

From: June.Bergquist@deq.idaho.gov June.Bergquist@deq.idaho.gov
To: [FS-IPNFplanrevision](#)
Cc: June.Bergquist@deq.idaho.gov; Thomas.Herron@deq.idaho.gov; [Hansen, Barbara J -FS](#)
Subject: Proposed Land Management Plan comments
Date: Monday, April 30, 2012 12:46:31 PM

The Department of Environmental Quality, surface water section of the Coeur d'Alene Regional Office would like to offer the following comments on the Proposed Land Management Plan for the Idaho Panhandle National Forests :

1. The vision statement under Access and Recreation Desired Condition briefly states that roads are efficiently maintained, environmentally compatible and responsive to public needs and desires. Beyond that statement there is little information about the most dominant and problematic man-made feature on the Forest. The brief visionary statement does not include direction regarding legacy roads, unauthorized roads, road density and a distinction between Forest system roads versus roads that exist now on the landscape. We suggest that the vision statement for roads be expanded to include the concept that all existing roads are part of the forest road system and non-authorized and legacy roads have been removed. Additionally, the Forest road system remains on the landscape in its authorized form due to an adequate level of public education and surveillance. This vision statement should be followed in the Strategy section by relevant objectives. Without this type of vision it would be difficult to achieve the desired conditions for "Watersheds", "Riparian Habitat" and "Aquatic Habitat". See comment number 3 for more details.
2. Watersheds Desired Condition section begins by defining "watershed" as meaning streams, lakes, wetland and riparian areas. This is confusing since the definition of watershed in the glossary contradicts this as does the conventional use of this term. The paragraph heading might more appropriately read "Waterbodies" or "Water Resources Desired Condition" which better fits the discussion. The watershed definition is key to linking actions that occur on uplands to their resulting effect on waterbodies. This concept should be better developed in a vision statement as recommended in comment #3 below.
3. In reading the riparian and aquatic habitat desired conditions the goals are noteworthy but there is no acknowledgment that achieving these goals often must involve the entire watershed, i.e. uplands as well as riparian conservation areas. Is this a purposeful separation of the two? Does the Forest believe that if RCAs are appropriately managed then water resources (streams, rivers, lakes, wetlands) should achieve their desired condition? If so, this management philosophy should be stated. If not, we suggest including a sentence under Watersheds Desired Condition such as this: "All Forest lands are located within watersheds and therefore actions on the land are designed to positively affect water resources."

4. The Coeur d'Alene GA, roads are identified as an issue but then accepted as a legacy issue that is to continue presumably for the life of this plan. In Chapter 2 "Strategy", in conjunction with our above comments, the legacy road issues should be given a strategy to reduce the road system to that which can be maintained by the Forest on a biannual basis, rather than the proposed once every four to ten years. Or alternatively, add an inspection criteria with a strategy that states all roads are to be inspected and have urgent problems (such as plugged culverts, washouts and slides) corrected on an annual basis.
5. "Open and Total Motorized Route Density" are terms defined in the Glossary and utilized once in the text under Grizzly Bear Guidelines. The definitions are unclear as to what these terms mean, could you improve the definitions and better develop how the road density methodology is used and in what program areas?
6. The Idaho Water Quality Standards IDAPA 58.01.02 should be added to Chapter 3. Design Criteria under Other Sources of Design Criteria for the topics of Riparian Areas and Aquatic Species.

Thank you for considering our comments.

June Bergquist

June Bergquist
Regional Water Quality Compliance Officer
Idaho Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
phone (208) 666-4605
fax (208) 769-1404
e-mail: june.bergquist@deq.idaho.gov
Receptionist telephone number (208) 769-1422