



United States  
Department of  
Agriculture

Forest Service



United States  
Department of  
Interior

Bureau of Land  
Management



*Final Analysis of Public  
Comment for the Eastside  
and Upper Columbia River  
Basin Draft Environmental  
Impact Statements*

*Prepared by the*

*Content Analysis Enterprise Team  
October 1998*

# Final Analysis of Public Comment for the Eastside and Upper Columbia River Basin Draft Environmental Impact Statements October 1997 – May 1998

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## *October 1998*

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for the Eastside and  
Upper Columbia River Basin  
Draft Environmental Impact Statements*

*Executive Summary*

*Prepared by the*

*Content Analysis Enterprise Team  
October 1998*

# Final Analysis of Public Comment for the Eastside and Upper Columbia River Basin Draft Environmental Impact Statements

## Executive Summary

*Prepared by*  
USDA Forest Service  
Content Analysis Enterprise Team  
406-758-5243

*October 1998*

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# Introduction

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## Background

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On June 6, 1997, the Eastside and Upper Columbia River Basin (UCRB) Draft Environmental Impact Statements (EISs) were released for public review, initiating a formal 120-day comment period. The two Draft EISs address the management of more than 72 million acres of Forest Service and Bureau of Land Management (BLM) administered land in the interior Columbia River Basin and portions of the Klamath and Great basins. One Draft EIS (Eastside) covers these public lands in eastern Oregon and eastern Washington, and the other Draft EIS (UCRB) covers much of Idaho, western Montana, northern Nevada, and parts of Utah and Wyoming.

The Interior Columbia Basin Ecosystem Management Project (ICBEMP) was launched in 1993 by the Forest Service and BLM to address environmental and economic issues that affect areas larger than traditional administrative boundaries. Such issues included: recovery of Snake River salmon, declining forest and rangeland health, and changing economies and social conditions of local communities. Several comprehensive science reports were issued in December 1996.

After numerous requests from the public for more time to review the Draft EISs, the project's regional executives decided to extend the comment period from October 6, 1997, to February 6, 1998. In December 1997, the comment period was extended again to April 6, 1998, in response to additional project requirements included in the 1998 Department of the Interior and Related Agencies Appropriations Act. In March 1998, the ICBEMP released a report on the economic and social conditions of several hundred communities in the Pacific Northwest. The comment period was extended an additional 30 days to give people time to review and submit comments on the new report. The final close of what became a 330-day comment period was May 6, 1998.

The extensive amount of time allowed for public comment generated what may be the largest response in the history of the Bureau of Land Management or the Forest Service. Some 82,895 people submitted comments by either letter or Internet. Respondents not only have taken interest in the particulars of the Draft EISs, but they also have invested much time and effort to voice their opinions and concern over the very conception and objectives of such a large undertaking.

This executive summary introduces the content analysis process used on this project; gives a brief overview of public opinion regarding major pervasive themes underlying the majority of comments received during the formal comment period; and provides demographic information for the almost 83,000 separate responses.

## How to Use Content Analysis

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Content Analysis is a process used to compile and correlate similar comments into a format usable by decision makers and the EIS Team. Content analysis helps the EIS Team clarify, adjust, or use technical information pursuant to NEPA regulations, which require response to comment before issuing a Final EIS and Record of Decision.

The type of content analysis used by this team was to manually read each letter and to code both the subject matter and the perceived intent and emotion. All comments were considered, whether they were presented by thousands of people saying the same thing or by a single person bringing up a technical point. Emphasis in this process was on the content of the comment rather than the number of times a comment was received. The numbers can be derived from the database if desired.

All comments can be tracked to the original letter and can be sorted and reported in a variety of ways. The comprehensive *Final Analysis of Public Comment* document

provides an in-depth summary of all letters and comments. Please see Appendix C of the *Final Analysis of Public Comment* for more details on the content analysis process.

Four different tools were provided through the content analysis process for the Interior Columbia Basin Ecosystem Management Project. None of the tools alone is all inclusive, but together they provide complete documentation and storing of all public comment. Any tool alone would not give the reader a true assessment of an issue; however, used in conjunction they will assist decision makers and the project team understand and adjust direction where appropriate. These four tools include:

- The nearly 83,000 responses, cataloged and stored for easy access, linked to a unique identifying number.
- A database storing all names, addresses, and coded comments, using the unique identifying number.
- A summary of public comment (Final Analysis of Public Comment), analyzing batched comments by topic area. Used as a roadmap, the Analysis of Public Comment can guide the project team back to both the database and original letter.
- A mailing list of names and addresses for future response.

The full *Final Analysis of Public Comment* document is organized in the following way: Chapter 1 presents policy and procedural comments (comments on Chapter 1, Purpose & Need, of the Draft EISs). Chapter 2 contains comments on the affected environment, management direction, and environmental consequences for various resources; Chapter 3 contains comments on social and economic consequences. (Chapters 2 & 3 of *Analysis of Public Comment* includes comments from Chapters 2, 3, and 4 of the Draft EISs). Appendices contain a list of issues, the organized response report, the content analysis process, a list of preparers, and a list of acronyms.

## Public Opinion and Pervasive Themes

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### Introduction

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Reviewing public comment from almost 83,000 letters is both informative and enlightening. As evidenced by the small percentage of singular responses received, the majority of technical comment has been gleaned from approximately 5,000 letters, leaving 78,000 general, often emotional letters to understand and summarize. The pervasive themes and public opinion set a tone throughout the comment period for the Draft EISs, weaving together common threads on major issues and concerns that not only affect the Interior Columbia Basin Ecosystem Management Project but also address opinions on all major land management decisions for both the Bureau of Land Management (BLM) and the Forest Service.

The sequential order of the following narratives does not imply importance but should lead the reader from the broad picture to more specific concerns. Please consult the full *Final Analysis of Public Comment* for complete details.

Purpose of and Need for This Proposed Action  
Ecosystem Management  
Active and Passive Resource Management  
Scale of Interior Columbia Basin Ecosystem Management Project  
Decisions  
Ecosystem Analysis at the Watershed Scale  
Reserves  
Public Trust and Federal Authorities  
Use of Science  
Range of Alternatives

Relationship to Existing Forest Service/BLM Plans  
Public Involvement Process  
National vs. Local Stakeholders  
Effects on other Public Lands and Private Lands  
Implementation  
*Analysis of Economic and Social Conditions of Communities* Report  
Roadless Areas and Wilderness Designations  
Specific Resource Concerns  
Specific Social and Economic Concerns

## **Purpose of and Need for This Proposed Action**

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***Issue: Most of the public feel that the purpose and need for the proposed action(s) will not be met by the EIS alternatives. Where people differ in opinion is on why.***

Among commodity resource businesses and people working within local resource-dependent communities, people are convinced, regardless of statistics displayed, that a final decision including the preferred alternative will not assure a sustainable and predictable level of products and services.

People who are dependent on timber from Federal lands, for example, feel that any selected alternative chosen from the Draft EISs will jeopardize their jobs, families, and the stability of their communities. Not only do they believe the Draft EISs predict decreased harvest levels, but they believe the EISs also fail to quantify how severe these decreases may be and fail to specify allowable sale quantities. Although the EIS contains standards for the purpose and need of restoring long-term ecosystem health and integrity, these respondents believe that there are no standards for the health and integrity of their livelihoods. Many feel that ecosystem health or recreation are only “value-based” estimates which should not take precedence over quantifiable economic values.

These people feel that the planning process contains inherent problems, which will block its ability to fulfill its congressional mandate of multiple use. They assert commodity production levels cannot be predicted until BLM and Forest Service land use plans are revised, and they worry that continued watershed analyses will only delay on-the-ground decisions. Adaptive management is seen by others as just another delay tactic that will only increase uncertainty about their future.

From the environmental community, many believe strongly that neither the preferred alternative nor any of the other alternatives go far enough to restore long-term ecological health and biological diversity.

Some declare the Draft EISs fail because there are no clear and enforceable standards. The methods called for in the various alternatives, according to many, will not accomplish the on-the-ground work to restore forests, grasslands, wildlife habitat, and aquatic resources. They believe that these standards are too vague and broad, leaving enforcement impossible. These respondents also hold firmly to the belief that both the BLM and Forest Service are using the terms ‘ecosystem management’ and ‘restoration’ as a smokescreen to actively manage lands. They interpret this to mean the continuation of resource extraction that many believe has caused the problem in the first place and which they would like to see halted. Many people made clear they would like to see the mission of both agencies change.

**Issue:** *The direction being taken is appropriate and will set a good precedent.*

Relatively few yet strong voices applaud the professionalism and hard work put into this project. These respondents, on the whole, are encouraged by the direction the project has taken and hope it will set a precedent for future land management plans. People supporting the effort, with few reservations, came from all over the country (including in the local communities where opposition was the strongest) and from many different backgrounds.

## **Ecosystem Management**

---

**Issue:** *The terms cause concern and confusion.*

Noting the complex and diverse definitions of the word ‘ecosystem’, some wonder how decision-makers will agree on a suitable definition, not to mention agree on a plan to manage such a system. They noted that professional scientists cannot agree among themselves on a definition for ecosystem, and that even the Draft EISs state that there is no clear definition. Several, therefore, interpret ecosystem management as a vague, arbitrary, ill-defined, and thus inappropriate cornerstone for a proposed action of this magnitude. Some state that the concept of an ecosystem is not scientific theory but social, political, philosophical, or religious.

The uncertainty surrounding the term ‘ecosystem management’ inspires numerous and varied fears in the public and conjures feelings of distrust for many respondents. Some feel the vague terminology allows planners and managers to make decision they choose. Many people question whether a document that relies on these concepts can ever attain the needed clarity, authority, and freedom from future gridlock, confusion, and litigation.

**Issue:** *The EIS needs to establish legal justification for using ecosystem management concepts.*

Many assert that no legal authority or congressional mandate exists for the use of the ecosystem management concept in management plans, and they call for some justification for using the concepts. Some warn that the size of the project area and the lengthy time frame of the project put too much at risk under a plan that stresses such an unproven and nebulous concept. At least one respondent calls ecosystem management a tool to achieve goals, rather than a goal in itself, thereby dismissing the concept as inappropriate for a statement of proposed action.

**Issue:** *Public comments diverge on whether ecosystem management should more strongly emphasize economic and social needs of humans or protection and management of natural resources.*

Some people feel the definition of ecosystem management should include humans, but others feel that it should not.

Many feel the role of humans and their economic and social health are ignored by the project’s definition of ecosystem health. Accusing the Federal Government of selling out to the “agenda of radical environmentalists,” some perceive a biocentric, anti-human, or nature-knows-best bias in the project which they feel places the well-being of other life forms ahead of the interests of humans. With ecosystem health as the stated goal of the plan, some foresee economic disaster for people, companies, and towns that depend on commodities from public lands. There is a belief that a top-down, bureaucratic, and elite government system decides the definition of ecosystem health, with disregard or even contempt for the communities most affected, thus violating the Multiple-Use/Sustained Yield Act and the Organic Act along with both agencies’ policies.

Contrary to the large majority of people failing to see human inclusion in the project, many advocates for preservation and conservation are extremely concerned that the implied definition they read for ecosystem management places too much emphasis on the human side. They feel that there is so little left and humans have already destroyed so much, that now, more than ever, the two agencies need to move away from what they see as a fancier term for multiple-use and focus on protecting and preserving what is left.

## Active and Passive Resource Management

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***Issue: Active management is emphasized too much.***

Some respondents state the Draft EISs emphasize active management and resource extraction too much, missing what one respondent calls “a unique opportunity” to restore and preserve a part of the nation that many describe as clean, wild, and beautiful. For them, resource extraction should take place only when ecological health will not be compromised, if at all. Others assert the preferred alternative’s emphasis on active restoration of damaged lands represents further concessions to extractive business interests motivated by short-term profits. They say nature itself, rather than active management, can best restore degraded landscapes to a healthier and more productive condition.

***Issue: Active management is not emphasized enough.***

In contrast, others believe that active management and commodity production can and should be a tool for restoring ecosystem health. Many respondents warn against reducing management activities in the name of healthy lands. These people believe that silvicultural tools such as thinning, clearcuts, grazing, and sometimes fire, can improve wildlife habitat and prevent destruction of resources by insects, disease, and catastrophic wildfire.

***Issue: There is disagreement about the link between management activities and ecosystem health.***

Disagreeing with those who blame historical management activities for ecosystem problems, a few argue the land is in the best health it has been in recent history thanks to resource extraction. They feel the science being used is overstating existing conditions. While some state that commodity extraction can improve ecosystem health, others look at the equation in reverse, asserting that a management approach favoring ecosystem health will also produce the greatest economic benefit by creating sustainable commodity outputs.

## Scale of the Project

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***Issue: The broad-scale approach is neither adequate nor appropriate.***

Many people feel that broad-scale direction in the Draft EISs is not adequate to analyze and manage an area as vast, complex, and diverse as the interior Columbia River Basin. The area, they note, contains a wide array of dissimilar landscapes and resources; they feel that effective management will result only from a study of fine-scale areas such as administrative units, watersheds, or landscape types. Some note that the concept and definition of an ecosystem will be elusive even on a small scale, and that any attempt to manage at a larger scale is doomed to fail.

Many believe the broad-scale approach does not adequately recognize the on-the-ground knowledge and expertise of local land managers. The size of the plan makes it unresponsive to local concerns and makes it inadequate to allow effective collaboration with other agencies and affected parties. They feel planning and management should not be controlled by a top-down approach, but rather directed on a case-by-case basis by local people who are familiar with the land. Many view the motive for using the broad approach not as

sound ecological management, but rather as a matter of social and political control. Respondents say that although some small areas may indeed show poor ecological health, they believe the EISs address only the broad scale and do not provide appropriate remedial guidance. Many feel that standards and objectives should be developed on a smaller scale and that the project should only provide guidance for local land managers.

Others assert the project applies generalized objectives and standards to the whole planning area when they should be used only for specific subjects such as wildlife habitat management, yet at other times the EISs mandate specific standards, such as regarding road densities, for the entire planning areas.

***Issue: A broad-scale approach is needed.***

A contrasting opinion is that a broad outlook, rather a piecemeal approach, is needed to improve the ecological health of the Columbia River Basin. Some argue that there needs to be a marriage of the large and small scales by using intermediate, or landscape, analysis to not only ensure proper management, but also to gain public acceptance of the planning process.

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## Decisions

***Issue: Local people should make local management decisions.***

Informed by a sense that each landscape has unique features and needs, many people who oppose the project as described in the Draft EISs feel local people should make local management decisions.

According to many people, a ‘top-down’ management philosophy, which they believe the project promotes, fails to adequately consider economic or social consequences. They note that distant decision makers do not have to live with consequences of their management, as local people must. Many vehemently decry what they perceive as unnecessary moves toward centralized control. Contesting the assumption that agency personnel have more knowledge and experience, many demand that local authorities keep control over management. Working and living with the natural resources, they argue, leads to scientific knowledge and common sense lacked by those sitting at a desk far away. Centralized planning and decision-making for any enterprise, they state, always suffers from a loss of productivity, accountability, and quality. A county official from Salmon, Idaho, would like to see language included in the preferred alternative to involve permittees in the decision-making process.

***Issue: Local groups and commodity interests should have less influence.***

Others take the opposite view, that the agencies have let local groups and commodity interests be too influential for too long, creating the poor ecological consequences with which we now live. They assert business as usual will further degrade the ecological health of the region.

***Issue: There is confusion about how the decisions in the ROD will be translated to on-the-ground decisions.***

Many questions remain among the public about how decisions in the EIS will be translated to decisions on the ground. Many feel that when faced with a specific land management decision, local land managers will be bound to the EIS, even if goals are

contradictory or make little sense. They feel that land managers will be forced somehow to balance conflicts such as:

- reducing fire fuels vs. the need for downed wood,
- fire risks vs. impacts of harvest on aquatic resources, or
- watershed restoration needs vs. recreational opportunities.

These respondents are concerned that local land managers will be straddled with hundreds of new standards and the impossible task of proving the science wrong or justifying any course of action. They feel the ultimate result will be uncertainty, confusion, and costly delays.

Many suggest standards should be more flexible and serve only as scientifically sound guidelines for local managers. In some cases, they state, local managers don't have the resources, time, or expertise to do the type of research and documentation to support changes in the standards; they feel that if managers attempt such activities, they undoubtedly will be challenged every step of the way through appeals and litigation by those seeking to prevent changes.

## Ecosystem Analysis at the Watershed Scale

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### *Issue: Ecosystem Analysis at the Watershed Scale is not necessary.*

Some question whether ecosystem analysis is necessary at all. Because analyses are tiered from basin to subbasin to watershed, some respondents have doubts about the analyses' applicability, and they anticipate interminable delays in their completion. They fear that the process will become a bureaucratic bottleneck, asserting that the purpose and needs of the Draft EISs— whether restoring ecosystem function or providing goods and services— will be held hostage to another planning process. These people believe that even if the process is viable, the agencies will not have adequate funding to accomplish analyses.

Because the National Environmental Policy Act (NEPA) already provides for site-specific impact analysis, many point out that local BLM and Forest Service management plans are already doing an adequate job; even if such efforts fall short, respondents think that problems should be resolved on a local basis. They feel that imposing programmatic guidelines and standards will only serve to muddy the water and contradict what is perceived by many to be already numerous laws and regulations. Others feel that watershed analysis does not consider a range of possible management activities and is not legally required, so why spend all this money?

### *Issue: Ecosystem Analysis at the Watershed Scale is necessary.*

Some people argue that watershed-scale analysis is necessary to estimate environmental impacts. They feel more site-specific data on existing environmental conditions is a prerequisite for determining whether particular management activities are appropriate for a given piece of land. If activities should be deemed appropriate, many feel ecosystem analysis is then needed to fully estimate environmental consequences. Watershed-scale analysis, its advocates assert, is especially needed when trying to estimate impacts from prescribed burning, including weed invasion, impacts of sedimentation and stream channel morphology in rare fish habitats, human safety and health concerns, and the possible loss of native plant species.

## Reserves

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***Issue: Biological reserves are needed.***

To conserve biological diversity and to maintain or restore ecological health, many people suggest creating biological reserves in the Columbia Basin. They argue that old-growth forests, riparian values, roadless areas, and fish and wildlife must have protection to meet the project's stated purpose and need. Some people assert that many of the few remaining intact ecosystems left in the country are found in the planning area. This project, in their view, is the last chance to protect remnants of disappearing ecosystems for future generations. They reject what they call the "pseudo-science used by commodity interests to destroy the ecological health of forests."

***Issue: There is disagreement about how to manage reserves.***

There is some disagreement about how to manage reserves. A 'hands-off' wilderness management approach is desired by some, as opposed to ecosystem management which many believe requires considerations of economic and social values in management decisions. Others feel that active restoration, such as removing roads and prescribed burning, is necessary to first return potential reserve areas to ecological integrity. Many of these respondents do not want any type of timber harvesting, mining, or grazing in these areas, and they ask that non-native species be controlled to ensure that reserves function as intact natural ecosystems.

***Issue: Reserves under Alternative 7 are wholly inadequate.***

Some feel that reserves listed in Alternative 7 are not large enough to maintain ecological integrity and are too fragmented from each other to be effective. Other new areas are also suggested for reserves because of their high degree of biological diversity; respondents feel that these areas were inappropriately ignored in Alternative 7. Some feel that reserves should be created next to existing wilderness areas and national parks to provide core habitat for such species as the grizzly, wolf, and salmon. Other respondents feel that not enough analysis was done to show whether Alternative 7 is attainable. They believe that analysis of socio-economic impacts of reserves needs to be more in-depth. "Set up as a straw man" captures the sentiment of people who believe that Alternative 7 is provided with criteria that do not meet the purpose and need; therefore, the alternative and its reserves approach are doomed to fail. See the discussion of Alternative 7, below, for additional comments.

***Issue: Biological reserves are not needed.***

Some people concerned about their livelihoods do not want reserves because they feel that reserves would preclude proper management for wildfires, wildlife, noxious weeds, and a predictable flow of commodities.

## Public Trust and Federal Authority

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***Issue: Some people distrust the project and the government.***

Numerous respondents say that not only does the project bypass all legal mechanisms for land management and planning, but they feel it is a massive Federal takeover that threatens to depopulate the Northwest, lock up public lands, and steal State and local power in favor of Federal or even international control.

In comments ranging from suspicious to hostile to furious, many call the project a back-door land grab and a conspiracy, or they equate the plan with socialism, communism, or

dictatorship. Many identify President Clinton, Vice President Gore, or Interior Secretary Bruce Babbitt either as perpetrators of this perceived outrage or as pawns of other powerful groups such as “uninformed, brainwashed urban residents,” powerful environmental lobbies, or international organizations. Many claim that Congress has not mandated this project or authorized ecosystem management as a driving principle for planning. Many scoff at the notion of public collaboration in the project, believing that Federal officials have decided the outcomes of the planning process long ago.

International organizations such as the United Nations appear in the comments of a few respondents, who state that the project is a manifestation of such pan-national edicts as the United Nations Biodiversity Treaty, the Man and the Biosphere program (MAB), and ‘Agenda 21’. Some claim these items, as well as the concept of World Heritage Sites, are threats to American sovereignty because they think such programs propose to return much of North America to a state of wilderness. Within the United States, some who fear a loss of national sovereignty accuse the President’s Council on Sustainable Development and various non-governmental organizations of collaborating with international interests to the detriment of American citizens.

***Issue: Some people distrust commodity interests and local control.***

Others voice a concern that if there is any conspiracy, it is that of powerful interests such as miners, grazers, and loggers, whom some respondents see as having exploited the land while wielding undue control over public agencies. Some argue that Federal control is better for the land than local control because centralized planners taking a long and broad view of ecosystems are less influenced by local economic demands.

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## Use of Science

***Issue: Scientific information should play a larger role in the Final EIS.***

According to many, the Draft EISs are politically driven, and the preferred alternative ignores the advice of the agencies’ own scientists. They cite the impartiality of scientific findings of poor resource health, whether regarding salmon, other fish, the rarity of old growth, detrimental effects of roads, soil productivity, an unnatural buildup of fuels, or poor range condition. They criticize what they see as the personal values and biases of the EIS Team which they feel have influenced the structure of the alternatives and selection of the preferred alternative. Some believe the EIS must address a continually changing world and population, and should not set standards that cannot change with the decades to come. A few feel the agency is collecting the best data possible and commend the science used by the EIS Team.

***Issue: The scientific information alone should be considered and there should be no Final EIS.***

One prevalent view is the project should be terminated and the science forwarded to the local Forest Service/BLM administrative units for their consideration and use when revising their land management plans. This demand is linked over and over again with requests that there be no Final EIS or Record of Decision. Respondents strongly believe the original intent of this project has been waylaid and if any use is to come from the science collected, it is best to do it now before all is lost.

## Range of Alternatives

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***Issue: The range of alternatives doesn't provide any option for increased commodity use.***

Some respondents feel there should be an alternative to accommodate an increased amount of commodity uses such as timber, wood fiber, livestock forage, and recreation, as outlined in the Draft EIS alternatives. They contend that although a broad range of conservation and restoration strategies are analyzed, little consideration is given to increasing the amount of timber, grazing, and motorized recreation. For example, one person notes that only one cluster in one alternative was designed for high intensity commodity management.

***Issue: The range of alternatives is inadequate because all action alternatives are the same.***

Some respondents feel that the range of alternatives is inadequate because all action alternatives effectively adopt the same standards. These respondents think that although goals and objectives for all alternatives should be the same, standards and guidelines should provide different management approaches for each alternative.

***Issue: The range of alternatives doesn't include a sufficient range of riparian management options.***

***Issue: The range of alternatives should include at least one alternative to address one or more of a variety of other options.***

Various respondents feel that none of the alternatives address one or more of the following:

- Significantly reducing or eliminating livestock grazing or eliminating logging in riparian areas or key watersheds;
- Providing adequate protection to roadless areas and old-growth forests;
- Protecting fish habitats; or
- Establishing economic transition assistance.

***Issue: Alternative 7 is inadequate.***

For the Draft EIS to represent a broad range of alternatives, the Forest Service Employees for Environmental Ethics (FSEEE) wants their "conservation science" alternative to be considered in detail. This organization and other respondents believe that not enough analysis was done to show whether Alternative 7 is attainable or adequate. They believe that analysis of socio-economic impacts of reserves needs to be more in-depth. "Set up as a straw man" captures the sentiment of people who believe that Alternative 7 is provided with criteria that do not meet the purpose and need; therefore the alternative is doomed to fail. See also the discussion of Reserves, above, for additional comments.

***Issue: Combine Alternatives 7 and 4.***

Some feel it would be best served to combine Alternative 7 and the preferred alternative (Alternative 4) to add more balance and improve its chance to be implemented.

**Issue:** *Specific new alternatives should be added.*

“The EIS should consider an alternative that halts commercial logging and grazing in old-growth and unroaded areas, and that corrects past damage in those areas with active restoration.”

“The EIS should consider an alternative that incorporates input received from the Columbia River Bioregion Campaign, Indian tribal nations, and others.”

“The EIS should consider an alternative that incorporates Oregon Governor Kitzhaber’s 11-point timber plan.”

“The EIS should consider an alternative that incorporates input received by the Deschutes Provincial Advisory Committee.”

