

Subject: COLLABORATION (PC #s starting with COL)

Category: Access & Recreation Clark GA Desired Condition (KNF)

PC# COL0003

The FS should show how the input from the Clark Fork workgroup (retaining current use levels) was used to determine the proposed desired condition for Scotchman Peaks.

(Letter #s: 300)

Category: Collaboration/Public Involvement concerns

PC# COL0002

The FS should consider extending the comment period.

(Letter #s: 101, 444)

PC# COL0004

The FS should consider the following regarding collaborating with people that desire wilderness:

- if multiple use is the goal, then people who desire wilderness areas are being left out of the collaborative process.;
- it has placed the values of timber interests and motorized recreationists above those that value wilderness.;
- to have true collaboration, the desires of the public for Wilderness recommendation must be represented in the LMP alongside other desires expressed by other parties.

(Letter #s: 215, 68, 72)

PC# COL0005

The FS should consider in its collaborative efforts:

- all comments, regardless of how they are submitted;
- continuing public comment on FS actions and not bypassing the public involvement process;
- comments relating to laws and policies (if a commenter is questioning the legality of a Plan component).

(Letter #s: 326, 480, 481)

PC# COL0006

The FS should recognize the following regarding the collaborative process as it relates to the Kootenai PLMP:

- the good collaborative efforts of conservation groups with snowmobile and motorized access groups that occurred to provide input to the Kootenai PLMP;
- the need and desire for the allocation of Recommended Wilderness in capable roadless areas as repeatedly expressed by the conservation community and other parties is not represented;
- the feelings that further polarization of this issue has been created with the change of Recommended Wilderness to Wild Lands;
- that participants feel their desires for Wilderness recommendation were ignored.

(Letter #s: 436, 66, 507, 48, 46, 338, 322, 298, 262, 37, 293)

PC# COL0009

The FS should involve more motorized recreationists in the collaborative process and consider:

- using a variety of methods such as interviews at club meetings and at trailheads, use of news(Letter, posting information at trailheads, and not just through written comments;

- that the level and effectiveness of participation should not influence decisions about the types of recreational opportunities that can occur on public lands.

(Letter #: 355)

PC# COL0010

The FS should recognize the following with regards to the collaborative process that:

- the Plan does not reflect the many meetings, long evenings and miles traveled by citizens that participated in "collaboration";
- it is not too late to achieve effective collaboration bringing together diverse interests to find common ground;
- the efforts of the Beaverhead-Deerlodge NF where environmental groups like the Montana Wilderness Association and timber interests have come together to develop a LMP that is rational and balanced;
- the resulting LMP does not reflect the desires of all parties;
- many people believe public input is not being evaluated and integrated into the LMP;
- people who work 40 hours a week cannot dedicate the time required to keep up with all the current travel planning processes;
- the process is inordinately demanding of participation and has unreasonable expectations for the involvement of individuals and families;
- the adoption of the "new rule" took away much of what was previously achieved in the GA workgroups;
- these lands serve a national purpose and managers need to listen to comments from people in addition to the local residents;
- managers need to listen to the interests of local communities in managing the National Forests;
- the process resulted in dissention and polarization;
- there was a lot of good discussion and progress towards agreement at the workgroup meetings but trust was lost due to the decisions made by the KNF Forest Supervisor concerning Recommended Wilderness.

(Letter #: 422, 427, 430, 445, 452, 453, 506, 64, 398, 48, 347, 325, 306, 279, 263, 186, 185, 159, 17, 355)

PC# COL0011

The FS should evaluate whether it is using public involvement in a discriminatory way by:

- asking the motorized recreationists to provide a comprehensive inventory of roads and trails (to establish which motorized routes remain open) when they don't have the resources and expertise to do it;
- creating a lack of understanding brought on by inadequate communication in the form of maps, documents and on-the-trail public involvement.

(Letter #: 355)

PC# COL0012

The FS should consider a collaborative approach that produces a reasonable multiple-use alternative that includes more motorized recreation opportunities.

(Letter #: 355)

PC# COL0014

The FS should provide the collaboration that is required by the 2005 NFMA rules.

(Letter #: 422)

PC# COL0015

The FS should consider having in-depth discussions with interest groups about specific issues, such as:

- the mountain biking community regarding decisions about prohibiting mountain biking;
- those interested in travel management, especially for Recommended Wilderness and roadless areas.

(Letter #s: 202, 220, 308, 64)

Subject: COOPERATION (PC #s starting with CCI)

Category: Cooperation Forestwide Desired Condition

PC# CCI0001

The FS should continue to incorporate public involvement and input during the Plan revision process.

(Letter #s: 145)

PC# CCI0002

The FS should consider the following additional Cooperation and Community Involvement Monitoring Questions:

- addressing how many restoration-related partnerships exist;
- disclosing FS endorsed/funded projects related to threatened and endangered species recovery efforts.

(Letter #s: 293)

Subject: EDITORIAL (PC #s starting with EDT)

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

PC# EDT0076

The IPNF should consider removing the reference in the motorized recreation section that says routes are shown on Forest Visitor maps because the only map that is accurate is the Coeur d'Alene map and all the other maps are full of errors.

(Letter #s: 146, 70)

Category: Access & Recreation Guidelines

PC# EDT0072

The FS should consider the following because the LMP mentions Scenic Integrity Objectives on page 1-2:

- including Scenic Integrity Objective maps in the document;
- Scenic Integrity Objectives have never been mentioned or discussed throughout the entire planning process.

