

Attachment 3: Issues Reviewed and No Change Determined to be Necessary

This attachment documents those objection issues that were reviewed with a resulting determination that no change to the planning documents was necessary. Most of these issues are addressed with a limited response describing why no further action by the responsible official is necessary. However, for some of these issues, the reviewers felt a more detailed response would be beneficial to helping the objectors and interested persons better understand the conclusions reached.

The first part of this attachment provides the more detailed responses. Following those responses is a table documenting the other issues considered.

Climate Change

Objection Issue:

In their comments on the DEIS, the objectors contend they presented three pages of discussion on scientific research and opinion identifying forest management as a contributor to climate change. Instead of addressing the implications of this scientific research and opinion cited regarding the LMP's forest management, Appendix G dismisses it without addressing the substance. The Forest Service refused to include an alternative that considered this scientific research and opinion. Given that the alternatives, all stress vegetation management, there could be no real comparison of management options. The FEIS even failed to use Climate Change as a topic for comparison of how the alternatives it did include respond to, or contribute to, climate change.

The objectors also state that information in the 2010 KIPZ Climate Change report asserts "Harvested wood products increase the net sequestration on these forests by an undetermined amount" is unsubstantiated by cited scientific research or information (#0025, p. 61).

Response:

The KIPZ Climate Change report was compiled to synthesize the best available scientific information on climate change. It summarizes available information on climate changes observed over the last 100 years and the amount of change projected in the coming decades. It contains over 200 pages and went through a science consistency review by specialists from two Forest Service Research Stations, the U.S. Geological Survey, and universities. Parts of the report were incorporated into the EIS and were used to guide revised Forest Plan elements (FEIS, p. 13). Upon reviewing the process used to develop and review the KIPZ Climate Change report, it appears the IPNF used a reasoned and thorough approach in looking at the available science and making changes in response to comments received during the science consistency process. Following the development of the climate change report, additional publications and research related to the topic of climate change and adaptation opportunities for national forests has been published and reviewed by the KIPZ. Additionally, the IPNF acknowledges that the science surrounding climate change and carbon sequestration will continue to evolve. The adaptive management approach of the forest planning process will allow the Forest Service to update and

adjust the Forest Plan comprehensive evaluations and management options as additional information becomes available.

Appendix G (pp. 438-442) responds to multiple concerns raised by the objectors and explains the reasoning for using the scientific information that was used during the planning process.

Upon reviewing the specific quote questioned by the objectors, the KIPZ Climate Change report (p. 60) does not include a citation to support the statement “Harvested wood products increase the net sequestration on these forests by an undetermined amount.” A citation is not needed.

While climate change was not used as a topic for comparison of how the alternatives respond to or contribute to climate change, carbon sequestration and climate change are incorporated in the discussion on the affected environment and environmental consequences, primarily on pages 91 and 113-115, as well as throughout other parts of these sections. Carbon sequestration is listed as an indicator under the Vegetation resource area, and page 38 of the FEIS includes a table summarizing the effects by alternative for each revision topic. This includes a comparison of carbon sequestration for each alternative. There is currently no direction or any policy that requires forests to use climate change as a specific topic for comparing alternatives during the land management planning process.

Economics

Objection Issue:

The objector contends the economic impact analysis presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues forecast for wildlife and fish on the IPNF. The objector further contends, “The largest portion of these outputs is generated from big game hunting activities. ...Big game receipts are down, due to what is considered poor forest management, lack of habitat resulting in an impact on the local economy.” (#0054, pp. 15, 19)

Response:

The analysis by the IPNF shows an increase in visits for all categories of recreation except one, and all categories of wildlife/fish over current levels for all Alternatives considered for the Revised Plan. As shown in the FEIS (Appendix B, Social and Economic Analysis, Economic Impacts, pp. 45-50), the economic effects to local counties were estimated with input-output analysis using the IMPLAN (IMPact analysis for PLANning) modeling system (MIG 2003) and FEAST (Forest Economic Analysis Spreadsheet Tool).

Riparian

Objection Issue:

Regarding standards FW-STD-RIP-01 and 02, the objector contends the meaning of “intact and...functioning at desired conditions” is unclear. There is no reference to any established objective criteria.” (#0025, p. 23)

Response:

The IPNF FEIS (pp. 174-175) provides helpful clarification: “The condition of riparian areas can be an indicator of overall ecosystem quality. There are an estimated 700,000 acres of riparian areas across the planning unit, and on average, these areas are considered to be approximately 96 percent intact. In general, many riparian areas on the Forest are believed to be functioning at or near their potential; and most degraded areas are in a stable condition or improving. It is estimated that almost 70 percent of all subwatersheds on the Forest have a low to moderate amount of disturbance (table 34), with most of the higher levels of riparian disturbance associated with the central and southern portions of the planning unit (figures 23 and 24). This is likely due to the relatively higher levels of timber management, road construction, and mining activities, compared to other areas on the Forest. Although these areas are relatively functional and there has been improvement in some areas, there are localized areas where riparian areas may be functioning below potential.”

Roadless Areas

Objection Issue:

Regarding the guideline FW-GDL-IRA-01, the objector contends it “implies direction to the Forest Service to remove (or at least allow degradation of) Wilderness potential on 84% of the inventoried roadless areas on the Forest. Because Wilderness is a nonrenewable resource, there must be no more loss of Wilderness potential.” (#0025, p. 46)

Response:

The Revised Plan (p. 37) states “FW-GDL-IRA-01. Wilderness potential will be maintained on 16 percent of the inventoried roadless areas on the Forest.” FSM 1923.03 provides that “Any inventoried roadless area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of an area.” IPNF evaluated all IRAs for recommendations as potential wilderness consistent with 36 CFR 219.17 (1982 Planning Rule) and FSH 1909.12, 70. When considering all the alternatives and consistency with the Idaho Roadless Rule (36 CFR 294 Subpart C), the Responsible Official determined that “approximately 17 percent of the Inventoried Roadless Areas” should be included in MA1b – Recommended Wilderness (2013 IPNF Revised Forest Plan, p. 46.). As a result, FW-GDL-IRA-01 is consistent with Forest Service regulations and policy.

Objection Issue:

The objectors contend:

- The process used to designate IRAs currently designated on the IPNF is not consistent with law due to the presence of roads.
- Roadless boundaries are incorrectly mapped.

(#0018, p. 7; #0054, pp. 8, 9)

Response:

The Idaho Roadless Rule (Idaho Rule) applies to inventoried roadless areas (IRAs) in Idaho and the 2001 Roadless Area Conservation Rule (2001 Rule) applies to IRAs in the remainder of the planning area. Each rule went through a public review and analysis process, separate from this Forest Plan revision. Both the 2001 Rule and the Idaho Rule provide higher level management direction for IRAs and limit the scope of changes that can be made in this Forest Plan revision. “The terms of each rule are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plans or revisions (36 CFR 294.28 (Idaho Rule); 36 CFR 294.14(e) (2001 Rule)). All forest plans must comply with applicable laws and regulations, such as the 2001 Rule and the Idaho Rule.

Regarding IRA boundaries and the IRA designation process, designation of IRAs and the process used to map boundaries in the 2001 Rule and the Idaho Rule are outside the scope of this Forest Plan revision. The Forest Service established the boundaries of IRAs with the publication of each final rule (2001 and Idaho). Only the Chief of the Forest Service can modify an IRAs boundary; this process is separate from the Forest Plan revision process. As stated above, IRA designation and boundary drawing cannot be modified or revisited in the forest planning process.

Regarding the scope of prohibited activities in IRAs under the 2001 rule, the Rule only prohibits road construction or reconstruction and the cutting, sale, or removal of timber unless one of its exceptions applies. For example, the 2001 Rule allows timber cutting to improve threatened or endangered species habitat, to reduce the risk of uncharacteristic wildfire effects, or when the timber cutting is incidental to an activity not otherwise prohibited by the Rule (36 CFR 294.13(b)). As stated in the preamble to the 2001 Rule, “management actions that do not require the construction of new roads will still be allowed, including activities such as timber harvesting for clearly defined, limited purposes, development of valid claims of locatable minerals, grazing of livestock, and off-highway vehicle use where specifically permitted. Existing classified roads in inventoried roadless areas may be maintained and used for these and other activities as well” (66 Fed. Reg. 3250).

Timber

Objection Issue:

Regarding Forest-wide standard FW-STD-TBR-02 (“If individual harvest openings created by even-aged silvicultural practices are proposed that would exceed 40 acres, then NFMA requirements regarding public notification and approval shall be followed. These requirements do not apply to the size of areas harvested because of catastrophes such as, but not limited to, fire, insect and disease attacks, or wind storms.”), the objector contends, “This highlights a problem we’ve long noted, there being an undefined category of natural processes the Forest Service calls ‘catastrophe’, which has generally translates to dead trees not being logged (not maximizing timber volume produced) as the catastrophe rather than there really being something truly ecologically harmful. Also, it seems redundant for a Standard to explicitly state that the law would be followed (#0025, p. 59).

Response:

The word “catastrophe” does not imply an economic loss but rather large natural disturbance events such as fire, insect and disease attack, or windstorm. Dead trees are removed after a natural catastrophe for both environmental and social reasons. While safety of human communities and infrastructure protection is paramount, there is also a critical need to restore the function and structure of our forests after these events.

