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Analysis of Public Comment

Proposed Land Management Plans

Kootenai and Idaho Panhandle National Forests



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Introduction and Summary

Collaboration and public involvement are important components of revising the Kootenai National Forest (KNF) and Idaho Panhandle National Forests (IPNF) Land Management Plans (hereinafter referred to as the “Plans” or “LMPs”). The Proposed LMPs (PLMPs) were released on May 12, 2006, which initiated the 90-day public comment period. The comment period was to end on August 10, 2006; however, the comment period was extended 30 days and ended September 11, 2006. The extension was a result of the Forest Supervisor’s decision to allow for additional public review, primarily because the PLMPs were released under the 2005 Planning Rule, which resulted in the new Plans looking substantially different than the 1987 Plans. The Forest Supervisor’s decision gave the public the opportunity to become more familiar with the new Plan format and context, in order to better prepare their comments.

Upon completion of the 120-day comment period, the Forests received 517 unique and substantially different comment letters. Of the 517 letters, there were 17 different form letters and three petitions. The form letters were primarily generated electronically, resulting in a significant number of emails (see Appendix B of this Report for details).

Copies of the PLMPs were mailed to over 4,500 individuals, elected officials, tribes, state and federal agencies, organizations, and special interest groups. The PLMPs, and other information such as maps and the Comprehensive Evaluation Report (CER), were available on the KIPZ web site.

This document, the *Analysis of Public Comment for the Kootenai and Idaho Panhandle National Forests*, is a synthesis and summary of the comments and concerns we heard during the comment period. It is organized into the following sections:

- **Introduction and Summary:** This section provides a broad overview of the collaboration and public involvement process; the process used to analyze comments; and a brief summary of the public comments.
- **Statements of Public Concern:** This section consists of the public concern (PC) statements by resource, which follows the coding structure displayed in Appendix B. The PC statements summarize key concerns received during the public comment period.
- **Appendices:** This section consists of: A) a list of communication numbers assigned to every comment letter, including the PC numbers that summarize the comments in each letter; B) information about the process used to analyze the comments and the coding structure; and C) a list of acronyms used throughout this document. An additional appendix will be added to this report upon release of the Final LMP and is expected to include a summary of changes to the Proposed LMP based on public comment.

Summary of Public Participation and Collaboration

Since April 2002, personnel on the Kootenai and Idaho Panhandle National Forests have been working and collaborating with the public on the revision of the 1987 Plans for both Forests. The five primary phases of public participation/collaboration include:

1. **Scoping comment period (4/30/02 – 5/1/04)**, which included open houses and public meetings identifying issues of concern and discussion about the Analysis of the Management Situation (AMS);
2. **Collaborative workgroup meetings (8/1/03 – 5/1/04)** to discuss desired conditions and other Plan components (8/1/03 - 5/1/04);
3. **Collaborative workgroup meetings (11/29/04 – 9/7/05)** to discuss Starting Option maps;

4. **Release of the Proposed Plan maps (10/2005)** via meetings, news releases, newsletter and the KIPZ web site; and
5. **Release of the Proposed LMPs (5/10/06 – 9/11/06)**, which included open houses and public meetings to share the Proposed LMPs, CER and other documents for the 120-day public comment period.

All of the information summarized above and results from the collaborative meetings can be found on the KIPZ web site at: www.fs.fed.us/kipz/documents/plmp/public_involvement. In addition to efforts that were designed to involve the public, agencies, partners, etc., measures were also implemented to engage employees (see planning record for details).

Process Used to Analyze Public Comments

Analysis of the public comments was completed by a contractor who used a systematic approach of compiling and categorizing all viewpoints and concerns that were submitted. The comments that were most helpful were those that were unique, substantive, and provided specifics about the Proposed LMPs. In addition to capturing unique and substantive comments, this report attempts to reflect the emotion and strength of public sentiment in order to represent the public's values and concerns as fairly as possible.

Once the unique and substantive comments were coded, they were summarized and captured as the Public Concern (PC) statements found in this report. It is important to keep in mind that even though the PC statements attempt to capture the full range of public issues and concerns, they should be reviewed with the understanding that there is no limitation on who submits comments. Therefore, the comments received do not necessarily represent the sentiments of the public as a whole. This report attempts to provide fair representation of the wide range of views submitted. Every comment has the same value, whether expressed by many, or by one respondent. Analyzing the comments was not a vote-counting process. The outcome, which will result in changes to the PLMPs, was not determined by majority opinion. The content analysis process we used ensured that every comment was read, analyzed, and considered during the decision process.