(Letter #s: 465, 387)

Category: Access & Recreation Lower Kootenai GA Desired Condition (IPNF)

PC# EDT0005

The IPNF should consider adding the following four additional bullets to the list found on Page 1-45 Chapter 1 Vision, Geographic Areas Desired Conditions, Lower Kootenai Geographic Area, General Location, Description, and Unique Features: * Snowmobile Trails and Off-Trail Riding, * ATV and Motorized Trails and Access, * Hunting and Fishing Opportunities, and * Long Canyon/Parker Area.

(Letter #s: 444)

PC# EDT0078

The IPNF should include for the Lower Kootenai GA on page 1-45 under the Unique Features, the availability of high elevation snowmobile use.

(Letter #: 168)

Category: Access & Recreation Objectives

PC# EDT0073

The FS should consider clarifying whether the objective that states "provide access on" should be rewritten to mean "maintenance" (in relation to snowmobiling and grooming trails).

(Letter #: 146)

Category: Access & Recreation Pend Oreille GA Desired Condition (IPNF)

PC# EDT0006

The IPNF should consider the following changes to the LMP:

- Page 1-51. Chapter 1 Vision, Geographic Areas Desired Conditions, Pend Oreille Geographic Area, General Location, Description, and Unique Features: Three additional bullet points should be added to the list: Snowmobile Trails and Off-Trail Riding; ATV and Motorized Trails and Access; and Hunting And Fishing Opportunities;
- Page 1-51. Chapter 1 Vision, Geographic Areas Desired Conditions, Pend Oreille Geographic Area, Geographic Area Desired Condition, Access and Recreation: The last two sentences should be revised as follows: "On trail and off trail winter snowmobiling is popular across the entire GA and connects to neighboring GAs. The most popular areas include the Pack River and Trestle Creek areas, as well as the southeast end of the GA. Groomed trails and off trail riding are essential components of these activities";
- Pages 1-51 to 1-52. Chapter I Vision, Geographic Areas Desired conditions, Pend Oreille Geographic Area, Geographic Area Desired Condition, Access and Recreation, Access and Recreation Desired Condition: First, if the topic is to address the desired condition for Access and Recreation, it is unnecessary and confusing to add a sub-topic heading. Second, the sentence that begins with "Nonmotorized opportunities are emphasized . . ." is an inaccurate statement. Both motorized and nonmotorized opportunities are emphasized. That statement should be revised.

(Letter #: 444)

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

PC# EDT0024

The IPNF should consider the following regarding discussion of Priest Lake trails:

- the Priest Lake Winter Recreation Trails Map you refer to is incomplete, inaccurate and misleading;
- in the Strategy section on page 2-2 - the mileage for winter and summer trails is way off. Priest Lake alone has 400 miles of groomed trails.

(Letter #: 110)

PC# EDT0077

The IPNF should consider making the following change on page 1-58, paragraph 1, the 5th sentence: "an extensive snowmobile trail system that attracts" should be changed to read "an extensive snowmobile trail system and off-trail opportunities that attract..."

(Letter #: 146)

Category: Editorial comment to the Plan.**PC# EDT0001**

The FS should consider the following to improve the readability and understandability of the PLMP:

- on pages 1-1 to 1-34. Chapter 1 Vision, Forestwide Desired Conditions by Sustainability Topics, it is very difficult to separate out the topics, subtopics, paragraphs, and subparagraphs to ascertain statements from a general level to a more specific level. No hierarchy is established, and the use of different size fonts and boldness are not easy to ascertain or relate to one another;
- certain "Forest Wide" Topics have Desired Conditions set forth while others do not, or the statement(s) provided are not even close to being something designated as a Desired Condition;
- the last sentence on page 1-23 under Old Growth Desired Condition is a good example of how one has to jump around in the rest of the document to get context. Examples or summaries should be included where appropriate;
- in working through the document, it was very difficult to create a context because there were ubiquitous references to previous works, underlying documents or other sources. There are numerous places in the PLMP that should have maps, tables, or sidebars which accompany the text that would provide basic background or description of the underlying "classes" or "conditions" etc (many of these classes and conditions are groupings or homogenizations of earlier work, and have lost meaning in the process). In some cases it was necessary to wade through three documents to get to an underlying description i.e. the Vegetation Response Units (VRUs);
- consider writing and providing information for the average lay person to understand the document.

(Letter #: 158, 384, 444)

PC# EDT0002

The IPNF should consider the following in the Introduction on page x, About the Idaho Panhandle National Forests:

- in the last full paragraph, it is good to see the reference to recreational opportunities, but the paragraph should be revised to make it clear that people from across the nation and those that live in this area equally undertake the activities;
- the activities should not be separated into fishing and boating versus the other activities listed;
- reference should be made to the Purcell Mountains in the first full paragraph.

