaries in the Scenery Mountain area to reduce fire danger in the urban interface; for the Cabinet Mountain Additions because of enforcement problems with MA1d.

(Letter #s: 46, 381, 394, 418, 436, 374, 453, 387, 517, 57, 59, 60, 69, 444, 137, 417, 129, 35, 167, 21, 218, 23, 304, 305, 327, 334, 34, 344, 285, 108)

PC# MGA0040

The KNF should eliminate the Wild Lands (MA1d) allocation because:

- management is identical to MA1b;
- it prohibits winter motorized and mechanized uses;
- it is unnecessary and should be replaced with pure multiple use.

(Letter #s: 136, 354, 353, 327, 252, 216, 237)

PC# MGA0041

The FS should consider revising the Wild Lands (MA1d) suitability to:

- include winter motorized use;
- include mountain biking in the Cabinet Peaks addition, Roderick, Scotchman Peaks, Whitefish Divide, and Grandmother Mountain area;
- permit mountain bikes per the IMBA Memorandum of Understanding;
- include Wild Lands (MA1d) in the timber base.

(Letter #: 353, 181, 208, 294, 373, 425, 427, 444, 57, 59, 326)

Category: MA - 1e Primitive Lands

PC# MGA0045

The IPNF should monitor and analyze recreational uses in Primitive Lands (MA1e) in order to ensure the primitive values and resources are not overwhelmed by allowed uses, and in order to impose appropriate restrictions.

(Letter #: 339)

PC# MGA0047

The IPNF should clearly define "backcountry values".

(Letter #: 110)

PC# MGA0048

The IPNF should change the following Primitive Lands (MA1e) allocations to:

- MA1b or MA5a in vital wildlife habitat;
- MA1b in the Selkirk Crest for wilderness qualities, to protect the integrity of wildlife habitat and corridors in relationship to the entire roadless complex, and to protect rare low elevation coastal forest;
- MA5 east of Pack River and west of Roman Nose Divide.

(Letter #: 339, 82, 83, 296)

Category: MA - 2a /2b Wild and Scenic Rivers

PC# MGA0049

The FS should recommend the following rivers for Wild and Scenic designation:

- all eligible rivers, with full protection until congressionally designated;
- Upper Priest, Coeur d'Alene, North Fork Coeur d'Alene, Little North Fork Clearwater, Yaak River, Kootenai River, Bull River, Vermilion River, Pack River; and the Yaak River as a blue ribbon trout stream;
- additional stretches on the main stem of the Bull River;
- all those deemed eligible in the Starting Option unless there are documented circumstances that have changed their eligibility criteria.

(Letter #: 257, 476, 475, 436, 339, 206, 398)

PC# MGA0050

The FS should propose 'wild' river designation only for those rivers that lie within wilderness and are within their historic fire regime.

(Letter #: 152, 170, 223)

PC# MGA0051

The FS should broaden Wild and Scenic Rivers (MA2) suitability to permit:

- motorized and mechanized use in all three categories (wild, scenic, and recreational);
- vegetation management in areas outside the historic range of variation for fire in order to prevent losses to catastrophic fire.

(Letter #s: 110, 254, 331)

PC# MGA0052

The FS should limit Wild and Scenic River (MA2) suitability to prohibit logging, mining, development, and nonconforming special uses.

(Letter #s: 506)

PC# MGA0053

The FS should remove some rivers from Wild and Scenic (MA2) consideration including:

- the main stem of Bull River because it lacks community support;
- creeks, small tributaries and intermittent streams because these areas should be managed as buffers to decrease the probability of catastrophic fire.

(Letter #s: 218, 413, 417)

PC# MGA0055

The FS should determine Wild and Scenic River (MA2) classifications by getting in the field on a boat on the river rather than in the office looking at a map.

(Letter #s: 398)

PC# MGA0056

The KNF should include a Wild and Scenic Rivers Objective to develop a management Plan for any eligible designated rivers.

(Letter #s: 257)

PC# MGA0057

The FS should articulate the decision making process used to alter the Wild and Scenic River (MA2) designations from the Starting Option and describe the management strategies for these areas that will maintain their Outstandingly Remarkable Values."

(Letter #s: 339)

PC# MGA0058

The FS should make a distinction in the Wild and Scenic River (MA2b) allocation between those rivers that are 'wild' versus those which are 'scenic'.