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## Public Involvement Process

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**Issue:** *Public input is being ignored.*

Most individuals who commented on the adequacy of public involvement in the process agree on the importance of public input to the project, but many are frustrated with the process for public collaboration and suspect their input is not being considered by government decision-makers.

**Issue:** *Government employees are inadequately informed about the project.*

While some appreciate government efforts at collaboration (such as the public meetings and the use of newer technology, such as the Internet, to disseminate plan documents), some say they wish government employees themselves were better informed about the project so the public’s questions could be answered.

**Issue:** *Information should be clearer and more accessible.*

Many state that the process for public collaboration by the project should be clearer and more accessible. There is concern among these people that the very size of the document and supporting data are so large that participation and understanding are discouraged. If the project would present the local impacts of each alternative in a clear and accessible format, some suggest, the public could more easily identify their concerns and offer constructive comment.

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## National vs. Local Stakeholders

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**Issue:** *Opinions diverge on whether local or national comments should have more influence.*

Some feel that comments from the public who live within the project area should be more influential than those from outside the project area. One person suggests that comments from outside the project area be separated because more distant people have a less crucial stake in the final outcomes.

Others state the opposite: that since public lands belong to the entire nation, the entire American public should have a say in decisions concerning public lands. To some, the level of comment is not an indication of public sentiment but merely a reflection of the political campaigns of interest groups that have mailed thousands of form letters aimed at influencing the process.

## Relationship to Other Planning Processes and Plans

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**Issue:** *The project may conflict with other planning processes and plans.*

Several people question the legality of the project and possible conflicts with the National Forest Management Act (NFMA), the Forest and Rangeland Renewable Resources Planning Act Draft Program (RPA), and the Federal Wildland Fire Management Policy and Program Review. Some argue that other State and local plans conflict with direction found in the Draft EISs, and that the project will overlap and sometimes negate local plans which now work. These respondents also fear that it will create economic hardships.

Many respondents note that Forest Service and BLM units already have their own plans as mandated by the NFMA and the Federal Land and Policy Management Act (FLPMA). They say that these plans enjoy broad local support, employ valid scientific methods, and are the result of years of hard work, planning, and compromise. Appeals and litigation, some note, have prevented implementation of many such local plans. Many respondents are confused and alarmed by apparent conflicts between the project and existing plans, because they fear that strategies and commodity output levels established in the individual plans will be superseded by the final decision. Some state that supplanting the existing plans would violate NFMA and FLPMA, which establish rules for revising or amending plans.

## Effects on Private Lands and Other Public Lands

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**Issue:** *The project will negatively affect private property values and property owner rights.*

The effects of the EIS alternatives on private property cause great concern among the majority of respondents who discuss this subject. Many fear that the project's vast scope and philosophy of ecosystem management will negatively affect private property values and the rights of property owners. These respondents say that the project only hints at its true effects on private lands, and many view this denial of effects with suspicion and anger. For example, many state that the historical range of variability is a plan to revert the land to the way it was in 1850.

Many assert that if the project plans to protect wildlife with corridors and buffer zones, then private property owners will be forced to absorb added restrictions on the use of their own land. Some suspect that if the plan provides for more abundant wildlife, then private landowners will suffer the consequences of unwanted big game or predatory animals. Many landowners state they are already burdened by restrictions on use, licensing requirements for various activities, and excessive taxes.

**Issue:** *The project will lead to increased stresses on private lands.*

Many fear that public use and resource production on public land will be curtailed after a Record of Decision has been signed. They further believe that the resulting shortfall anticipated by many will increase stresses on private lands, leading to degradation of those lands and increased commodity prices. Many feel that increased restrictions on private lands, which many feel will inevitably arise if the preferred alternative is implemented, will lower land values and amount to an illegal taking. They state that such takings would violate the Fifth Amendment to the U.S. Constitution.

**Issue:** *Nearby public lands also will be affected.*

Similar worries about the spillover effects of the project apply to those concerned with other public lands. Some state the project is unclear regarding its effects on the numerous public lands other than those administered by the Forest Service and BLM. Some feel the Draft EISs fail to address these concerns.

**Issue: *Private property won't be affected.***

A few do not feel that the project will affect private property. Some feel that resource extractors might treat their private lands with more responsibility than they would similar public lands.

**Implementation****Issue: *Lack of a congressional mandate will keep the project from being implemented.***

Some believe the project will never get to the stage of being implemented on the ground because there is no mandate by Congress to do so. They believe the project will end, in the words of one, "up on a shelf unused." Others think the timelines that are set in the alternatives are unrealistic and cannot be met.

**Issue: *The complexity and ambiguity of the project will hamper implementation.***

Some are concerned that the preferred alternative imposes hundreds of new management standards on land managers, many of which are vague and conflicting. According to some respondents, this creates an atmosphere of uncertainty and confusion for managers and the public alike, leading to excessive and costly delays in decision-making. They say the ambiguous wording in the alternatives will impede implementation of the EIS; for example, some respondents question differences in implementation between a Restore and a Produce category. They ask, how will ecological priorities be determined when there are competing ecological needs?

Other concerns related to the complexity of implementation include the following:

- The EIS should discuss how the project will gain local and congressional support for implementation.
- The EIS should establish a schedule (where, when) for implementation at the local level.
- The Final EIS should identify how to fund implementation and alternate strategies if full funding is not received.
- Interagency and intergovernmental collaboration should be thoroughly addressed in the EIS implementation plan.
- The EIS should address who will be responsible and accountable for its implementation and monitoring.
- Some believe there should be accountability for outputs of goods and services.

**Roadless  
Areas and  
Wilderness  
Designations****Issue: *All wilderness type areas should be protected.***

A great number of respondents using the terms 'wilderness' and 'roadless areas' did not differentiate between designated wilderness and other undeveloped lands. Ensuring that such areas are adequately protected is a major concern, regardless of what labels are used or what land allocations have been chosen on a local basis. Many people perceive wilderness to be a finite resource; they aren't sure the Draft EISs do enough to protect them from extractive industries and pollution. The majority believe that all wilderness study areas should be put off-limits to logging, grazing, oil and gas exploration or leasing, and mining activities. One major reason cited is that once wilderness areas are developed they can never be restored to their original condition. Several people ask why the BLM's wilderness study areas are not mentioned in the Draft EISs.

*Issue: Roadless areas should stay open for recreation and commodity uses.*

Some respondents feel the project is an attempt to create one huge wilderness at taxpayers' expense. Many assert there is little or no land left in the West that qualifies for roadless or wilderness designation. Some feel there might even be an over-abundance of wilderness acres that could provide tangible benefits if they were given Restore or Produce allocations in land management plans. Respondents who believe there are enough 'set asides' hold very strong convictions that roadless areas should not be locked up but need to stay open for recreation, logging, and other extractive uses. They believe putting roadless areas off-limits would not be effective ecosystem management. According to these respondents, decisions about these lands need to be made on a site-by-site basis. They feel that adopting a blanket policy (national programmatic policy) would violate access laws such as Age Discrimination, Americans with Disabilities Act, various tribal treaty rights, and agency mandates for multiple use.

## Specific Resource Concerns

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*Issue: Specific resource concerns should be addressed.*

A great many comments were received regarding specific resources and ecosystem processes such as soils, air quality, fire, insects and disease, forest health, rangeland health, aquatics and fish, and wildlife. The majority of the comments said that particular data were not adequate or complete, or that the effects of management activities on specific resources, especially cumulative effects, were not disclosed fully. Full details of the comments regarding specific resources can be found in the full *Final Analysis of Public Comment* document.

Among the major themes of the resource comments were the following:

- Concerns about **soil** productivity and management activities on soils;
- Adequacy of analysis of **air quality** impacts;
- Effects of wildfire and prescribed **fire**, the role of fire in restoring ecosystems, and fire management considerations;
- Adequacy of analysis of **insect** disturbance and management options with respect to insects and disease;
- Disagreement about what constitutes **forest health**, adequacy of the analysis of forest conditions, and concerns about the effects and effectiveness of proposed management actions on forest health;
- Whether the Draft EISs adequately addressed the long-term management of mature and **old-growth forests** and roadless areas;
- Adequacy of the analysis of the importance of Federal **grazing** land to the grazing industry;
- Concerns that the Draft EISs do not propose to limit or eliminate livestock grazing where needed, especially in riparian areas;
- Whether the science and assumptions regarding **aquatic health** are flawed (such as use of buffer zones—whether they are needed and whether they will restore aquatic health);
- Whether the Final EIS should provide strict default **standards for watersheds** that have not yet undergone required analyses;
- Whether **aquatics standards** should be uniform and basin-wide, or whether standards are attainable;
- Adequacy of the Draft EIS effort to identify or protect **aquatic habitat fish strongholds**;
- Adequacy of measures to control **noxious weeds**, address plants and microorganisms, and protect native plants;
- Concerns about whether **wildlife species habitat** requirements will be met, especially in reserves, and about the adequacy of scientific data on and the analysis of wildlife habitat;

- The need for the Final EIS to address **species viability** from an ecosystem management approach, including the need for consideration of corridors and linkages to maintain viable wildlife populations;
- Whether standards will protect **threatened, endangered, and sensitive species** and their habitats;
- The need for the Final EIS to address and analyze protection of **species of special interest to States and tribes**;
- That management objectives fail to adequately protect **anadromous fish** populations, especially native fishes, and to provide for the long-term protection and restoration of habitat to allow for **viable populations of fish species**, including special status fish species;
- That **roads** be evaluated for their impacts to fish;
- That fish habitat and water quality objectives be **managed with a regional approach**;
- That the agencies address the **social and economic effects** from proposed standards replacing interim direction from INFISH and PACFISH.

## Specific Social and Economic Concerns

### *Issue: Analysis of Economic and Social Conditions of Communities Report.*

A few people believe the economic analysis contained in the report, *Analysis of Economic and Social Conditions of Communities*, does not comply with the Department of Interior and Related Agencies Appropriation Act of 1998. According to these respondents, the project team did not provide the information required by the Act, which includes a subbasin review and the impacts each alternative will have on local economies.

### *Issue: Specific social and economic concerns should be addressed.*

Some social and economic comments are reflected in most of the earlier sections of this document, including concerns about: livelihoods, local control of decision-making, commodity predictability, impacts of reserves, public trust and Federal authority issues, effects on private lands, wilderness and roadless area issues, and the public involvement process. Full details of the comments regarding specific social and economic issues can be found in the full *Final Analysis of Public Comment* document.

Among the other major themes of the specific social and economic comments were the following:

- Concerns about effects of the alternatives on **community resiliency and economic conditions for resource-dependent communities**;
- The adequacy and completeness of the **economic analyses** and the balance between ecosystem integrity and economic health;
- Improving the alternatives to provide for more **predictability of effects** on individual communities;
- More clear disclosure of **effects on commodity production and jobs**;
- More extensive economic analysis of the effects on **mining, grazing, and energy production**;
- Adequacy of alternatives to protect **amenity-based economies** (including recreation);
- Need to address potential impacts of changes to **receipts to local governments**;
- **Quality-of-life issues** including spiritual values and cultural integrity of resource-dependent communities;
- Adequacy of disclosures of effects of road closures and management activities on **recreation**;
- Adequacy of analysis of **road management effects**;

- Concerns about **road densities** and definitions and about management **access** issues
- Concerns about inventory and protection of **cultural resources**;
- Adequacy of protection of **tribal treaty rights** and Federal trust responsibilities, including tribal cultural resources and restoration of tribal interests.

## Demographic Information

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### Introduction

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To understand public input, information about who submitted comments during the comment period and how those comments were received is important. In the content analysis process used for this project, each piece of mail received as a comment was assigned its own number and entered into a log book. The letter was then examined for content and information pertaining to the author. Codes were assigned to a demographic header, which was stamped at the top of the letter, characterizing the number of authors, author association (individual/family or organization), and form of mail and/or how it was received (fax, letter, E-mail, postcard, comment form, form letter).

Content analysis is not a vote counting process. Responses generated during the comment period do not constitute a statistically valid random sample of the public and they do not necessarily reflect broader societal values or trends. Therefore, the total number of comments for each issue was not used in analyzing the content. However, the number of comments and other demographic information can be useful and pertinent when looking for trends or values expressed in public comments.

During the content analysis process, each comment was considered equally. Opinions, feelings, and preferences for one aspect of the proposal over another, and comments of a philosophical nature, were all read and analyzed. Descriptive words such as the majority, several, some, and a few, are used in the *Analysis of Public Comments* document to indicate the intensity of response to an issue. Each issue is important to the decision maker, regardless of the numbers received.

The Interior Columbia Basin Ecosystem Management Project received a total of 82,895 responses during the comment period for the Draft Environmental Impact Statement, which began June 6, 1997, and ended May 6, 1998.

### The Origin of the Responses

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Figure 1 shows the number of responses received from each State.

Figure 2 displays the number and percent of responses received from within the Basin (Project Area) compared to outside the Basin. This figure suggests that more responses (77 percent) were received from outside the project area than from inside. However, a closer look at the number of responses received compared to the population indicates that *proportionally*, more responses came from inside the project area than from outside the project area: although the population in the interior Columbia Basin is only 1.2 percent of the nation's population, approximately 23 percent of the responses came from within the project area.

Table 1 presents the number and percent of responses received from the States that have land inside the Interior Columbia Basin. Totals in this table represent the entire State, including portions that are outside the ICBEMP project area.

## Who Responded

Figure 3 displays the organizations that commented on the Draft Environmental Impact Statements (Draft EISs), excluding individuals/families. Most organizational comments were associated with: natural resource-based businesses or groups, county agencies or elected officials, wise-use groups, and conservation/environmental groups. Individuals are excluded from this figure because of disproportionate response numbers.

Figure 4 displays the total responses received, including individuals and families. The individual/family category characterizes the majority of the respondents (81,965 out of 82,895 total). Most of the form letters and postcards were sent by these individuals.

## Method of Response

Table 2 displays the methods used to submit comments to the Interior Columbia Basin Ecosystem Management Project offices in Boise, Idaho, and Walla Walla, Washington. The vast majority (77,462) were form letters, followed by letters, postcards, faxes, or memos, which numbered 4,582.

**Table 1. Number and Percent of Responses from Each State with Land Inside the Basin.**

States with Land Within the Basin	Total Percent Responses by State*	Total Number of Responses by State
Idaho	15.37	12,742
Montana	9.59	7,953
Washington	6.25	5,179
Oregon	4.61	3,823
Utah	2.14	1,778
Wyoming	1.25	1,033
Nevada	0.63	522
<b>Total</b>	<b>39.84%</b>	<b>33,030</b>

\* Percent for entire State including area outside of the Project Area.

**Table 2. Method of Response.**

Method of Response (Response Type)	Number of Responses
Letters/postcards/faxes/memos	4,582
Petitions	515
Comment form (initiated by the ICBEMP Project)	137
Electronic mail	69
Form letters	77,462
Idaho Forest Congress	27
Resolution	88
Other	15

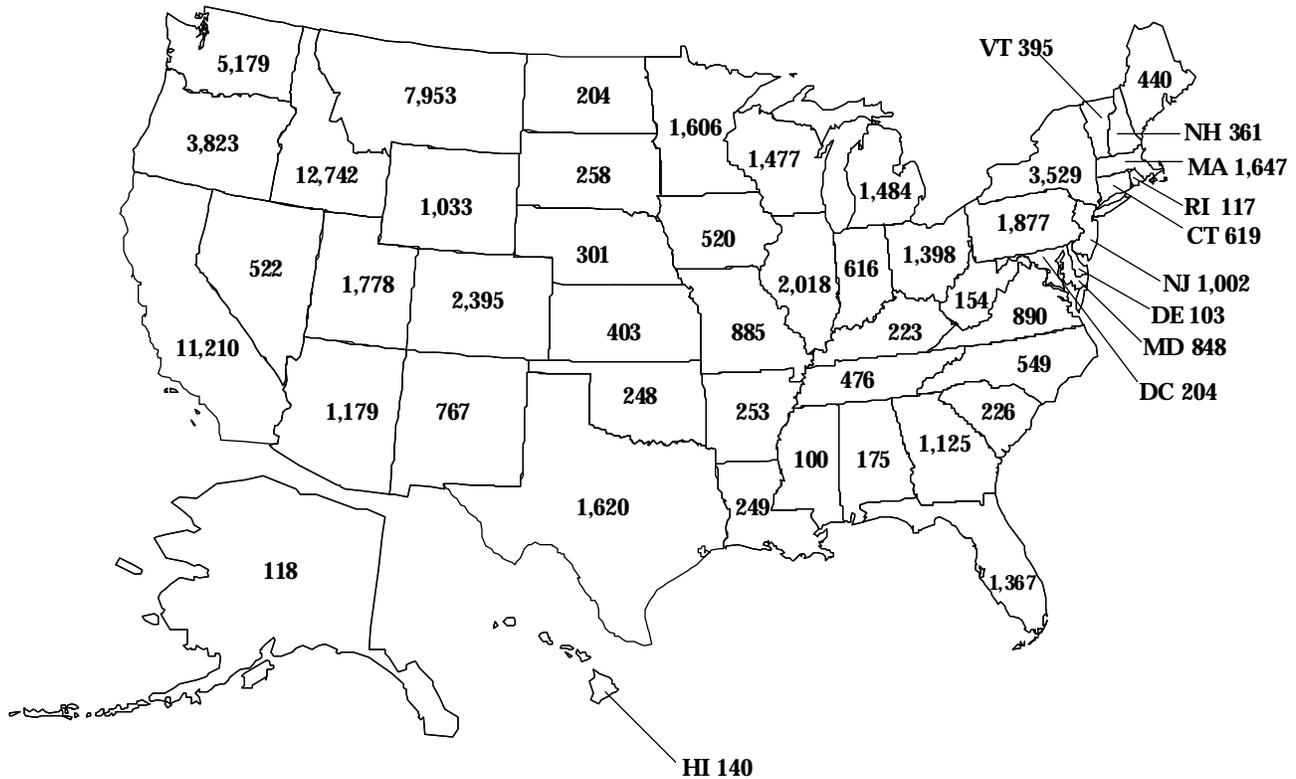


Figure 1. Number of comment letters received, by State.

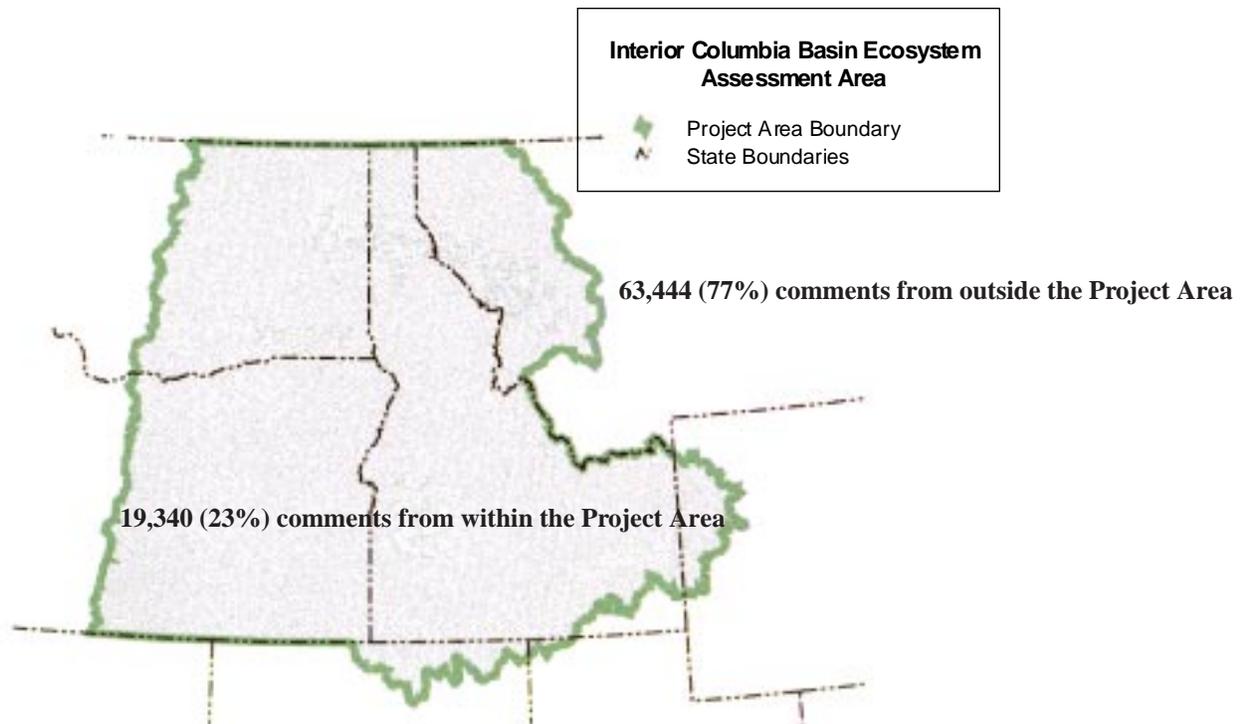


Figure 2. Comparison of the number of responses from within and outside the project area.

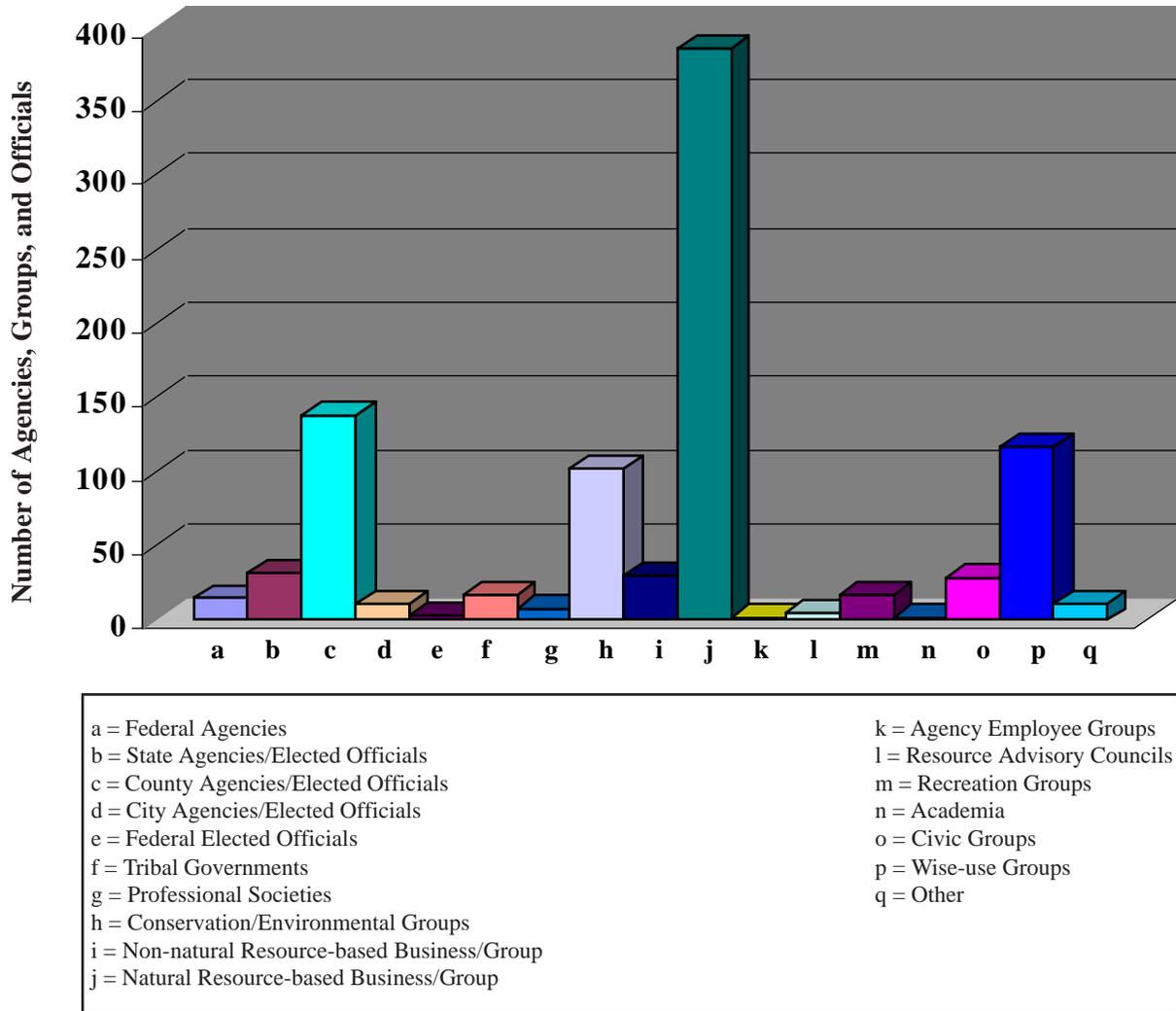


Figure 3. Organization type, excluding individuals.