(Letter #: 444)

PC# EDT0003

The FS should consider the following changes to their maps:

- include detail in mapping to identify streams, road numbers, trail numbers, landmarks, and key topographic features in a manner that all citizens can easily interpret so they can adequately evaluate the proposal;
- changing the color groupings as they were similar looking at the scale presented. This is a recurring problem with .pdf maps and web-based distribution for many agencies;
- show the Coeur d'Alene Reservation boundary on the maps in the LMP, include a map of the Tribe's ceded or aboriginal territory in the Plan, (please contact Mr. Frank Roberts, Tribal GIS Manager, to obtain the maps), review the Coeur d'Alene Tribe's Integrated Resource Management Plan Draft Programmatic Environmental Impact Statement for consistency with the draft IPNF Land Management Plan;
- provide maps showing WUIs.

(Letter #: 482, 465, 355, 384, 456)

PC# EDT0007

The FS should consider the following changes to Chapter 2:

- Pages 2-25 to 2-27, Chapter 2 Strategy, MA5 - Backcountry: The third sentence under the heading Description should be revised, because motorized winter opportunities and activities are not even primarily on trails. Snowmobile use is primarily off trails. The description needs to be accurate. Table 28 should not use a * and footnote for motorized (summer and winter) suitability. Those columns should each include Yes, and leave the site-specific analysis (travel management) to that process;
- Page 2-28, Chapter 2 Strategy, MA6 - General Forest: The third sentence under the heading Description here should also be revised, because motorized winter opportunities and activities are not even primarily on trails. Snowmobile use is primarily off trails. The description needs to be accurate. Under the heading Desired Condition, off trail opportunities need included as well for the same reasons as just stated.

(Letter #: 444)

PC# EDT0008

The FS should consider the following change on page A-2, Appendix A - Plant and Animal Diversity: the five-step approach should probably be numbered 1 through 5, not 8 through 12.

(Letter #: 444)

PC# EDT0010

The FS should consider the bullets on page 1-4 provide descriptions using the words "increase" or "decrease." Those terms and terms like them including but not limited to "enhance," "maintain," "improve," "expand," "enlarge," "augment," "add to," "extend," "reduce," "lower," "abate," "sustain," "preserve," "continue," "strengthen," and "provide," should be in the vocabulary for writing and stating all desired conditions, and particularly for actually making Desired Condition statements for access and recreation and for roadless areas and recommended wilderness.

(Letter #: 444)

PC# EDT0011

The FS should consider in Appendix B including maps with Tables B-3, B-4 and B-5.

(Letter #: 456)

PC# EDT0012

The FS should consider enclosing all lake boundaries on maps.

(Letter #: 17)

PC# EDT0013

The FS should consider making the following changes to the Introduction to the LMP regarding Tribes:

- Page x, third paragraph: Please add discussion on the tribes in the area and briefly describe their lifeways (in addition to mentioning ranchers, loggers and miners);
- Page xi, top of the page in the Wildland Urban Interface subsection: If the USFS partners with tribes, please add references to tribes here;
- Page xi, under Wildlife and Fisheries subsection: If the USFS cooperates with tribes in wildlife and fisheries management, please add references to tribes here;
- Page xi, under Roadless State Petition Process subsection: If IPNF is working with tribes on this issue, please add references to tribes as these roadless areas are part of the tribes' ceded areas.

(Letter #: 456)

PC# EDT0014

The FS should consider correcting the following typos:

- on page 1-21 "reminant" to "remnant";
- in the Down Woody Debris paragraph "sic" instead of "six";
- page 2-8 under 'Special Forest Products & Firewood,' Line 3, change "bows" to "boughs";
- in discussion of recreational opportunities correct "sight-seeing" with "sightseeing";
- correct the spelling of Mullan Park Campground (should be spelled with an "a") in Table B-4 of the IPNF Proposed Plan Appendix B.

(Letter #s: 480, 50, 456, 21)

PC# EDT0015

The FS should consider that every planning action "re-invents" the line weights, color, and line styles for the different motorized and nonmotorized road and trail designations. This is very confusing to the public and, once again, puts motorized recreationists at a disadvantage. A national mapping standard for travel planning actions must be developed starting with proposed action in order to address this inadequacy.

(Letter #s: 355)

PC# EDT0016

The FS should consider providing a map and name key for wildlife linkage areas on the National Forest.

(Letter #s: 343)

PC# EDT0019

The FS should consider that a reasonable definition for "significant conflict" be developed and used as part of this action. Whether there is a "user conflict" or not depends primarily on user attitudes. Just because someone says it is a conflict does not mean that it is a "reasonable" or "significant" conflict.

(Letter #s: 355)

PC# EDT0021

The KNF should consider including camping as one of the recreational opportunities enjoyed by visitors to the KNF on Page x, Paragraph 3. This will better reflect the number and diversity of people camping on the KNF, in both developed campgrounds and dispersed sites.

(Letter #s: 394)

PC# EDT0022

The FS should be illustrating acreage changes in the various Management Areas throughout the Plan in a way that allows the reader to make comparisons between existing management and the changes being proposed, which will also be helpful in assessing the direction of the LMP.

(Letter #s: 465)

PC# EDT0023

The FS should consider that there are a lot of supporting documents one would have to review to gain more in-depth knowledge of related topics.

(Letter #s: 416)

PC# EDT0025

The FS should consider that the writing of the Desired Conditions in the present tense is a bit confusing. It seems if they were written in a more forward looking manner, they would have more impact when reading the Plan. I found myself thinking that most of the desired conditions were already met, but I doubt that is the case.

(Letter #s: 416)

PC# EDT0026

The FS should consider including a literature cited section that describes the documents or information on where to locate documents referenced in the LMP, particularly in Chapter 3.