(Letter #s: 374)

PC# MGA0059

The IPNF should actively manage wild and scenic rivers to protect them from recreation abuse.

(Letter #s: 142)

PC# MGA0102

The FS should recommend eligible rivers for Wild and Scenic designation to protect them from development.

(Letter #s: 229, 512)

PC# MGA0103

The IPNF should change the MA2 designation of the upper segment of the Little North Fork inside the Grandmother Mountain roadless area from recreational to wild.

(Letter #: 506)

Category: MA - 3 Special Interest Areas

PC# MGA0060

The FS should maintain historical and existing uses in Special Interest Areas (MA3) areas including winter motorized uses in:

- aquatic, botanical, ecological and zoological SIAs;
- geologic, recreation and scenic SIAs;
- areas with written grooming agreements including Spread Creek, Keeler Creek, Graves Creek, East Fork, Purcell, Pete Creek, Whitetail, Rainbow Lake, and Big Creek;
- in the MA3 scenic area in the Ten Lakes area.

(Letter #: 304, 411, 57)

PC# MGA0061

The FS should consider revising the following Special Interest Areas (MA3) allocations:

- MA3 acreage surrounding the Ten Lakes WSA should be allocated to MA1d to consolidate a large roadless block for ease of management and ecological integrity;
- MA3 area surrounding the Ten Lakes WSA should be MA1e and permit winter motorized use;
- Pioneer area of the Mallard Larkins should be MA1b because it rates "high" in all criteria for wilderness classification, and because an MA1b allocation will ensure management consistency with the adjacent Clearwater/Nez Recommended Wilderness.

(Letter #: 203, 380)

PC# MGA0062

The FS should define Special Interest Areas as per 36 CFR 219.7(a)(2)(v).

(Letter #: 480)

Category: MA - 4a Research Natural Areas

PC# MGA0063

The FS should broaden the suitable uses for Research Natural Areas (MA4a) to allow traditional winter motorized use to continue.

(Letter #: 304, 57)

PC# MGA0064

The FS should consider the following additional Research Natural Areas (MA4a):

- Lost Lake in the Little North Fork Clearwater for comparable management to the adjacent BLM lands;
- streams entering the St Joe River to provide research and monitoring opportunities;
- in the Upper St Joe drainage allocate undisturbed sites as examples of pristine ecosystems;
- Black Prince Creek for its pristine characteristics;
- the entire Mosquito-Fly Creek complex because of beaver activity .

(Letter #: 141, 504)

PC# MGA0065

The KNF should consider revising the following Research Natural Areas (MA4a) allocations to:

- MA6 for the Norman/Parmenter area to enable fuel treatments near the urban interface;
- MA3 for Parmenter Flats to allow multiple use recreation area to reflect existing uses.

(Letter #s: 129)

Category: MA - 5 Backcountry

PC# MGA0066

The FS should broaden the suitability of Backcountry (MA5) to:

- avoid the perception of managing MA5 as de facto wilderness;
- effectively manage hazardous fuels;
- allow facilities that enhance or preserve the backcountry experience;
- include timber harvest;
- manage fuels in the urban interface.

(Letter #s: 413, 418, 110, 336)

PC# MGA0067

The FS should provide additional direction regarding recreation management in MA5 to address the increasing impacts associated with increasing use.

(Letter #s: 339)

PC# MGA0068

The FS should designate Backcountry (MA5) motorized and nonmotorized suitability, with a clear differentiation between winter and summer motorized use in the PLMP:

- because the Planning team has the best access to objective data;
- because the Desired Condition statement includes motorized opportunities;

(Letter #s: 7, 110, 146, 359, 378)

PC# MGA0069

The FS should limit Backcountry (MA5) suitability:

- for motorized use by clearly defining what is meant by "density of motorized routes remain significantly less than MA6";
- prohibiting logging, motorized use and other development;
- allowing natural ecological processes to manage the land.

(Letter #s: 96, 506, 497, 493, 428, 410, 148, 153)

PC# MGA0070

The FS should convert closed roads to trails in Backcountry (MA5) for motorized or nonmotorized use.