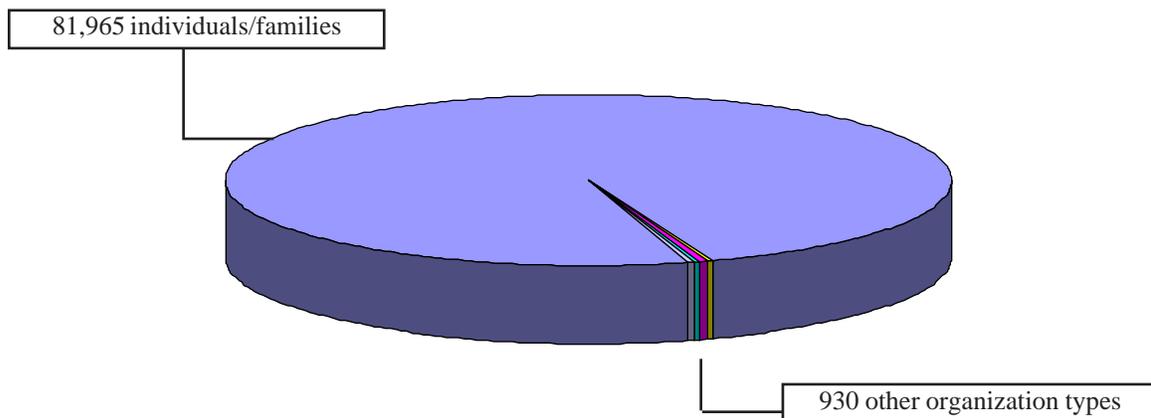


Figure 4. Organization type, including individuals.

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## INDEX: Issues Summarized in Executive Summary

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### ***Purpose of and Need for This Proposed Action***

- \* Most of the public feel that the purpose and need for the proposed action(s) will not be met by the EIS alternatives.
- \* Where people differ in opinion is on why.
- \* The direction being taken is appropriate and will set a good precedent.

### ***Ecosystem Management***

- \* The terms cause concern and confusion.
- \* The EIS needs to establish legal justification for using ecosystem management concepts.
- \* Public comments diverge on whether ecosystem management should more strongly emphasize economic and social needs of humans or protection and management of natural resources.

### ***Active and Passive Resource Management***

- \* Active management is emphasized too much.
- \* Active management is not emphasized enough.
- \* There is disagreement about the link between management activities and ecosystem health.

### ***Scale of the Project***

- \* The broad-scale approach is neither adequate nor appropriate.
- \* A broad-scale approach is needed.

### ***Decisions***

- \* Local people should make local management decisions.
- \* Local groups and commodity interests should have less influence.
- \* There is confusion about how the decisions in the ROD will be translated to on-the-ground decisions.

### ***Ecosystem Analysis at the Watershed Scale***

- \* Ecosystem analysis at the Watershed Scale is not necessary.
- \* Ecosystem analysis at the Watershed Scale is necessary.

### ***Reserves***

- \* Biological reserves are needed.
- \* There is disagreement about how to manage reserves.
- \* Reserves under Alternative 7 are wholly inadequate.
- \* Biological reserves are not needed.

### ***Public Trust and Federal Authority***

- \* Some people distrust the project and the government.
- \* Some people distrust commodity interests and local control.

### ***Use of Science***

- \* The scientific information should play a larger role in the Final EIS.
- \* The scientific information alone should be considered and there should be no Final EIS.

### ***Range of Alternatives***

- \* The range of alternatives doesn't provide any option for increased commodity use.
- \* The range of alternatives is inadequate because all action alternatives are the same.
- \* The range of alternatives doesn't include a sufficient range of riparian management options.
- \* The range of alternatives should include at least one alternative to address one or more of a variety of other options.
- \* Alternative 7 is inadequate.
- \* Combine Alternatives 7 and 4.
- \* Specific new alternatives should be added.

***Public Involvement Process***

- \* Public input is being ignored.
- \* Government employees are inadequately informed about the project.
- \* Information should be clearer and more accessible.

***National vs. Local Stakeholders***

- \* Opinions diverge on whether local or national comments should have more influence.

***Relationship to Other Planning Processes and Plans***

- \* The project may conflict with other plans.

***Effects on Private Lands and Other Public Lands***

- \* The project will negatively affect private property values and property owner rights.
- \* The project will lead to increased stresses on private lands.
- \* Nearby public lands also will be affected.
- \* Private property won't be affected.

***Implementation***

- \* Lack of a congressional mandate will keep the project from being implemented.
- \* The complexity and ambiguity of the project will hamper implementation.

***Roadless Areas and Wilderness Designations***

- \* All wilderness type areas should be protected.
- \* Roadless areas should stay open for recreation and commodity uses.

***Specific Resource Concerns***

- \* Specific resource concerns should be addressed.

***Specific Social and Economic Concerns***

- \* Analysis of *Economic and Social Conditions of Communities* Report.
- \* Specific social and economic concerns should be addressed.

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# Chapter 1

## Proposed Action/Purpose and Need

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### Introduction

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**C**hapter 1 discusses comments regarding broad topics encompassing the project such as: the size of the project area, the nature and range of decisions to be made, the planning process, and the relationship of the project to various laws and other planning processes. This chapter also includes comments about definitions and clarity of terminology used in the Draft Environmental Impact Statements (EISs), implementation, subbasin reviews, public involvement, and others.

Specific issues regarding environmental, social, and economic consequences of a final decision are presented in Chapter 2 - Affected Environment, Management Direction, and Environmental Consequences and in Chapter 3 - Social and Economic Consequences.

### Section 1.1 ~ Purpose of Proposed Action

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**T**he purpose of the proposed action as described in the Draft Environmental Impact Statements (Draft EISs) is to take a coordinated approach and to select a management strategy for Federal lands in the interior Columbia River Basin that best achieves a combination of:

1. Restoration and maintenance of long-term ecosystem health and ecological integrity;
2. Support of economic and social needs of people, cultures, and communities;
3. Updating and amending if necessary the long-range plans of Federal land management agencies at regional and subregional scales;
4. Provision of consistent direction to assist Federal managers in making decisions at a landscape level within the context of broader ecological considerations;
5. Emphasis on adaptive management over the long-term;
6. Help in restoring and maintaining habitats of plant and animal species by moving toward desired ranges of landscape conditions at a regional and subregional scale;
7. Provision of opportunities for cultural, recreational, and aesthetic experiences;
8. Provision of long-term management direction to replace interim strategies; and
9. Identification of where current policy, regulations, or organizational structure may act as barriers to implementing the strategy or achieving desired conditions.

These actions are aimed at restoration and maintenance of long-term ecosystem health and integrity while supporting the economic and social needs of the region's people.

## 1.1.1 Purpose and Need

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Meeting this dual purpose and need, the majority of respondents feel, is a large and daunting task given the size of the land area encompassed and the complexity of issues that the project needs to address.

Many respondents strongly assert that the project as written cannot fulfill its purpose and need for various reasons. People who are dependent on timber from Federal lands, for example, feel the project will not assure a sustained and predictable level of products and services. They say that this uncertainty will jeopardize their jobs, their families, and the stability of their communities. Not only do many people fear that the project predicts decreased timber harvest levels from those set previously in current Land and Resource Management Plans, but they also believe it fails to quantify how severe these decreases may be. They note that the alternatives are ranked by the amount of timber to be harvested, yet the alternatives do not specify allowable sale quantities. Many people contend that although the project contains standards for the purpose and need of restoring long-term ecosystem health and integrity, there are no standards for the health and integrity of their livelihoods. Ecosystem health or recreation, some people feel, are only value-based estimates which should not take precedence over quantifiable economic values.

Those with an opposing view hold that the Draft EISs fail in their purpose and need to restore and protect the long-term ecological health and biological diversity of the area because of a lack of clear and enforceable standards. According to many, the methods called for in the various alternatives will not accomplish the on-the-ground work to restore forests, grasslands, wildlife habitat, and aquatic resources. These respondents also are critical of the preferred alternative, which they perceive is much too commodity driven, undermining any hope of recovering and preserving the ecosystems involved.

Some people feel the Draft EISs contain inherent problems which will block its ability to be successfully implemented. They assert that timber harvest levels and other commodity production levels cannot be predicted until Land and Resource Management Plans are revised, and they worry that continued watershed analyses will only delay on-the-ground decisions.

A number of respondents question the validity of adaptive management as part of the ICBEMP process. Several individuals believe that adaptive management is but another delay tactic and will only increase uncertainty about their future. These respondents suspect that complex and conflicting standards and objectives in the Draft EISs will gridlock implementation. Others contend that current policies, regulations, and a possible lack of funding could potentially slow down, if not stop, implementation of the project. However, a few feel that adaptive management could become a useful tool for land management if monitored well and approached slowly.

**Issue:** *The Final EIS should provide certain and predictable supplies of resources and restore ecosystem health.*

**Sample Comments:** *If the stated reason for completing and implementing the project is to grant impacted communities certainty and stability in the process, then why does the document clearly state (chapter 4, pg. 169-174) that certainty will decrease? (Individual, Troy, MT - Letter #W849)*

*While the stated purpose of the plan being proposed is to protect the long-term ecosystem health and biological diversity, this is in fact not what the proposed plan will do (even the best of those being considered). Please, we need a plan that makes the stated purpose a reality - put the ecosystem health and biological diversity first! (Individual, Seattle, WA - Letter #W350)*

*I agree with the agencies writing that under all the alternatives, even the Project's Preferred Alternative, uncertainty would increase for timber producers and it will be difficult in the future to achieve predictable supplies of timber from Federal lands in the project region. This is directly contrary to the Project's stated Purpose and Need and the intent of Congress, which makes predictability a cornerstone of multiple use management of Federal lands. The DEISs should be withdrawn. The Interior Columbia Basin Ecosystem Management Plan was chartered to establish coherent management strategies that would lead to healthy, productive, and sustainable ecosystems balancing the needs of people, wildlife, and habitat. The DEISs as written, do not accomplish this objective. (Form Letter #W216)*

*Two needs are identified in the UCRB DEIS. These needs are 1. long term ecosystem health and integrity and 2. sustained and predictable levels of products and services. These two needs are to be balanced i.e. have equal value of important. The management priorities subordinate the need for sustained and predictable levels of products and services to long term ecosystem health and integrity. Integrity and health are valued-based estimates of conditions made by UCRB DEIS scientists and EIS team personnel. Rather than value-based estimates that predetermine priorities, regional guidelines should be developed that resource managers could refer to as they maintain a balance between long-term ecosystem health and integrity and sustainable, predictable levels of Products and Services. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*There are plenty of standards that apply to the first part of the Purpose and Need statement - ecological standards; but there are no standards that support the second part of the Purpose and Need statement, which applies to Social-Economic needs and predictable and sustainable levels of goods and services. The document is extremely biased and should be scrapped, or standards should be developed. (Individual, Rexford, MT - Letter #B76111)*

*Our forests, rivers and streams, and grasslands need real protection, which means the plan must have clear and enforceable environmental guidelines. (Individual, Sequim, WA - Letter #B76658)*

*We feel the effort expended has failed to meet its objectives, purposes and needs, nor produced a plan to accomplish needed on the ground work to restore forest ecosystem health. (Individual, Haines, OR - Letter #W729)*

*The evaluation criteria against which alternatives were compared (DEIS Chapter 3, pages 184 and 185) are too simple to evaluate the performance of alternatives in meeting the projects purposes and needs. For example, none of the evaluation criteria address the need for providing sustainable and predictable levels of products and service. A more complete evaluation would show that no alternative meets the projects purposes and needs. (Natural Resource-based Businesses or Business Group, La Grande, OR - Letter #W686)*

**Issue:** ***The Final EIS should not defer decisions to the National Forest, BLM District, or other sub-regional level which could contradict the original purpose and need.***

**Sample Comments:** *Timber harvest levels for the Proposed Action and alternatives cannot be predicted until after the EIS decision is made and strategies are implemented on a local basis. (Natural Resource-based Businesses or Business Group, La Grande, OR - Letter #W686)*

*The document states that predictability of timber benefits will be determined when the Preferred Alternative is incorporated into local Forest Service and BLM land use plans. (chapter 4, page 173). Deferral of programs addressing the predictability of timber production to future decisions substantiates the claim that the Eastside DEIS has failed to meet the project need. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*I disagree that alternative 4 meets the purpose and need. Restore and maintain long-term ecosystem health and integrity; support within the capacity of the land, the economics and/or social needs of people, cultures, and communities, and provide sustainable and predictable levels of products and services from Forest Service and BLM administered lands. Are these considered constraints (standards which must be met) or objectives that can be traded off against each other?...Within the capacity of the land, this is extremely variable and depends on investment level and degree of meeting need 1. If systems of overlapping standards become complex, the feasibility for anything approaches zero very quickly. (Individual, Moscow, ID - Letter #W449)*

*Stated purpose and need: (4): Provide consistent direction to assist Federal managers in making decisions at a landscape level within the context of broader ecological considerations. The DEIS provides standards and guidelines. The direction is not appropriate or legal at the programmatic level. Alternative 4 does not provide clear direction to assist land managers in making decisions at the landscape level. The direction is aimed at the watershed scale and not the landscape level. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B75417)*

*Stated purpose and need: (9) Identify where current policy, regulation, or organizational structure may act as challenges to implementing the strategy or achieving desired future conditions. Answer: Funding to implement Alternative 4 will prove the most difficult to overcome. Some of the direction provided in ICBEMP is counter to existing policy, regulation, and organizational structure. This is especially true when standards are dictated outside regulations and existing line and staff organization. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B75417)*

**Issue:** *The purpose and need should explain and expand upon the concept of adaptive management.*

**Sample Comments:** *Stated purpose and need: (5): Emphasize adaptive management over the long term. Adaptive management is an excuse to do nothing but study. It will likely reduce the ability to provide goods and services and will certainly reduce the predictability of them. (Natural Resource-based Business or Business Group, Coeur d' Alene, ID - Letter #B75417)*

*The introduction and many other references in the document recognize our changing knowledge of our environment and our need to adapt our management to this knowledge. The EIS then ignores this in many of the standards by requiring specific actions to reach a goal that may not be required to reach the goal. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

*We must set a range of conditions as our target, not simply identify a singular state which is in vogue at the time. This range of conditions goal will require continuous monitoring and management must be adapt with the introduction of new on-the-ground data. (County Agency or Elected Official, Ephrata, WA - Letter #W4568)*

*An adaptive management strategy with adequate monitoring could allow changes in management when the evaluation of monitoring data reveals the need for change, which in turn could reduce the long-term ecological risk to acceptable levels. (Professional Society, Moscow, ID - Letter #W546)*

*The ICBEMP addresses the uncertainty [of ecosystem management] by proposing an Adaptive management process whereby information that is gained during implementation is applied towards further planning efforts - in other words, a learn as you go approach. ...the ICBEMP proposes to apply this concept to 42 million acres of public land in all or portions of five states. (Natural Resource-based Business or Business Group, Englewood, CO - Letter #B78926)*

*To represent true Adaptive management, ecosystem and other projects need to be focused more on 5 to 10 year goals and impacts, more reliably projected than speculation a century into the future. More emphasis on effective monitoring to provide reliable feedback for adjusting management in response to improved information is needed. (Natural Resource-based Business or Business Group, Boise, ID - Letter #B75569)*

## **Section 1.2 ~ Proposed Action**

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Several topics related to the project's proposed action cause concern among respondents and are discussed in this section. The terms ecosystem management, ecosystem health, and ecosystem integrity were the subject of numerous and often emotional public comments. While some express support for these concepts and their use in the Draft EISs, many demand clearer definitions of the terms or want the project to drop these terms altogether. The need for restoration of lands in the interior Columbia River Basin is agreed upon by many respondents, but they diverge in views on the quantity and types of restoration activities needed.

Public comments with regard to the proposed action are further summarized and organized into the subsections to follow, capturing public perspective on maintaining ecosystem health, restoring degraded lands, and establishing biological reserves.

### **1.2.1 Ecosystem Management**

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Noting the complex and diverse definitions of the word ecosystem, some wonder how decision makers will agree on a suitable definition, not to mention agree on a plan to manage such a system. Several interpret ecosystem management as a vague, arbitrary, ill-defined, and therefore inappropriate cornerstone for a proposed action of this magnitude. Some state that the concept of an ecosystem is not scientific theory but social, political, philosophical, or religious.

The term ecosystem management conjures feelings of distrust for many respondents. The uncertainty surrounding the words inspires numerous and varied fears in the public. Some feel the vague terminology of the Draft EISs allows planners and managers to incorporate any management decision they choose. Some fear that such a decision might inappropriately favor commodity extraction, while others believe that ecosystem management provides an excuse for managers to implement an agenda curtailing resource extraction in favor of recreation, preservation, and wilderness. Advocating control and decision-making by local authorities, some warn ecosystem management could lead to top-down mandates from centralized authorities. They argue that such a "faulty and amorphous centerpiece" to the proposed action has doomed the entire project from the start.

Asserting that no legal authority or congressional mandate exists for the inclusion of the concept into management plans, many claim this is sufficient reason to abandon the plan. The size of the project area and the lengthy time frame of the project puts the health of the basin at risk, some warn, in order to implement a plan that stresses an unproven and nebulous concept. The legality of using ecological health as a goal for the plan is problematic for many respondents. They point out that long-standing laws and policies relating to multiple-use mandate a balance of resource goals; placing ecosystem health above all other considerations, they say, may violate such laws.

Quoting several government officials who have noted the lack of a precise definition for ecosystem or ecosystem management, many people question whether a document that relies on these concepts can ever attain the needed clarity, authority, and freedom from future gridlock, confusion and litigation. They point out that if professional scientists cannot agree among themselves on a definition for ecosystem and that even the Draft EISs state that there is no clear definition it will make implementing the project that much more of a difficult task.

Those who approve of the concept contend that ecosystem management is the best approach to regional management precisely because ecosystems transcend boundaries of ownership and jurisdiction. Some express a nearly spiritual reverence for the natural world, and feel that only by managing for broad ecosystems can managers maintain these intrinsic values. Stressing the inherent values of nature, some believe human survival or well-being is dependent on healthy ecosystems characterized by such elements as biodiversity and extensive wild areas.

**Issue:** *The Final EIS should contain a clear, scientific definition of ecosystem management.*

**Sample Comments:** *The DEIS uses numerous ill-defined terms throughout the manuscript with vague concepts guiding assembly of the favored alternative. The Scientific Method notwithstanding, the DEIS utilizes standards and measures which fail to enable the reader to come to an objective, independent conclusion using the derived data. Failing to define the specific ecosystems to be protected precludes an analysis of reasonably foreseeable outcomes to be postulated. (Individual, Colorado Springs, CO - Letter #E30)*

*According to commentary from ICBEMP authors at a public meeting in Baker City, Oregon, there is no successful example of ecosystem management in the U.S. (Individual, Baker City, OR - Letter #W492)*

*The definitions provided for ecosystem management and most of the terms that seem to relate to objectives are so ambiguous that it is impossible to pin down exactly what you are saying or are attempting to accomplish. Jack Ward Thomas, former Forest Service chief, stated this very appropriately in a speech he made in 1993: I promise you I can do anything you want to do by saying it is ecosystem management.... It is incredibly nebulous (Individual, Spring Creek, NV - Letter #B75617)*

*The meaning of ecosystem is not scientifically agreed on or defined. The areas referred to in this study are arbitrarily determined by persons employing the ecosystem concept. They do not represent real objects on the landscape discovered through the application of ecological theory or agreed upon methodologies. Geographically, an ecosystem is anything anybody wants it to be. One man's pond is another's ecosystem. This is true because there are no theories, methodologies, or rules to guide the determination of ecosystem size, shape, location, or boundaries. This entire proposal is based on a flawed premise. (County Agency or Elected Official, Lordsburg, NM - Letter #W794)*

*We cannot risk 144 million total acres; 72 million acres of BLM/FS managed land, 55 million acres of privately owned land; and the future well-being of 104 counties and their people to this nebulous experiment called ecosystem management. (County Agency or Elected Official, Okanogan, WA - Letter #W861)*

*A statement made in Alternative Six implies that the government really does not understand what it is doing with regard to ecosystem management. This alternative makes the statement that knowledge of the functions and processes that make up ecosystems is limited. I question*

*the rationale of trying to implement a management scheme based on a theory that you do not completely understand. (Individual, Elko, NV - Letter #W892)*

*Just what is ecosystem management remains unclear and in many respects remains to be defined. In essence, the agency is yet in the process of defining ecosystem management, the very process that will have to be well defined, with associated clear goals and expectations in order to be able to achieve successful implementation. Without prioritized or defined production standards (regardless how minimal), there really is no agency accountability. The Eastside DEIS needs to acknowledge explicitly that the ultimate goal is choosing the best feasible strategy for allocation of Federal resources to promote the overall welfare of the people of the nation and the region, within the strictures of Federal law. Ecosystem management, no matter how it is defined, is but a tool for achieving that goal. It is not a goal in and of itself. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*I have attended numerous forums and conferences sponsored by Federal, state agencies and Colorado State University that were attempts to define ecosystems and ecosystem management concepts and approaches. Even the so-called experts admitted they could not really define or translate the concept into practical workable objectives. The only consensus was that it was not science driven [but] politically and socially oriented. (Individual, Bellevue, CO - Letter #B3938)*

**Issue:** *Ecosystem management should be legally supported before it is implemented.*

**Sample Comments:** *There is no legal rationale for utilizing the ecosystem-based management offered in the DEIS. Hence, I believe this DEIS is fatally flawed and should be withdrawn. (Individual, Colorado Springs, CO - Letter #E30)*

*Ecosystem management has not been mandated by Congress and is a tool of extremists. (Natural Resource-based Business or Business Group, Broadus, MT - Letter #W1279)*

*The DEISs raise protection of ecosystem health and integrity above all other factors in land use decision making. This is fundamentally inconsistent with existing multiple-use laws, which provide that no single use should predominate over all other uses in the management of Federal lands. (Individual, Huachuca City, AZ - Letter #W3794)*

**Issue:** *The Final EIS should address the needs of all of the social, economic, and biophysical elements in the interior Columbia River Basin through Ecosystem Management.*

**Sample Comments:** **REFLECT THE ECONOMIC AND SOCIAL NEEDS OF HUMANS -** *More emphasis needs to be placed on American people than on animals and elite groups trying to limit use of lands in the name of ecosystem management. (Individual, Valley, WA - Letter #W803)*

*We suggest that the measure of integrity should be the ability to provide the multiple use outputs of MUSY, NFMA and FLPMA in the context of the primary purposes for which the lands were established. (County Agency or Elected Official, Canyon City, OR - Letter #W4580)*

*[The] presumption appears to be that the presence of man is bad, that the use of resources by man is bad, and that the only recourse is to eliminate access and exclude man from the forest environment. The real science proves them wrong. (Individual, Libby, MT - Letter #W973)*

*We are on the verge of making disastrous mistakes when we start forcing people out of work, closing businesses, creating false security, etc., all in the name of the environment and saving the endangered species. At the same time one can sit back and watch our forests decline in health, die, burn up, and waste away, totally unmanaged but explained and excused as ecosystem management. Give me a break. (Individual, Palo Cedro, CA - Letter #W2112)*

*The ICBEMP proposes a radical departure from a multiple use management scheme to a new, untested method that will drastically reduce the future levels of output, and will have profound economic and social impacts to all communities in the project area. (Natural Resource-based Business or Business Group, Englewood, CO - Letter #B78926)*

*Providing multiple human benefits must be done within the unspecified capabilities of ecosystems and the limitations of ecological integrity, health and diversity. The idea of limiting human endeavors in favor of ecosystem protection is further reinforced by three of the five goals established for alternatives 3 through 7. (Natural Resource-based Business or Business Group, Woodbridge, VA - Letter #W564)*

*We believe that the frequent and vague references to the promotion of human and economic welfare in the DEIS reflect purposefully deceitful rhetoric crafted to obscure that ICBEMP is designed to ultimately end the legitimate and productive non-recreational use of public lands. (Wise-Use Group, Elko, NV - Letter #W1394)*

*The DEIS should clearly state that the statutory direction being established by this document is that public lands will be managed to provide threatened or endangered species excessive safety margins at the expense of other uses. You should then explain how the above statutory interpretation squares with the multiple use mandates of both agencies. (Natural Resource-based Business or Business Group, Wallowa, OR - Letter #W3761)*

**Sample Comments:**

**EMPHASIZE THE PROTECTION OF ALL LIVING CREATURES -**  
*ICBEMP should have assembled for about an hour and gone home -- after issuing the following statement, 'Ecosystems are part of Nature, vital to human survival, must be preserved and maintained at all costs, and any attempt to manage them should be guided by simple common sense.' Had that happened, we would have saved four years, 35 million dollars, and ended up with a plan that had some merit and realistic potential. (Conservation / Environmental Group, Bates, OR - Letter #W222)*

*In the Framework Document, ICBEMP attempted to redefine the term ecosystem by insisting that people are part of, not separate from, ecosystems. In addition to the natural components recognized by everyone else, ICBEMP insisted upon a social component (including such factors as culture, community, economy, and politics) being not just part of ecosystems, but at the very heart of them. They didn't say that humans can affect ecosystems in various ways (which is obvious), but that we are actually organisms operating within every ecological system. Before ICBEMP, each organism in an ecosystem occupied a niche - that is, performed certain functions or roles vital to other organisms and ultimately to the welfare and proper functioning of the entire system. ICBEMP didn't attempt to define or designate the niche occupied by humans in the planets myriad ecosystems. Instead they simply ignored the matter and refused to discuss it. Furthermore, we are never told what people are parts of what ecosystems. For example, if we are talking about the Mountain Hemlock zone in the Wallowa Mountains, would it be only people hiking trails? People living in the nearest town? In Boise, ID? In Denver, CO? Chicago? Miami? Lisbon? Calcutta? Or where? We would love to see ICBEMP folks draw that line and defend their decision. (Conservation / Environmental Group, Bates, OR - Letter #W222)*

*Multiple use management provides little guidance in terms of actual management practices, and can be very misleading when used to describe management direction. Although multiple use should assure a consideration of various resource uses, most regulatory and management interpretations do not expressly provide for conservation of salmonid habitats and resources. (Conservation / Environmental Group, Arlington, VA - Letter #B4789)*

*The first priority for multiple use of Federal lands is to ensure the health of biological diversity. (Conservation / Environmental Group, Arlington, VA - Letter #B4789)*

*More roads, logging, and mining will make major contributions to the destruction of the ecosystems involved. Trees may seem to be merely a commodity for economic exploitation to you, but they contain a life force that matures in a unique way, and which takes centuries to replace. If we do not begin work with a bigger picture in terms of respecting all life forms on this planet, we may find ourselves to be the most expendable species in the end. (Individual, Malden, MA - Letter #B2519)*

*The ecosystem does just fine without human interference. (Individual, Stevensville, MT - Letter #B4507)*

## **1.2.2 Health and Integrity**

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The perceived lack of any solid, unambiguous definition for ecological health or ecological integrity causes concern for many, who believe there is no meaning for such terms that can pass peer-review. Some assert that the absence of clear definitions will necessitate a reliance on subjectivity and inexact science, and they call for quantitative and absolute data regarding the health of the area. Distrust of government planners and officials informs a notion expressed by some that the language of ecological sciences is deliberately vague in order for officials to take whatever action they like, and justify it with ambiguous terms and concepts.