NFMA allows harvest openings created by even-aged silvicultural practices to exceed 40 acres after large natural catastrophic events. NFMA states, “. . . insure that clearcutting, seed tree cutting, shelterwood cutting, and other cuts designed to regenerate an even-aged stand of timber will be used as a cutting method on National Forest System lands only where there are established according to geographic areas, forest types, or other suitable classifications the maximum size limits for areas to be cut in one harvest operation, including provision to exceed the established limits after appropriate public notice and review by the responsible Forest Service officer one level above the Forest Service officer who normally would approve the harvest proposal: Provided, That such limits shall not apply to the size of areas harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm. . .”

Vegetation

Monitoring

Objection Issue:

The objector contends that the indicator for MON-VEG-01-05, the annual measure of old growth and recruitment potential old growth, does not require that the old-growth definition as specified in the LMP Glossary be the measurement criteria utilized to determine if any acre is old growth.” The objector further contends “the measure of “recruitment potential old growth” is problematic due to its highly subjective definition” (#0025, pp. 63-64).

Response:

The definition of old growth in the Revised Plan’s glossary (p. 118) references the publication Green, et al. 1992 as the applicable source for old growth definitions, unless updated or replaced by the Northern Region. This makes it clear that references to old growth in the management direction and monitoring requirements of the Revised Plan are based on these definitions.

The term “recruitment potential old growth” is defined in the glossary for both plans on IPNF page 121 and KNF page 119.

Analysis

Objection Issue:

Objector contends the use of VMap base data causes unacceptable inaccuracy in the wildlife analysis. More broadly, objectors contend the use of vegetation (the habitat proxy) is not valid for insuring viable populations of wildlife (#0025, pp. 35-40).

Response:

The issues regarding vegetation mapping and associated wildlife analysis are linked to the 1982 planning regulation at 36 CFR 219.19:

Fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area. For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area. In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area.

The use of VMap base data is in the ERG report. This report is supplemental analysis that augments the viability analysis as discussed on page 219 of the FEIS.

Further, the ERG Report 2012 recognizes the VMap data limitations and addresses them by comparing species-specific habitat identification criteria to FIA summary data for the KIPZ planning unit. They determined how many of the 723 forested fixed plots in the KIPZ met both of these criteria, and then compared these results to VMap-based, SIMPPLLE-modeled data. Where species occurrence data were available, such data was overlaid with VMap-predicted habitat to refine the accuracy of the data and query design (e.g. goshawk nests and flammulated owls) (Doc. 01495, pgs. ES-3 and ES-4).

Watersheds

Objection Issue:

The objector contends the monitoring program lacks a focus on Water Quality Limited Segments and meeting state-defined beneficial uses (#0025, p. 66).

Response:

While the objector is correct in identifying that the forest monitoring program does not contain a specific requirement for the monitoring of restoration or recovery of Water Quality Limited Segments (303d), the Revised Plan does have a specific objective (FW-OBJ-WTR-02) that addresses the needs for improvements to 303(d) listed streams (“Annually, improve aquatic ecosystem function and processes across 100 to 500 acres of subwatersheds that are rated as ‘Moderate’ or ‘High,’ emphasizing activities in subwatersheds with Category 4a water bodies, on Idaho’s §303(d) list of impaired waters.”)

Category 4a water bodies have an approved total maximum daily load (TMDL), have pollution control requirements in place other than a TMDL, or are impaired by pollution (e.g., flow alteration and habitat alteration) but not pollutants). These segments or water bodies involve 68 percent of the subwatersheds (N=227) on the Forest. The dominant pollutant currently affecting "impaired" water bodies is temperature. Because of new protocol for assessing temperature criteria there has been a dramatic increase in the number of streams listed as

impaired from the 1998 list to the 2008 list. The next most common pollutant is sediment. Other pollutants are listed for a small number of subwatersheds.

There is no requirement that every objective have a matching monitoring indicator.

Wildlife and Fisheries

Objection Issue:

The objector expresses support for establishing a Management Area 8: Wildlife Linkage Zones, stating, “Such mapped zones would visually illustrate a ‘Desired Condition’ of connected core habitat areas (roadless and wilderness, Wild and Scenic, etc...) and offer no ambiguity about the management intention for such linkage zones” (#0025, pp. 43-44).

Response:

The IPNF FEIS identifies habitat connectivity within and between the Selkirk Grizzly Bear Recovery Zone (SRZ) and the Cabinet Yaak Grizzly Bear Recovery Zone (CYRZ) as an issue for grizzly bears. The main “fracture zones” identified in Servheen et al 2003 are: 1) CYRZ – SR-2 and SR-56 and the railway lines that parallel SR-2; 2) SRZ – B.C. Highway 3 (in Canada); 3) Between the SRZ and CYRZ – SR-95 and the parallel railway; 4) Between the CYRZ and the Bitterroot Mountains – SR-200 and the parallel railway; and 5) Between the CYRZ and the NCDRZ – SR-2 and SR-93. SR-95 and portions of SR-2 are located within the action area of the Proposed Action (pg. 248).

The Revised Plan takes a more collaborative than prescriptive approach to habitat connectivity at the “fracture zones” (IPNF FEIS, p. 264). This approach is incorporated into a desired condition and three guidelines (Revised Plan, pp. 30 and 32):

FW-DC-WL-18. Forest management contributes to wildlife movement within and between national forest parcels. Movement between those parcels separated by other ownerships is facilitated by management of the NFS portions of linkage areas identified through interagency coordination. Federal ownership is consolidated at these approach areas to highway and road crossings to facilitate wildlife movement.

FW-GDL-WL-15. Connectivity. During the construction or reconstruction of highways that cross national forest lands, or high use forest roads, wildlife crossing features would be included in the design where necessary to contribute to connectivity of wildlife populations.

FW-GDL-WL-16. Connectivity. Management activities within one-quarter mile of existing crossing features, and future crossing features developed through interagency coordination, should not prevent wildlife from using the crossing features. The vegetative and structural components of connectivity, including snags and downed wood, would be managed according to the desired conditions for vegetation.

FW-GDL-WL-17. Connectivity. In wildlife linkage areas identified through interagency coordination, federal ownership should be maintained.

In addition, reduced motorized route densities and increased habitat are expected to increase the overall grizzly bear population by supporting female grizzly home ranges (IPNF Biological Opinion (BO), pages II-31 and II-46). Also the BO notes that the forest-wide Food Storage Order further limits risk of conflicts between bears and humans in Bears Outside Recovery Zones and thereby facilitating connectivity (p. II-76).

The Revised Plan BO notes some recent developments like a 2012 MFWP conservation easement and a recently completed State of Montana Conservation Plan that suggests a flexible collaborative approach to managing connectivity might be beneficial (p. II-29 and II-35-36). The BO recognizes that, if warranted in the future, the development of crossing structures for linkage is dependent on future interagency coordination and collaboration with the public, primarily because the highways and railroads that may be barriers for wildlife are not under the jurisdiction of the IPNF. However, the IPNF may manage lands near future crossing structures (i.e., approach areas) and has thus identified the need to manage lands near those features to maintain the effectiveness of those features.

Because of the importance of linkage for grizzly bears, it is likely that they would be one of the species considered in the design of future crossing structures or maintenance or enhancement of lands near crossing areas to link blocks of habitat important to grizzly bears (#01197, p. II-73). The USFWS evaluated the desired conditions and guidelines supporting connectivity in depth (#01197, p. II-73-76). They concluded that the Revised Plan elements would support linkage conditions on NFS lands that are likely to foster movement of sub-adult and male grizzly bears that are required for genetic recovery, and in time, will also likely support linkage for females with cubs needed for demographic recovery.

The issues in the table below were reviewed and determined to not require any changes based on one or more of the following reasons:

Determinations

- 1) The issue was one alleging non-compliance with law, regulation, or policy; but the review found adequate compliance with applicable law, regulation, and policy as supported by analysis and rationale made available in the FEIS and draft ROD and, furthermore, supported by information in the planning record.
- 2) The objector misinterpreted or incorrectly applied law, regulation, or policy.
- 3) The appropriate models, methodology, data, and/or science were applied.
- 4) The issue expressed disagreement with choices or decisions made in the planning process, but the review found that those choices or decisions were within the discretion and authority available to the responsible official and were adequately explained in the planning documents.
- 5) An adequate and thorough response to the issue has already been provided in the Response to Comments appendix, elsewhere in the FEIS, and/or the draft ROD.