(Letter #: 465)

PC# EDT0027

The IPNF should consider the following changes to the Plan:

- The LMP covers an area that encompasses a designated National Natural Landmark (NNL), the Hobo Cedar Grove Botanical Area. While the Hobo Cedar Grove Botanical Area is listed in the LMP as a botanical Special Interest Area (SIA), there is no identification of Hobo Cedar Grove Botanical Area as a designated NNL (see Chapter 2, page 20, Table 21: Management Area Direction For Special Interest Areas (SIAs)). In order to fully capture the significance of the Hobo Cedar Grove Botanical Area as both an SIA and an NNL, the Department recommends that the words "National Natural Landmark" be included within the "SIA Name" column so that the LMP would read: "Hobo Cedar Grove Botanical Area/National Natural Landmark."
- The Department also recommends that the "Acronyms and Glossary" section should include the following definition of an NNL: "a nationally significant natural area that has been designated by the Secretary of the Interior" (see the National Natural Landmarks Program web site: <http://www.nature.nps.gov/nnl/>).

(Letter #: 271)

PC# EDT0028

The KNF should consider reviewing the acreage difference in the KNF PLMP briefing paper that indicates the total acreage associated with wild, scenic and recreational rivers is 59,300 acres. According to the LMP, the total acreage associated with wild rivers is 15,649; scenic rivers is 1,450; and recreational rivers is 39,320 for a total of 56,429 acres.

(Letter #: 254)

PC# EDT0031

The KNF should consider reviewing the following acreage discrepancies between the KNF PLMP Briefing Paper and the Proposed LMP:

- For Timber lands: The KNF PLMP Briefing Paper identified 1,707,800 acres of the KNF as lands generally suitable for timber harvest. Of which, 817,200 acres is determined to be suitable for timber production. Page 2-6 of the KNF PLMP states that "The Forest has 1,584,700 acres where timber harvest could be used as a tool to achieve desired conditions. This represents approximately 72% of the KNF. Of those lands, approximately 817,200 acres are generally suitable for timber production. This represents 37% of the KNF.";
- Table 1.1 on this same page depicts an additional 777,500 other acres where harvest may be used as a tool to achieve other multiple-use objectives. The timber production acres and the timber harvest acres do not add up to what is reported in the Briefing Paper.
- Additionally, the acres in Management Areas 2b, 5a, 5b, 5c, and 6 - in each geographic area - is again different. As shown below, total acres identified in MA6 is 1,422,800, not 1,422,900 and when one adds the MA6 acres to the MA2b, 5a, 5b, and 5c acres the total is 1,882,380 acres where timber harvest could occur - not 1,707,800.

(Letter #: 254)

PC# EDT0032

The KNF should consider the following changes to the LMP in the:

- Introduction, Page IX, Paragraph 3: Most sources show Lincoln County as 78% National Forest. "Use the actual percentage and not the lower 70% estimate which has the quality of truthiness, but is less than the actual amount";
- Introduction, Page X, Paragraph 2: Kalispell, Montana should be listed as an urban area which is providing many of the goods and services formerly provided by Spokane, Washington;
- Introduction, Page 3, Paragraph 3: Include firewood cutting as a major recreational activity. Chapter 1, Page 1-2, Paragraph 8: Delete "A minimum transportation system," and replace it with " A transportation system is in place. Fourth sentence, delete "other forest management," and replace it with "vegetative management";
- Chapter 1, Page 1-3, Paragraph 3: Include a sentence which states, "Forest roads which provide access to multiple non-industrial private landholdings have jurisdiction transferred to County Governments";
- Chapter 1, Page 1-3, Inventoried Roadless, Paragraph 1, 2nd sentence: "Include vegetative condition in evaluation. As a statement, I believe the first sentence lacks truthiness. I do not believe the existing vegetative condition of land was evaluated";
- Chapter 1, Pages 1-5 through 1-15: Simplify the graphs or eliminate them all together. As presented, the graphs could be used to just about mean anything someone wanted them to mean. These graphs have the maximum fog index;
- Chapter 1, Page 1-6, Paragraph 3: Under Forest Diseases, include a statement that planting of genetically improved resistant stock and pruning saplings is the reason for increasing numbers of western white pine.

(Letter #: 218)

PC# EDT0059

The FS should consider the definitions for "public highway" for the following reasons:

- The handicapped vehicle hunting permit allows certain persons to shoot from a motorized vehicle, an activity that is normally illegal. This permit does not allow the holder to shoot from or across public highways. This important distinction described at 1C 36-202 (x) states: "Public highway" means the traveled portion of, and the shoulders on each side of, any road maintained by any governmental entity for public travel, and includes all bridges, culverts, overpasses, fills, and other structures within the limits of the right-of-way of any such road. The above definition means that any road, be it FS, BLM, city, county, or state, that can be legally driven on, is probably a public highway. It is not legal to shoot from these roadways.;
- Roads installed and maintained by private entities, such as Potlatch Lumber, Stimson Lumber, Inland Paper, etc. are not public roads. Many of these roads are open to the public, but your tax dollars do not maintain them. While not considered safe, it would be legal to shoot from these roadways.;
- In most cases, as can be seen in the above definition, a public highway is much more than simply the portion that vehicles drive on. There is no requirement to be any set distance off the public highway for legal shooting, as long as you are not shooting from any portion mentioned in the above definition.