Citing a perception that extractive industries have severely compromised ecosystem health and integrity, numerous respondents admonish decision-makers to enact a plan that assures the preservation and restoration of the lands and waters in the project area. In language frequently emotional and urgent, many people assert activities such as road building, commercial logging, grazing, and mining have damaged valued indicators of ecosystem health and biodiversity such as old-growth forests, clean air and water, roadless areas, recreational opportunities, and productive fisheries.

Some state that the project emphasizes active management and resource extraction too much, missing what one respondent calls a unique opportunity to restore and preserve a part of the nation that many describe as clean, wild, and beautiful. These respondents say resource extraction should take place only when ecological health will not be compromised, if at all. Some who share this view favor Alternative 7 as the preferred alternative; others find failures with all the alternatives, and call for a new conservation alternative.

Some say nature itself, rather than active management, can best restore degraded landscapes to a healthier and more productive condition. These respondents assert that the preferred alternative's emphasis on active restoration of damaged lands represents further concessions and tax-payer subsidies to extractive business interests. Calling these activities "a recipe for disaster" and "business as usual," some feel that Alternative 4 will simply continue the actions many perceive as having degraded these lands for the past century. Underlying these concerns over ecosystem health is the feeling that Federal lands in the interior Columbia River Basin are a priceless legacy for future generations to inherit; many feel that the ecological integrity of these lands is important to people all over the United States, not just to those residing in the project area.

In contrast, others assert that active management and commodity production can be a tool in restoring ecosystem health. They state that silvicultural tools such as thinning, clearcuts, grazing, and prescribed fire can improve wildlife habitat and prevent destruction of resources by insects, disease, and catastrophic wildfire. Disagreeing with those who blame historical management activities for ecosystem problems, a few argue the land is in the best health it has been in recent history, thanks to resource extraction. They warn against reducing management activities in the name of healthy lands, claiming that a management approach which favors ecosystem health will also produce the greatest economic benefit by creating sustainable commodity outputs.

Many assert that humans are part of the of the ecosystem and that the project's "agenda" for ecosystem health fails to consider people's needs. They think the government is selling out to environmentalist pressures, foreseeing economic disaster for people, companies, and towns dependent on commodities produced by public lands.

**Issue:** *The Final EIS should emphasize ecological health as a primary goal.*

**Sample Comments:** *The communities of the Columbia Basin need the public resources that we all depend on to be managed for clean water, healthy forests (a healthy forest has diseases throughout its entire life just like humans get sick every once in a while), diverse economic opportunities that come from sustainable practices, protection of biodiversity and restoration of the degraded ecosystems. (Individual, Portland, OR - Letter #E27)*

*The DEIS does not address the causes of ecosystem damage such as road building, excessive logging, and grazing. I urge you to withdraw the DEIS until a strong conservation alternative has been completed. The ICBEMP represents a unique opportunity to set a precedent for environmentally responsible ecosystem management. (Individual, Washington, DC - Letter #W27)*

*Alternative 4, which would aggressively restore ecosystem health through active management, seems to miss one very important point. That is, that the areas deemed (by your own data) to have the highest ecological integrity are the national parks, federally designated wilderness areas, and remote canyon lands.... What better evidence that ecological health is (at least to an extent) linked to level of development in an area. These areas have largely been spared the impacts of timber extraction, road building and other associated disturbances. (Individual, Sioux Falls, SD - Letter #B110)*

*What are we leaving to our kids? Will it be used up, laid to waste and turned to pocket change? Can you face your children or relatives' children and know that their future is only worth what we made yesterday? Where will they go to get rich off the land once these lands fail, which they will at present rates? What example are we setting for them to follow? Remember that the ripples we make in this pool of life, our childrens' children will feel. In our attempt to make a quick buck our cost/risk/benefit equation gets all screwed up. We are now making decisions that will have ramifications for generations. (Individual, Shartlesville, PA - Letter #W193)*

*It is time to recognize the intrinsic value of wild land and wild places with wild non-humans unrelated to human comfort and convenience. The arrogance exhibited by the DEIS that identifies and considers and then proceeds with business as usual in unconscionable. I am outraged. There is far more than a high correlation between roadless and biological diversity. Our public lands must be managed for long-term biological diversity and natural processes and not short-term human gain. (Individual, Darby, MT - Letter #W228)*

*I do not believe that such a thing as ecosystem management will or can occur under our present system of politics, fragmented and degraded lands, conflicting motives and exponentially growing population and consumption. (Individual, Anacortes, WA - Letter #W466)*

**Issue:** *The Final EIS should have quantifiable definitions for ecosystem health and ecosystem integrity.*

**Sample Comments:** *[This is] an example of the soft science likely to generate greater distrust in the dependence on the classification of lands by their ecological integrity and resiliency. As defined, these classifications are vulnerable to challenge as vague and unreproducible even if that's the best we can presently do with ecosystem evaluation. A more quantitative approach is needed to convince both sides of the need-for-management argument. Numerical descriptions of absolutes and trends will carry more weight with the involved publics. Disparate urban/rural populations and economic interests will require truly convincing arguments unclouded by social science jargon. (Professional Society, Eatonville, WA - Letter #W573)*

*There are 12 different definitions of ecosystem in the Draft Glossary, yet none include the human element, which is and has been a part for quite some time? And the definition of ecosystem health makes it sound as if nature was a static condition, which it is not and never will be, no matter how we manage it. And who will decide when the area has reached the quality of being complete? The whole universe is in a constant state of change, never reaching a sense of wholeness. (Individual, Troy, MT - Letter #W849)*

*Ecosystem health doesn't mean anything. Ecosystems are not living, breathing entities, or even living vegetation. An ecosystem is a combination of a multitude of events, situations, conditions, slopes, aspect, elevation, climate, catastrophic events, disturbances, plants, animals, fungi, bacteria, and the list goes on and on and on over time. And, ecosystems change from day to day. To look at such vast areas of wildlands, containing such enormous opportunities for variation, and attempt to determine health is ludicrous. Health is given credibility by the planners in order to give them the authority to do about anything they damn well please in the future in the name of forest health. Forests don't respond to medicine or one or two treatments. They respond to multiple treatments, applied over vast areas, to produce and maintain benefits. That is management. Health is not an appropriate term or concept. Health, integrity, sustainability and function are all meaningless terms to apply to an ecosystem. (Individual, Libby, MT - Letter #W973)*

*To some, forest health or a healthy ecosystem is one largely devoid of human interaction and is achieved primarily by leaving the land alone. For resource users (which all humans are) a healthy ecosystem is one that produces food, clothing, shelter, recreation, and beauty. These polarized views have been around for quite some time; it remains unresolved how ecosystem management proposes to cure this situation. What the agencies have proposed in the ICBEMP strategy is that resource outputs will somehow magically appear if they manage for ecosystems. To varying extent, the agencies have produced a straw man, the ecosystem, to deflect having to take responsibility for making hard decisions and commitments to people.... Ecosystem health problems are caused by a combination of factors that include vegetation species changes resistant to fire, abnormally dense strands of vegetation with lowered tolerance to drought stress and insect attacks, fuel ladders and high levels of accumulated debris, etc. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*All ecosystems are dynamic. Static ecosystems do not exist. Attempting to distinguish between healthy and unhealthy ecosystems on the basis of dynamism is akin to trying to distinguish between good and bad major league baseball teams on the basis of whether or not they wear uniforms during games. Vagueness prevents the remainder of the explanation of ecosystem self-repair from providing useful guidance. For example, the Mt. St. Helens ecosystems is surely unhealthy according to the standard suggested. Compared to pre-eruption conditions: it no longer produces diverse populations of biota, its waters are fouled, and its soils are in some places not-existent. However, the standard contains sufficient waffle room so that the opposite conclusion can also be reached. Since in healthy ecosystems recovery from disturbances may take varying amounts of time and specific conditions may look different afterward, we can consider the facts that biota have returned, natural processes are converting sterile volcanic debris into soil, and the water and air are cleaner now than during the disturbance event, and conclude that the Mt. St. Helens ecosystem is perfectly healthy after all. (Natural Resource Based Business or Business Group, Bozeman, MT - Letter #B77931)*

*The concept of terrestrial integrity, as presented in Chapter 2, has serious flaws as a concept for ecosystem management of terrestrial organisms in the Interior Columbia River Basin. The three concepts for defining terrestrial integrity include species viability, evolutionary potential, and ecological scales - evolutionary time frames. As presented, these concepts are based on single, legally designated species, rare endemics, and fringe populations. There is no attempt to define vegetation or wildlife in terms of vegetation or wildlife communities, species or community densities, species or community diversities, species or community biomass, abundances, or any other ecological concepts that characterizes animal components of a system as a whole. Consequently, the concept of terrestrial integrity in this draft does not represent overall measurements of ecosystems. These concepts measure, in fact, the reciprocal of ecosystem integrity and are biased against parameters that measure systems as a whole entity. Either revise this concept to include a significant measure of total ecosystem health or delete it altogether. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should promote management activities that increase ecosystem health.*

**Sample Comments:** **ACTIVE MANAGEMENT CAN PROMOTE ECOSYSTEM HEALTH -**  
*Our forests and rangelands can sustain timber harvest and grazing while maintaining balance between man, beast, fish and fowl. (Individual, Troy, MT - Letter #W729)*

*To attribute the lack of ecosystem health solely to land management actions such as fire suppression, over harvest of timber, and overgrazing is misleading and will lead to ill-founded decisions. (Individual, Seattle, WA - Letter #W881)*

*[The DEIS] is driven to advance two general concepts: anti-human and nature knows best. Those concepts are accepted without critical evaluations. The reports and reasoning clearly indicated that the team writers consider human species unwanted on Federal lands. Whatever the humans do is undesirable and nature knows best. Reduction of human use is the goal in an unbalanced way in that nowhere is it even hinted that nature can be improved upon. (Individual, Why, AZ - Letter #B4704)*

**Sample Comments:** **ACTIVE MANAGEMENT CANNOT PROMOTE ECOSYSTEM HEALTH -**  
*I feel the protections proposed by the project are not nearly adequate to preserve this ecosystem and that they will merely allow the mining, logging and grazing to continue, though under new acceptable names. (Individual, Ashland, OR - Letter #B75755)*

*We have found time and time again that we do not understand ecosystems well enough yet to be able to intervene with the confidence of doing more good than harm. Our past forest and range management practices have obviously contributed a great deal to our present deteriorating ecosystem. (Individual, Omak, WA - Letter #W948)*

*Your plan to restore the health of the forest ecosystems in the Northwest by increasing logging and road building on these natural lands is abhorrent to me. Your ideas seem to be nothing more than plans to completely destroy all the natural characteristics of forests and wildlands. (Individual, Klamath Falls, OR - Letter #W772)*

## 1.2.3 Restoration

In the opinions of many, public lands within the interior Columbia River Basin require restoration because of a history of management activities which they feel have been detrimental to ecosystem health. There is disagreement, however, on the level and type of management activities people feel should be a part of the restoration efforts.

Citing a belief that nature can best heal itself without the interference of human management, some respondents favor a passive restoration scheme including biological reserves, which they feel would protect ecological health and allow degraded areas to heal. These advocates of passive restoration claim the active methods suggested in the Draft EISs are, to a large degree, the same activities that degraded the region in the first place.

Conversely, those who support active restoration point to excessive fuel build-up in the forests, dead and decaying trees, and infestation by insects and disease as evidence of need. Suggestions for active restoration include such activities as prescribed fire, thinning timber stands, removing roads, and controlling non-native plants. Painting a forest health crisis picture, they protest what they see as a 50- or 70-year time frame for restoration activities in the project area as too long of a timeframe to tackle issues that need to be addressed through active management today.

Some of these respondents maintain that timber harvest should go beyond pre-commercial thinning. They feel that science has shown there is a place for silvicultural techniques in improving forest health, but that these techniques are being ignored by the agencies. They view commercial activities and harvest prescriptions as helpful to restore ecosystem health, and insist that private lands alone will not be able to supply a growing demand for commodities if extractive activities were to be severely curtailed on public lands.

***Issue: The Final EIS should re-examine restoration prescriptions.***

***Sample Comments: PASSIVE RESTORATION OVER ACTIVE MANAGEMENT -***

*The DEIS' preferred alternative proposes to continue destructive activities (such as road building in remote areas, logging old-growth forests, and grazing by domestic livestock in sensitive riparian and dryland areas), and then somehow 'restoring' them. ....Once these lands have been degraded, it is very difficult, expensive, and sometimes impossible to rehabilitate. Granted, much of our public land has already been damaged, and restoration work will be necessary. But this ongoing restoration should not be used to justify the continuation of the extractive activities that are responsible for causing this damage. (Individual, Yakima, WA - Letter #W631)*

*I find your definition of "restoration" that includes logging, grazing, and mining to be a misleading euphemism. (Individual, Darby, MT - Letter #W228)*

**Sample Comments: ACTIVE AND AGGRESSIVE RESTORATION -**

*Give local foresters the tools they need to properly, actively, manage the forests. Active, progressive management of the forest is the only way to avert a disaster of catastrophic proportions! (Individual, Oldtown, ID - Letter #B79117)*

*We find that the DEIS preferred alternative falls short of meeting the purpose and need statement. One of these areas is the purpose and the need to restore and maintain long-term ecosystem health and ecological integrity. Our main concern is that the preferred alternative does not adequately speak to salvage of much of the dead and dying timber that is present throughout the area. The theme of the preferred alternative is supposedly to do aggressive restoration, but we do not see that here. The means to accomplish restoration is commercial silvicultural treatments. Realistically there is no other way that restoration on such a broad scale is going to be accomplished. (Business Group, Prineville, OR - Letter #W746)*

*Even on public lands intensive forest production will be needed to meet increasing societal needs. Ecological integrity can be maintained for the aquatic, riparian and other sensitive systems and also on a landscape basis, but some priority areas with high productive capabilities should be dedicated to production of goods and services over the long term. We feel it is essential to dedicate priority Intensive strategy or production areas on public lands in order to retain the opportunity for Multiple Benefits and Preservation areas. The challenge is to develop an accepted balance between these strategies. Ecosystem management concepts integrate with the Multiple benefits strategy. It is a logical adjustment of past multiple-use practices that recognizes the need to consider ecosystem dynamics. The emphasis for eco-system management should concentrate on these lands. Recognize ecosystem management as an extension of multiple use management, and the need for Intensive, Preservation and Multiple benefits areas. Continue to develop consensus for a balance of these three strategies. (Professional Societies, Eatonville, WA - Letter #W573)*

*I believe that the DEIS's require, at the very least, a major rework because none of the alternatives adequately support the "aggressive active management approach" determined as needed by the Project's own scientific findings. Management direction is light on guidelines and heavy on standards. (Individual, Libby, MT - Letter #W852)*

*We understand the need for a primary focus on restoration work, but we do not understand why there is no direction for timber management (aside from restoration) in accordance with the multiple use principles written into Federal land management law. (State Agency or Elected Official, Salem, OR - Letter #W4827)*

*Multiple-use objectives, particularly timber production, are relegated to a by-product of ecosystem restoration rather than being treated as objectives to be achieved through the ICBEMP strategy. (Natural Resource-based Business or Business Group, John Day, OR - Letter #W4829)*

*The overriding goal outlined in the DEIS preferred alternative is maintenance and restoration of the ecological health of vast landscapes under Federal jurisdiction. The traditional emphasis on multiple use of Federal land resources has been discarded. In its place, Federal land managers have substituted a focus on the maintenance and protection of ecosystem integrity. (State Agency or Elected Official, Boise, ID - Letter #B77953)*

**Sample Comments: PASSIVE MANAGEMENT AND TIME CONSTRAINTS -**

*Ecosystem health will not be restored in a reasonable length of time, since you are relying on passive rather than active management. The risk of wild fires, insects and disease on forest health has been greatly under-estimated. Scientific studies which show that timber harvest improves forest health have been ignored. I feel that too much emphasis has been placed on philosophy and theory and not enough on active restoration activities. (Individual, Elgin, OR - Letter #W1819)*

*All alternatives fail to restore ecosystem health in a reasonable period of time... that is within the 10- to 15-year horizon of this plan. (Business Group, La Grande, OR - Letter #W686)*

*The proposed rates of restoration (probably in recognition of the vulnerability of funding) are too slow to be effective under any alternative. (Business Group, Salem, OR - Letter #W759)*

## **1.2.4 Ecosystem Analysis at the Watershed Scale**

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Many comments are directed at ecosystem analyses at the watershed level, which would be completed after a Record of Decision is issued for the project to identify management opportunities that fit local conditions and opportunities. Pointing out that the Draft EISs reveal very little about this aspect of implementing the project, some assert these watershed analyses should provide clear, concise standards and direction for specific resource management activities. Many, however, question just how any watershed analysis will accomplish this goal. Some feel that directions in the interim fish recovery plans (PACFISH and INFISH) already are too restrictive and would become even more constrained after ecosystem analysis is completed.

Some question whether watershed analysis is necessary at all. Because analyses would be tiered from basin to subbasin to watershed levels, some respondents have doubts about the analyses' applicability to specific areas and anticipate interminable delays in their completion. They fear that the process will become a bureaucratic bottleneck, and they assert that the purpose and need of the Draft EISs—whether restoring ecosystem functioning or providing goods and services—will be held hostage to another planning process. These people believe that even if the process is viable, the agencies will not have adequate funding to accomplish analyses.

Some feel that because NEPA already provides site-specific impact analysis, watershed analysis simply is not necessary. Others feel that watershed analysis does not consider a range of possible management activities and is not legally required.

Arguing that watershed analysis is necessary to estimate environmental impacts, others feel more site-specific data on existing environmental conditions is a prerequisite for determining if any management activities are appropriate for a given piece of land. Many feel that if any activities are deemed appropriate, then watershed analysis is needed to fully estimate environmental consequences. Watershed analysis, its advocates assert, is especially needed when trying to estimate impacts from prescribed burning, which include weed invasion, sedimentation and stream channel morphology impacts in rare fish habitats, human safety and healthy concerns, and the possible loss of native plant species.

Many believe that the findings of watershed analysis will be difficult to quantify. Many feel that rather than postponing watershed analysis until after the Record of Decision is issued, the environmental effects of the alternatives could be stated more clearly in the Final EIS if the analyses were completed as part of the scientific assessment. Some expressed fear that no management activities will be possible until watershed analyses are completed. Whereas, others think local managers will use this as an opportunity to implement any projects according to their own interpretation of the data from watershed analysis. Respondents suggest the use of agency and peer review to ensure compliance with watershed analysis direction.

Although some people appreciate that an analysis of ecosystems requires the use of hydrologic units, they feel that this methodology may not be a perfect tool and that ecosystem analysis must encompass issues on both a broader and finer scale. They argue that adjoining watersheds are not necessarily ecologically isolated, and management in one can affect the other. Many are concerned that because resources such as plants and animals or even roads cross these boundaries, any analysis must consider different management activities, such as prescribed burning, grazing practices, and transportation plans. Others argue that ecological variations within any given watershed must be closely examined in any analysis. They state that this ecological variability can include conflicting management strategies for private lands, or other public lands. Some feel watershed analysis is needed for all areas, while others recommend a screening process to identify any possible areas which might be exempt.

**Issue:** *The Final EIS should allow for watershed analysis to provide clear management direction.*

**Sample Comments:** *This DEIS does not provide land managers with any more assurance of consistent decision making than present direction does. Watershed analysis is only useful in the context of clear management standards. We endorse developing an alternative that clearly describes the Ecosystem Analysis at the Watershed Scale process and gives land managers clear direction for making land use decisions. (Conservation Group, Reno, NV - Letter #B75212)*

*Experience tells us that there are unacceptable risks involved when managers are given broad discretion to translate the results of watershed into management direction--e.g. management which does not retard or prevent attainment of management objectives. The Project's vision of watershed underscores the reason that the ICBEMP decision must incorporate measurable, enforcement default standards. (Natural Resource-based Businesses or Business Groups, Eugene, OR - Letter #W4658)*

*Ecosystem analysis at the watershed scale is an undefined entity. We cannot find with the body of the DEIS what this process actually entails, what technologies might be used to conduct the study, what data is to be collected and how it is to be used. (Natural Resource-based Businesses or Business Groups, Boise, ID - Letter #B4583)*

*Watershed analysis preparation or review does not require inclusion of interagency, intergovernmental participation, or peer review. There is no discussion in the DEIS how watershed products, reports or recommendations will be used to implement management decisions. We recommend the inclusion of agencies, tribes and possible peer review in the WA process, and a clear process for implementing their recommendations. (Individual, Portland, OR, - Letter #W840)*

**Issue:** *Watershed analysis should take place before a Final EIS is issued.*

**Sample Comments:** *Ecosystem analysis at the watershed level should be documented as part of the ICBEMP, not put off until some hazy future date. With this vital knowledge, grandiose ideas and guesses on outcomes of the DEIS-proposed ecosystem manipulation cannot be adequately assessed. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

*The draft EIS is not clear whether ecosystem analysis precludes any resource work being done prior to the completion of the analysis. In an ideal setting, ecosystem analysis would occur prior to any changed management activities. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

**Issue:** *The Final EIS should allow resource management to continue without delays related to watershed analysis.*

**Sample Comments:** *Is this intended to stop ongoing projects? The DEISs focus on additional analysis will come at high costs to taxpayers with very little benefit... Watershed analysis is not linked to the Desired Future Conditions in Forest Plan allocations and therefore should not be expected to provide context for many of the commodities the agencies are budgeted and expected to produce. The FEIS needs to provide clear objectives so project level proposals can answer the questions why here? and why now? The DEIS, Sub-basin Review, and Watershed Analysis do not help the line officers to answer those questions but rather focus on what should not be done and why it should not be done. (Individual, Walla Walla, WA - Letter #W3793)*

*The Eastside DEIS fails miserably to reveal the effects of the process decisions. This is particularly of concern for the multi-tiered planning process with ecosystem analysis on the watershed scale as its centerpiece. The Eastside DEIS explains that the Forest Service really does not know how much watershed analysis would occur in the first decade. Since watershed analysis is a prerequisite to many restoration activities, including timber harvest, and is the key process in achieving the purpose and need of the Eastside DEIS, the plan must indicate where and when watershed analysis will occur. (Natural Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*It appears UCRB will put the managing agencies in an analysis paralysis doing all the watershed analysis work. Regarding Alternative 4, are we expected to do an ecosystem analysis at the Watershed Scale for forest wide miscellaneous forest products? i.e...firewood, mushrooms, etc. (Individual, McCall, ID - Letter #B75382)*

*Until ecosystem analysis is performed, interim guidance would continue to be imposed under proposed plans. The interim guidance would remain in place for years. It resembles the old interim guidance, and in many cases would be more restrictive and contain difficult quantified standards. (Natural Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*Currently there is no process that will revise existing project-specific NEPA analysis schedules to include completion of high priority EAWS that were identified through the completion of the SBR process. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** *Watershed analysis should clearly identify environmental impacts.*

**Sample Comments:** *Although prescribed burning is a major restoration technique in ICBEMP, only a tiny area of land would undergo watershed analysis prior to being burned. This ignores everything from downstream threats to human health and safety impacts due to runoff events following burning in degraded watersheds. It fails to consider irreversible or long-term loss of native species following burning and invasion of annuals, to impacts of sedimentation, accelerated runoff, etc. from burned areas on rare fish habitats. (Conservation Group, Boise, ID - Letter #W3690)*

*Is watershed analysis at the watershed scale like suitability analysis? No. It should be based on 'capabilities and limitations of specific watersheds' (DEIS page 3-89) but it's not decision-oriented (doesn't identify lands suitable for grazing and prescribe management), it's not required for everything (as is 36 CFR [Section] 219,20), it's not done in forest planning as required in NFMA, it's not based on 'alternative uses foregone' as required in the regulations. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

**Issue:** *The Final EIS should ensure that watershed analysis consider effects of land management activities on whole ecosystems.*

**Sample Comments:** *We question the statement in Standards EM-S8 (Alternative 4) and EM-S12 that land management activities can proceed outside of Category 1 sub-basins in the absence of watershed analysis. Such analysis is critical to understand the ecosystem consequences of potential land management activities, and is at least as important in Category 2 and 3 sub-basins as in Category 1 sub-basins. Many units of the National Park System are within Category 2 and 3 sub-basins. These sub-basins are in great need of the restoration activities called for in Alternative 4; the effectiveness of such activities depends on the understanding to be gained through ecosystem analysis at the watershed level. (Federal Agency, Seattle, WA - Letter #W881)*

*Map 3-8 shows only small sections of certain drainages/watersheds undergoing ecosystem analysis. Major watersheds, such as the Owyhee River drainage in Oregon and Idaho (a wild and scenic river in Oregon), where there is serious documented ongoing harm being caused by livestock (BLM-Draft Owyhee RMP 1996), and a host of special resource values - including California bighorn sheep, rare plants, numerous WSAs, several tributary drainages which have been determined eligible for wild and scenic river status - would not have watershed analysis occur before prescribed fire, and highly fragmented and disconnected portions of the landscape would undergo ecosystem analysis. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

*The Draft EIS is lacking any recognition of the relationship of private land to public land in watershed scale ecosystem analysis. Support for collaborative full watershed across public and private boundaries should be promoted in the Draft EIS. Ecosystem analysis for all lands in contiguous area, irrespective of ownership, is desirable in mixed ownership watersheds... Often watersheds are under multi-ownership and a fear does or may exist that issues and recommendations for their solution will be applied to private as well as public lands. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*DEIS 3:174 is inaccurate when it states that lands would be managed as a whole within watershed and as connected lands between watersheds. ICBEMP proposes only very limited watershed analysis. Under all alternatives, large acreage would be omitted from analysis, and not managed as ecosystems. (Conservation/Environment Group, Boise, ID - Letter #W3690)*

*Appendix 3-1, page 217, para 5. Problem Statement: A screening process for identifying when ecosystem analysis is needed is not included in this Appendix. Supporting Evidence: The paragraph indicated that the agencies will develop a screening process to determine when ecosystem analysis at the landscape (watershed) scale needs to be performed, but is not specified here, nor in Table 3-5. Lack of a specified screening process in the DEIS makes it difficult to understand the effects of proposed alternatives. Recommendation: A screening process is needed to disclose and ensure the planning linkages between the broad scale and the fine scale, and identify exemptions from ecosystem analysis. (Natural Resource-based Business or Business Groups, LaGrande, OR - Letter #W686)*

*Ecosystem analysis at the watershed level is likely to be at a scale that is too fine for preparing Access and Travel Management plans. Most sub-watersheds are not large enough for transportation planning in isolation from surrounding Federal lands. Recommendation: Remove this and other standards that are not implementable. (Natural Resource-based Business or Business Groups, La Grande, OR - Letter #W686)*

## 1.2.5 Reserves

Many people suggest creating biological reserves in the interior Columbia River Basin to conserve biological diversity and to maintain or restore ecological health. They argue that old-growth forests, riparian regions, fish and wildlife, and roadless areas, must have protection to meet the project's stated purpose and need. Numerous respondents assert that many of the few remaining intact ecosystems left in the country are found in the planning area, and this project, in their view, is the last chance to protect remnants of disappearing ecosystems for future generations.