Issue Topic	Issue Statement	Objection Reference	Determination(s)
Access	Lack of funding is not considered a good excuse to close off access to the public.	#0014, pp. 3-5	4
Access	No consideration or analysis given regarding local law enforcement, national security agencies, (i.e., Homeland Security/Border Patrol, and emergency response units, etc.), access of restricted National Forest roads and trails, where the road system is restricted to administrative use only. The northern most portions of the IPNF are unique to the forest as it intersects the international boundary with Canada. National security issues are paramount to the management of the road system.	#0014, pp. 2-4	4, 5

Access	<p>“The BOCC letter stated that snowmobile access is very popular/an economic boon to our county, and is non-invasive to the landscape. We do not agree that snowmobiling on designated trails is traumatic to the wildlife and advocate a policy to keep the maximal number of roads open to provide maximum access to our public lands.</p> <p>“The USFS ignored our policy and its response was to close snowmobile access in MA1b and MA4a Research Natural Areas.”</p>	#0054, pp. 3	4, 5
Aquatic Habitat	FW-OBJ-AQH-01. The Forest Service sets as an Aquatic Habitat restoration Objective for the next 15 years an inadequate length of stream channels, hardly addressing the LMP Goal for this topic.	#0025, pp. 25-26	4
Climate Change	“My objection to the plan revision is that it only mentions climate change rather sporadically and almost as an afterthought.”	#0005, p. 1	3, 4
Fire/Fuels	“Develop a cohesive strategy that identifies options and associated funding to reduce potentially hazardous vegetation and address wildland fire problems. Despite our repeated calls for a cohesive wildland fire strategy, the Forest Service has yet to develop one...In January 2009, agency officials told us they were working to create such a cohesive strategy, although they had no estimate of when the strategy would be completed.”	#0054, pp. 7, 8	3, 4
Fire/Fuels	“We adamantly disagree that fire suppression created this horrible state of the federal lands but instead insist that lack of proper management and in most cases a complete lack of any management that has degraded the forests in Shoshone County to their current condition of explosive catastrophic fire state. In addition, given the history of fire suppression and lack of management on the IPNF, there are currently thousands of acres on the forest that if not treated with mechanical vegetation management strategies sometime in the near future, will likely be burnt up by wildfires...At this harvest level, given a 100 year harvest rotation schedule, (likely longer than needed on the majority of the IPNF), 440,000 acres or less than (20%) of the IPNF would be managed for timber production. Given the fact that these lands can easily be simultaneously managed for the benefit of both, fish and wildlife, and water quality, as well as many other resources, it is unacceptable that the other 80% of the IPNF would essentially be managed with fire as the primary vegetation management too.” Impacts resulting from fire and contaminated soils from the superfund site also mentioned.	#0054, pp. 21-23	3, 4

Fire/Fuels	“The BBCC objects to the planned proposal to manage lands and vegetation by fire use without fire suppression. Failures of the USFS to manage fuels loads caused by the USFS failure to meet the ASQ and timber harvest levels required in the 1987 plan have allowed the fuel load to reach critical levels. Historic records of the results of the catastrophic 1910 fire show how wildfire unchecked with the current fuels and forest conditions will put private property and communities at significant risk. Catastrophic fire also causes environmental damage such as hydrophobic soils which lead to accelerated erosion, increased peak flows, destabilization of stream beds, damage to fisheries, loss of wildlife habitat, and flooding of downstream communities.”	#0023, p. 5	3, 4
Fire/Fuels	MON-FIRE-02-01. There is nothing ecological about this indicator, since there is no spatial measure (acres burned that meet positive ecological outcomes.) It isn’t even a decent bureaucratic indicator, since a fire—allowed to burn 300 acres to meet ecological objectives but then suppressed before it was allowed to potentially meet ecological objectives over untold thousands more acres—could be placed in either category of ignition.	#0025, p. 65	4
Fire/Fuels	The revised Plan increases the potential for catastrophic wildfire by failing to provide for adequate thinning, restricting access, and increasing wilderness where forest management is restricted.	#0062, p. 1	4
Fire/Fuels	Wildland Urban Interface (WUI). The BOCC requests that they be considered in discussions on vegetation management, especially harvest or thinning. The BOCC is concerned about a conflict with the USFS management and strategies that will keep communities safe from fires, and asked the USFS to work with it regarding WUI.	#0054, pp. 5-6	4
Fire/Fuels	FW-DC-FIRE-02. The Desired Condition does not contain any scientific perspective regarding the home ignition zone, nor does it prioritize treatments in the WUI where property owners have taken proper steps to minimize fire risk on their own property. The language of this Desired Condition would nullify the language in FW-DC-FIRE-03 that recognizes the desirability of wildland fire because of the latter’s vague language.	#0025, p. 13	4
Fire/Fuels	MA6-GDL-FIRE-01 has the same problems as FW-DC-FIRE-02. It is also redundant.	#0025, p. 13	3, 4
Fire/Fuels	FW-DC-FIRE-03. It is likely that the vague language in this Desired Condition would essentially nullify its intent that recognizes the desirability of wildland fire.	#0025, p. 13	4

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Fire/Fuels	The Draft Plan Elements need much stronger direction and certainty for use of wildland fire for resource benefits. The DEIS does not present an analysis that faces up to this constrained budget scenario, in regards to the Draft Plan’s strong management emphasis to “Move towards Desired Vegetation Conditions” using active management, mostly mechanical manipulations. ...[F]ire suppression will continue to dominate, except in those weather situations when and where suppression actions are ineffective, in which case fires of high severity will occur across relatively wide areas. The FEIS’s analysis fails to adequately recognize or consider that scenario’s likelihood.	#0025, pp. 14-15	4
Fire/Fuels	FW-OBJ-FIRE-02. The numbers must specify acres rather than fire starts; and this should affect a much more significant portion of the IPNF than the wording of this objective implies—to be determined ‘subject to the test of good science and full and fair analysis’ as we stated above.	#0025, p. 14	4
Fisheries	Indicator MON-FLS-01-03. Specific to the INFISH monitoring requirements that this Indicator adopts; since at age 18 years INFISH has long ago become more than “interim” the logical requirement is that the IPNF must use monitoring data to determining if project implementation results in attainment of riparian goals and objectives—deemed to be “critical” monitoring by the Forest Service in Appendix B. Also, the bull trout redd count data must be supplemented by fish survey data for numbers of bull trout in bull trout streams. It is also important to measure population trends of brook trout in bull trout streams for hybridization reasons.	#0025, p. 67	2, 4
Fisheries	MON-AQH-01-01. ...lacks a baseline of unconnected stream habitat for subsequent comparison.	#0025, p. 66	4

Forest Mgt.	<p>“This concept ‘change in policy’ as an overall theme of managing for ecological outcomes primarily and only considering social and economic outcomes secondarily is doomed for failure. Without primary attempt to generate revenue the revised IPNF plan will fail.</p> <p>“The desired outcomes the IPNF plan revision hopes to achieve are misleading and unachievable. Much like the recent ‘too big to read’ bills have been misleading to the general public and have shown surprise consequences, this plan revision also leaves undesired, unsought consequences. Where the primary objective of using ecosystem management is to attain the desired forest condition, without recognition for emphasis on economic stability, the desired management philosophy in fact, will exhibit the opposite outcome by degrading the forest to an undesirable state. Not only will the condition of the forest deteriorate under ecosystem management, but also as a secondary effect, forest communities cannot be sustained because of the loss of economic stability that Congress mandated agencies must assure under NEPA policy. A further outcome will result: Without a forest plan driven first by revenue creation and then using these revenues to rehabilitate eco-systems, the Forest Service will not be able to survive. One need only to look to the present state of government to realize that Congress cannot continue to spend money on National Forest Lands without some assurance of monetary return to the federal budget.”</p>	#0054, p. 18	1, 4
Minerals	Indicator MON-MIN-01-01. “...the baseline number of unreclaimed abandoned mine sites must be disclosed. Additionally, including monitoring items for water quality and soil productivity in abandoned mine sites is important for biological resources including human health and safety.”	#0025, p. 70	4, 5
Minerals	Guidelines for MA1b, MA1c, and MA1e are inconsistent with the intent of the Idaho Roadless Rule that mineral leasing be prohibited in roadless areas.	#0045, p. 16	1

Minerals	“Failure to comprehend the economic contribution mining and recreational mining has had and continues to have on the county, in fact on the entire State. The USFS fails to allow mining in many management areas of the county. The USFS seems to be unaware of the immense geological deposits of silver, gold, lead, zinc, copper in the county. By no means have these resources been depleted. Their extraction is necessary for virtually everything used by humans; such as vehicles, computers, phones, machines etc. Their extraction was mandated during the World Wars to aid our nation's defense, and may be needed in the future. If the USFS reviews the Mining Districts Map, they will notice that very little of the county land mass does not contain a mining district, which indicates minerals were located and mined.”	#0054, pp. 13-14	4
NEPA	“The documents provided did not comply with either Article 102(c) of the NEPA of 1969 as amended and US Forest Service's 2011 NEPA Handbook 1909.15 at Chapter 25.1. Both require the inclusion of the entire comments of at a minimum, all federal, state, tribal and local governments. Appendix G of the FEIS provides no copies of any comments.”	#0054, p. 25	1
NEPA	Objectors contend the revised Plan does not include an adequate range of alternatives because there is too little difference between the alternatives in such factors as output of timber, assessment of net benefits, recommended Wilderness, and areas allocated for over-snow vehicle use.	#0025, pp. 2-3, 46-48	1, 4, 5
NEPA	Objectors contend the FEIS includes numerous, unspecified instances where their comments were omitted from the response to public comments, in violation of NEPA regulations at 40 CFR 1503.4(a)(5).	#0025, p. 2	1, 5
Planning	“The USFS response to the other letters was extensive and wandering and made reference to a White paper that was not titled or easily locatable. White Papers are not necessarily scientific nor peer reviewed; mostly they are opinions...The BOCC fails to see where the USFS is incorporating any data from other official sources in its ecosystem management techniques, with the exception of its involvement with the IUCN (World Conservation Union) Ecosystem Management Implementation Plan, (http://lndata.iucn.org/dbtw-wpd/edocs/CEM-003.pdf).”	#0054, pp. 3-4	3, 5