(Letter #: 30)

PC# EDT0060

The FS should consider the proposed LMPs for the Western Montana Planning Zone Forests (Lolo, Bitterroot, and Flathead National Forests) which provided background discussions of status or major issues regarding each resource topic along with the Desired Conditions. The PLMP for the KNF does not

include this type of background information. We found this background information to be helpful in providing understanding of existing conditions and major issues, and setting the context for clearer understanding of the proposed desired conditions for the Lolo, Flathead and Bitterroot Forests. We encourage the KNF to consider adding similar brief background discussions preceding the identification of the Desired Conditions for the individual resource topics.

(Letter #: 257)

PC# EDT0062

The FS should consider adding a section that describes the trends in activities that are taking place on the Forest. For example, the section could discuss whether recreational activities are becoming a more popular use of the forest compared to other uses, and if so, the type of recreational uses that are increasing. Consequently, the forest may be experiencing an increasing or decreasing amount of logging, mining, etc. Having an understanding of the trends, however unpredictable they may be, would give the reader a larger context for the vision for the forest as well as an understanding of the FS's strategy for managing the resources.

(Letter #: 197)

PC# EDT0063

The FS should note that the IPNF Proposed LMP does not include specific language found in the new final rules, in particular the rules that pertain to best available science, 219.11, environmental management systems (EMS), 219.5, and evaluations and monitoring, 219.6.

(Letter #: 386)

PC# EDT0065

The FS should consider that seven topics were identified in the AMS as issues in need of analysis and change, but in the Proposed Land Management Plan, Chapter 2, Strategy pages 2-1 through 2-4, only six of the seven are discussed and developed (Inventoried Roadless Areas and Recommended Wilderness are listed under Other Topics including American Indian Rights and Interests, grazing objectives, heritage resources, RNAs, Social and Economic Objectives, and bringing up the rear end is Wilderness objectives. Inventoried Roadless and Recommended Wilderness were originally identified as AMS issues).

(Letter #: 387)

PC# EDT0066

The FS should consider the following wording in Chapter 2, Strategy (page 2-4 of both PLMPs):

- Objectives 1 and 2 contain estimates such as, ". . .approximately 15 to 20 percent.. .". This could mean from 10 to 25% or more. It might be more meaningful to drop either the range of numbers or the word "approximately";
- Include the term "HUC" in Objective 1 so a reader can find the definition of "6th code" in the glossary;
- Reference the definition of RCA so the reader can find the definition for Class II and III watersheds;
- Change Objective 4 to read, ". . .three miles of fragmented stream habitat.. ." if this is the intent.

(Letter #: 6)

PC# EDT0068

The FS [IPNF] should explain why there is a difference in Wilderness acreage numbers displayed on page 2-10 (9,900 acres in table) and page 2-11 (11,949 acres in text).

(Letter #: 146)

PC# EDT0069

The FS should explain why there is a difference between the acres of Congressionally Designated Wilderness in table 12 on page 2-10 and the total acres of Congressionally Designated Wilderness shown in the tables for each geographic area.

(Letter #s: 250)

PC# EDT0070

The FS should consider that the Plan demonstrates a perceptible bias against production while stressing conservation. Our recommendation is to remove the qualifiers. For example, here's a solution for page 1-59: "Summer and winter motorized and nonmotorized opportunities are maintained and expanded." Note the deletion of "where feasible."

(Letter #s: 168)

PC# EDT0071

The FS should apply more precise use of the terms "ATV", "motorized", and "snowmobile" to avoid misleading and confusing information.

(Letter #s: 110)

PC# EDT0074

The IPNF should consider changing in Chapter 2 Strategy, the statement that motorized winter travel is only suitable in "designated areas" because the current travel plan for winter recreation on the 2004 Kaniksu map is "open, unless posted closed".

(Letter #s: 444)

PC# EDT0075

The IPNF should change the reference to the "Sandpoint and Bonners Ferry Area Snowmobile Trails map" to the revised "Lake Pend Oreille Region Idaho Winter Recreation Trails map produced by the Winter Riders, Inc."

(Letter #s: 444)

PC# EDT0079

The FS should note that on page 2-27, Table 28 there is no listing for mechanized use.

(Letter #s: 416, 7)

PC# EDT0080

The FS should reconsider the use of the word "values" when referring to Wilderness and Backcountry, and use the word "attributes" with definitions of what the attributes are.

(Letter #s: 146)

PC# EDT0081

The FS should consider on page 1-3, it is stated that 63% of Inventoried Roadless Area is allocated to backcountry, 19% to wildlands, and roughly 18% (this figure is not used, but I did the math) to mostly wilderness and undeveloped areas. The terms wildlands and wilderness are somewhat explained in the rest of the text, but there is no definitive If/Then statement regarding these terms. For example, ..If wilderness, Then no motorized traffic ever, or words and meanings such as that. And, if wildlands then motorized traffic only in approved areas, or words and meanings such as that.

(Letter #s: 250)

PC# EDT0082

The FS should revise the "Leasable and Mineral Materials" language to "Leasable, Locatable, and Mineral Materials" and include locatable mineral language in the document and tables as appropriate.

(Letter #s: 218, 420)

PC# EDT0084

The FS should apply more precise use of the terms "ATV", "motorized", and "snowmobile" in the PLMP because use of the terms could be misleading and result in lawsuits.