There is some disagreement about how to manage reserves. A hands-off management approach to the management of lands administered by the BLM and Forest Service in the project area is desired by some as opposed to ecosystem management. They perceive that ecosystem management requires considerations of economic and social values in management decisions. Others feel that active restoration, such as removing roads and prescribed burning, is necessary to first return potential reserve areas to ecological integrity. Many of these individuals do not want any type of timber harvesting, mining, or grazing in these areas, and suggest that non-native species be controlled to ensure that reserves function as intact natural ecosystems.

Those opposed to reserves feel designation of these areas would preclude proper management for wildfires, wildlife, noxious weeds, and a predictable flow of commodities from the public lands.

Many people complain that only one alternative in the Draft EIS proposes a series of reserves. Some feel that even these areas are too small to maintain ecological integrity and far too fragmented from each other. The preferred alternative has support from some, but only if it is modified to include all or part of the identified reserves suggested in Alternative 7. Some question the likelihood of funding for the active restoration proposed under the preferred alternative, suggesting that passive management in reserves is a more realistic and effective method to restore ecological health. Some people feel that reserves should be created next to existing wilderness areas and national parks to provide core habitat for wildlife species. They think that areas other than those proposed in the Draft EISs should be considered because of their high biological integrity.

**Issue:** *The Final EIS should use reserves to restore ecological health.*

**Sample Comments:** **EMPHASIZE RESERVES -**

*Reserves containing wildlands must be established and said reserves must prevent logging or any other activities that will disturb the plant and animal world. These must prevent mining and other extractions including mineral and non-mineral items. Logging and access roads will not be installed in these reserves and wildlands. Everything in the reserves must be protected and allowed to develop in a natural way. No timber harvest or extractions will be permitted. (Individual, Roseburg, OR - Letter #W747)*

*The agencies' scientific information confirms that old growth forests and native grasslands have been depleted, and watersheds, habitats, and soils have been degraded, putting fish and wildlife at risk. Unless these problems are addressed, the Forest Service and the Bureau of Land Management are likely to continue with the business-as-usual management that has degraded these lands and waters over the past 100 years. (Individual, Rupert, ID - Letter #B4881)*

*There should be a scientifically-based system of reserves with the goals of conserving biological diversity and maintaining or restoring ecological integrity because we have so few old-growth of riparian areas left in a pristine state in this country that some of this must be preserved for our posterity. (Individual, Newcastle, WA - Letter #E13)*

*Reserves are too essential an element of our understanding of conservation biology to be ignored in this planning process. In particular, there needs to be clear protection of forested roadless areas, as well as those areas of aquatic and grassland ecosystems that still preserve essential elements of native biodiversity. Reserves need to be protected from commercial timber harvest, especially removal of large and/or old trees, and they also need to have cattle grazing removed. (Individual, Portland, OR - Letter #W4730)*

*The final Columbia Basin plan must include a scientifically-based system of reserves with the goals of conserving biological diversity and restoring ecological health. We need to remember that so-called scientists of the far Right-Wing interests in Congress and of the timber, mining, grazing, and oil-and-gas industries are not true scientists. They have no real scientific basis for their arguments or reasons for continuing extractive and development practices that destroy forests and related ecological and biologically-essential wildlands areas. We need a sound scientifically based system of reserves which plans for the long-term health of multiple ecosystems and for the welfare of future generations. (Individual, Kaysville, UT - Letter #B76357)*

*70% of the healthy big wild ecosystems left in the lower 48 are found in the UCRB. Unfortunately, the DEIS fails to recognize and protect these remaining healthy ecosystems with scientific information: 1. Integrate all major scientific finds in Highlighted Scientific Findings of the Interior Columbia Basin Ecosystem Projects, General Technical Report PNW-GTR-404 (May 2997) 2. Integrate all major scientific findings in a Status of the Interior Columbia Basin-Summary of Scientific Findings, General Technical Report PNW-GTR-385 (Nov. 1996) 3. Integrate all major scientific findings in Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin., General Technical Report PNW-GTR-382 (Sept. 1996) (Conservation/Environmental Group, Hungry Horse, MT - Letter #B81)*

*Only one of the alternatives examined designated reserves, and that alternative was not the chosen as the preferred alternative by the agency team. (Individual, Portland, OR - Letter #E25)*

*The preferred option does not adequately protect the fragile ecosystems of the Columbia Basin. There are no areas specifically set aside for ecological reserves. (Individual, Spokane, WA - Letter #W602)*

*Unfortunately, the Columbia Basin Ecosystem Management Project Plan, the BLM and the Forest Service propose no new reserves in the basin. I am now convinced that both the Forest Service and the BLM in the West will not be happy until all of America's wild virgin forests and wildlife are completely wiped out to extinction! (Individual, Redding, CA - Letter #W632)*

*We believe that there is little evidence to suggest that the full range of biological diversity can be maintained at an eco-regional scale without establishing a set of biological reserves specifically managed to maintain biological diversity. Therefore, Alternative 4 is inadequate for this purpose without incorporating some aspects of Alternative 7. (Conservation/Environmental Group, Boulder, CO - Letter #W3676)*

**Sample Comments: DON'T EMPHASIZE RESERVES -**

*We strongly oppose alternative number 7 whereas placement of land into reserves will not adequately address proper resource management for wildfires, wildlife, noxious weeds and a predictable, stable harvest of our timber, mineral, and rangeland resources. (County Agency or Elected Official, Burley, ID, Letter #B78695)*

**Sample Comments: MANAGEMENT OPTIONS FOR RESERVES -**

*The Reserves are not defined and it is unclear what their relationship is with classified Wilderness. It seems that Wilderness meets the ecosystem management definition of 'reserves'. Display wilderness areas as Reserves in all alternatives. The reserve management has an entirely different emphasis and focus than the anthropocentric and utilitarian ecosystem management. These two approaches need to have different names. We recommend ecosystem management be considered management that integrates ecological capabilities with social values and economic relationships. (DEIS Glossary). And even though the passive or reserve management also considers ecosystems, this management should be called wilderness, reserve or natural area management. This would eliminate a major source of confusion for ecosystem management as it is now presented. The two approaches cannot both be labeled 'ecosystem management.'*" (Professional Society, Eatonville, WA - Letter #W573)

*Without reserves the current preferred alternative relies completely upon intensive management and restoration, both of which are needed within the Columbia Basin but which are not needed everywhere at once and cannot be implemented with any semblance of a realistic budget. By designating reserves, there are the immediate benefits that active restoration and intensive management can be implemented in a much more focused manner. (Conservation/Environmental Group, Portland, OR - Letter #W502)*

*The management plan should allow road removal, prescribed fire and control of non-native species as necessary to achieve the goals of the reserve system. Without such guidance, no plan can assure that the agencies will make the transition from logging to protection and restoration of ecological values. (Individual, Oroville, WA - Letter #E11)*

*We do not have to choose between restoration and reserves as some have stated. Forests do not need to be thinned to be healthy. In fact, the erosion, fragmentation of habitat, encouragement of invasive species and destruction of wilderness far outweigh any benefits from logging. (Individual, Knoxville, TN - Letter #B75378)*

*What is needed is at least one alternative that emphasizes a credible reserve design while also emphasizing monitoring and adaptive management, and the restoration of degraded watersheds, ecosystems, and key ecological processes and functions. Many of the alternatives in the Draft EIS documents address one or more of these key topics, but none effectively combines all of them as a single package. (Conservation/Environmental Group, Eugene, OR - Letter #W4661)*

**Issue: More reserves than those identified in Alternative 7 should be included in the Final EIS.**

**Sample Comments:** *Even Alternative 7, which poses as the best of the lot, shows no recognition that a few isolated reserves is not the same as an intact ecosystem... if you take a magnificent Persian carpet 12 x 18 ft. and cut it into 36 pieces, you don't get 36 beautiful Persian throw-rugs. You get three dozen worthless and unraveling fragments with no discernible pattern. (Individual, Frenchglen, OR - Letter #W24)*

*The current Draft EIS contains only alternative seven which superficially addresses protection of reserved areas, however, alternative seven falls far, far short of what is required. A functional system of reserves would be accomplished by expanding the existing wilderness and national park units within the Columbia Basin to provide viable core habitat for all species associated with the ecosystem (i.e. as indicated by key species such as wolf, grizzly bear, salmon) and connecting these expanded core units with viable wildlife corridors to reverse current rates of rampant habitat destruction. (Individual, Richland, WA - Letter #W428)*

*ICBEMP proposes no reserves in the Owyhee Uplands--one of two zones of moderate rangeland ecological integrity, and no reserve in the 'Hotspot' of biodiversity in southern Idaho. These areas must be proposed as reserves. (Conservation/Environmental Groups, Boise, ID - Letter #W3690)*

*The selection criteria state that habitats that support rare or narrowly endemic species were included (DEIS 3-51). However, large areas of high endemism or biodiversity value (i.e. Centers of Endemism and Rarity or Biodiversity) identified by the Scientific Assessment were not included in the reserves. These types of areas should be included. (Individual, Missoula, MT - Letter #W3801)*

## Section 1.3 ~ Scale/Decisions

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Many respondents feel that ICBEMP is one of the most ambitious planning endeavors in the history of the nation, and this concept alone inspires a broad spectrum of comments. Many people have questions or concerns with the scale of the project both in terms of effects analyses and in terms of its sheer geographic scope. The kinds of decisions that will be made, the far-reaching effects of these decisions, and the mechanisms and logistics of planning and implementation all cause reactions ranging from enthusiastic support to fear of a government attempting to do more than it should.

This section describes some of the broad public concerns regarding the scale of the project, the kinds of decisions that will be made, the use of science in the planning process, and the value of multiple layers of analysis, such as the subbasin review. The issue of the public's trust of the government's intentions and global issues such as climate change and United States sovereignty also appear in this section.

### 1.3.1 Scale

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Many people feel the broad-scale direction found in the Draft EISs is neither appropriate nor adequate to analyze and manage an area as vast, complex, and diverse as the interior Columbia River Basin. They note that the area contains a wide array of dissimilar landscapes and resources. Many believe only fine-scale study of National Forests, BLM Districts, watersheds, or landscape types will lead to effective management. Some think that the concept and definition of an ecosystem will always be elusive even on a small scale and that any attempt to manage at a larger scale is doomed to fail. They contend that even if an ecosystem can be defined, no agreement can be reached on its boundaries, let alone its health. Respondents believe that even if some small areas do show poor eco-logical health, the Draft EISs address only the broad-scale and do not provide appropriate remedial direction. Many feel that standards and objectives should be developed on a smaller scale and the project should only be a guideline for local land managers.

Many believe the broad-scale approach does not adequately recognize the on-the-ground knowledge and expertise of local land managers. They contend that the size of the project makes it unresponsive to local concerns and fosters inadequate collaboration with other agencies and affected parties. They feel that planning and management should not be controlled by a top-down approach, but rather directed on a case-by-case basis by local people who are familiar with the land. Many view the motive for using the broad approach not as sound ecological management, but rather as a matter of social and political control.

Some question the methodologies and data used to study ecosystems in the project area. They note that saying portions of land are in poor ecological condition should not be construed to mean that the whole landscape is unhealthy. They contend that classifications using this aggregated data gives a poor picture of the existing ecological condition of the interior Columbia River Basin, fail to portray site specific risks, and masks good ecological health.

People question how cumulative effects can be predicted from alternatives when ecosystem classification data varies in its scale and resolution, or when only sample data were used in the analysis. They feel forest and range clusters are artificial groupings which have more diversity than implied in the plan.

Others assert that the Draft EISs apply generalized objectives and standards to the whole project area when they should be used only for specific subjects such as wildlife habitat management. While at other times the project inappropriately mandates specific standards for the entire planning area, such as regarding road densities.

A contrasting opinion is that a broad outlook is needed to improve the ecological health of the interior Columbia River Basin rather than a piecemeal approach. Still others argue that there needs to be a marriage of the broad and fine scales by using intermediate, or landscape, analysis not only to ensure proper management, but also to gain public acceptance of the planning process.

**Issue:** *The Final EIS should offer guidelines and allow for standards to be developed through analysis at a finer scale.*

**Sample Comments:** *The ICBEMP DEISs are one-size-fits-all plans which rely too heavily on standards and not enough on guidelines... (Form Letter #225)*

*Ecosystem-based is an absurd term under the circumstances of the size of this vast areas. Also, the term ecosystem is not definable in a broad context. An ecosystem may be defined as a moss-filled crack in a sidewalk, a football field, or Lake Superior. The national forests are composed of millions of ecosystems, habitat types, and vegetation, soils, aspects, ... relationships. To attempt to plan at any level for an area the size of the ICRB, in one process, is ludicrous. (Individual, Libby, MT - Letter #W819)*

*Health is such a meaningless term when speaking of vast areas of unlike land and water. If there are forest health problems, they do not occur generally over large areas. They have historically occurred in localized areas on national forests... (Individual, Libby, MT - Letter #W819)*

*The definition of an Oregon landscape is so absolutely foreign to Northwest Montana that it may as well be the moon. Still you propose to develop management direction, management strategy, for both areas? I don't believe you should be attempting to do that. (Individual, Twin Falls, ID - Letter #W8119)*

*I had a youth baseball team last year outfitted with one size fits all caps. One was too large; two were small and three players couldn't wear them at all. The one size fits all concept in forest management doesn't work either. Let the local managers plan the use of our local forests. Is this a game of common sense or of power and control? (Individual, Panama City, FL - Letter #W2126).*

*We have long managed forests and rangelands by the ecosystem concept so it is not a new idea. However, we have done it by manageable units based on many ecological components, rather than by one enormous drainage based on only one animal - salmon. Most of southeastern Oregon and southern Idaho have much more in common with the Intermountain Basin than they do with the Columbia Basin. If we are going to develop EISs on such a broad scale, it would make more sense to include these areas in an EIS on the Intermountain Basin. (Individual, Twin Falls, ID - Letter #W1910)*

**Issue:** *The Final EIS should allow ecosystem management to be adaptable to local circumstances and conditions.*

**Sample Comments:** *I believe that the best management decisions are made by those closest to each situation - with hands-on, specific knowledge of a particular site and input from and coordination with locally affected parties. I am greatly disturbed that a top-down, cookie-cutter approach may be implemented and, therefore, reiterate my request for a record of no decision. (Individual, New London, NH - Letter #W2950)*

*To adequately address the Earth's needs, we need to start from the individual site and work up to a decision. (Individual, Stevensville, MT - Letter #B76889)*

*We are concerned that anytime one plan or option is used to manage this large of an area rather than more localized management, there is a tendency to be unresponsive to local concerns. Anytime local control is lost, common sense seems to be forgotten. (Individual, Imnaha, OR - Letter #W787)*

*Federal lands are lumped into degraded category, though it's plain to see the contrast between excellently managed tracts and those needing changes in grazing, etc. The over-all view is idealized, at the expense of troublesome data and conclusions from local community and larger management areas. This whole-country approach cannot properly identify the needs of each valley and slope. (Individual, Elgin, OR - Letter #W733)*

*The plan for use of the precious natural resource rich area should be planned and executed one parcel at a time by the local people who live on and around this area and therefore know what is best for its long term use... (Individual, Pendleton, OR - Letter #W1498)*

**Issue:** *The Final EIS should use data in its ecosystem analysis that is internally consistent across varying scales.*

**Sample Comments:** *There is an assumption by some that when they say over-grazing they have indicated a condition of all rangelands. This term is not a condition associated with vast acreage. It is only descriptive of site specific, species specific, and use specific land that has had a methodical examination through data collection and analysis... Clusters are too large of an area. They have more diverse management and risks associate than implied here. This glosses over the premise that ecosystem management can use the best science available and attain goals and objectives that have been set. These areas do not identify where the high, medium, and low integrity identification is occurring relative to private landowners range and forest. (Individual, La Grande, OR - Letter #W3806)*

*The Project has used the term "broad-scale" inconsistently to define the realm of environmental parameters to be included in the assessment, and therefore the decisions to be made. Supporting evidence: At times, the project applies hierarchy theory to broad-scale processes and conditions of the landscape that have coarse resolution and are manifest only by aggregation of finer level ones; however, at other times, the project considers very detailed, fine-scale processes and conditions (for example, species distribution, threatened and endangered species conditions) that are included only because they are widely distributed. This has caused the project to propose management direction that is inconsistent in its level of detail and prescriptiveness; at times, the proposed direction addresses broad ecosystem processes and conditions that may be manifest over small areas, but other times, it addresses fine-scale ones that occur over broad areas. Recommendation: This*

*distinction needs to be clarified in the Affected Environment chapter, and the conflict in management detail needs to be eliminated in Chapter 3 by eliminating fine-scale management direction. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*In ICBEMP's Commonly Asked Questions and Answers: Set 1 Question 6 - it is stated in some cases the broad scale data may not match the fine scale or conditions on a particular piece of ground. This statement is reasonable, however, in order to have scientifically sound broad scale data, it is essential that one have sound data on many particular pieces of ground, not just isolated anecdotal observations which are often cited in the Draft EIS as if they were broad scale data. (Individual, Clarkston, WA - Letter #W31114)*

*The proposed mid-scale assessment has been abandoned, reportedly because of technology problems. The CRBSUM model proved to be too cumbersome to run management scenarios using the mid-scale photo-interpreted data. Sub-basin or other analyses based on the broad-scale assessment will be too inaccurate for future revision of Forest Service/Bureau of Land Management land-use plans as suggested in DEIS standard EM-S4 (Chapter 3, page 89), implying additional future detailed analysis is required. By abandoning this effort, relationships among components in the existing environment, subsequent impact analysis in the Eastside DEIS is incomplete and inaccurate. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 1.3.2 Decisions

Identifying that each forest and landscape has unique features and needs, many people who oppose the project as described in the Draft EISs feel that local people should make local management decisions.

Many believe the project promotes a 'top-down' management philosophy, which fails in their view to adequately consider economic or social consequences. They note distant decision makers do not have to live with consequences of their management as local people must. Many decry what they perceive as an unnecessary move towards centralized control. Contesting the assumption that local agency personnel have more knowledge and experience, many demand that local authorities keep control over management. Working and living with natural resources, they argue, generates scientific knowledge and common sense lacked by those sitting at a desk far away. They state that centralized planning and decision-making for any enterprise always suffers from a loss of productivity, accountability, and quality.

Others take the opposite view: that the agencies have let local groups and commodity interests be too influential for too long, leading to the poor ecological consequences with which they now live. They assert that business as usual will further degrade the ecological health of the region.

A number of questions remain about how decisions made in the plan will be translated to decisions on the ground. Others worry that when faced with a specific land management decision, local agency managers will be bound to the final decision, even if goals are contradictory or make little sense in their local area. These respondents think that agency managers will be left to somehow balance vexing problems such as: reducing fire fuels vs. the need for downed wood, fire risks vs. impacts of harvest on aquatic resources, or watershed restoration vs. recreational opportunities. They predict local land managers will be straddled with hundreds of new standards and the "impossible" task of reconciling local land management plans with these new standards and direction or justifying any course of action that deviates from them. Respondents feel that the ultimate result will be uncertainty, confusion, and costly delays. Many suggest standards be more flexible and serve only as scientifically sound guidelines for local managers.

Questions are raised about whether a programmatic EIS should set standards which will directly address environmental concerns and determine timber harvesting levels without site-specific NEPA analysis. Specifically, one respondent, who cites an apparent lack of case law in support of providing standards for management in programmatic decisions, asks that the Final EIS explain the legal justification for this kind of action. Other comments related to this issue can also be found in Section 1.8 of this document, Relationship to Laws.

The sentiment that no Final EIS or Record of Decision should be developed was expressed by a number of respondents in relationship to this topic. This belief is based on two factors: (1) the BLM and Forest Service should return to their original intent to bring together scientific studies that would go directly to local land managers and not make it a decision document, and (2) not only should this not be a decision document but the science is so inconsistent that even the use of that information is questionable.