Planning	<p>“The Mullan School District sent a letter requesting ‘Coordination Status’ in July of 2012 which was followed up with a productive meeting at the Mullan District Office with Supervisor Farnsworth and her staff and we were assured we did not need a formal ‘coordination status’ and that she would, in effect, give all citizens ‘coordination status’ and equal opportunity for input. While there is no objection or complaint to the number of public meetings and public notices provided, our objection is that we feel we were left out of the planning and formulating part of the process other than just given the opportunity to ‘submit comments’...we as community leaders do not see any effort has been made to ‘compromise’ to address our future economic viability.”</p>	#0064, p. 2	2, 4
Planning	<p>An objector contends the revised Plan does not include those monitoring components required under 36 CFR 219.12(k)(4).</p>	#0045, p. 2	1, 5
Planning	<p>The LMP’s Monitoring Program is inadequate for informing the agency and the public within any valid adaptive management framework. For many resources, Table 22 Monitoring Indicators (“specific resource measures used in answering the monitoring questions” p. 99) lack specific direction on what and how the indicators are to be measured, to the degree that one cannot determine if they would be valid or reliable measures.</p>	#0025, pp. 61-62	3, 4
Planning	<p>MON-VEG-01-01. “...since the LMP has no valid, scientifically based metrics forming a definition of a stand that is resilient, resistant, meeting Desired Conditions, etc. it will always be cloaked in ‘professional judgment’. Even old growth is not good enough, as the LMP directs that it be logged.”</p>	#0025, pp. 62-63	4
Planning	<p>“The BOCC considers the plan to fail to fully appreciate the complete scope of ‘multiple use’ and denies this in vast areas of the forests. The reduction in areas available for timber harvest, mineral extraction and recreation is in direct conflict of the BOCC’s statements to the USFS. We view this as a violation of 36 CFR §219.10(a) and 36 CFR §219.11.”</p>	#0054, p. 24	1, 4

<p>Planning</p>	<p>“The failure of the USFS to comply with the 1987 Forest Plan multiple use provisions has economically and socially damaged the counties and communities in the IPNF. Significant changes to communities’ heritage, custom and culture have occurred with mill closures, job loss, loss of revenue to schools, reduced revenues to counties, and loss of access roads for recreationalists. As a result of the USFS issuing a ROD that includes reduction in timber harvest from the 1987 plan, increasing road closures, reduction or elimination of grazing allotments, increasing wilderness, and removing lands by primitive designations, the USFS has created a significant risk to communities that depend on the extractive resources, as mandated by Congress to be made available to these communities for their ‘economic sustainability’. Throughout the DEIS Document the IPNF Plan states that the rationale for not providing for timber harvesting, road maintenance, fire suppression, and providing other multiple use activities is due to a shortage of funding. The USFS by creating a Plan that further reduces the economic activities that sustain our communities also reduces USFS revenue from land management activities to uphold the Congressional intent for use of public lands to sustain rural communities.”</p>	<p>#0023, p. 4</p>	<p>4</p>
<p>Planning</p>	<p>“The BOCC was not in receipt of the complete set of documents for the Plan until October 7, 2013, which was ten days into the Process. The revision process began under a different set of CFR's (Appeal) and was changed to the objection process on April 9, 2012. The original comment period for the Appeal process was from January 3, 2012 through April 7, 2012. On March 21, 2012 the comment period was extended an additional 30 days to May 7, 1012. It is unclear how comments filed prior to the March 21, 2012 were handled by the USFS, since the Objection Process had not been activated in the Federal Register yet. Did they have to resubmit objections after their original comments?”</p>	<p>#0054, p. 25</p>	<p>4</p>
<p>Planning</p>	<p>“The BOCC objects to this statute's [36 CFR 219.56] rigidity in light of the failure of the USFS to comply with it in several areas. The USFS failed to make available its planning documents at the time stated they must be made available. The USFS website for the IPNF had and continues to contain flaws. One such flaw is the link to the Objection Process CFR Is for 36 CFR §218 not for 36 CFR §219. Other flaws include links that do not work or deny the viewer access.”</p> <p>“The BOCC strongly objects to the rigidity of the extension of objection deadlines as only applicable to weekends and holidays. This statute should only be valid if all other portions of the process have been successfully met.”</p>	<p>#0054, pp. 24-25</p>	<p>1</p>

Planning	“36 CFR §219.52. Giving notice of a plan, plan amendment, or plan revision subject to objection before approval. The BOCC objects to the publication of the Notice of Objection Filing Period (Notice) in a ‘newspaper of record’ that is not distributed in Shoshone County, while the County contains the largest portion of the IPNF and has its own newspaper. A similar notice was published in two Montana publications regarding the Kootenai NF Plan, demonstrating a conflict in procedures. The USFS needs to take steps to ensure each county newspaper located in an affected county is a ‘newspaper of record’; otherwise, the public within the affected county has not truly been properly ‘noticed’”.	#0054, p. 24	1
Planning	“The BOCC repeatedly reported to the USFS its concerns that the plan will necessarily negatively impact the socio-economic sustainability of the citizenry. We feel that the outdated documentation regarding the ever-increasing socio-economic impacts to the area were cited yet not considered in the plan. We see this as a violation of 36 CFR §219.8(b).”	#0054, p. 24	2, 3, 5
Planning	Objectors contend the use of the word “should” in Guidelines is of concern because of the level of discretion it allows managers.	#0025, p. 3	4
Planning	Objectors contend “short term” and “long term” are not defined.	#0025, p. 4	4
Planning	Objectors contend many unspecified LMP Objectives are not linked with LMP Goals, as required.	#0025, p. 3	1, 2, 4
Planning	“The BOCC strongly objects to the IPNF Land Management Plan beginning under the Appeal Process and its statutes, and finishing under the Objection Process and its statutes. We feel that once a Process has begun, it needs to be followed through to its completion. This would avoid conflicts in the Planning phases.”	#0054, p. 26	4
Recreation	Motorized recreationists and non-motorized recreationists desire a range of recreation opportunities settings ranging from primitive to rural under the Recreation Opportunity Spectrum. Eliminating motorized use from recommended wilderness further reduces semi-primitive motorized (SPM) opportunities for North Idaho residents and visitors. SPM recreation opportunities can’t be replaced unless other roadless areas are opened up to motorized use.	#0002, p. 4	4

Recreation	An objector contends the IPNF failed to consider reasonable options for preserving existing bicycle use on Trail #48 in the Upper St. Joe Wild River Corridor. More specifically, the objector contends “the solution of using the Wild River Designation as a corridor through the Recommended Wilderness was not adequately evaluated, valued or implemented.”	#0028, pp. 1-2	5
Recreation	“We feel strongly that the goal as worded is inappropriate as a foundation statement driving management of recreation on the IPNF. It is appropriate only for designated wilderness and perhaps portions of the Primitive ROS lands, but certainly not ‘large areas on the Forest’. Managing to provide solitude, the state of being alone, separated from other people, requires extremely low levels of human presence. Even in designated wilderness we recognize that much of the land area, such as that along busy trails, lakes and rivers, will not provide solitude, but try to make sure that some lands do provide opportunities by severely limiting access to certain areas.”	#0010, pp. 10-11	4, 5
Recreation	Management Area 3. “We support the establishment of the Stevens Peak Backcountry Winter Non-Motorized Area... To add some non-motorized recreation balance that the Draft Plan lacks, the Stevens Peak Backcountry Winter Non-Motorized Area must be managed as a Recreation and Scenic Area (MA3-DC-AR-02) where winter recreation opportunities and experiences are consistent with the Recreation Opportunity Spectrum (ROS) classification of Primitive to Semi Primitive Non-Motorized.”	#0025, p. 60	5
Recreation	SPM recreation opportunities were reduced when the IPNF adopted its Travel Management Plan for the Coeur d’ Alene River Ranger District under the 2005 Motor Vehicle Use Rule. Instead of having polygons for SPM recreation, now the forest has linear buffers for SPM recreation. Each and every trail closure further reduces the SPM recreation opportunities on the forest. The 2009 CDA River Ranger District Travel Plan decision eliminated 29 miles of trails open to motorized use. The revised forest plan takes another 24.5 miles of trail open to single-track motorized use. These are opportunities that are not being replaced.	#0002, p. 4	3, 4