(Letter #: 110)

Category: Social/Economics Forestwide Desired Condition

PC# EDT0004

The FS should make the following changes to the LMP on page 1-33, Chapter 1 Vision, Other Topics, Social and Economic Systems Desired Condition:

- The second full paragraph on page 1-33 provides that "Some values are a result of the natural environment, such as opportunities for solitude, and spiritual and scenic values." That sentence should be revised to more accurately describe the situation and written as : "Some outputs and values are a result of the natural environment and forest lands, such as opportunities for access, recreation, solitude, and spiritual and scenic values";
- The third full paragraph on page 1-33, in introducing the bullet list, uses the word "perceived." That word should be removed from the sentence, and revised as: "The IPNF provides a range of benefits to local communities ";
- Likewise on page 1-33, the word "perceived" should be removed from the first sentence of the first bullet point, with the sentence revised as "Recreation opportunities and access are an important benefit of the Forest";
- Again on 1-33, the first sentence of the fifth bullet point should be revised. The example of "existence benefits" should not be defined by using just wilderness and roadless areas. It is an unfortunate fact that the vast majority of people in our nation do not understand that the word "wilderness" has legal consequences;
- The fifth bullet point on page 1-33 needs to be revised to make the examples be "recreation, access, scenic beauty, backcountry, primitive lands, roadless areas, and wilderness." That is more accurate and not misleading or implying that people want more legally defined and restrictive wilderness designations.

(Letter #: 444)

Category: Vegetation Comprehensive Evaluation Report (CER)

PC# EDT0017

The FS should consider that there is supposed to be a map of the VRUs in the Comprehensive Evaluation Report (CER) which could never be located (map of the Three Biophysical Settings, paragraph 5, page 1-10), and to get at least the basic grouping of VRUs, the Analysis of Management Situation (AMS) report had to be visited. And that did not actually supply the individual Habitat Types included in the original VRUs.

(Letter #: 384)

Category: Vegetation Forestwide Desired Condition

PC# EDT0018

The FS should consider that the graphs on pages 1-5, 1-7, 1-11, 1-13, and 1-15 are confusing and recommend you find another way to illustrate the vegetation desired condition.

(Letter #: 362)

PC# EDT0029

The FS should consider providing on page 1-14 size class (DBH) definitions for the Class A, B, C variations and should carry these definitions through to other tables and discussions. Also, the glossary reference should read "(see Vegetative Condition Class in glossary)."

(Letter #s: 465)

Category: Vegetation Objectives

PC# EDT0083

The FS should include in language for noxious weed objectives, "Noxious weed infestations will be treated and reduced with integrated weed management techniques and new noxious weed invasions will be contained after discovery within the discovered site."

(Letter #s: 257)

Category: Watershed Forestwide Desired Condition -- IPNF Watersheds

PC# EDT0020

The FS should consider the following changes in Watersheds (Water, Soil and Riparian) and Aquatic Species Desired Condition section page (1-27):

- The first sentence in this section uses the phrase "natural potential condition". We recommend that this phrase be defined or a reference added;
- The last sentence should read, "Water quality meets or exceeds applicable State Ambient Surface Water Quality Standards" for the designated use of the stream.

(Letter #s: 197)

Category: Watershed Guidelines – Watersheds (general)

PC# EDT0067

The FS should consider using the term "approved" TMDL in the Watershed Guidelines (#2) instead of "adopted" TMDL.

(Letter #s: 6)

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

PC# EDT0058

The FS should consider defining on page 1-20 "Large Continuous Habitat Blocks." Are these 40 acres or 40,000 acres? It isn't essential to be exact (i.e. 40 acres); however, some measure of the order of magnitude is needed. (This holds for other terms in the report as well, for example, more natural, historic, high integrity landscape). There must be some benchmark definitions to measure against in order to evaluate/monitor progress toward the Desired Condition statements. Knowing what the target is will provide a higher level of certainty in what to aim for, and a better feel for whether efforts are successful.

(Letter #s: 465)

Subject: Environmental Management System (EMS) (PC #s starting with EMS)

Category: EMS

PC# EMS0001

The FS should consider whether Environmental Management System (EMS):

- is really applicable to public lands management;
- can provide accountability for whether the standards are maintained;

- has measurable criteria for improving water quality, preserving ancient forests, wildlife habitat or other important conditions.

(Letter #: 506, 145, 206, 294)

PC# EMS0002

The FS must address how the PLMP can meet the planning regulations when the EMS is not done yet.

(Letter #: 145, 506)

PC# EMS0003

The FS should consider whether any human activity would align with the EMS because they all impact, rather than "continually improve" the environment.

(Letter #: 480)

PC# EMS0004

The FS should make all employees accountable for implementation of the LMP and the organization as a whole should audit the effectiveness of their actions.

(Letter #: 297)

PC# EMS0005

The FS's EMS process should evaluate all acres on the forest, not just those having treatment.

(Letter #: 331)

PC# EMS0006

The FS should provide more detailed explanation of EMS in the Plan:

- and how complying with it will integrate into the rest of the LMP;
- by providing high quality information that describes the documents that are expected to be produced during the first year after the final Plan has been approved;
- by providing explanations of how the EMS will change everyday work to reduce impacts and how it will guide decisions.