**Issue:** *The Final EIS should allow local people and ground-level administrators to make local resource decisions.*

**Sample Comments:** *Each forest, community, county, state has its own uniqueness as foreseen when national forest and state boundaries were adopted. The ICBEMP will create a top-down management philosophy. Land Management decisions are best formulated by a local planning committee. (Individual, Unity, OR - Letter #W774)*

*They also reiterated their strong support for natural resource planning and environmental management that features site-specific management decisions made by local decision makers, local citizenry and parties directly and personally affected by those land management decisions. (Natural Resource-based Business or Business Group, Cove, OR - Letter #W827)*

*Give it up. Give control back to local communities! The desired condition that has been predetermined should be scrapped and locals define that for each area. (Libby, MT - Letter #B1144)*

*Most environmental and natural resource experts in Federal, state government and the private sector... promote the Community-based Stewardship Approach. This approach with a scientific foundation also relies on flexible and adaptable implementation, and successfully addresses watershed and landscape visions... This is the approach needed for successful achievement of the larger vision. Contrary to the ecosystem approach, it begins at the local level with decisions, not at the top mandated by Federal compliance. (Natural Resource-based Business or Business Group, Fort Collins, CO - Letter #W528)*

*I am concerned that our forest would be managed by people that don't live here nor are familiar with local conditions i.e. forest, economic base, community impact, wildlife impact, or plants, or fire fuel build-up. We would be better served by our local forest managers with community input. (Eureka, MT - Letter #B4607)*

*Real problems such as increased fuel loading, bug kill, catastrophic forest fires, and uncontrolled spread of noxious weeds can only be addressed by real locally-implemented solutions (Wise-Use Group, Omak, WA - Letter #W758)*

*On page 27 for the most part site-specific direction has been deferred to local decision makers who are more familiar with individual site conditions and local needs. Some of the standards make this statement absurd... I feel the EIS would be much improved and would more closely follow its stated goals and purpose if all of the standards were titled possible or suggested standards. (Individual, Gooding, ID - Letter #B75387)*

*There is no mention in the DEIS of working cooperatively with grazing or other user permittees in the decision making process. Sustainable land management only works if all parties can be involved in the decision making process, and participate in the projects. A good example of cooperatively working to improve range in our area is the Morgan Creek Grazing Association. We would like to see language included in the preferred alternative to include permittees in the decision making process. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*I'd like people to see the value of regional ecosystem planning and therefore the public should be involved in decision making - not just loggers, ranchers, and miners. (Individual, Ashland, WI - Letter #W3678)*

*It is these same DEIS preparers who have in recent years logged healthy forests in the name of ecosystem health by using trumped up excuses to Kill it to save it, and have so willingly looked away from grazing harms and violations of law. We have zero confidence that these same bureaucrats, who have managed lands inflicted with the host of woes - from weeds to water quality problems - have suddenly gained great wisdom, and will manage lands any better or differently under Alternative 4. All Alternative 4 does is provide license to do rapid widespread ecological manipulation and harm with very limited bureaucratic accountability. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

**Issue: *The Forest Service and BLM should not issue a Final EIS or Record of Decision.***

**Sample Comments:** *Should not go to a record of decision. Our local studies at the local level have been put out to pasture on the upper Columbia Basin. We believe that there is too big of government trying to run our local environment. Every area needs to be treated differently according to soil, bugs, fish, fires, etc; the local people that live in this area need to decide how to work their back yard. Not the people that has never seen the state. (Individual, Emmett, ID - Letter #B80097)*

*Record of no decision... It bothers me that representatives from preservation and environmental groups from outside the ICBEMP region can have an influence over what happens here at home. We need the ability to manage and make decisions LOCALLY. (Individual, Cusick, WA - Letter #B80060)*

*I firmly believe that both the BLM and Forest Service should NOT go to a Record of Decision on this project! There has already been too much time and money spent on this top down management style of plan. Planning must be done at the local level, by people who are actively involved in the process and who will have to live with the results. (Individual, Kalispell, MT - Letter #B78908)*

*The information and analysis in the ICBEMP documents will be most useful if finalized as an integrated resource inventory and assessment, not management direction. Collecting and integrating information at the Basin level can provide a useful framework for planning and decision making at a more local level, particularly with regard to issues that transcend local boundaries, such as anadromous fish population viability. Some general, flexible guidance at the broad scale level can contribute to greater consistency in updating or establishing new direction in national forest and BLM district plans, and in completing site-specific project level analysis and prescriptions. However, attempting to establish binding prescriptive management direction at the geographic scale covered by the ICBEMP is not professionally or scientifically sound. Such top-down management is not otherwise justified.... (Professional Society, Boise, ID - Letter #B75495)*

**Issue: *The Final EIS should contain consistent and clear direction.***

*Many contradictory goals and directions exist (e.g. fire fuels vs. down wood for soil nutrients, stand type vs. big game habitat, road reduction for watershed restoration vs. recreational opportunity, risk of fire vs. risk of harvest/treatment on aquatic resources). It is not clear who will decide which way to go when tradeoffs are necessary. (Professional Society, Corvallis, OR - Letter #W4635)*

*One of the purposes of this project is to provide consistent direction at regional and sub-regional levels that will assist managers in making project decisions. I don't see any assisting going on here; instead it is directing. There is a distinct difference. I do not question the need for some consistency, but this has been carried to such excess that it is clear the real intention is not consistency but control. The DEIS at page 3/70 states that the local manager can modify the over 100 new standards where local conditions create a need to do so. This is a nice statement but simply is not the way it will work. Local managers neither have the resources, time, or expertise in some cases to do the type of research and documentation to support changes in the standards. If they attempt to, they undoubtedly will be challenged every step of the way through appeals and litigation by those seeking to prevent changes. (Civic Group, Eureka, MT - Letter #75619)*

*An effective region-wide approach is legally required under commitments made in treaties with Indian Tribes, international treaties, and other rebuilding efforts such as the Northwest Power Act's Fish and Wildlife Program. We already know what fish need, and this does not vary by watershed or by state. This EIS is the place to address these needs. However, Federal agencies have abdicated their responsibility by postponing development of standards that assure habitat protection and restoration to the next level of process. And so, once again, we are left with empty promises of trust us we'll get it right this time. (Tribe, Pendleton, OR - Letter #W625)*

*It is important to ensure that the public and decision makers do not assume that the timber harvest projects are management targets for any of the basin's administrative units, or that they will be used in any future decisions beyond this broad-scale, programmatic NEPA process... The proper place for timber supply decisions to be made is in the land use plan revision process, and in the planning of individual projects based on site-level inventories and assessments. Unfortunately, the Eastside DEIS sets expectations for timber quantities, and established a de facto upper limit on the production of goods and services, that is, a maximum threshold for production under all land use plans combined. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue: *The Final EIS should clarify the legality of including standards in a programmatic EIS.***

**Sample Comments:** *The ICBEMP usurps the power of Congress to manage Federal lands because the policy was adopted, not through Congressional statute as mandated in the Constitution, but through administrative rules coming down from government agencies... The Federal agencies involved in these projects of Ecosystem Planning have evaded the power extended to Congress by the Constitution in at least two critical ways: 1. Congress did not authorize development of ecosystem plans which would cut across management agency lines and which would develop one set of standards and guidelines to be used for all forest lands, and for all range lands, regardless of the differences existing among the public lands... 2. The ecosystem projects are being prepared outside the scope of Federal management agency regulations. (County Agency or Elected Official, Murphy, ID - Letter #B77171)*

*Chapter 1, page 16-18, Planning Consideration. Problem Statement: The legal findings of Sierra Club v. Roberston, 28 F3d 753 (8th Circuit 1994), twice states that programmatic decisions establish and provide guidelines for planning and forest management decisions. There does not appear to be any reference to programmatic decisions establishing or providing standards for management as the Eastside EIS does. Could the Eastside EIS be out of step with the cited court decision in that it puts forth standards as well as guidelines? Recommendation: Explain the legal justification for including standards in the programmatic decision document. Also, explain how a programmatic document that is expected to alter land use and yields of forest commodity outputs through adaptive management, as the Eastside EIS does, can not effectuate any on-the-ground environment changes? (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

### 1.3.3 Subbasin Review

Perceiving that subbasin reviews would involve large amounts of time and energy for coordinating among government agencies and tribes, some people question the assertion that these reviews will take only two to three weeks to gather the data and complete. Many feel that the quantity and types of data available are highly problematic as a validation tool. For example, some suggest that new mid-scale data may reveal little about existing broad-scale data, not to mention data that are estimated from limited samples or are anecdotal. Many fear that inconsistencies in the nature of data required by the subbasin review process will lengthen the time needed to approve implementation of management activities. People predict that if any information should be incorrect, new valid data will take a long time to gather. They feel that subbasin reviews will cross jurisdictional boundaries and private property, creating a problem.

A number of respondents ask that subbasin review objectives and standards clearly state that they will require a collaborative intergovernmental approach. These respondents feel that such collaboration means that subbasin reviews will require more than a brief validation as indicated in Standard EM-S1. They think the time required to evaluate the information contained in such reviews needs to be recognized as an early planning requirement. They suggest that rather than prescribing a timeframe, the Final EIS should outline the parameters of the review to assure completeness and consistency.

Some feel that unless there are compelling reasons, on-the-ground projects should not have to wait for completion of subbasin reviews, especially in areas where similar reviews have already addressed project issues. People fear lengthy delays in more ecologically complex areas, and they want local agency managers to have authority to continue activities without completion of subbasin reviews. They believe that forests, wildlife, water, and other resources will suffer from any management delays. Some think that people who depend on commodities from public lands also will suffer from any delays.

Another rationale for not requiring subbasin reviews some individuals assert is the extra layer of analysis perceived to be superimposed on local land managers. Many people refer to what they see as an extraordinary amount of data collection and wonder when and where it will stop. Between subbasin reviews and Ecosystem Analysis at the Watershed Scale (EAWS) plus land management plan revisions and amendments to the Forest Service Regional Guides, some people feel “enough is enough.”

An opposing view is that no management should take place until subbasin analyses have been completed. Whereas, another individual espouses the need for subbasin review to be completed prior to issuing a Final EIS to understand and verify the implications of all the alternatives.

Some feel the Final EIS should provide clear guidance about how administrative units will determine which subbasin reviews occur in the first, second, and third years of implementation. All subbasins have been categorized by cluster in the Draft EISs; it is not clear to the public whether results of subbasin review will supersede the cluster designations. Many feel that if a specific subbasin or watershed does not clearly fit into the pre-determined cluster, the Final EIS should state which designation takes precedence. The results of subbasin review should be considered the source of the best information to guide decision-making, rather than the clusters established in the Draft EISs.

Several modifications to the subbasin review process are suggested. Some propose reviews and authorization by the BLM State Director or Forest Service Regional Forester or by local managers under the auspices of approved unit plans. Others want better guidance and latitude for local managers to coordinate across administrative boundaries. Some question whether funding will be available for subbasin reviews, and they express concern that there are insufficient assurances that the results of analytical processes (subbasin review and Ecosystem Analysis at the Watershed Scale) will be used to direct land management planning and project implementation.

**Issue:** *The Final EIS should ensure that lengthy subbasin reviews will be avoided.*

**Sample Comments:** *A sub-basin-level validation process for the 3-year-long scientific assessment for the ICRB cannot be completed in a brief 2-to-3-week validation process, especially if existing information from all appropriate sources, including tribes, counties, states, etc. shall be used. Proposed subbasin review as described will fail for several reasons: 1) time required for intergovernmental coordination and data acquisition alone will greatly exceed 2 to 3 weeks; 2) data input from new sources at this mid-scale has a probability of near zero of validating the broad-scale analysis due to data inconsistencies that prevent aggregation and disaggregation... it is presumptuous to call the process a validation process when it is equally likely that the broad-scale data will be found invalid. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The Lower Grand Ronde Sub-basin Review, a pilot or trial of the analysis that was supposed to be limited to three weeks is still in the process of being completed after 6 months of full time work by a team of professionals. The analysis... should be reviewed. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4831)*

**Issue:** *The Final EIS should address if management activities can continue during subbasin reviews or must subbasin reviews be completed before management activities can take place.*

**Sample Comments:** *Will projects be delayed for Subbasin Review, then Watershed Analysis, then new/additional project-level NEPA, if the projects were recently developed and already address the concerns associated with the ICBEMP? (Individual, Walla Walla, WA - Letter #W3793)*

*Sub-basin reviews should have been accomplished as part of the ICBEMP DEIS. They are necessary for the public and decision makers to understand components and implications of various alternatives. They must be completed under all alternatives before management actions tiered to ICBEMP occur. Ditto for Watershed Analysis... No transition periods can be allowed. No activities can occur during the interim period. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

*The RAC questions the need to suspend management activities in order for a subbasin review to be conducted. When only 2-4 weeks are necessary for this review, little to no conflict would be expected. However, it is conceivable that subbasin reviews in more ecologically complex areas may take considerably longer than one month. In those situations, the RAC recommends that appropriate level line officers be given authority to continue management activities unless it can be clearly shown and verified that such activities preclude significant future management options. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*Studies must be done in all areas where threatened or endangered species might live. There is no explanation of how the analysis should be done or how long it could take. Forests, wildlife and water will be at risk until all studies are complete. (Individual, Walla Walla, WA - Letter #W2444)*

*The wording of EM-S1 for alternatives 3-5 is contradictory, suggesting that management activities can occur with or without completion of subbasin reviews. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS needs to address how funding levels will effect subbasin review time lines.*

**Sample Comments:** *One concern is that all subsequent analyses, such as Ecosystem Management at the Watershed Scale, must wait until sub-basin analysis is conducted.... What happens if the agencies are not fully budgeted the \$560,000 per year to conduct the analyses? (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*  
*EM-S1 - Do you really think the FS/BLM will be financed to do this job? Where and when do you expect to get the money when we have not budgeted for this in the FY 98 and 99 budgets? (Individual, McCall, ID - Letter #B75382)*

### **1.3.4 Trust and Authority**

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Numerous respondents claim that the project bypasses all legal mechanisms for land management and planning, and that it is a massive Federal takeover that threatens to depopulate the Northwest, lock up public lands and steal state and local power in favor of Federal or even international control. In comments ranging from suspicious to hostile to furious, many call the project a back-door land grab or a conspiracy, or they equate the project with socialism, communism or dictatorship.

Many identify President Clinton, Vice President Gore, or Interior Secretary Babbitt either as perpetrators of this perceived outrage, or as pawns of other powerful groups such as “uninformed urban residents,” environmental lobbies or international organizations. Many claim that Congress has neither mandated this project nor authorized ecosystem management as a driving principle for planning. A number scoff at the notion of public collaboration in the project, believing that Federal officials have decided the outcomes of the planning process long ago.

Another “conspiracy” theory proposed by some respondents is that powerful interests such as miners, ranchers, and loggers, whom some respondents see as having exploited the land while wielding undue control over public agencies are the force behind the project. Some argue that Federal control is better for the land than local control, because centralized planners take a long and broad view of ecosystems and are less influenced by local economic demands. A few commend the project for viewing the region as an ecosystem in need of restoration and for attempting to restore its health and promote the collaborative process outlined in the Draft EISs.

International organizations such as the United Nations appear in the comments of a few respondents, who claim that the project is a manifestation of such pan-national edicts as the United Nations Biodiversity Treaty, the Man and the Biosphere program, and 'Agenda 21'. Some claim these items, as well as the concept of World Heritage Sites, are threats to American sovereignty because they propose to return much of North America to a state of wilderness. Others who fear a loss of national sovereignty accuse the President's Council on Sustainable Development and various non-governmental organizations of collaborating with international interests to the detriment of American citizens.

Many respondents, angry at the Federal government for perceived mismanagement, demand that all Federal holdings be returned to the States. These respondents believe that States have a constitutional right to control lands within their boundaries; they believe that the Forest Service and BLM are circumventing Congress, and the people, by imposing Federal laws and regulations.

**Issue:** *The project appears to be an abuse of power which will take away individual rights.*

**Sample Comments:** *It appears to be nothing more than a pretext for more government control over our environment and our lives. (Individual, Moses Lake, WA - Letter #W470)*

*This whole mess is unconstitutional and all those involved are traitors to America. (Individual, Colville, WA - Letter #W541)*

*Comparison of ICBEMP with the Communist Manifesto reveals that they blend very well with each other. Both represent a misguided philosophy which requires the citizens to give up their rights with ICBEMP using the law of environmentalism as justification. (Individual, Roseburg, OR - Letter #W1362)*

*...Knowing that we have a president who is as power and money hungry as Hitler was, this whole thing is nothing more than a huge political grab for power and money under the guise of environment... and naturally the Forest Service and the BLM are eager to jump on the bandwagon because that is exactly what both of these agencies have been wanting for some time is to expand their range both in authority and a huge drain of taxpayer's dollars which is exactly what is ruining our United States. (Individual, Durango, CO - Letter #W614)*

**Issue:** *The Final EIS should consider divestiture and give Federal lands back to the States.*

**Sample Comments:** *The ecosystem management plan really stinks! It is very biased in favor of a socialist type of government take-over of what was considered public lands. The states should make decisions, not the federal bureaucracy. (Individual, Kinne, MT - Letter #W947)*

*Rural America is being destroyed as a place to live and work by those insanely selfish so-called environmentalists. We already have enough counter-enviro terrorists registering their protests (Montana Freemen, for example), and these ICBEMPs are generating more and more. Can anyone remember what the 'terrorist' Robin Hood was fighting for centuries ago? It was for the RIGHT of the local people to use the local lands. People who NEED lands KNOW they cannot destroy them. Why can't these insane regulators appreciate that? (Answer - because they ARE insane!). (Individual, Sweet Home, OR - Letter #W1886)*

**Issue:** *The project is an instrument of higher levels of control who wish to take away the United States' sovereignty over its lands.*

**Sample Comments:** *What is driving this shift in federal land management policy seems to be the philosophy of Vice President Al Gore who would shape the federal government into a tool to carry out a 'radical transformation of human society to save the world, a policy he shared with us in his book 'Earth in the Balance'. The way you do that is you make sure you can do whatever you think it takes to save the world even if a lot of people disagree with you. You write rules that are self-perpetuating and incontestible. Vice President Gore is in a unique position to do this as the Chair of the White House Interagency Ecosystem Management Task Force. We believe his actions in this capacity, of which the DEISs are a product, is an abuse of government power. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter # B77929)*

*I believe this whole study project to have been a smoke screen to cover the planned depopulating [of] the Northwest United States. (Individual, Colville, WA - Letter #W969)  
You are so dumb you don't even know who you are working for. The final plans of the United Nations New World Order is to remove all habitation from 50 percent of the land area of these United States. To turn it back to wilderness. This EIS is a step in that direction. The next step is to reduce the population of the U.S. by 50 percent. Will you be one who is allowed to live? (Individual, Bellingham, WA - Letter #B75316)*

*Under Gore's direction, the President's Council on Sustainable Development's function is to implement the policies outlined in Agenda 21, the implementing document of the biodiversity treaty.... This by-pass violated the U.S. Constitution. (Individual, Kettle Falls, WA - Letter #B77206)*

*These proposed regulations and rules... are just another government scheme by the dictatorial Clinton administration to steal land from U.S. citizens as well as giving into the demands of radical environmentalist groups and giving up our sovereignty to the United Nations.... It seems President Clinton and his New World Order cronies are hell-bent on total control of everybody and everything or turning this country into another Bosnia. (Individual, Enumclaw, WA - Letter #W2448)*

*Why does ICBEMP sound like an implementation plan for the Wildlands Project, a radical plan that seeks to return at least one half of the North American continent to its supposed pre-Columbian condition through a connected system of 'core areas' surrounded by 'buffer zones'? (Individual, Wellington, Co - Letter #W3783)*

**Issue:** *The Final EIS should continue the public collaboration process established by the project.*

*You have restored my faith in government, the Bureau of Land Management, [the] Forest Service and [the] democratic process. (Individual, Langley, WA - Letter #W33)*

*The project is not intended to cover the landscape with a suppressive regulatory blanket. It is intended to be a program supportive of the multiple-use needs of citizens who have relied on its abundance for generation. Add to that a measure of local control, which was effectively inserted into the project because of Eastside Ecosystem Coalition of Counties involvement, and we have a formula for the successful future we all want.... The openness of the Executive Committee to modify and adjust in response to EECC wisdom gives me a great deal of confidence that we have done our job at the table and that we will continue to exert substantial influence in the final form of the EIS and the project's ultimate implementation. (County Agency or Elected Official, Missoula, MT - Letter #B2736)*

**Issue:** *In identifying the selected alternative, the project should resist the influence of powerful lobbies.*

**Sample Comments:** *I hope that someday the USFS and BLM adequately protect and sustainably manage our Natural Heritage rather than follow their incessant tendency to bend over backwards for private interests. (Individual, Los Angeles, CA - Letter #W3679)*

*...Selection of #4 as the preferred alternative strongly indicates that the Interior and Agriculture agencies involved have once again thrown in the towel to the region's hungry extractive industries. (Individual, Bozeman, MT -Letter #B3931)*

*As much as I detest government dictating land-use policy, private interests and corporate America have been worse. Greed drives all!! (Individual, Vancouver, WA - Letter #B77248)*

### 1.3.5 Global Climate

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A few comments reflect the debate over changes to the global climate. Some respondents believe the earth's temperature is increasing, and that human activities such as the production of greenhouse gases are causing this change. Others claim that no such warming trend exists and that human activity has not caused any change in global climate.

In relation to the project, some respondents say the Draft EISs and *Scientific Assessment* fail to adequately address global warming. A few people, citing the perceived gravity of the issue, state that such an omission is a major flaw. Noting the project's advocacy of prescribed burning as a management tool, some wonder if planners considered global climate when writing the Draft EISs. Others predict cataclysmic effects that might take place if human activities do not change "for the better." Several claim the best way to combat global warming is to harvest and use timber, thus preventing its carbon from re-entering the atmosphere as part of greenhouse gases.

**Issue:** *The Final EIS should consider effects on global climate change.*

**Sample Comments:** *Rampant desertification, radical climate changes, much hotter summers, vastly increased drought, mass die-offs and mass extinctions of wildlife, little or no opportunity to seek cures for cancer and other deadly diseases, new and more severe diseases, collapsed watersheds, a vast reduction in our water supplies, a vast reduction in our oxygen supplies, much worse air pollution, much higher levels of carbon dioxide and carbon monoxide in our air, more respiratory and heart failure, mass starvation and famine, more heat-related deaths, hotter tempers, marked social decline, more suicides and murders, more mental illness and severe depression, even genocide and eventually even cannibalism. How many people that we know would really want that? Deforestation and destruction of the natural world may be one of the greatest single causes of dysfunctional families and social and mental illness in today's society. (Individual, Kaysville, UT - Letter #W55)*

*The DEISs fail to address numerous significant issues. For example, nothing is said about global warming and possible effects upon long-term expectations or problems. (Individual, Darby, MT - Letter #W228)*

*We are heaping enough climatologic disaster on ourselves without removing more of our forests in order to build more pollution-spawning cities. (Individual, Troy, MT - Letter #W1055)*

*The DEIS... is suggesting tourism for our public lands. Your team has not taken into consideration the Conference of the Parties to the Framework Convention on Climate Change. This conference calls for reduction of emissions to 1990 levels with demonstrable progress to be made by the year 2005. The U.S. position would require a reduction of some 34% according to most studies. Tourism is not a viable alternative due to international treaties now in effect. (Individual, Republic, WA - Letter #W1597)*

*The Eastside DEIS devotes three paragraphs in some 900 pages to global climate change.... After those early statements, there is no further discussion in the document.... Clearly the Columbia Basin Ecosystem Project has intentionally ignored the problem of global climate change. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*Has anyone looked into the Global Warming that will be caused by these prescribed fires? (Individual, Butte, MT - Letter #B3790)*

*The best way to stop global Warming is to cut down a mature tree and turn it into boards and then build a house. That way all the carbon dioxide that the tree took from the atmosphere is locked up. (Individual, Garrison, MT - Letter #W4712)*

## 1.3.6 Use of Science

Many assert the Draft EISs are politically driven, claiming the preferred alternative ignores the advice of the agencies' own scientists. They cite scientific findings of poor resource health—whether in regard to salmon, other fish species, the rarity of old growth, detrimental effects of roads, soil productivity, an unnatural buildup of fuels or poor range condition. They criticize what they see as the personal values and biases of the project staff, which they believe have influenced the structure of the alternatives and selection of the preferred alternative. Some believe the project must address a continually changing world and population and not set standards that cannot change with the decades to come. Others feel the agency is collecting the best data possible and commend the science used by the team.

Among respondents agreeing in general with the science, including a few who question some of the particular findings, many are concerned about a perceived disconnect between the science information and direction provided in the Draft EIS. They feel integration between the alternatives and the science used to analyze effects and the findings of the Science Integration Team is weak at best. They would like to see this resolved before a Final EIS or Record of Decision has been published. Some use this concern as a platform and rationale for abandoning the NEPA process and recommending that the science be passed off to the local land managers for their use in making land management decisions.

A few criticize the scientific methodology used, citing faulty assumptions and a lack of detained analysis. They doubt the credibility of the science collected, stating that the project used old data and did not do any field work of their own. Others wonder why the project didn't collect available data from local communities that had recent findings. The science that was collected, many assert, should be sent through a peer-review process, that excludes BLM or Forest Service scientists. They believe the science would have more credibility if it had been collected by scientists from outside the Federal agencies.