Recreation	“The BOCC does not support any closure of snowmobile trails, nor does it support the designation of any new Recommended Wilderness (de facto) or Research Natural Areas. It is the duty of Congress to place land into wilderness and it appears that the USFS has neglected to follow 16 CFR §1132 (d)(e) by not holding hearings or allowing any input from other federal agencies, states, local governments, or the public prior to this plans designations.”	#0054, p. 3	2, 4
Riparian	FW-STD-RIP-03. “This Standard incorporates the INFISH direction in the 1995 forest plan amendment. The LMP and FEIS fail to acknowledge the known limitations of the INFISH direction by supplementing it with sufficient other LMP Direction. ...According to the [1998 Bull Trout BO regarding INFISH], INFISH does not provide sufficient protection for bull trout and thus the reliance of the DEIS on INFISH does not ensure against further violations of the Endangered Species Act.”	#0025, pp. 24-25	3, 4
Socio-Economics	“The IPNF did not do an adequate job analyzing the effects on the local community, The concerns over decrease in timber harvest volume, decrease in motorized recreation opportunities, increasing wilderness or backcountry that does not allow motorized use, the loss of timber jobs, logging companies going out of business, increased taxes for employees and companies, lack of data showing the impacts to jobs. What is the job multiplier for each job in the wood products industry and how does it relate in the new ecosystem management scheme? Where is analysis that addresses the effects the loss of revenue from ecologically driven management and not considerations for economic stability will have on Shoshone County, the school districts within the County and the citizens? Where is the economic study which shows impacts of a plan on the health, safety and welfare of the citizens of Shoshone County? When was the last study done to actually determine the impacts agency polities have done to local forest communities! The USFS did not coordinate with Shoshone county for any economic figures or input that so gravely impacts the human lives of the county.”	#0054, p. 17	3, 4, 5
Socio-Economics	“FS is violating the intent of the Executive Order 13575 dated June 9, 2011.”	#0023, pp. 2-3	2

Attachment 3
 Issues Reviewed and No Change Determined to be Necessary

Socio-Economics	“Lowering ASQ and adding restrictions to RWAs and Wild and Scenic Rivers will provide hardships to the local community. Objections to the reduction of both the ASQ and proposed timber harvest which is well below the levels set in the 1987 Forest Plan and we object to restricting access by road closures, adding wild and scenic river designations, increasing primitive areas, and increasing wilderness areas.”	#0023, pp. 2-3	4, 5
Socio-Economics	Monitoring Question MON-SOC-01. Data on the contribution to the economy from those gathering non-timber products, hunters, anglers, and recreationists would lead to a more balanced understanding by the agency of how the Forest sustains local and regional economies.	#0025, p. 70	4
Socio-Economics	FW-DC-SES-04. This Desired Condition risks perpetuating the Smoky Bear myth that protection from fire is a promise that the government can and should make. Unlike the direction provided in the LMP Fire section, there is no recognized balance with ecological considerations. This Desired Condition does not provide any further increment of public safety over and above the direction provided in the LMP Fire section, and is redundant.	#0025, p. 60	2, 4
Socio-Economics	“The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for recreation on the IPNF. It is impossible that these economic outputs can be met when the IPNF is proposing to further restrict recreational access especially in Heartbeats (number of persons/animals in group together) and or motorized access in differing MAs.”	#0054 pp. 14, 19, 20, 21	4, 5
Soils	The Monitoring Program lacks a measure for determining significant reductions in soil productivity due to land management activities in any timeframe short of forever. There is a lack of any measure of the areal extent of soil damage within any geographic scale.	#0025, p. 67	4
Soils	There is no monitoring of the accomplishment of soil restoration.	#0025, p. 67	4
Soils	An objector contends the FEIS and revised Plan perpetuate confusion around the distinction between thresholds for soil bulk density and that for the areal extent of compacted soils. The objector further contends the aerial extent of soil disturbance has not been correlated to long-term reductions in soil productivity and has not been factored into sustained yield calculations.	#0045, pp. 9-13	3

Soils	The LMP and FEIS do not consider cumulative losses of soil productivity due to noxious weeds in assumptions concerning timber growth and yield, or any biological feature positively correlated to the productivity of soils. The Forest Plan did not implement any standards for noxious weed management that address the cause of the problem through prevention.	#0025, p. 22	3, 4
Soils	NFMA regulations at 36 CFR 219.27(e) state: “No management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment shall be permitted within these areas which seriously and adversely affect water conditions or fish habitat.” The LMP does not contain direction that explicitly limits the amount of sediment that would be allowed to enter water bodies from management activities.	#0025, pp. 26-27	5
Soils	“There are no soil quality standards in the LMP. FEIS Appendix G refers to the “Regional Forest Quality Standards (FSM-2500-99-1)” . . . Many provisions of FSM-2500-99-1 are written with language that resembles guidelines, objectives, or other more discretionary components found in the LMP, so no Forest Service statement exists that insures everything in them is mandatory despite the FEIS using the word “required” in referring to them. . . . Nowhere in the LMP or FEIS did the Forest Service demonstrate that it will actually prevent irreversible soil damage. . . . The failure to ensure that soils are not irreversibly damaged violates NFMA.”	#0025, pp. 20-21	5
Soils	FW-DC-SOIL-01. The meaning of the sentence “Areas with sensitive and highly erodible soils or land types with mass failure potential are not detrimentally impacted or destabilized as a result of management activities” is unclear.	#0025, p. 19	4
Soils	FW-OBJ-SOIL-01. The meaning of “not meeting soil quality criteria” is unclear.	#0025, p. 19	4
Soils	There is no LMP requirement to quantify, minimize, or even consider the total amount of detrimentally disturbed soils. . . . The potential loss of productivity from compaction should also be accounted for in the ASQ model runs.	#0025, p. 21	4
Soils	“We are aware of no scientific information based upon IPNF data that correlates the proxy (areal extent of detrimental soil disturbance in activity areas) to metrics of long-term reductions in soil productivity in activity areas, in order to validate the use of the proxy as a scientifically meaningful estimate of changes in soil productivity.”	#0025, p. 22	2

Timber	<p>“The failure of the USFS to comply with the 1987 Forest Plan ASQ and timber harvest has economically and socially damaged the counties and communities in the IPNF. Significant changes to the communities’ heritage, custom and culture have occurred with mill closures, job loss, loss of revenue to schools, reduced revenues to counties, and loss of access roads for recreationalists. As a result of the USFS issuing a ROD that includes reductions in timber harvest from the 1987 plan, increasing road closures, increasing wilderness, and removing lands by primitive designations, the USFS has created a significant risk to communities that depend on the extractive resources mandated by Congress to be made available to these communities for their ‘economic sustainability’.”</p>	#0023, p. 3	4, 5
Timber	<p>“Where is the economic analysis that shows the impacts to rural economies as a result of this ‘change in policy’, before the policy was implemented? Is such an analysis not a requirement of NEPA Section 4332 Cooperation of Agencies; Reports; Availability of Information: Recommendations; International and National Coordination of Efforts? We believe that this ‘change in policy’, is in direct violation of the Multiple Use Sustained Yield Act of 1960. Where is the EIS, including the detailed studies that show the effects of the loss of timber jobs to the communities because of a change in policy to not manage the forest as is required in the National Forest Management Act? The NFMA has the requirement to manage the forest for production of natural resources.”</p>	#0054, pp. 15, 20	1, 4
Timber	<p>An objector contends the revised Plan, in violation of unspecified law, regulations, and policies, relies on budget constraints to meet the timber harvest goals and set ASQ.</p>	#0044, pp. 3-4	4
Timber	<p>FW-DC-TBR-01. Including the sentence that begins with “Salvage...” perpetuates the longstanding conflict between timber production and natural processes that create wildlife habitat. The Desired Condition also includes the vague phrase, “associated desired conditions.” And the Desired Condition fails to recognize that, for decades, market demand has conflicted with ecological sustainability. As AWR’s comments stated, “Since the Draft Plan and DEIS fail to acknowledge the scientific and public controversy and begin to address the “salvage” issue, such statements should be dropped.”</p>	#0025, p. 58	5

Timber	<p>“Next year for the first time since Shoshone County became a county, in 1861, we will not be able to fund our road budget to a level that will provide health, safety and welfare of our citizens. The school districts within the county also face lost revenue and this directly affects their ability to provide good education and quality buildings to hold school.</p> <p>“Two years ago when reauthorization of SRS funds was doubtful, the Idaho Association of Counties (IAC), our representative body for all counties within Idaho, asked us to do a study and answer questions as to how this would affect our county road budget. (See Appendix 6) Based on the loss of SRS funds these figures are relevant economic data that was never asked for by the Forest and not supplied by the County. SRS funds are 44% of our budget and thus revenue from 25% Fund must make up that difference or the following: We would have a loss of 9 positions out of 27 full-time and 5 winter temporary positions and could only service 2/3rds of our routes daily. This would directly affect state mandated school bus routes and emergency services access. In addition to not being able to provide health, safety and welfare for our citizens it would also lead to a decline in population base for the County.”</p>	#0054, pp. 15-16	4, 5
Timber	FW-GDL-TBR-01 and MA6-STD-TBR-01. “Together with the wording of FW-DC-TBR-03, this Guideline and Standard essentially nullify any meaningful distinction between suitable and unsuitable land, and together with timber targets (FW-OBJ-TBR-01) and the ASQ (FW-DC-TBR-04), encourages logging in unsuitable land. One or more of the ‘purposes’ of logging it allows in land that is ‘unsuitable’ appear in all timber sale NEPA documents.	#0025, pp. 59-60	4, 5
Transportation Mgt.	<p>Monitoring Questions MON-AR-02 and MON-AR-03. Identification of the minimum transportation system necessary is a regulatory requirement, so the IPNF must complete forestwide travel planning in 2015.</p> <p>An objector contends the revised Plan fails to comply with agency policy to identify its minimum road system or to include direction that would require the road network be reduced to a level that can be maintained within foreseeable future budgets.</p> <p>Inadequate direction to designate the minimum road system. ...The Draft Plan does not contain adequate direction to designate the minimum road system.</p>	#0025, pp. 44, 69-70; #0045, pp. 16-17	4, 5