(Letter #s: 146, 7)

PC# MGA0071

The FS should reconsider the Backcountry (MA5) designation because:

- backcountry is a misleading, confusing, and undefined term;
- it provides no protection from logging, ATV use, and for areas previously designated as Recommended Wilderness.

(Letter #s: 81, 145)

PC# MGA0072

The FS should more clearly distinguish between the Desired Condition for Backcountry (MA5) and that of MA1 areas because MA5 offers an opportunity for true multiple use adaptive management that MA1 allocations do not.

(Letter #: 146)

PC# MGA0073

The FS should consider changing the following Backcountry (MA5) allocations:

- Packsaddle Mountain should have a more restrictive allocation;
- the area north of Upper Priest IRA to Upper Priest/Hughes should be MA2b;
- returning to the areas designated MA5 in the Starting Option;
- Blacktail Roadless Area should be MA1b;
- Trout Creek Backcountry area should be MA1b;
- Trout Creek Backcountry area should be MA1d including Minton Peak and the middle and lower reaches of White Pine Creek;
- all MA5 should be MA1d to preserve their wilderness characteristics;
- all MA5 IRAs should be allocated MA6;
- the MA5a Scotchman Peaks allocation south of Spar Lake on the KNF should be MA1b because the mineral claim has been abandoned by ASARCO;
- roadless areas on the IPNF Wildland Urban Interface to MA6 in order to effectively manage fuels and fire.

(Letter #: 424, 59, 428, 374, 339, 227, 203, 153, 467)

PC# MGA0075

The FS should modify the Backcountry (MA5) Desired Condition for road construction to include roads needed in conjunction with any mineral lease, license, permit, or approval issued for mineral leasing or locatable mineral operations.

(Letter #: 420)

PC# MGA0078

The KNF should combine all Backcountry (MA5a, 5b, and 5c) allocations into one MA5, similar to the IPNF:

- to allow for consideration of timber production, access and recreation;
- because it is too fine a degree of management direction for this level of Planning.

(Letter #: 444, 57)

PC# MGA0082

The FS should add an MA5.2 in the residential and forest intermix to represent the WUI and prohibit wildland fire use.

(Letter #: 336)

PC# MGA0097

The FS should provide additional guidance for MA5 and MA6 to match the level of guidance for other MAs.

(Letter #: 416)

PC# MGA0104

The FS should broaden Backcountry (MA5) suitability on Lightning Mountain adjacent to Scotchman Peaks to include traditional snowmobile use.

(Letter #: 59)

Category: MA - 5a Backcountry - Nonmotorized summer and winter

PC# MGA0077

- The KNF should change the following Backcountry (MA5a) allocations:
- in the Benning Mountain area, from the Kootenai River south to Twin Peaks, the Scotchman Peaks, Cheer Creek, Glad Creek, Cliff Creek, Spruce Lakes/Drift Peak, West Fork Yaak, in and around Northwest Peaks, Roberts IRA and Lost Creek to MA5c to reflect current use;
- to MA5c south of road 322 in the Clark GA;
- to MA5c in all non-big game winter range currently open to snowmobiles;
- in the Scotchman Peaks, MA5a allocation should be changed to MA1d for management consistency with the IPNF;
- in the Scotchman Peaks, MA5a allocation should be changed to MA1b to prevent snowmobile use in these sensitive habitats;
- all MA5a should be MA5b or MA5c.

(Letter #: 252, 35, 59, 57, 489, 444, 353, 34, 327, 326, 304, 237, 203, 312)

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

PC# MGA0076

The FS should expand Backcountry (MA5b) allocations to increase the amount of areas open to motorized summer use.

(Letter #: 418)

PC# MGA0080

The FS should retain the Backcountry (MA5b) allocation:

- next to the Northwest Peaks SIA as one of the few areas open to OHVs;
- on the east face of the Cabinets Mountains to access mining claims.

(Letter #: 57, 516)

PC# MGA0081

The KNF should change the following Backcountry (MA5b) allocations:

- all MA5b allocations on the Bonners Ferry Ranger District should be MA6 because they will never qualify as wilderness candidates;
- in the unroaded area encompassing Marmot Mountain and Cooney Mountain to a more restrictive allocation because motorized use would significantly degrade this wet subalpine meadow ecosystem;
- all MA5b allocations should be eliminated, MA5a areas increased, and MA5c areas decreased.