**Issue:** *The selected alternative should be based on good science, not political or personal biases.*

**Sample Comments:** *I agree that the level of science behind the DEIS's is far too vague to offer a firm foundation for public policy. There are no agreed upon definitions of such terms as "ecosystem health, integrity, or sustainability" in the scientific community. (Form Letter #219)*

*I strongly oppose all of the DEIS's alternatives for the Columbia Basin. They are ignoring their own scientific findings of degradation of land and forest. (Individual, Portland, OR - Letter #W644)*

*ICBEMP has not delivered on its promises to create a scientifically-sound land management strategy. ICBEMP is instead a convoluted collection of assumptions and theories without substance. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W4538)*

*We do not consider the outcome of the DEIS process so far to be 'science'. Instead it is a highly biased, warped one-sided view of rangeland health which panders to the livestock industry... With these marching orders, the DEIS preparers proceeded to omit, misinterpret, and ignore scientific evidence which shows harms caused by livestock grazing. (Conservation/ Environmental Group, Boise, ID - Letter #W3689)*

*The mandate, implicit or explicit, that appears to have been given to the ICBEMP team was to demonstrate that so-called ecosystem management is biologically, socially, and economically desirable. As a result, the federal employees assigned to work on this project may have been unable to conduct the type of independent, objective analyses that are necessary to develop an optimal management strategy for federal lands in the Interior Columbia Basin. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*We feel most of the science developed and used in this study is of utmost value, to be used and built upon. We commend the agencies involved for this and recommend the "science" be incorporated in existing NEPA's and EIS's presently required for Federal Land use. (County Agency or Elected Official, Soda Springs, ID - Letter #B77138)*

*In the event the process is halted as we recommend, the research generated by the project should be forwarded to the local level for evaluation of its usefulness and accuracy and where appropriate incorporated into regularly scheduled revisions of Forest Service and BLM planning documents. (Wise-Use Group, Salt Lake City, UT - Letter #E56)*

*The ICBEMP scientific findings rather clearly demonstrate that intensive road building, logging, grazing, etc. has severely degraded the environment in the Oregon east side wild lands. The Forest Service/BLM selection of Alternative 4 is therefore surprising because it increases logging and grazing to the detriment of fish, wildlife, drinking water, and non-degrading uses. (Individual, Eugene, OR - Letter #W375)*

*The 50-100 year projection done for the DEIS's do not account for societal change. They assume that no new laws and policies affecting the living and non-living components of the environment in project area will be enacted over the next five to ten decades; that technological change in such things as energy, materials, transportation, communication, and agricultural will not influence the region; and that shifting perceptions and preferences in everything from how the outdoors are viewed to what constitutes an ideal homesite will likewise not impact the region and its environment. The presumption of static cultural influences on the region cannot be sustained given our society's rapid and seemingly accelerating pace of change. If I am mistaken, however, and the agencies do not presume static conditions then they must fully explain how their projections adequately account for all the relevant societal changes that can occur during the next century. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter # B77931)*

**Issue:** *The Final EIS should verify the validity and credibility of science used in the Draft EIS.*

**Sample Comments:** *Scientific data looks like it has been retrieved from past documents, Rare I, Rare II, new forest practices and roadless areas that already has been implemented by USFS. The outline for this entire project seem to be coming from a study that was done for the Cascade Range for Spotted Owl Habitat. The Montana area you are working is overstocked stand that is virgin forest, not regenerated from previous disturbances. (Form Letter #227)*

*The public doesn't trust the agencies involved anyway based on years of lies and mismanagement of our public lands. Outside scientists should be reviewing these documents not your own employees. Where are the Conservation Biologists and Restoration Ecologists? If this is a restoration of a degraded ecosystem you need some real experts with real experience in the field of restoration working on the plan. These are also the folks why should be reviewing your scientists work. (Individual, Portland, OR - Letter #E27)*

*I take exception to the often repeated statement in the video that range land condition is declining when Interiors own recent studies show it's in the best condition since the 1900's. (Individual, Unknown - Letter #B4575)*

*The DEIS's do not provide an adequate basis for well reasoned and scientifically sound management of federal lands. Here are a few reasons why: The DEIS's assume that nature provides the perfect model for land management, which is not true; the DEIS's make extensive use of vague, ambiguous, and controversial concepts. (Individual, Falls City, WA - Letter #W534)*

*There are too many emotional statements, and unfounded, and easily misinterpreted terms used in the EIS, for it to have any credibility. Here are a few examples: ecological trust fund, wider lens, ecosystem, etc. Ecological integrity is a case in point. Any forest "ecosystem", at any one point in time, is not the same as it is in another point in time. Left in a natural state, a single forest "ecosystem", however it may be identified, will change drastically over time. (Individual, Libby, MT - Letter #W819)*

*We are disturbed by the apparent fact that information was readily available from communities and counties directly affected by ICBEMP, but no effort was made to obtain some. (County Agency or Elected Official, Walla Walla, WA - Letter #W3781)*

*Good science is essential. Keep up the good work. (Individual, Laramie, WY - Letter #W1643)*

## Section 1.4 ~ EIS Alternatives

This section addresses how the public feels about the adequacy of alternatives addressed in the Draft EISs. Comments include whether the project fulfills NEPA requirements to provide a wide range of viable alternatives to address the purpose and need. To provide an adequate range of alternatives, many people feel the project should combine parts of the existing Draft EISs alternatives to better address the issues. Some individuals and organizations believe that providing their own alternatives is the best way to address the projects purpose and need.

Many references to specific alternatives and details found in the alternatives also are addressed under specific sections of Chapter 2 (Affected Environment/Environmental Consequences) and Chapter 3 (Social and Economic Consequences).

Some people question the appropriateness and accuracy of the Desired Range of Future Conditions and a Historical Range of Variation to assist in constructing and evaluating the alternatives. Several individuals believe attempting to plan too far into the future is futile because of ever-changing environmental conditions. A Historical Range of Variation, some people feel, has no verifiable scientific basis, thereby questioning its value to the project analyses.

## 1.4.1 Range of Alternatives

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Conflict between the alternatives presented in the Draft EISs and the purpose and need statement was identified by a few respondents. A number of individuals promoted the need for a wider range of alternatives to be considered.

Some people contend that although a broad range of conservation and restoration strategies are analyzed in the Draft EISs, little consideration is given to increasing timber and grazing allowances and management for motorized recreation. For example, one person notes only one cluster in one alternative is designed for high intensity commodity management. Socio-economic issues, others believe, are treated as impacts on the ecosystem rather than as part of an integrated system including humans.

Many people think that various features of different alternatives should be combined to reflect the strengths of these alternatives. Alternative combinations presented by the public include:

- Alternatives 4 and 7 to provide better protection for areas designated “low ecological integrity” by calling for active restoration and areas of “existing high integrity” by including them in a system of reserves.
- Alternatives 4 and 6 would restore damaged areas yet take a slower management approach emphasizing conservation, research, and extensive monitoring.
- Alternatives 6 and 7 to utilize the active management activities along with a system of reserves.
- Alternatives 4, 6, and 7, to aggressively restore some areas for wildlife needs (Alternative 4), go slowly where uncertainties exist (Alternative 6), and also create some reserves (Alternative 7).
- Alternatives 2 and 5 would provide for improved forest and range health (Alternative 5), restoration of riparian health (features from Alternative 2), and more timber harvesting and fewer roadless areas (Alternative 5).

For the Draft EISs to represent a broad range of alternatives, various organizations submitted their own alternatives for analysis. A number of people feel that the Forest Service Employees for Environmental Ethics (FSEEE) “conservation science” alternative is a low-cost, low-risk alternative based on scientific principles which will best restore watersheds and protect riparian areas, old-growth forests, and roadless areas in the project area. They feel it does this by incorporating new standards for salvage logging, road building, grazing, and mining. They also like the reserves proposed in this alternative, and they support restoring the important role of fire to the ecosystem. Some, however, feel the FSEEE alternative is incomplete and does not address many issues raised in public scoping, nor does it effectively meet the project’s purpose and need.

Others endorse the alternative submitted by the Natural Resource Defense Council as a way to best protect the environment through halting commercial harvesting in old-growth forests and roadless areas.

Several people promote the active-yet-cautious approach to closely monitored restoration proposed by the Columbia River Bioregional Campaign, for what they see as its emphasis on non-motorized recreation.

The State of Oregon submitted an alternative, which is supported by several individuals for its scientific approach to protecting old-growth forests, riparian areas, and roadless areas.

The Bureau of Indian Affairs endorses the Deschutes Provincial Advisory Committee's alternative, which favors the preferred alternative plus elements found in Alternatives 5, 6, and 7. Elements supported include American Indian use of culturally significant fish, wildlife, and plants, plus reserves to protect the integrity of streams containing anadromous fish.)

**Issue:** *All alternatives in the Final EIS should adequately address the purpose and need.*

**Sample Comments:** *I agree that the agencies write that under all the alternatives - even the Project's Preferred Alternative - uncertainty would increase for timber producers and "it will be difficult in the future to achieve predictable supplies of timber from Federal lands" in the project region. This is directly contrary to the Project's stated "Purpose and Need" and the intent of Congress, which makes predictability a cornerstone of multiple use management of federal lands. (Individual, Livingston, MT - Letter #W877)*

*Alternatives 1,2,3, and 5 do not adequately respond to the identified purpose and need for action and management priorities with respect to aquatic ecosystems. These alternatives are inadequate for the restoration and maintenance of ecosystem health and for the ecological integrity, restoration, and maintenance of habitats for plant and animal species. (Professional Society, Corvallis, OR - Letter #W4635)*

**Issue:** *The Final EIS should consider a wider range of alternatives.*

**Sample Comments:** *The ICBEMP proposed alternatives offer an inadequate range of alternatives. There is not a real range of grazing or timber harvest volume proposed. (Individual, Portland, OR - Letter #W11)*

*Economic and social needs are treated as impacts rather than integrated into the alternative management approaches. The amount of detail and number of specific economic and social programs is conspicuously out of balance with other programs. The FEIS needs to include a variety of programs and policies to integrate social and economic factors with other components of the ecosystem. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The range of alternatives is inadequate. All action alternatives effectively adopt the same standards. All action alternatives adopt similar goals. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*The Draft Eastside EIS does not present an adequate range of alternatives. At least one additional alternative should be analyzed. This alternative should accommodate an increased amount of commodity uses such as timber, wood fiber, livestock forage and recreation. (Individual, Clarkston, WA - Letter #W3111)*

*Add alternatives for intensive management - need more harvest and grazing accessed by roads. (Individual, Heppner, OR - Letter #W3838)*

*None of the alternatives adequately address the issues of... removing cattle from streams, permitting logging in riparian sensitive areas, protecting fish habitat, establishing economic transition assistance. (Individual, Spokane, WA - Letter #W42)*

*None of the management alternatives presented in the DEISs gives adequate protection to the Basin's remaining roadless areas and old-growth forests. (Individual, Kalispell, MT - Letter #B3832)*

**Issue:** *Several alternative features should be combined into new alternatives to be analyzed in the Final EIS.*

**Sample Comments:** *[Alternatives 4 & 7] I recommend a balance between the preferred alternative and Alternative 7. Areas of high ecological integrity must be preserved as protected reserves and reservoirs of ecological strength. I would like to see the final plan incorporate the more aggressive treatment of disturbed areas recommended in Alternative 4. The trick is to know when Mother Nature is already doing an excellent job and leave her be. (Individual, Littleton, CO - Letter #B60)*

*[Alternatives 4 & 7] There are many good ideas developed in the preferred alternative that could be combined with a series of reserves and provide a great opportunity to make substantial progress towards restoration of lands while maintaining a series of reserves that function as a reservoir of biological diversity for species, communities and ecological processes. (Conservation/Environmental Group, Portland, OR - Letter #W502)*

*[Alternatives 4 & 7] My main concern with the preferred alternative (4) is that there is so much emphasis on management. Given the finding that the most ecologically intact lands are those that are roadless and up to now have received minimal or no management, it would seem only prudent to continue a policy of hands off and to ensure that the vast majority if not all of these lands remain roadless and unmanaged. This would necessarily involve the integration of some provisions of alternative 7. (Individual, Hudson, WI - Letter #W311)*

*[Alternatives 4, 5, & 7] Alternatives 4, 5, and 7 contain features that should be incorporated in a final alternative. The Nature Conservancy's Columbia Plateau Ecoregional Planning Team is willing to cooperate with and provide information to the ICBEMP team to achieve an alternative that would, among other goals, significantly contribute to maintaining the biological diversity of the Interior Columbia Basin. (Conservation/Environmental Group, Boulder, CO - Letter #W3676)*

*[Alternative 4 & 6] I liked the restoration of Alternative #4 and the conservation of Alternative #6. If the conservation reserves can be linked along river or stream valleys there would be more opportunity for wildlife migration. If you would combine 4 & 6 with more conservation, research, and elimination of roads where possible it would be best. (Individual, Lexington, KY - Letter #B100)*

*[Alternative 4 & 6] Our resource agencies continue to view some combination of Alternatives 4 and 6 aggressive restoration combined with a conservation reserve design and adaptive management... as holding the best prospects for success. (State Agency or Elected Official, Olympia, WA - Letter #W3780)*

*[Alternative 4 & 6] If adaptive management is to succeed, incorporation into the preferred alternative of more of the experimentation, local research, and of course extensive monitoring of Alternative 6 appears essential (Individual, Spokane, WA - Letter #W854)*

**[Alternatives 6 & 7]** Our organization strongly urges you to support Alternative 6 with some combination of Alternative 7. Alternative 7 creates reserves of Federal lands where management activities are limited. (Environmental/ Conservation Organization, Clayton, ID - Letter #B105)

**[Alternatives 6 & 7]** We urge the Interior Columbia Basin Management Team to select Alternative 6/7 with the addition of mitigation strategies to avert the negative socio-economic effects on isolated, non-resilient communities. (Individual, Portland, OR - Letter #W1755)

**[Alternatives 6 & 7]** Alternative 6 is the most environmentally friendly and appears to be the alternative that should pave the way to meet most of this projects goals. Of all the alternatives, it appears to be the most effective at supporting viable terrestrial and fish populations, as well as reducing environmental risk over the long term. Alternative 6 shows a lot of promise to: provide a healthy mix of forest stages and composition, restore landscape health, and control noxious weeds... Second incorporate the theme of Alternative 7 which is to establish a system of reserves on Federal lands. (Individual, Eureka, MT - Letter #B75498)

**[Alternative 4,6, & 7]** The parts I do not like are the failure of any alternatives to ban clear cutting, high grading, or road building, and the failure of any alternative to include all the obviously biologically beneficial measures needed, such as thinning from below and prescribed fire. What would work best is a combination of alternative 4,6, and 7 - aggressively restoring conditions to benefit wildlife, going slow where uncertainties exist - as with Lynx - and reserving the maximum area possible in roadless condition. (Individual, Mazama, WA - Letter #W414)

**[Alternative 4,6, & 7]** If the watershed, or subwatershed under consideration for a project... is judged by all interested parties to be in robust health... we would go with the Alternative 4 approach. If there are problems in the watershed... Alternative 6 might be appropriate. If the situation looks bad... Alternative 7 would be implemented until the area moves to acceptable standards. (Individual, John Day, OR - Letter #W655)

**[Alternative 4,6, & 7]** The preservation alternative (Alternative 7) should be applied to all unroaded areas so that they can act as reserves... Restoration (Alternative 4) should be applied only where preservation will be inadequate to return the land to ecological integrity. Caution should be used in areas where management direction may not be clear as to whether restoration or preservation (in areas too small for effective reserves) should predominate and further study (Alternative 6) is needed to determine that direction. (Individual, Moyie Springs, ID - Letter #B4692)

**[Alternative 3, 4, & 5]** The Montana Society of American Foresters believes that Alternatives 3, 4, and 5 with some modifications would provide different but substantial levels of forest restoration and resource protection. (Professional Society, Libby, MT - Letter #W967)

**[Alternative 1, 2, & 5]** My preference is for some combination of alternatives 1, 2, and 5. This will combine some level of restoration to improve forest and range health (alternative 5), restore riparian health (Alternative 2), and provide some level of hard targets to meet the social and economic needs of our society (Alternative 1) ...Alternative 5 will provide a large ASQ, greater road densities, more grazing, and less wilderness and roadless areas than Alternative 2 by itself. (Individual, St. Anthony, ID - Letter #B75365)

**Issue:** *Alternatives submitted by other entities should be considered in the Final EIS.*

**Sample Comments:** *[FSEEE] The best alternative and the most likely to succeed in the long-run is one that is not in the DEIS. It is the proposed alternative the [Association of] FSEEE gave to the ICBEMP Team two years ago. It is a low cost, low-risk alternative patterned after the Northwest Forest Plan, which is proving implementable and successful in the Pacific Northwest. (Individual, McCall, ID - Letter #B78886)*

*[FSEEE] We agree with Edward O. Wilson, Reed Noss, and other scientists. Business as usual won't work in the interior Columbia River Basin. Please give full consideration to the science based recommendations in the FSEEE plan. The Forest Service employees and scientists who created the FSEEE plan understand the critical importance of combining watershed restoration with protection of riparian areas, old growth forests, and roadless areas. (Individual, Chicago, IL - Letter #W2562)*

*[FSEEE] The FSEEE plan offers an aquatic conservation strategy to restore the ecological integrity of entire watersheds, not just riparian areas or in stream habitat. It also proposes an extensive system of old-growth reserves and new standards for salvage logging, road building, grazing, and mining. (Individual, San Francisco, CA - Letter #W4533)*

*[FSEEE] An ecosystem-based plan for the Columbia Basin should do at least three things: (1) establish a reserve system to protect key areas of fish and wildlife habitat, including old growth forests and roadless areas; (2) implement strong watershed restoration and habitat enhancement measures in priority areas; and (3) restore to the fullest extent possible the important ecological role of fire and other disturbances. No alternative being considered by the Forest Service and the Bureau of Land Management would do these three things. The FSEEE alternative would. (Individual, Astoria, OR - Letter #W220)*

*[Natural Resource Defense Council.] Please, endorse the management plan supported by the NRDC and other conservation groups that halts commercial logging and grazing in the Columbia River Basins old-growth areas and those without roads. Please undo the past damage in these areas with active restoration. (Individual, Tempe, AZ - Letter #W49)*

*[Natural Resource Defense Council.] I am requesting that you endorse a management plan supported by the NRDC and other conservation groups that halts commercial logging and grazing in the regions old-growth and unroaded areas and undoes past damage with active restoration. Continued commercial logging and continued heavy grazing is damaging to the ecosystem. We must protect our natural resources and turn a deaf ear to commercial interests. (Individual, Rocky Mount, NC - Letter #W111)*

*[Columbia River Bioregional Campaign] You have failed to include a critical alternative that flows from: The science compiled by the Science Integration Teams; The objectives of the... Project... and input you have received from the Columbia River Bioregional Campaign, Indian Tribal nations, and others. This alternative should involve carefully-selected restoration actions which are closely monitored. It should involve varying levels of activity and controls in some areas, so that management is always tentative, adaptive, and comparative with natural processes. Finally, large, well-functioning and recovering areas should be protected within which natural processes can predominate, with restoration activities undertaken lightly, appropriately, and non-commercially wherever possible. Non-motorized recreation should be emphasized in this alternative. (Individual, Eugene, OR - Letter #W15)*

*[Columbia River Bioregional Campaign] The DEIS lacks an alternative that addresses concerns like protecting ancient forests, roadless areas, soils, and rangelands. Instead, I am asking the ICBEMP team to seriously consider the CRBCs call for a fully funded Ecosystem alternative... Migration corridors, old growth forests, and key watersheds need protection. (Individual, Airway Heights, WA - Letter #W312)*

*[Oregon State Plan] I suggest the panel look closely at Oregon Gov. Kitzhabers 11-point timber plan. He calls for protection of remaining old-growth stands, protection of riparian and roadless areas, and generally considers a closer look at what your constituents and professional scientists are saying. (Individual, Eugene, OR - Letter #W410)*

*[Deschutes Provincial Advisory Committee] We support the approach to the alternatives presented by the Deschutes Provincial Advisory Committee which are being forwarded to you. We believe that the Alternative 4 active restoration approach will begin to meet the Federal trust responsibility if it is modified to include certain objectives found in Alternatives 5, 6, and 7 regarding harvest ability of culturally significant fish, wildlife and plants. One of these objectives is the establishment of reserves that will promote hydrological integrity of anadromous fish yielding streams. (Federal Agency, Portland, OR - Letter #W3811)*

*... In order to credibly assess the effectiveness of reasonable approaches to protecting and restoring anadromous fish habitats consistent with federal trust responsibilities, the Clean Water Act, and other applicable laws, the DEISs must be revised to include evaluation of at least one alternative that has high levels of active restoration of road networks in watersheds with anadromous fish AND a suspension of road construction as recommended... The DEISs must be revised to include an alternative that completely protects RCAs from degradation from logging, road construction, mining and grazing in all watersheds with anadromous fish, as is essential to rebuilding anadromous fish runs and providing some contribution towards continued viability. (Tribal Commission, Portland, OR - Letter #W4733)*

*The [Fish and Wildlife] Service strongly recommends development of an alternative that would allocate specific areas for emphasis of certain management priorities. ... specific locations in the Basin should be identified where commodity extraction and other human uses like grazing and recreation would be emphasized. Such an approach could assure predictable future outcomes and successfully meet habitat needs while providing for human uses. (Federal Agency, Portland, OR - Letter #W4641)*

*It may be necessary to present a new alternative, focused on aggressive ecosystem restoration and support of local communities, reflecting the original intent of Alternative 4. (State Agency or Elected Official, Boise, ID - Letter #B77953)*

*We suggest that the team develop an alternative that modifies alternative 4 to reverse the acres burned trend and changes the standards to regional guidelines. (Natural-Resource-based Business or Business Group, Wallowa, OR - Letter #W3761)*

*I recommend that instead of putting more lands into preserves or reserves, why not increase the land base of Tribes so they can manage the lands? (Tribal Government, Bonners Ferry ID - Letter #B75823)*

*The information provided in the ICBEMP documents and elsewhere supports .. an alternative which prescribes: a) preservation of all roadless areas as roadless and unmanaged; b) a concerted program of road obliteration in the areas already roaded; and c) return of wildfire rather than more fire suppression to these ecosystems. (State Agency or Elected Official, Kalispell, MT - Letter #B78701)*

## 1.4.2 Specific Alternatives

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Comments in this section are general and less resource-specific than those found elsewhere in this document (Chapters 2 and 3) which focus on the effects of the alternatives to specific resources. For example, if an individual believes Alternative 4 does not adequately protect aquatic resources, the ideas and issues in the comment are captured in Section 2.7, Aquatic Health.

Some feel that Alternative 1 is simply business-as-usual and does nothing to fulfill the purpose and need of restoring ecosystem health; they feel that in the long-term Alternative 1 will not provide a reliable flow of goods and services. However, some of individuals feel current management represents the collective values of how the public wants Forest Service- and BLM-administered lands to be managed.

Few people provide general comments on Alternative 2, those that do feel it contains the same problems as Alternative 1. The Draft EISs refer to Alternative 2 as a modified No Action Alternative, which one individual believes is incorrect. He feels the interim directives in Alternative 2 are different from current management standards and therefore Alternative 2 cannot accurately be referred as no-action, modified or not. However, several proponents of this alternative feel it is the true no-action alternative because it emulates current management direction as outlined in current land management plans with interim direction.

Alternative 3 received very few general comments. One positive aspect of Alternative 3, some people feel, is its cost-effectiveness and immediacy while retaining a moderate amount of harvesting activity.

The preferred alternative, Alternative 4, represents for some people a reasonable compromise between social demands for commodities and ecosystem health. Others question whether restoration activities will truly mimic ecological processes, especially in areas that already have high ecological integrity or are capable of recovering by themselves. Some feel that new harvesting technologies, which make restoration possible with little environmental impact, were not sufficiently considered. Most people contend the preferred alternative does not restore ecological health quickly enough and does not provide goods and services as the purpose and need promises.

Alternative 5 is considered by some people to be very similar to Alternatives 1 and 2. Promoting what they see as a favorable natural resource production orientation, some people promote Alternative 5. Others, however, feel Alternative 5 moves too slowly toward ecosystem restoration.

Some people, while generally in support of Alternative 6, feel it should designate some areas as control points to evaluate different types of commodity use. Some individuals believe that Alternative 6 offers the best benefits to aquatic resources, because of its slower and more cautious approach.

A number of respondents feel that Alternative 7 designates many areas too degraded to fulfill their purpose as reserves and does not include some areas with high ecological integrity. Some people contend that not enough analysis was done to show whether Alternative 7 is attainable. They believe analysis of socio-economic impacts needs to be more in-depth. "Set up as a straw man" captures the sentiment of some people who believe Alternative 7 is provided with criteria that do not meet purpose and need and is therefore doomed to fail.