Attachment 3
 Issues Reviewed and No Change Determined to be Necessary

Travel Mgt.	FW-DC-AR-04. This Desired Condition is a forest plan decision that prioritizes vast but unspecified acreages of the IPNF for motorized recreation, in the absence of the travel planning required by regulation to be completed in 2015. In addition, because of the existing degraded condition of many motorized travel routes and the implications of the Table 6 acreage, this Desired Condition conflicts with FW-DC-AR-07 and 08.	#0025, p. 44	4, 5
Travel Mgt.	FW-OBJ-AR-04, 05. These Objectives are forest plan decisions that designate unspecified mileages of the IPNF for motorized recreation, in the absence of the travel planning required by regulation to be completed in 2015. In addition, because of the existing degraded condition of many motorized travel routes this Desired Condition conflicts with FW-DC-AR-07 and 08.	#0025, p. 44	4, 5
Travel Mgt.	<p>“The IPNF Revised Forest Plan's designation of the large area near Lookout Pass Ski Area as MA7 without following the NEPA process appears to be legally inconsistent. No such analysis regarding this designation was made during the creation of the IPNF Revised Forest Plan.”</p> <p>“...the IPNF should at a minimum apply a consistent management policy to the entire proposed Steven’s Peak Backcountry Area...We object that all of the IPNF land in the Willow Creek, Boulder Creek, and Gold Creek drainages and the adjoining area to the south along the St. Joe divide, at a minimum, has not been included in the MA5 management area rather than MA6.”</p>	#0033, pp. 1-2	3, 4, 5

Vegetation Mgt.	<p>The LMP contains no minimum acreage or distribution requirements for maintaining old growth, as does the 1987 plan. Those acreage and distribution requirements responded to 36 CFR 219.19 viability provisions, their purpose being that large areas of the Forest would not become devoid of old growth or old-growth associated wildlife.</p> <p>The Forest Service has never completed an analysis, based upon the best scientific information available, that adequately analyzes the wildlife viability implications of managing the IPNF well outside the HRV for old growth.</p> <p>The Draft FP contains no requirement to maintain old growth in large enough contiguous blocks to meet the habitat requirements of old-growth associated wildlife.</p> <p>The Draft Plan contains no requirement to designate specific stands of mature forest, i.e., “recruitment” old growth, to be protected from logging so that they evolve into old growth for the future.</p> <p>The Draft Plan does not contain a Standard to protect old growth from firewood gathering. Current roads adjacent to and through old growth result in the loss of important habitat components when snags and down logs are removed for firewood.</p>	#0025, pp. 8-10	3, 4, 5
Vegetation Mgt.	FW-STD-VEG-01. This Standard’s allowance of active mechanical treatments in old growth ignores the scientific fact that such active management is the very antithesis of old growth. The Forest Service cites no scientific research or monitoring results from the IPNF that demonstrate such manipulations will create net ecological benefit and not net ecological harm to old growth and old-growth associated wildlife.	#0025, pp. 7-8	3, 4, 5
Vegetation Mgt.	An objector contends the revised Plan does not take concrete steps to ensure that old growth will increase to the historic levels, which means that old growth associated wildlife will be at risk. The objector contends the revised Plan lacks any standards to assure achievement of the Desired Condition for old growth and does not perpetuate an inventory of old growth that was first directed by the Chief of the Forest Service in 1989.	#0045, pp. 7-8	1, 3
Vegetation Mgt.	FW-DC-VEG-07. The desired ranges for snags are not supported by reliable historic data taken from IPNF surveys or scientific research that we are aware of. The scientific basis for the delineation of snags into two diameter groups using 20” d.b.h. as the division point is not disclosed.	#0025, p. 6	3, 4

Attachment 3
 Issues Reviewed and No Change Determined to be Necessary

Vegetation Mgt.	Indicator MON-VEG-01-04 relies upon the FIA program. The size of the plots used by the FIA methodology is ¼-acre. The FIA survey methodology results in boots-on-the ground measurements in less than 10 acres of forest meeting old-growth criteria... Less than 10 acres of 243,699 acres is not a statistically valid sample size to produce anything but a rough comparison to other forestwide old-growth inventory, the stand-level mapping...FIA data is not subject to independent verification because plot locations are kept confidential.	#0025, p. 63	3, 4
Vegetation Mgt.	The Indicator MON-VEG-01-08 lacks relevance since it would merely measure the “Number of acres influenced by insects and disease.” Naturally, the outcome would be—every acre on the forest.	#0025, p. 64	3
Vegetation Mgt.	“There are gaps in explanations, questionable conclusions, and apparent discrepancies between the ERG Report and the Final EIS [suggesting that the ERG report had limited internal USFS biological review]...The ERG report shows that Alternative B would result in about 40% less whitebark pine potential regeneration habitat on the IPNF and 30% more on the KNF and relates it aback to fire. However, if that were the case, then the no action alternative (i.e. has the most stand replacing fires), would be higher in both cases, which it is not. The ERG report needs a clarifying explanation on why the action alternatives decrease whitebark pine potential on the IPNF, while increasing potential on the KNF.”	#0036, pp. 2-4	3, 4
Vegetation Mgt.	FW-DC-VEG-06. The implied assertion that root fungi and forest insects are causing too much tree mortality on the IPNF is not supported by specific reliable historic data gathered from IPNF surveys or science that we are aware of.	#0025, p. 6	3, 4
Vegetation Mgt.	FW-DC-VEG-05. The desired increase in size of forest patches in the seedling and sapling size classes and decreases in size of forest patches in the small and medium size classes is not supported by specific reliable historic data gathered from IPNF surveys or science that we are aware of.	#0025, p. 6	3, 4
Vegetation Mgt.	Regarding Forestwide guideline FW-GDL-VEG-08, the objector contends the first sentence, coupled with the consistency requirement on page 4, suggests that any silvicultural system may be used in any proposed treatment unit, regardless of its appropriateness.	#0025, p. 12	4

W&S Rivers	<p>“The plan manages recommended Wild and Scenic River the same as designated Wild and Scenic Rivers. The wild recommendation prohibits motorized use under the plan standards. Motorized use does not impact whether a river is designated under the Wild and Scenic Rivers Act. We commented on this issue during the EIS review period on Page 4 of our comments.</p> <p>“We were concerned that no scenic river classifications were created. Our staff can’t understand why the planning team wanted to eliminate premium motorized single track trail opportunities in the Little North Fork drainage.</p> <p>“The Wild and Scenic Rivers Act was created to stop dam building on some of the remaining free flowing rivers in the United States. The last Idaho Wild and Scenic Rivers designated in 2009 were in Owyhee County. Many of these wild rivers have motorized access points. Without these access points, visitors could not launch their boats. The Salmon River Wild River and Snake River Wild River specifically allows jet boat use on the rivers.</p> <p>“Motorized use on trails or on the water is not an impact on whether a river is actually designated under the Wild and Scenic Rivers Act.”</p>	#0002, p. 5	1, 4, 5
W&S Rivers	Objectors oppose additional Wild and Scenic River designations and contend that the FS has not followed protocols.	#0054, p. 13	4
Watershed	Objectors contend watershed guidelines do not assure compliance with 36 CFR 219.19 and 36 CFR 219.27(e) as those section apply to fish passage barriers located in IPNF watersheds.	#0025, p. 27	1, 3, 4
Watershed	MON-WTR-01-01. “Number of Best Management Practices...” This Indicator is too vague to answer the Monitoring Question, “Are soil, water quality, and riparian and aquatic habitats protected and moving towards desired conditions?”	#0025, p. 65	3, 4

Watershed	MON-WTR-02-01, MON-WTR-02-02. It is unclear how measuring watersheds by “miles of restoration activities” would be useful. It is also unclear how measuring watersheds by “acres of restoration activities” would be useful since the definition of restoration in the LMP and in NEPA documents is so lax that every acre treated would be considered restoration. Indicator MON-WTR-02-03: Too general; the meaning of “trended toward” (as discussed elsewhere in this Objection) is highly vague and subjective. It is hard to understand how any of these three indicators would answer the Monitoring Question.	#0025, p. 66	4
Watershed	The major flaw in these Watershed Condition Ratings is that there is no enforceable threshold associated with the conditions of the watersheds to impede or approve of a level of permitted activities.	#0025, p. 15	3, 4, 5
Watershed	FW-GDL-WTR-01. This guideline offers little to no protection to the impaired waters on the IPNF. Even with an approved TMDL, there is no legal authority to enforce a violation of the TMDL.	#0025, p. 18	4, 5
Watershed	FW-OBJ-WTR-01. This Objective seems to prioritize management (logging, fuel reduction) in the watersheds in best condition on the Forest, because of use of vague language “toward a better condition” and “risk factors.”	#0025, p. 18	4
Watershed	The Watershed Disturbance Rating strongly suggests forestwide direction to attain watershed restoration. Yet, there are no forestwide standards for those parameters, which would provide much stronger prioritization towards meeting forestwide Watershed and Water Quality Desired Conditions than the LMP includes.	#0025, p. 19	4
Wilderness	“The current theme designation for this area under the Idaho Roadless Rule is Wild Land Recreation. See CFR 294.23(a) and CFR 294.24(a), which allows for mountain biking and mechanical devices. Should the Recommended Wilderness designation apply to all the identified lands on Page 179, Table 163; 35,636 acres, of the Appendices, Final EIS for Revised Land Management Plan, August 2013, and also identified on Page 86, Table 18, Land Management Plan 2013 as 35,026 acres, then per national directive the current uses will eliminate and cause harm to the public that enjoys them at present.”	#0014, pp. 1-2	1, 2, 5