Following is the systematic process used in analyzing the public comments that were received on the PLMPs (see Appendix B for more details). Note that a substantive comment is a comment that is specific to the PLMP.

Step 1: All comment letters (hereinafter, comment letters includes hard copy and emails) were assigned a communication number to allow for tracking the unique and substantive comments within the letter to the PC statements (see Appendix A for communication numbers assigned to each letter). Name and address information were entered into a database.

Step 2: Every comment letter and/or petition was read by members of the planning team, and/or a Forest Supervisor. In addition, a Forest Service contractor (TEAMS Enterprise) read and coded all the unique and substantive comments to help ensure that an unbiased approach was utilized to code each letter (see Appendix B for coding structure).

Each unique and substantive comment within a letter was assigned a comment number, subject code, and category code to enable grouping of similar comments for the report in Step 5. The coding of each comment letter can be found in the Planning Record. For example, a comment regarding the desired condition for access and recreation for summer, motorized use would be coded as:

Comment Number: 1 (1st comment coded in the letter)
Subject Code: ACC (access and recreation)
Category Code: 2100 (desired condition for summer, motorized use)

Step 3: Form letters and petitions were identified and filed in the planning record (see Appendix B for details). Regardless of the number of copies received or the number of signatures, one copy of each form letter and/or petition was analyzed for unique and substantive comments and that one letter followed Step 2 of this process.

Step 4: Each of the more than 3,000 unique and substantive comments that were coded were entered into a database, verbatim.

Step 5: Reports were produced from the database that contained the coded comments, and a report was generated that grouped similar comments. TEAMS then drafted PC statements that summarized what was being said in each group of like comments. These PC statements were reviewed and revised by the planning team and approximately 700 of these PC statements are contained in this report.

Step 6: The Forest Leadership Teams (Forest Supervisors, District Rangers, and Staff Officers) and Planning Team were provided a report of the PC statements to assist them in discussing changes to the PLMPs. In addition, both Teams received copies of all 3,000 substantive comments, as well as the original comment letters and petitions.

Step 7: After reviewing the PC statements and comments, the Forest Leadership Teams (FLTs) met with the Planning Team to clarify questions and discuss comments. The FLTs will instruct the Planning Team regarding the changes to be made for the Final Land Management Plans.

Summary of Public Comments

The public comments received on the PLMPs included a wide range of concerns with a number of the respondents addressing multiple topics in their comment letter. The following summary is not intended to provide an exhaustive account of all the public concerns but to provide the broad topic areas that capture the main concerns. This Summary is organized in three parts: 1) Plan Component Requests and Recommendations, 2) Management Area Allocations, and 3) Other Comments.

Plan Component Requests and Recommendations

A large number of respondents requested specific Plan component changes, which included changes to the desired conditions, objectives, and guidelines. In addition, comments were received on the monitoring questions and program, which are useful in the development of the Monitoring Guide. These types of specific comments were requested during the comment period and are very useful; however, they don't lend themselves to a brief summarization and may not be included in the following summary. However, the Planning Team is considering each of these specific comment suggestions while making modifications to the PLMPs.

Most comments focused on the following areas, which are identified in our Plans as sustainability topics:

Access and Recreation

Access to and recreation on public lands is very important to many people. Most comments were general in nature and requested Forests to increase, decrease, or maintain access for the following opportunities: summer and winter motorized use; summer and winter nonmotorized use; mountain bike use; horseback use; and dispersed and developed camping. In addition, there were many comments asking for specific roads, trails, and areas to be open or closed to motorized or nonmotorized use (see Other Comments section below).

Inventoried Roadless Areas, Recommended Wilderness, Wild Lands and Primitive Lands

A significant number of respondents were interested in lands identified as inventoried roadless areas (IRAs), recommended wilderness, wild lands, and primitive lands. Some of the comments included: all roadless areas should be designated recommended wilderness (RW), while others commented there is enough RW; the wild lands on the KNF should be RW as proposed in the starting option, while others felt the roadless areas should remain wild lands; and specific areas that should be designated RW include, but are not limited to, Scotchman Peaks, Northwest Peaks, Cabinet additions, Ten Lakes, and Mallard Larkins, while others believed these areas should be managed for motorized activities.

In addition, comments on the management of recommended wilderness, wild lands, and primitive lands included: these roadless lands should be managed as wilderness, while others believed that some of the roadless lands should be managed for multiple use including motorized recreation and vegetation management; mountain biking is or is not a suitable use in these lands; and snowmobiling is or is not a suitable use in these lands.