(Letter #: 514, 426, 293, 322)

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

PC# MGA0083

The KNF should change the following Backcountry (MA5c) allocations:

- the Silver Butte-Fisher River drainage should have a more restrictive roadless/non-motorized to better reflect reality;
- Scotchman Peaks, including east of Savage Peak should be MA1b as it is the biological heart of the Scotchman Peaks area, and because there is no rationale or documentation to justify the MA5c allocation;

- on Buckhorn Ridge, Gold Hill West, and Zulu to restrict snowmobile access in late spring when animals are coming out of hibernation;
- Berray Mountain should be MA5a to protect critical fall/winter/spring habitat;
- Buckhorn Ridge IRA #661 to Spread Creek road immediately south of Northwest Peaks should be MA5a as crucial secure grizzly bear, lynx, wolverine, elk, mule deer, moose and whitetail habitat.

(Letter #s: 318, 517, 436, 42, 398, 374, 317, 293, 283, 169, 387)

Category: MA - 6 General Forest

PC# MGA0084

The FS should make all timberlands in General Forest (MA6) available for either timber harvest or timber production.

(Letter #s: 223)

PC# MGA0085

The FS should create sub-allocations for General Forest (MA6):

- that address the range of issues and resource conditions on the Forests including long-term direction by creating management prescription categories like those on the Boise NF to provide direction for active management and to better inform the public;
- for areas around Murphy and Dickey Lakes as General Forest 'Low' because of the value of the area as whitetail deer winter range.

(Letter #s: 517, 423, 300, 339)

PC# MGA0086

The FS should reconsider the General Forest (MA6) allocation because it will result in the proliferation of illegal and damaging ATV use, which the Forests will find difficult to control.

(Letter #s: 329)

PC# MGA0087

The FS should expand the Desired Condition for General Forest (MA6) to include standards to limit introduction of noxious weeds and reduce those present.

(Letter #s: 423)

PC# MGA0098

The FS should consider changing General Forest (MA6) allocations to:

- MA5 for the McArthur Lake wildlife corridor; for the area east of the town of Clark Fork, which links Scotchman Peaks to MA5 lands to the south;
- MA5c for the Elk Creek IRA because it is too steep to be suitable for general timber production;
- more restrictive MA allocations in IRAs.

(Letter #s: 322, 332)

Category: MA - 7 Primary Recreation Areas

PC# MGA0088

The FS should allocate the following areas to Primary Recreation Areas (MA7): Bull Lake, the Yaak valley, East Face of the Cabinets, Cabinet Mountain Wilderness, the Whitefish Range, McGregor Lake, and the Thompson Chain of lakes because of the heavy recreation use they receive.

(Letter #s: 394)

Category: MA Allocation change - general

PC# MGA0091

The FS should consider the following MA allocation changes:

- all non-wilderness areas should be designated MA6;
- all suitable timber production and harvest acres also suitable for other multiple-uses should be allocated to MA6;
- the WUI in the Bull River corridor and Elk Creek area should be allocated to MA5a for minimal treatment by helicopter;
- the Galena and Cataract areas on the KNF should be allocated to MA1d as valuable wildlife corridors.

(Letter #: 129, 223, 398, 47, 481, 505)

PC# MGA0092

The FS should create additional Management Areas to:

- address the range of issues and resource conditions present;
- address the scientific needs and diversity of ecological zones;
- identify and manage wildlife movement corridors;
- identify and manage critical riparian areas with requirements that mirror those of INFS;
- double the timber cut and keep all roads open;
- identify and manage bull trout priority watersheds.

(Letter #: 421, 47, 343, 339, 87)

PC# MGA0108

The KNF and IPNF should use the same MA designations in order to facilitate effective commentary on the allocations, especially across Forest boundaries.

(Letter #: 517)

Category: MA Suitability and Desired Conditions - general

PC# MGA0010

The FS should consider the following additional Wilderness Monitoring Questions for (MA1a), Recommended Wilderness (MA1b), Wilderness Study Areas (MA1c), and Wild Lands (MA1d):

- for MA1a, MA1c, and MA1d - "Is the Forest maintaining wilderness character in its existing Wilderness areas and minimizing recreational impacts to Wilderness areas?";
- "Has the KNF increased its contribution to the National Wilderness Preservation System by allocating Recommended Wilderness?";
- "Has the wild character of backcountry areas/IRAs been preserved such that they may be considered for wilderness designation in the future?";
- "Has illegal motorized use been prevented in Wilderness Areas or Recommended Wilderness Areas?";
- "Has wilderness character been preserved and has wilderness been untrammled?";
- for MA1b and MA1c - the degree to which wilderness attributes may be protected or compromised by activities, including management.