Wilderness	Boundary conflicts between the two forests, inconsistent approaches and perceptions of agreements between draft and final. The main issue concerns the Scotchman Peaks Proposed Wilderness Area (see included map). There are also some slight boundary changes that need addressing in other parts of the KNF plan.	#0052, pp. 1-2	4, 5
Wilderness	<p>“The BOCC commented to the USFS that it opposes designating the Grandmother/Grandfather area as a Wilderness Study Area.... Based upon the definition of wilderness, regarding the requirements to be untrammled by man and no historic roads, ... there are no areas that can be considered. There is no section of land large enough that has not been trammled by man or that has no roads or trails. ...[T]he lack of management and particularly regarding trail management is causing deterioration within the wilderness areas and limiting access available to fewer and fewer visitors.</p> <p>“The USFS generalization of all similar comments fails to mention anything about the lack of any land in the county that legally complies with this designation. ...The USFS responded that it is required to identify areas as Recommended Wilderness, which is true; however, in the plan revision there is only a requirement to consider wilderness and no requirement to ‘recommend’ any such areas! As stated earlier, it is the duty of Congress to place land into wilderness and it appears that the USFS has neglected to follow 16 CFR § 1132 (d), (e) by not holding hearings or allowing any input from other federal agencies, states, local governments, or the public prior to this plans designations.”</p> <p>“The area doesn't meet the integrity of wilderness because of: pungent, bridging, number nine telephone wire, you can hear logging high line horns from/on the peaks from all directions; The rise/fall in elevation (3000 ft.) does not support characteristics exhibited by the Frank Church Wilderness, the Selway-Bitterroot and other Idaho wilderness areas where the rise/fall of vertical is 5000+ drops; Watershed drainages of 23 miles are not like Idaho's other areas of 6-7 miles in length; The importance of predator control within the Mallard Larkin as a designated pioneer area would allow helicopter use and landing pads, administrative use can be utilized by Idaho fish and game or their designated agents. Hunters should be allowed access with snow machines or equipment, to assist in the predator control in the spring, fall and winter.”</p>	#0054, pp. 9-11	1, 3, 4, 5

Wilderness	Monitoring Question MON-WLDN-01. The IPNF has so many acres of roadless areas that deserve protection as Wilderness. The public would be well-served with a Monitoring Question and Indicators that assess wilderness conditions and trends in roadless areas.	#0025, p. 70	4
Wilderness	“Motorized and mechanical (mountain bikes) should happen until Wilderness is designated by Congress. The plan asserts that the change from allowing some limited motorized and mechanized use is necessary because of the increase in motorized use in recommended Wilderness. The plan offers no basis for this increase.”	#0002, p. 3	4
Wilderness	“Boundary County absolutely objects to any areas of Recommended Wilderness within the Idaho Panhandle National Forest and the Kootenai National Forest. We specifically object to the Recommended Wilderness designation of the Salmo, Page 174, Table 154, 16,027 acres and the Selkirk Crest IRA, on Page 179, Table 163, 35,636 acres, of the Appendices, Final EIS for Revised Land Management Plan, August 2013...Recommended Wilderness, Wilderness and Primitive Classification does not allow for adaptive management of the forest as the condition is constantly changing. The inability to manage for human benefit, endangered species benefit, water quality benefit and other habitat needs, is not allowed under these classifications.”	#0014, pp. 1-2	4, 5
Wilderness	“The severe limitations that go with wilderness are very restrictive and take away too many management tools like motorized rescue efforts, motorized hand tools for the general traveler, the ability to suppress fire and management ability in general is threatened by potential litigation by the whims of any opinionated fancy. Shoshone County BOCC adamantly opposes any proposed wilderness within county lines.”	#0054, p. 11	4
Wilderness	“The USFS response did not address our comment when it said, ‘Not including the Grandmother/Grandfather area as a wilderness study area because one of the conditions when this area was acquired by the Forest Service was that the area would remain open for single track motorized use. As such, this does not fit the requirement for wilderness and should be released as a study area and managed for multiple uses. Consider expanding access for ATV operation, either by converting some single track trails to ATV, or creating some new ones.’”	#0054, p. 12	4, 5

Wilderness	“Past utilization of trail funding within the proposed Mallard Larkin area, example is the Pole Mountain trail from Table Camp campground to Five Lakes Butte, the trail was reconstructed with motorized tracked equipment and the use of that funding now being turned into proposed wilderness area.”	#0054, p. 11	4
Wilderness	The FEIS engages in a Wilderness Evaluation process that largely elevates Manager Preferences over Protecting the Wilderness resource, and in so doing, ignores the stated intent of Congress.	#0025, pp. 50-52	1, 2
Wilderness	<p>Management Area 1a Violates the Wilderness Act. MA1a-DC-AR-06 states, “Preservation of historic properties is common, although buildings and other structures are rare.” This is vague and confusing. What precisely is intended? Does this mean that archaeological concerns trump the Wilderness Act? If so, that is contrary to case law in this Circuit regarding Olympic shelters, Emigrant dams and the Green mountain lookout. This should be removed unless it can be stated in a way that is both clear and consistent with the Wilderness Act.</p> <p>MA1a-GDL-VEG-01 states, “Non-native invasive plant species may be treated where significant values inside or outside wilderness are clearly at risk, including recovery of TES Species.” Where in the Wilderness Act is there an exception that permits this kind of overt trammeling and manipulation of wilderness</p> <p>MA1a-GDL-FIRE-02 states, “Prescribed fire may be used when necessary to contribute to the survival of a threatened and endangered species or, if necessary to allow fire to play its natural role in wilderness.” Where in the Wilderness Act is this manipulation expressly permitted?</p>	#0025, pp. 48-49	1, 2, 5
Wilderness	“On page 462 of the KNF Final EIS, right after the 3 bullets it says that ‘if congress were to drop an area from further consideration as recommended wilderness, management would be reconsidered.’ This statement says that congress has identified recommended wilderness? Not so, the forest service looks at the suitability and evaluates the Need, Capability, & Availability. Before recommending a PW designation. Since congress has not acted on the Scotchman Peak PW for the past 25 years, it's time to remove this designation and identify it as only an IRA with different designations possible.”	#0052, pp. 1-2	4

Attachment 3
 Issues Reviewed and No Change Determined to be Necessary

Wilderness	Designation of additional Wilderness, Wild and Scenic Rivers, and Recommended Wilderness (managed as de-facto Wilderness) areas does not recognize public desire for a broad range of sustainable use of the national forests and is not consistent with existing multiple use legislative directions. (e.g. In the revised plan, the wilderness areas are advising no grazing allotments and the plan is advising to cut the amount of grazing allotments to 18,316 acres from 365,700 acres capable of supporting grazing).	#0011, pp.2-3	4
Wilderness	“We object to any increase in acreage of non-productive land or land that will no longer have the potential to generate income or revenue through logging or recreational activities... The proposed increase in Wilderness and 'non-productive' land flies in the face of the original commitment of the Forest Service and abandons the rural communities economical interests.”	#0064, p. 1	4
Wilderness	“Bonner County opposes additional Wilderness and Wild and Scenic River designations, especially those that constitute <i>de-facto</i> Wilderness designations created by designating lands as Recommended Wilderness (MA1b) and then applying management directives for those lands as wilderness.”	#0011, p. 2	4
Wilderness	“The Forest failed to inventory, evaluate, analyze and determine recommended wilderness in a fully transparent manner... The Forest Service intends to eliminate all ‘non-conforming’ uses in Recommended Wilderness Areas— <i>essentially treating these areas as de-facto Wilderness</i> without the ability to negotiate the issues as contemplated by Congress in the Wilderness Act. The Kootenai Tribe disputes the characterization of existing uses as 'non-conforming' and believes that this decision is not only inconsistent with the Wilderness Act on a legal basis, but bad policy that needlessly instigates conflict in our communities. The Kootenai Tribe maintains that the Forest Service has a broad range of discretion to determine management prescriptions in Recommended Wilderness Areas...the elimination of current existing uses may not be necessary and could lead to diminishment of Treaty and religious access for Kootenai citizens that rely on trails to certain areas.”	#0036, pp. 4-5	4, 5
Wilderness	“My other objection is the refusal to extend recommended wilderness establishment and management for the Upper Pack River area of the Selkirk Wilderness.”	#0005, p. 2	4