Vegetation

Many comments focused on the desired condition of the Forest vegetation and the amount and type of management that should be used to achieve that desired condition. These comments ranged from no management to active management and using tools such as prescribed fire and timber harvest. In addition, management within old growth and management of noxious weeds were of high concern.

Timber

Comments on timber production included: the need to reduce fire risk and improve forest health, the TSPQ (total sale program quantity) is too high or too low; logging should be used as a tool to improve forest health or logging is not an appropriate tool and natural processes should occur; and concerns about the effect of decreased timber production on the local infrastructure, jobs, and income on the communities in the zone.

Fire

Comments received for fire focused on: the concern of allowing wildland fire use across the Forests, including in the wildland urban interface (WUI); how the WUI boundaries were defined; use of prescribed fire versus timber harvest; fuel treatment within or outside the WUI; and that prescribed fire is or is not a tool to be used to improve forest health.

Wildlife

Comments on wildlife management included the importance of: unique, diverse and secure habitats, including old growth, to ensure thriving, viable native fish and wildlife populations; balancing the effects of human interaction with management of habitat for all species, including grizzly bears, caribou, and mountain goats; security for big game and big game winter range; and linkage and connectivity corridors for wildlife movement.

Watersheds and Aquatic Species

Comments for watersheds and aquatic species included comments on watersheds, aquatic species, soils, and riparian areas. Specifically, the concern that the commitment to restore impaired watersheds is not apparent; the resource needs to be well protected from damage by management and other human uses; the direction in INFISH (Inland Native Fish Strategy), such as the standards, have been weakened or lost under the 2005 Planning Rule; and soil productivity needs to be improved.

Other Topics

Comments for other topics included comments on grazing, heritage, lands, special uses, minerals, other forest products, social and economics, and tribal concerns. However, the majority of comments on these “other topics” focused on the social and economic implications of forest management activities or opportunities for the local communities. Examples include: loss of jobs and income with lower timber harvest levels; loss of motorized opportunities, both summer and winter and its effect on the communities; and loss of opportunities for other forest products, such as huckleberries, firewood, and mushrooms.

Management Area Allocations

Comments were received regarding management area (MA) allocations, with most of the comments focusing on changing or not changing Wild Lands (MA1e) and/or Primitive Lands (MA1d) to Recommended Wilderness (MA1b). In addition, there were respondents requesting the Forests to change or not to change the management area Backcountry (MA5's) to Recommended Wilderness (MA1b).

Other Comments

Comments were also received that are not directly applicable to making changes to the Proposed LMPs. Some of these included comments about: the success or breakdown of the collaborative and public involvement process; the use of best science; the regulatory considerations under the 2005 Planning Rule, such as an EIS is not required under the new Rule; the closure or opening of a specific road, trail or area; the need to understand the Comprehensive Evaluation Report and how it relates to the PLMP; what the monitoring program consists of; and questions about the integration between the Plans and the Environmental Management System (EMS).

Public Concern Statements

Introduction

This section includes the Public Concern (PC) Statements, which were developed by grouping similar comments and then writing a statement that characterized the group of comments. Respondents will find that their complete letter is not reproduced in the PC statements. Several of the comment letters contained very specific suggestions, which in most cases, are not incorporated into the PC statements; however, these comments have been reviewed by the team as they revise the PLMPs.

The PC statements were written to capture a main idea and are followed by more specific comments related to that main idea. The specific comments are either delineated by a semi-colon or by bullets. If there are quotation marks within a PC statement, these are comments taken verbatim from the letters and/or petitions. Acronyms and their definitions can be found in Appendix C.

The PC statements are organized by Subject, and then by Category because in many cases, at least one other party expressed a similar or the same concern and the PC statement summarize these like comments. Some PC statements fit under more than one Subject. In order to find your PC statement in this report, look at the table in Appendix A. The PC# has an identifier at the beginning of the PC# and this matches the Subject Code in the PC Statement portion of this report (i.e., PC# is ACC0041 and the “ACC” indicates that that PC statement is under the Subject “Access and Recreation.”

A list of the communication numbers is identified with each PC statement, enabling respondents to see which PC statements summarize their comments (see Appendix A for communication numbers). Following is an example of the organization for each PC statement:

Subject: Access and Recreation
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Category: **Access & Recreation Forestwide Desired Condition – Dispersed Recreation**

PC#: ACC0041

PC Statement: The FS should expand developed and dispersed recreation opportunities by:

- adding campsites, trails, and recreation facilities;
- converting old and decommissioned roads into motorized/mechanized trail systems;
- installing trailheads near urban areas.

Letter #s: 73, 355, 401