(Letter #: 153, 293, 146, 506)

PC# MGA0089

The FS should broaden the suitability of the following areas:

- all roaded areas, to permit thinning and prescribed burns;
- MA1a, 1b, 1c, 1e, 2, 3, and 5 on the IPNF, to permit motorized uses;
- MAs 2b, 5, 5a, 5b, 5c and 6 on the KNF, to permit timber production and harvest;
- the lower part of the Mount Henry area to permit traditional winter motorized use.

(Letter #: 116, 146, 223, 304, 418)

PC# MGA0090

The FS should limit suitability in the following areas:

- the Pack River should be nonmotorized;
- Roderick Mountain, Saddle Mountain, Grizzly Peak, Northwest Peaks, Buckhorn Ridge, Mt. Henry, West Fork Yaak, Robinson Mountain, Gold Hill West, Ten Lakes, Whitefish Divide, Zulu Creek, and Scotchman Peaks should prohibit snowmobiles to protect grizzly bears;
- Smith Creek to protect the delicate wildlife balance.

(Letter #: 66, 108, 99, 249, 255)

PC# MGA0095

The FS should manage the forest for protection and preservation, with emphasis on roadless areas, wilderness, and alpine areas that protect Plant and animal habitat.

(Letter #: 495, 22, 513, 479, 478, 463, 335, 300, 297, 12, 173, 117, 122, 15, 159, 162, 17, 172)

Subject: MINERALS (PC #s starting with MIN)

Category: Editorial comment to the Plan.

PC# MIN0005

The FS should continue to provide multiple use management:

- to provide for sustainability of the environment and communities;
- to provide mining opportunities;
- to provide an adequate allocation of a suitable timber base;
- including a balance of uses as desired by user groups.

(Letter #: 152, 306, 355)

Category: Minerals Forestwide Desired Condition

PC# MIN0001

The FS should consider the type of mineral activity in lieu of withdrawing particular lands from all mineral entry in recognition that hardrock underground mining does not impact surface recreational activities.

(Letter #: 480)

PC# MIN0002

The FS should consider the following additional Mineral Objectives to:

- better assure that the Minerals Desired Condition for mineral development includes: "Compatibility with ecosystem capabilities and other resource values" is attained. "Mineral

commodities will be developed in a manner consistent with national direction and protection of ecosystem capabilities and other resources;"

- minimize placer mining and other mining activities' impacts on other resources.

(Letter #: 257)

PC# MIN0003

The FS should consider revising the Minerals Desired Condition:

- to clarify what is meant by the phrase "compatible with ecosystem capabilities and other resource values"
- by adding the language "Locatable and leasable mineral exploration and development is compatible with ecosystem capabilities and other resource values, including consistence with desired conditions for other resources. "

(Letter #: 197, 257)

PC# MIN0004

The FS should coordinate with the Environmental Protection Agency and incorporate National Academies of Science recommendations to address concerns related to mineral activities.

(Letter #: 488)

PC# MIN0006

The FS should reclaim abandoned mines:

- that are negatively impacting aquatic and other resources;
- prioritizing the reclamation of vertical shaft mines for public and wildlife safety.

(Letter #: 197)

PC# MIN0007

The FS should define and describe mining reclamation activities.

(Letter #: 465)

PC# MIN0010

The FS should include an analysis of recreational dredge mining to identify potential impacts on water quality and fish habitat.

(Letter #: 465)

PC# MIN0011

The FS should consider the addition of Mineral Guidelines to:

- require reclamation of placer-mined areas to pre-mining conditions;
- require reclamation bonding for recreational as well as industrial mining;
- require surveys for bat roosts prior to activities that obstruct mine openings;
- require mining operators to comply with State water quality standards and TMDLs;
- prohibit suction dredging in bull trout priority watersheds;
- require hazardous materials Plans;
- require mining operators to obtain Army Corps of Engineer permits.

(Letter #: 197, 465, 339)