Wildlife	Regarding Forest-wide guidelines FW-GDL-WL-01, 03, 04, 05, 11, 14, 19, 20, 21, 22, 23, 24, and 25, the objector contends “The words, ‘or minimize’ are not objectively defined and threaten to nullify these guidelines. Since the intent of the use of Guidelines in the LMP (pp. 3-4) is to provide some management discretion, the inherent uncertainty of the words ‘or minimize’ is entirely unjustified.”	#0025, p. 42	4
Wildlife	An objector contends selecting hairy woodpeckers as an MIS is “meaningless” because their habitat requirements are so broad.	#0045, p. 5	4, 5
Wildlife	Monitoring Question MON-FLS-01. This is worded too vaguely to provide meaningful answers. The overarching goal of ESA listing is population recovery, which is omitted from this Question. It is not sufficient to measure these parameters. A measure of population numbers of grizzly bears is essential for determining attainment of recovery, as is mortality information.	#0025, p. 67	1, 4
Wildlife	Indicator MON-FLS-01-02. These parameters must be reported annually, however a measure of population numbers of Canada lynx is essential for determining attainment of recovery, as is information on trapping mortality.	#0025, p. 67	4
Wildlife	Monitoring Question MON-MIS-01. This lacks a requirement to estimate baseline population numbers, and measure population trends in response to management actions.	#0025, p. 68	4, 5
Wildlife	Indicator MON-WL-01-01. Nothing is required specific to any wildlife species, rendering it useless as a biological indicator. It is also highly redundant with above inadequate Monitoring Indicators. It is also unclear how measuring “acres of habitat restored or enhanced” would be useful since the definition of restoration in the LMP and in NEPA documents is so lax that every acre treated would be considered restored or enhanced.	#0025, p. 69	4
Wildlife	Indicator MON-MIS-01-03. This relies upon a measurement system that is not explained anywhere in the LMP. It merely commits to monitoring “changes” in the parameter, measured vaguely somewhere every five years.	#0025, p. 69	4, 5
Wildlife	The FEIS does not disclose the minimum viable population of any of the Sensitive species (plant, wildlife, or aquatic), nor does it describe the quantity and quality of habitat needed to maintain viable populations of any of the Sensitive species. ...The LMP does not contain any requirement for the Forest Service to insure that its management activities will maintain viable populations of Sensitive species. The LMP does not even include a definition of viable population in its Glossary.	#0025, pp. 29-32	4

Attachment 3
 Issues Reviewed and No Change Determined to be Necessary

Wildlife	The Forest Plan must also include science-based motorized route (road & trail) density Standards, not just those included in the Access Amendment for grizzly bear security.	#0025, pp. 45-46	4, 5
Wildlife	“There are gaps in explanations, questionable conclusions, and apparent discrepancies between the ERG Report and the Final EIS [suggesting that the ERG report had limited internal USFS biological review]...Northern Goshawk: The ERG analysis indicates that [Northern] goshawk habitat will decline over the next 50 years under any alternative. The decrease is less under Alternative B (constrained) and most under Alternative B (unconstrained). These decreases move goshawk habitat from within the Historic Range of Variability (HRV) to about 25% below the HRV. The ERG report state the estimates of habitat are low in the model (potentially indicating more appropriate criteria are needed), territoriality limits the population (in general, as habitat quality increases, territory size decreases), and concludes that the species is viable with no citations to support these contentions. Moreover, the ERG report stated that a reduction substantially below HRV could result in a risk to the viability of the species (pg. 16, ERG 2012). Movement away from HRV occurs again in the chipping sparrow/dusky flycatcher and the marten (mesic) analysis. The FEIS concludes the species are viable and cites ERG. These expected declines need to be better explained and defended in the FEIS.”	#0036, pp. 2-3	3
Wildlife	FW-DC-WL-07. This Desired Condition encourages occupancy of woodland caribou only within the currently designated Recovery Zone, far less than its historic range. The Recovery Zone is also not a Forest Service established geographic area, meaning it could be changed without public process at any time. Also, this Desired Condition of providing for management/activities or low levels of management/activities would potentially negate or hamper caribou ability or tendency to occupy the full extent of the existing recovery zone.	#0025, p. 41	4, 5

<p>Wildlife - Grizzly Bear</p>	<p>“The Revised LMP does not minimize conflicts between snowmobile use and grizzly bears emerging from hibernation. The travel management rule requires the Forest Service to minimize ‘[h]arassment of wildlife and significant disruption of wildlife habitats.’ 36 CFR § 212.55(b)(2). This requirement is particularly important when listed species are present, which are negatively affected by motorized vehicles. The Revised LMP incorporates the Grizzly Bear Access Amendment, which limits the amount of motorized access in the Selkirk and Cabinet-Yaak Recovery Areas. However, the Grizzly Bear Access Amendment does not limit or minimize snowmobile use in grizzly bear core habitat.</p> <p>Despite raising this issue in comments about the Draft LMP, no changes were made in the Revised LMP. Controlling and directing motorized access is one of the most important tools in achieving habitat effectiveness and managing grizzly bear recovery (U.S. Fish and Wildlife Service 1993). Limiting motorized access during the active bear year (April 1 to November 15 in the Selkirk Recovery Zone; April 1 to November 30 in the Cabinet-Yaak Recovery Zone) is necessary to minimize interactions with humans, habituation, and ultimately, mortality. Since the Revised LMP permits snowmobile use to occur in core habitat during the active bear year, it fails to comply with the travel management rule and the ESA.”</p>	<p>#0013, pp. 10-11</p>	<p>1, 4, 5</p>
<p>Wildlife - Grizzly Bear</p>	<p>Objectors make several contentions regarding management direction in the revised Plan for linkage areas for wildlife in general and grizzly bears in particular. Objectors contend the revised Plan fails to adequately identify, map, quantify, or propose proactive management standards and guidelines for wildlife corridors and linkage zones, and as a result fails to comply with the species viability requirements at 36 CFR 219.19. The objectors state, “Vaguely defined management direction and inability to determine where it applies leads to a high level of uncertainty regarding the effects of the plan on linkage areas and on grizzly bears.”</p> <p>“According to the BiOP ‘actions that fragment habitat, either temporarily (timber harvest) or permanently (developments), or alter species composition or stand characteristics, or decrease habitat security (access) also compromise habitat connectivity and linkage zones.’ The plan does not preclude these kinds of activities in linkage areas.”</p>	<p>#0045, pp. 3-4; #0049, pp. 1-4, 5-6</p>	<p>1, 3, 4, 5</p>

<p>Wildlife - Lynx</p>	<p>“Because the allocation of MA1e is contrary to the Northern Rockies Lynx Management Direction, which was adopted to protect a species listed as threatened under the ESA, the Revised LMP fails to meet the Act’s requirement to protect lynx. Similarly, the allocation of MA1e violates travel management rule criteria that require the Forest Service to minimize “[h]arassment of wildlife and significant disruption of wildlife habitats.” 36 CFR § 212.55(b)(2). If the upper Pack River was instead allocated to recommended wilderness, the Revised LMP would be consistent with the NRLMD.”</p>	<p>#0013, pp. 5-6</p>	<p>1, 4</p>
<p>Wildlife - Woodland Caribou</p>	<p>The Revised LMP fails to ensure the viability and recovery of woodland caribou. In order to help ensure the viability of listed wildlife populations in the planning area, NFMA’s 1982 implementing regulations require the Forest Service to articulate plan objectives ‘for threatened and endangered species that shall provide for, where possible, their removal from listing [...] through appropriate conservation measures, including the designation of special areas to meet the protection and management needs of such species.’ 36 CFR § 219.19(a)(7).</p> <p>“Unlike the Grizzly Bear Access Amendment and the Northern Rockies Lynx Management Direction, the Revised LMP does not include a single management standard for woodland caribou. Both the Grizzly Bear Access Amendment and the NRLMD contain standards to ensure that habitat for both species is well distributed. Unfortunately, the Revised LMP contains no comparable management standards to ensure, among other things, that adequate secure winter habitat is available to woodland caribou to promote recovery of the species. Despite our comments and the Forest Service’s (2004) own recommendations, the Revised LMP fails to designate or protect a single acre of late winter habitat or a single movement corridor. Instead, the agency insists that the Revised LMP is a programmatic document—not a site- specific travel management plan. The Forest Service further explains that the forthcoming winter travel management planning process will address conflicts between winter recreation and wildlife at that time. However, meaningful sideboards established in land and resource management plans provide the necessary framework for ecologically sound travel management decisions. Unfortunately, the Revised LMP contains no standards for caribou habitat security or the protection of movement corridors. ...Consequently, the Revised LMP fails to ensure the viability and recovery of woodland caribou as required by the ESA and the Forest Service’s planning and travel management regulations.”</p>	<p>#0013, pp. 6-9</p>	<p>1, 4</p>

<p>Winter Travel Mgt.</p>	<p>“The Revised Forest Plan and FEIS do not address the need for winter travel management in the Stevens Peak Backcountry Area. The Plan does not consider the possibility that winter travel management will be required by future regulations during the life span of the plans implementation; in particular the 2013 Federal Court Ruling declaring the exemption of OSV in the Forest Service's 2005 Travel Management Rule unlawful...Regarding the consideration of a designation of the proposed Steven’s Peak Backcountry Area as MA3 Appendix G of the FEIS states that ‘any site-specific management proposal would be analyzed through a NEPA process that would include the public.’ Otherwise no consideration was given to any such management direction in the Revised Forest Plan.”</p>	<p>#0033, pp. 1-2</p>	<p>4, 5</p>
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