(Letter #: 197, 384, 386, 389, 402)

PC# EMS0007

The FS should describe what will qualify for audits and management reviews, who will conduct them, and what will be their availability for public participation and review.

(Letter #: 387)

PC# EMS0008

The FS should explain whether an EMS relating to old growth issues separate from the land management process has been established or will be established on the IPNF.

(Letter #: 449)

Subject: FIRE (PC #s starting with FRE)

Category: Fire Forestwide Desired Condition -- Wildland Fire Use

PC# FRE0001

The FS should incorporate a fire management plan into the LMPs specifically for roadless and wilderness areas:

- based on the 1980 Cabinet Mountains Wilderness Interim Fire Management plan, which was widely agreed upon as an appropriate fire management tool;
- that allows wildland fire use as a tool to restore the natural fire regime;

- to help control future fires and enhance habitat;
 - because there is no proposed fire management plan for these areas other than suppression.
- (Letter #s: 430, 309, 332, 38, 387, 398, 426, 168)

PC# FRE0002

The FS should prohibit wildland fire use during the active fire season because of high fuel loading.
(Letter #s: 379, 362)

PC# FRE0004

The FS should consider the comparative costs of thinning as opposed to firefighting in any given location in its "budget restraint" argument.
(Letter #s: 269)

PC# FRE0006

The FS should use fire as a primary management tool:

- allowing wildfire to burn whenever possible, and using prescribed fire for fuel reduction in place of grapple piling;
- with jackpot burning to create islands and pockets of vegetation;
- in the backcountry of the Yaak on the KNF to return the natural fire regime;
- to restore the benefits of this disturbance process;
- in areas where there is minimal threat to private property;
- with appropriate timing and intensity in fire-dependent ecosystems using summer/fall burns where conditions allow.

(Letter #s: 293, 453, 465)

PC# FRE0007

The FS should use mechanical treatments as a primary tool for fuel reduction and discontinue using fire as a primary fuel reduction tool because:

- fuels should be used for biomass heating facilities and commercial wood fiber products;
- analysis has shown biomass accumulation is significantly outpacing its removal;
- in MA6 (general forest) prescribed fire is incompatible with timber production objectives;
- with the existing high fuel loads and poor forest health, there are better tools than lighting fires.

(Letter #s: 316, 467, 413, 321, 269, 223, 382)

PC# FRE0010

The FS should develop a fuel management plan:

- in at-risk lands, including Backcountry (MA5), using all the tools available;
- that takes advantage of local small-log processors;
- that increases timber harvest ;
- that gives appropriate consideration to mechanical harvest as mandated in the 2004 Interior Appropriations bill;
- that utilizes small wood for biofuel or wood fiber;
- that meets the goals of the Organic Act to provide a sustainable supply of renewable resources.

(Letter #s: 306, 467, 445, 307, 295, 254, 212, 2, 197, 419)

PC# FRE0011

The FS should reexamine the proposal to manage dense forests with prescribed fire because it is difficult to predict the effects of prescribed fire on stocking with any certainty.

(Letter #s: 466)

PC# FRE0012

The FS should provide additional direction on Wildland Urban Interface treatments:

- as building continues on the forest edge, limiting additional structures that increase the WUI;
- including provisions for local employment;
- making habitat connectivity part of the WUI desired condition.

(Letter #: 199, 343, 348, 430, 434)

PC# FRE0017

The FS should reassess the WUI boundary:

- to ensure the boundaries are large enough to protect adjacent communities;
- to incorporate additional fire science in determining the boundaries;
- using terrain, soil, and aspect to determine the depth of WUI corridors;
- with updated GIS to more clearly define the WUI.

(Letter #: 465, 506, 445,398)

PC# FRE0019

The FS should manage the Forest for protection from wildfires because of dense forests and ongoing drought.

(Letter #: 417)

PC# FRE0020

The FS should coordinate with local agencies in fuel and fire management:

- regarding fire mitigation plans and forest health problems in mixed ownership both within and outside the WUI;
- in community water supply areas where WUI plans conflict with local agency management direction;
- to establish common treatment parameters, goals and time frames;
- to clarify fire control policies regarding wildland fire use on mixed ownership lands where state and local government have primary fire protection.

(Letter #: 185, 336, 403, 467, 514)

PC# FRE0021

The FS should consider the following Fire Monitoring Questions:

- Is the Administration and Congress funding fire management activities adequately and what / where/how is the KNF prioritizing what funding it may receive?
- Has small diameter, overstocked wood fiber been given an appropriate emphasis in management to reduce the fire risk to communities?
- Are opportunities to restore wildfire to the landscape being pursued whenever possible?

(Letter #: 293, 387)

PC# FRE0023

The FS should develop a forest-wide suitability area specifically for the Wildland Urban Interface that includes goals for reducing fuels and reducing NFS land ownership in the WUI.

(Letter #: 199)

PC# FRE0025

The LMPs should include vegetation and fire models that forecast expected forest growth and fire growth and severity in order to better understand fuel management needs.

(Letter #: 387)

PC# FRE0026

The FS should take into consideration the effects of global warming on fuel management by:

- burning in open winters and early dry springs;
- acknowledging the probability of increasing numbers and severity of fires due to climate change.

(Letter #s: 387, 61)

Category: Fire Guidelines

PC# FRE0024

The FS should consider the following additional guidelines for fire management to protect water quality and riparian areas:

- Bladed firelines, for prescribed fire and wildfire, need to be stabilized with water bars and/or other appropriate techniques to control excessive sedimentation or erosion, and firelines should be rehabilitated to reduce erosion and sediment transport risk following the fire;
- Avoid delivery of chemical retardant, foam, or other fire chemicals and petroleum products to surface waters, following appropriate protocols and BMPs;
- Locate incident bases, camps, helibases, staging areas, helispots and other centers for incident activities outside of Riparian Conservation Areas (RCAs). If the only suitable location for such activities is within the RCAs, an exemption may be granted following a review and recommendation by a resource advisor. The advisor would prescribe the location, use conditions, and rehabilitation requirements, with avoidance of adverse effects to water quality and aquatic species as a primary goal. Use an interdisciplinary team, including a fishery biologist, to predetermine incident base and helibase locations during pre-suppression planning.

(Letter #s: 197)

Category: Fire Objectives

PC# FRE0009

The FS should address and explain the discrepancy between the number of acres proposed for fuel treatment and the number of acres needing treatment:

- to meet the desired condition;
- because proposed treatment acres are inadequate to begin treating the most at-risk category 2 and 3 lands;
- because prescribed fire treatment acres are unrealistic, which presents too great an expense and risk.

(Letter #s: 502, 467, 418, 466, 445, 425, 362, 342, 304, 128, 207, 413)

PC# FRE0013

The FS should adopt a Plan to treat forest lands in the WUI:

- including all forest lands in condition class 2 and 3 within ten years;
- before other forest lands;
- that prohibits the use of wildland fire, which is an inappropriate tool in the WUI.

(Letter #s: 336, 5, 4, 3, 2, 138, 496, 306)

PC# FRE0014

The FS should prioritize WUI fire protection by:

- excluding low population rural areas from the WUI;
- prioritizing protection for populated areas over isolated residences.

(Letter #s: 301, 328, 416, 473)

PC# FRE0015

The FS should adopt a fuel treatment Plan for NFS lands outside the WUI that will treat all condition class 2 and 3 lands within 25 years.

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

PC# FRE0022

The FS should consider adding to Fire Objectives "Establish shaded fuel breaks on major ridges throughout the Forest."

(Letter #: 218)

Subject: GLOSSARY (PC #s starting with GLO)

Category: Glossary

PC# GLO0003

The FS should consider the following changes or additions to the glossary:

- recognize in the definitions for summer and winter recreation that in any given year, weather patterns or conditions on the ground could modify the dates specified. Adding the word "generally" before the dates would help avoid illogical application of the dates;
- define high priority restoration watersheds in the glossary.

(Letter #: 257, 444, 197)

PC# GLO0004

Define "sustained yield".

(Letter #: 331)

PC# GLO0005

Reference where the term "properly functioning condition" is defined.

(Letter #: 197)

Subject: GRAZING (PC #s starting with GRZ)

Category: Grazing Forestwide Desired Condition

PC# GRZ0001

The FS should consider revising the Grazing Desired Condition to:

- limit suitable grazing lands;
- keep grazing from degrading habitat for other species;
- prevent sedimentation;
- include the language - "Over the life of the Plan and into the future, foliage is sustainable and not degraded, with no watershed damage. Grazing is also sustainable;"
- include the language - "Grazing occurs where soil and vegetation conditions are not degraded, and at a level that is sustainable and protective of riparian area integrity, wetlands, streambank and channel stability, and water quality."

(Letter #: 197, 257, 434)

PC# GRZ0002

The FS should restrict livestock in riparian areas and wetlands:

- and provide alternative drinking sources;
- to prevent sediment contribution to streams;
- to protect stream bank and channel stability;

- to protect water quality;
- to prevent soil and vegetation degradation.

(Letter #: 426, 465, 257)

PC# GRZ0003

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

- no net increase of Animal Unit Months (AUMs);
- closing abandoned allotments unless grazing will help achieve a desired condition.

(Letter #: 465)

PC# GRZ0004

The FS should consider revising the Grazing Objectives:

- to ensure that grazing management moves allotments toward the desired condition for grazing and for watersheds and aquatic species;
- including the language "Sustainable grazing opportunities will be provided consistent with the protection of other resources, including riparian area integrity, streambank and channel stability and water quality. "

(Letter #: 257)

PC# GRZ0005

The FS should identify the number of grazing allotments needing revision to meet desired conditions for other resources.

(Letter #: 257)

PC# GRZ0006

The FS should report grazing figures in animal unit months (AUMs) in lieu of Head Months (HMs).

(Letter #: 197)

PC# GRZ0007

The FS should consider the following additions to Grazing Guidelines:

- provide sustainable grazing management protective of other resources;
- protect riparian areas and water quality;
- provide water development restrictions;
- restrict livestock salting;
- address future permit (re-)issuance and problematic allotments;
- include - "Maximum utilization of 40% and maintenance of a 6-inch stubble height in RCAs, as delineated by INFS; No more than 40% utilization of upland vegetation with a minimum 4-inch stubble height; New water developments or other livestock facilities shall not be permitted in RCAs;
- Livestock salting should be prohibited in RCAs; Only annual, once-over sheep grazing should be permitted; and New, reconstructed, or replaced livestock water developments must provide access and escapement from water for all types of wildlife."

(Letter #: 339)