### ***Alternative 1***

*This alternative, in my opinion, maintains the current level of access to public lands that is necessary and outlined by the regulations. This is the alternative that makes the most sense for both maintaining access and for producing goods from the public lands. (Individual, Elko, NV - Letter #W892)*

*Does not recognize forest ecosystem health problem, not implementable as demonstrated by the lack of success in the forest plans. Business as usual is not working now, just because it is renamed Alternative 1, Alternative 1+ gridlock. Current trends show that public support is very low for the status quo. (Professional Society, Libby, MT - Letter #W967)*

*Alternative 1 may contribute to social misery in the long run by not adequately restoring the ecosystem so as to provide a reliable flow of goods and services. In that case we are back to ground zero. (Individual, Portland, OR - Letter #W1755)*

*This alternative at least represents the collective values of numerous large and small communities throughout the UCRB area. (County Agency or Elected Official, Dubois, ID - Letter #B75494)*

*All of the restrictive procedures that are highlighted in the Preferred Alternative for improvement of ecosystems will be applied to all activities in the EIS area, not just to timbering or grazing. ... For this reason I strongly feel that Alternative 1 (No Action) is the most appropriate alternative for management of the public lands covered by this project. (Individual, Sparks, NV - Letter #B77857)*

*Alternative 1 is not a true no action alternative because the land management agencies have already agreed to implementation of PACFISH and INFISH. Decisions would have to be made before implementation of them could cease. Therefore, it does not have value for comparing action alternatives. (Federal Agency, Portland, OR - Letter #W4641)*

## **Alternative 2**

*Just a variation on Alternative 1, with additional constraints on management approaches, rather than enhancing flexibility or management. Unlikely to work since it also is proposed for implementation in the context of existing land use plans. (Professional Society, Libby, MT - Letter #W967)*

*“Interim management guidance within Alternative 2 does not represent current management direction as described in land and resource management plans without a decision to make the guidance permanent. Remove references throughout the document that indicate that Alternative 2 is a No Action alternative. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The alternative presents additional standards and guidelines without explaining their relationship to those found in the interim direction. Also, what is the significance of Level I and Level II direction under alternative 2? (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*Alternative 2 had been implemented with environmental assessments despite the significant federal action involved. The environmental consequences of this action have not been disclosed and the DEIS does nothing to disclose the consequences. (Wise-Use Group, Hayden Lake, ID - Letter #B77853)*

*It is our conclusion that the evaluation of the alternatives is very subjective and based more on individual’s values than on anything measurable or defensible. We do not favor any alternative more than the true current action alternative 2. (Natural-Resource-based Business or Business Group, Colville, WA - Letter #W698)*

*Since Congress has not endorsed making ecosystem protection a fundamental goal of federal land management agencies as envisioned in alternatives 3 through 7, we feel that alternative 2 more clearly represents widely held social values. (Natural-Resource-based Business or Business Group, Colville, WA - Letter #W698)*

*Alternative 2, which is essentially a no change alternative, calls for implementation of existing plans and adherence to PACFISH and INFISH. It is not accurate to assume that there would be no watershed analysis under this alternative because such analysis is provided for under PACFISH and INFISH and would likely occur within the context of Section 7 Conferences for bull trout and anadromous fishes. (Federal Agency, Portland, OR - Letter #W4641)*

### **Alternative 3**

*Concern that increased production will be socially unacceptable and promote polarization. Successful implementation is doubtful because of only modest modification of existing land-use plans. Emphasis on local input is a plus. This is the most cost-effective, immediate and pragmatic solution. With a more positive philosophical spin in the narrative, Alternative 3 would become an attractive alternative that avoids the costly and indeterminate analysis paralysis of Alternatives 4 and 6. Provides for medium timber harvesting activities... will there realistically be enough money to perform thinning activities? If standards aren't too restrictive or constraining, then this is a workable alternative which moves toward the DFC with least investment... however, since there is no emphasis of production on any of the lands, it cannot provide predictable and sustainable levels of goods and services in the long-term... Will not allow agencies to make significant move forward. Would alter management just enough to address the most serious problems. (Professional Society, Libby, MT - Letter #W967)*

### **Alternative 4**

*The proposed activities are intended to mimic natural process, but many of the activities... are those which have been responsible for much of the present ecological degradation on public lands. As many of the activities will be designed to benefit private industry... their imperatives will be inappropriate in areas that still retain high ecological integrity or are capable of recovering without aggressive intervention. (Individual, Eugene, OR - Letter #W15)*

*It seems a reasonable compromise, of sorts, between the extremes of preservation and traditional resource exploitation, without however compromising the main thrust. (Individual, Portland - OR, Letter #W43)*

*Alternative 4 continues ecological decline instead of bringing about needed restoration... it smacks of chain saw surgery, killing the patient to cure it. (Individual, Eugene, OR - Letter #W372)*

*Alternative 4 implies knowledge of ecosystem needs (aggressive action) while other alternatives recognize lack of knowledge of ecosystem needs. (Individual, Blanchard, ID, - Letter #B2081)*

*The technical ability to implement Alternative 4 is lacking in the agencies. Replacement of this technical ability would require at least five years even if an adequate budget existed... Logging technology existing today is vastly improved over the past. When the objectives are correctly defined, the technology exists to meet those objectives. Not recognized is the expense of technology and the need for a defined timber supply to justify investment in technology. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B75417)*

*For meaningful restoration and management implementation, the time frame suggested by alternative 4 is too long. (Civic Group, Eureka, MT - Letter #B75619)*

... The restoration direction suggested in Alternative 4, the Preferred Alternative, is not clearly developed into a strategy that includes guidelines, time frames, and measurable objectives. Because of the very general language in objectives and standards for implementing the preferred alternative, it is not possible to predict what that approach will mean at the multiple scales. Much more information is needed about the actions for carrying out the proposed approach to restoration, how they will be implemented, and how progress and compliance will be measured. (Federal Agency, Portland, OR - Letter #W4641)

With the Project's preferred alternative, not a single acre of federal land falls into the agency's management category of production. (Individual, Huachuca City, AZ - Letter #B77947)

By choosing alternative 4 the agencies have bolstered the widespread public perception that self-interest is what truly drives public lands management. (Conservation/Environmental Groups, Republic, WA - Letter #W4660)

We believe there would be many obstacles and conflicts within Alternative 4's proposed standards and guides that would prevent fully successful implementation. (Professional Society, Redmond, OR - Letter #W693)

Lacking reserves, Alternative 4 does not sufficiently safeguard critical ecosystem elements such as roadless areas, old growth forests, aquatic strongholds, linkage zones, and hotspots of endemism, rarity and biodiversity identified by the Scientific Assessment. Nor does it provide an adequate check against the hubris that we can predict the effects of intensively managing everywhere. It does not adequately protect old growth forests, ESA listed or candidate species, Forest Service sensitive species, or rare community types such as intact shrub-steppe communities or Palouse prairie. (Conservation/Environmental Groups, Republic, WA - Letter #W4660)

Is practical, realistic, and gives the basin a win-win opportunity. The theme of Alternative 4 best speaks to the widest range of values. (Eastside Ecosystem Coalition of Counties, Salem, OR - Letter #W4555)

## **Alternative 5**

Acceptable if feasible - difficulties of implementing and gaining social acceptance - Too much like old paradigms of Alternatives 1 and 2 without balance of ecosystem management. Although it meets a portion of the purpose and need, it ranks low in trend toward DFC. It is better than existing Plans (Alternatives 1 and 2) but moves too slowly toward ecosystem health in the long-term. (Professional Society, Libby, MT - Letter #W967)

This approach appears to be similar to the recommendations of the Public Land Law Review Commission in the late 1960's. The commission recommended dominant use as the alternative to multiple use. Perhaps it is wise to revive the wisdom of the Commission. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B75417)

The Inland Empire SAF would generally favor some of the features of Alternative 5 more than the others because it supports the human aspects of the ecosystem and limits the imposition of restrictive basin-wide standards... (Professional Society, Moscow, ID - Letter #W546)

Alternative 5 gives the impression that species conservation will be focused in a few areas and be de-emphasized on the remaining lands. This scenario will most likely lead to continuing problems for currently listed and depressed populations and may contribute to additional listings under the ESA. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)

## **Alternative 6**

*This experimentation is to take place everywhere without leaving large areas from which to learn as natural controls. Such an approach does not constitute experimentation... The stated goal of Alternative 6 is to proceed with restoration on an experimental basis, with comprehensive monitoring. However, this 'experimentation' is to take place everywhere without leaving large areas from which to learn as natural con-trols. Such an approach does not constitute experimentation. The commercial push for motorized recreation is not confronted. (Individual, Eugene, OR - Letter #W15)*

*Through the application of a conserve/restore emphasis rather than restore only emphasis, Alternative 6 also provides the greatest potential benefit to the health of aquatic species. Alternative 6 considers ecosystem management on a smaller/subbasin scale, making it easier to observe and to measure results of management applications. ICBEMP is the new paradigm for ecosystem management that considers using a 100 year management plan... it seems more prudent to take a slower and more cautious approach where success and failures can be reviewed and documented for the use of further generations. (Individual, Ellensburg, WA - Letter #B77292)*

*Because Alternative 6 embraces adaptive management, [this commenter] fears that adaptive management would evolve into a do-nothing-but-study approach as managers fear making a decision that has not been studied. It will likely become an excuse to do nothing or as little as possible until all answers are known. We believe that this is the alternative that Alternative 4 would evolve into when funding is not available. Without a clear definition of the desired future condition this alternative is attempting to meet, it is not possible to comment further. (Wise-Use Group, Hayden Lake, ID - Letter #B77853)*

## **Alternative 7**

*The Idaho Dept of Lands is not convinced that a series of reserved or protected areas needs to be established in order to meet the objectives of ecosystem management. While there may be social rationale for preserves, there is certainly no economic or scientific basis for creating them at the expense of timber or forage production, community stability and other human amenities. (State Agency or Elected Official, Boise, ID - Letter #B77849)*

*Alternative 7 is set up with management restrictions that doom it to failure in the evaluation scheme of the DEIS and , therefore, it is designated to fail. From the outset Alternative 7 was burdened with criteria that would fail to meet the purpose and need. The emphasis on restoring degraded forest and rangeland systems within the proposed reserves in Alternative 7 is inconsistent with the direction stated for the document. While it may be more consistent with ultimate ecosystem persistence and naturalness, it is set up as a 'straw man' for comparison and ultimate rejection. Its inclusion also 'frames' Alternative 4, the preferred alternative, and makes it seem more reasonable. (Individual, Missoula, MT - Letter #W3801)*

*Alternative 7 needs further clarification. It proposes a strategy that would protect large tracts of high quality habitat for the conservation and restoration. The alternative does not, however, identify specific areas for protection, give clear direction for consistent identification of lands to be set aside, nor propose a process of allocation as a means for reconciling conflicting land uses. ...the passive restoration approach to its management makes this alternative unacceptable... Regulatory agencies would be severely limited in active efforts toward species recovery and restoration of habitat. (Federal Agency, Portland, OR - Letter #W4641)*

*Alternative 7's worst failing is the enormous reserve system that incorporates great areas of degraded lands without providing for needed active restoration. ... The DEIS readily concedes that no effort was made to exclude seriously degraded lands from the alternative's reserve system. ... no plans are included for any active restoration. Road removal, exotic species eradication, controlled use of prescribed fire are foregone. In the highly degraded forest lands included within the reserves, where restoration thinning might make sense, none is provided for. ... Neither conservationists nor the scientific community recommends exclusively passive management of reserves in the region. Aggravating this situation is the full commodity orientation of management in Alternative 7's between-reserve matrix. (Conservation/Environmental Group, San Francisco, CA - Letter #W4834)*

*The standards and guidelines in Alternative 7 were purposely designed to fail the Science Integration Team's evaluation... such that Alternative 7 achieves low ratings relative to criteria for landscape management, fire management, and species viability. By relying on wildfire to restore forest and range condition and by preventing road restoration and weed management, the framers of Alternative 7 designed an alternative that was guaranteed to receive low marks. Far from being a reasonable, reserve-based alternative, it never had a chance and therefore fails to contribute to a range of reasonable alternatives. ... With a few simple modifications a reserve alternative could have been constructed that would have achieved high ratings against all of the Science Team's criteria. (Conservation/Environmental Groups, Boise, ID - Letter #B78654)*

*Many areas of high ecological integrity have been left out of the these proposed reserves, and many which have been included are in degraded conditions. (Individual, Eugene, OR - Letter #W15)*

*Alternative 7 billed as the 'conservation alternative' offers only a disconnected series of reserves that omits significant areas and allows no active restoration of habitat or removal of exotic species in reserves. (Conservation/ Environmental Group, Boise, ID - Letter #W14)*

*There has been no analysis to suggest that Alternative 7 is realistically attainable. The economic analysis needs to be revised to include a robust analysis of the types of social and economic impacts purported in the DRFCs. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

### **1.4.3 Desired Range of Future Conditions**

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Many people question the validity and usefulness of the Desired Range of Future Conditions (DRFC). They feel that any predictions of the future will fail because we cannot predict how landscapes and society will change over time. They note that the Draft EISs state, "ranges of future conditions over the next 50–100 years are relatively unpredictable," and they wonder whether the unpredictability is due to faulty environmental analysis. If faulty analysis is not to blame, they wonder whether long-range DRFCs should remain in the document.

Some people argue that new laws, policies, and technological changes in energy, transportation, communication, and agriculture, will make the year 2150 as different from today as the changes since 1850. The DRFCs, some contend, reflect what people would like to see in the future rather than what is reasonable to expect. Some people fear that with vague predictions the DRFCs could mislead the public and decision makers. Several people believe that the DRFCs should vary among clusters and between communities in order to reflect site-specific variability.

**Issue:** *The Final EIS should allow for the Desired Range of Future Conditions to be as accurate as possible, yet flexible enough to address site-specific issues.*

**Sample Comments:** *You have failed to prove that the proposed logging and thinning will restore forests to their pre-European condition, because only a long-term study on the order of 100 years or more could be that. Computer models are only as good as what is put into them, and if the input is slanted, the results will be slanted. (Individual, Weiser, ID - Letter #B2743)*

*The world is too dynamic for us to predict conditions 50 to 100 years in the future. The environment is constantly changing... The Forest and Rangeland Renewable Resource Act of 1974 requires forecasts of resources and supplies and demands within the next 50 years. This DEIS should not be structured for conditions of the resource based 50 to 100 years in the future. (Individual, St. Maries, ID - Letter #W3792)*

*DRFC have taken on the tone of what someone would like to see in the future, not what can reasonably be expected to actually occur. The DRFCs and the themes for alternatives are somewhat imaginary and do not consider major concerns such as risk of catastrophic events. (Natural Resource-based Business or Business Group, La Grande, OR - Letter # W686)*

*DRFCs need to be as specific as possible so that the public and decision makers are not misled by vague statements. (Natural Resource-based Business or Business Group, La Grande, OR - Letter # W686)*

*The footnote on page 53 on Chapter 3, Table 3-4 states that 'ranges of future conditions over the next 50-100 years are relatively unpredictable.' This statement suggests an inadequate environmental analysis. This statement implies that the DRFCs associated with each alternative are unpredictable and, therefore, unreliable statements that cannot be modeled to an adequate level in the document. If the modeling effort is flawed, on what basis are projections made and reported in Chapter 4? Reconcile this statement or remove long-term DRFCs and/or alternative-specific DRFCs from the document. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*They assume that no new laws and policies affecting the living and non-living components of the environment in the project area will be enacted over the next five to ten decades, that technological change in such things as energy, materials, transportation, communication and agriculture will not influence the region. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*Develop ranges in variability to accommodate disturbance, societal needs, and activity priorities. The desired range of variability may differ between clusters and between communities. (Professional Society, Eatonville, WA - Letter #W573)*

*Another desired future condition is to maintain or restore healthy, productive and diverse populations and communities of plants and animals. This says nothing about the composition of these populations and communities. (Federal Agency, Seattle, WA - Letter #W881)*

## 1.4.4 Historical Range of Variability

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Use of the concept of Historical Range of Variability (HRV) tends to confirm some people's perceptions that one goal of the project is to make the interior Columbia River Basin look as it did in 1850. They feel European settlers and those since have greatly increased the productivity and health of the land. Agriculture and other developed water sources, some people believe, have afforded wildlife a much larger range, while dams have prevented flooding and riverbed scouring. They question how anyone could know the exact conditions of the land 150 years ago.

Some argue accurate scientific estimates of existing ecological health can barely be made, so it is not feasible to estimate previous health. Although HRV is defined as a reference point in the Draft EISs, many people fear that it is used as a goal for alternatives. They strongly assert any evaluation of the success of alternatives in satisfying purpose and need should be done against established goals and DRFCs not against the HRV. Many people note that the HRV is not a stated management goal under any alternative; therefore, they believe that HRV should not be used to determine the effectiveness of alternatives.

**Issue:** *The Final EIS should not establish standards for past ecological conditions based on the Historical Range of Variability.*

**Sample Comments:** *I agree that the DEISs imply that the perfect landscape is one unaffected by Europeans and their descendants. The alternatives seek to have management mimic nature to make much of the landscape look as though Europeans never settled the region. We believe there is no sound reason to accept this nature-knows-best philosophy and want to point out that human well-being in the area is far higher than in the mid-1800s while most other species continue to thrive. (Form Letter #221, 219)*

*The EIS suggests that there is variation in conditions over time that can be described and reconstructed based on one instant in time, the period of time before the settlement of the Columbia Basin by Euro-Americans. This is then taken to be a mid-point in the historical range of variability of conditions. (Individual, Ellensburg, WA - Letter #B77279)*

*Suppose researchers knew everything about every living thing that occupied the Interior River Basin during the 1800s. What would be the basin's Historic Range of Variation? What would be the mid-point of the HRV?. There is no comparison of estimated historical values of species richness to present values. There is no comparison of estimated historical values of biotic integrity to present values. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter #B77931)*

*How will you determine what the ecosystem of 150 years was like, and when will you know you have attained your goal? Which 1850 vegetation maps were used to make your determinations, and why did you use them? (Individual, Latah, WA - Letter #W485)*

*There is no scientific data to prove that the condition of these lands in the 1850s was ideal. Left alone, biological communities do not tend toward equilibrium, but fluctuate dramatically. (Country Agency or Elected Official, Salmon, ID - Letter #B77161)*

*If the meadow or range was produced by human effort is low integrity, never mind its increased productivity, lack of erosion, but if an opening was by natural calamity (wildfires, etc.) it's wonderful and rated high integrity. An example of this Pre-settlement bias is the references to riparian areas and how man has desecrated them. The truth is most of the streams in the west and beyond flooded severely, nearly annually, scouring a wide area preventing streamside vegetation... Human occupation has developed many more scattered water sources since that benefit the wild as well as domestic animals. (Individual, Kettle Falls, WA - Letter #B77206)*

**Issue:** *The Final EIS should not determine how well alternatives achieve their goals in relation to the Historical Range of Variability.*

**Sample Comments:** *The team should come clean and clearly state the natural range of variability... is not simply a reference point or indicator, but instead is a primary criteria that drives the analysis. (Civic Group, Eureka, MT - Letter #B75619)*

*The last sentence in paragraph 4, page 37, Chapter 4 states that comparisons to HRV are intended to determine how effectively alternatives would meet management goals. This is absolutely an incorrect approach to alternatives analysis and a significant flaw in the evaluation of alternatives. By the project's own admission, HRV is not a management goal under any alternative, so it cannot be used to determine the effectiveness of alternatives. The effectiveness of alternatives needs to be based on the ability of the alternative to achieve the DRFCs and the project purposes and needs. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Although HRV is defined as a reference point, not a goal for alternatives, the alternatives were evaluated on the basis of how well they achieve HRV. Presumably, the more deviation from HRV, the lower the evaluation of ecological integrity is. However, the alternatives should have been evaluated against the DRFCs. Perform a valid evaluation of alternatives, which evaluates how well the alternatives achieve their stated goals and the project purposes and needs. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

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## Section 1.5 ~ Collaboration and Public Involvement

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Numerous individuals are concerned about collaboration and consultation among project officials, American Indian Tribes, State and local governments and agencies, and other areas of the Federal government. Many harbor doubts regarding the methods and effectiveness of consultation and collaboration, and they remind the project to fulfill its obligations under the National Environmental Policy Act. Others suspect a lack of commitment by the Federal government regarding public involvement in the planning process. Respondents also note possible conflicts between the various public and government entities which may arise during implementation of the project, and they desire clarification about how such conflicts will be resolved.

### 1.5.1 Public Involvement/ Adequacy of Process

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Most individuals who comment on the adequacy of public involvement in the process agree on the importance of public input to the project. However, many are frustrated with the process and suspect their input will not be considered by the decision makers.

Many state the process for public involvement for the project should be more clear and accessible. These people contend that the very size of the document and supporting data discourages participation and understanding of the project goals. If the project would present the local impacts of each alternative in a clear and accessible format, some suggest, the public could more easily identify their concerns and offer constructive comment. Instead, many feel abandoned by a government they suspect has already made its decision under pressure from well-funded interests. Some suspect the cumbersome and confusing nature of the documents conceals an ulterior motive, such as a deliberate attempt to exclude the public from interfering in the decision-making process and/or with the implementation of decisions already made.

Several respondents feel that comments from people living within the boundaries of the project area should be more influential than those from outside, because more distant people have a less crucial stake in project outcomes. Others state the opposite: that since public lands belong to the entire nation, the entire American public should have a say in decisions concerning public lands. To some, the level of comment is not an indication of public sentiment but merely a reflection of the political campaigns of interest groups that have mailed thousands of form letters aimed at influencing the process.

While some appreciate government efforts such as public meetings designed to clarify the project, others say they wish government employees were better informed on the project so the public's questions could be answered at public meetings. They feel the generic answers they receive are inadequate. Many say such meetings provide only a one-way flow of information from the government to the public, rather than an opportunity for the public to express their concerns to government officials. Some people believe the public input process began only after a list of alternatives was presented to them and state they could have participated in the process more effectively if they had been invited from the start.

A few people commend the use of newer technology to present project information and offer suggestions to make it work better. For example, one suggests the Final EIS could be divided into smaller on-line documents, each with a table of contents, enabling computer users at home to download and print their particular areas of interest, rather than the entire document.

Many respondents have requested that project officials extend the time for public comment. Many of these letters were received prior to the decisions that resulted in extending the comment period from October 6, 1997 to May 6, 1998.

***Issue:*** *The process for public involvement in project should be more clear and accessible.*

***Sample Comments:*** *You solicit public input in the decision making process. I've listed below some aspects that seem to discourage participation:*

- 1- the sheer volume of the documents.*
- 2- the very unfamiliar terms that are used and the lack of any definition for those terms.*
- 3- In order to fully understand this document, one would need to be familiar with plans that precede it.*

*The time for this much study is very difficult to find for those who work for a living and have a family to care for. For many it becomes overwhelming and I wonder if that is the purpose. (Individual, Libby, MT - Letter #W852)*

*Will the public have a chance to comment on local impacts or input into the changes that will be made? The Final EIS should clarify this process. (Non-Natural-Resource-based Business, Portland, OR - Letter #W868)*

*Many are frustrated by the seeming inability of local Forest Service officials to provide information that will help them understand how implementation of the project will affect management of national forests in their area. I appreciate the fact that these are not easy questions. But the public's participation in this process is hindered when substantive information is not available for their consideration. (Federal Elected Official, Billings, MT - Letter #B75280)*

**Issue:** *Input from the public residing within the project boundaries should be more influential than input from those outside the basin.*

**Sample Comments:** *Small groups of people who have NO vested interest or direct connection, other than philosophically, are allowed too much influence on decisions affecting our forest eco-system. THIS MUST STOP!! I would like to see a plan which incorporated more direct input and control from our local people. These people know, understand and rely on the forest system--they live and work here. (Individual, Kamiah, ID - Letter #B79133)*

*The local working people's voice in this matter should also be considered. We have more at risk than the non-local people do! (Individual, St. Maries, ID - Letter #B79071)*

*We ask that the ICBEMP project stratify the public comments received during the comment period, to distinguish between comments from rural stakeholders and comments from citizens living out-of-region of urban areas - those who have a lesser stake in ICBEMP outcomes. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4732)*

*In taking a big picture look, you lost focus on localized reality. Your opportunity to recover that focus is gone. The level of comment on the ICBEMP documents is not an indication of public involvement. What you have seen is the determined political campaign of interest groups aimed at influencing you in various ways. Lots of money and lots of time went into these efforts but very little quality public involvement aimed at finding real solutions. That perception angered and frustrated many of us and resulted in reams of form letters and blanket mailers from all sides. It would be the height of cynicism for you to count the public battle over ICBEMP as public involvement. (Individual, Spokane, WA - Letter #B77866)*

**Issue:** *The project should continue and improve its methods for public participation.*

**Sample Comments:** *There were many new and innovative developments from this project that warrant recognition: The level of public participation through the 'monthly' meetings, newsletters, and teleconferencing, as well as the multitude of other meetings, was very beneficial to those interested in the development and outcome of the project. (Natural Resource-based Business, Coeur d'Alene, ID - Letter #B77304)*

*It would also be nice to be able to download the EIS summary, which was available in paper copy but not via Internet. (Individual, Bennington, NH - Letter #B2834)*

**Issue:** *In addition to providing information, the project staff should be more interactive with the audience at their public meetings.*

**Sample Comments:** *I would prefer to get an answer to my letters rather than the generic, rather uninformative documents that I usually get. (Individual, Boulder, CO - Letter #B77311)*

*Since the beginning of this project, the EIS Team has maintained that there has been public involvement throughout the process. However, from its inception, every meeting attended by Idaho Cattlemen Association members, has been informational only with no public input being accepted, particularly with reference to repeated requests for outside peer review of the science methods employed. (Natural Resource-based Business, Boise, ID - Letter #B77302)*

*At a hearing conducted in our county, we were unable to get satisfactory answers to many questions asked. (Individual, Wenatchee, WA - Letter #W1812)*

*'Scoping' meetings are not local input meetings with regard to content of the plans which are developed. They are meetings where the federal teams spread around a room an intimidatingly large number of maps and indices, and then ask member[s] of the public what they think the issues are which should be pursued in the planning. It is quite obvious that the agencies have already honed in on the issues which they will pursue, the methods by which they will pursue the issues, and the likely results of the pursuit of the issues by the time the 'scoping' meeting[s] are held. (County Agency, Murphy, ID - Letter #B77171)*

## **1.5.2 Inter-governmental Collaboration**

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Collaboration between the project and other governmental bodies during the planning process is important to the vast majority of respondents who commented on this issue. Many feel that the rights and interests of state and county governments play an integral role in project planning and must not be neglected. Some suggest that Canadian agencies should be included in the process because activities there can affect the project area. Many state that the National Environmental Policy Act (NEPA) mandates such collaboration and consultation.

Some respondents believe that local governments are too vulnerable to the pressure of industry, and they admonish the project to resist excessive collaboration with county governments and agencies. Others state that local governments have neither the resources nor the will to enforce existing laws.

The majority of people commenting on collaboration do not believe enough collaboration was done with county, State, or Tribal governments. Additional comments on this subject are presented in Section 1.6, Relationships to Other Planning Processes. A few respondents did express the sentiment that the Forest Service has always included State and local agencies in their planning and that this balance has worked well and needs no major changes.

Several people ask for clarification between collaboration and cooperation. They say they will be looking closely at the mechanisms that will be established to ensure interagency coordination among the different agencies.

When conflicts in implementation at the local level arise, some wonder how these differences between Federal and local agencies will be resolved. For example, many feel that if the project directives and a county land use plan conflict, the degree of control or enforcement is unclear. Many fear delays in implementation will arise.

Some people express concern that the collaborative process might block or slow action, while a few predict that interagency consultation will be unfocused and inefficient. Others say they are concerned that funding may not be available to ensure effective collaboration in implementing the project.

**Issue:** *In developing the Final EIS, the project should collaborate more with State, Tribal, and local governments as well as Federal agencies in the planning process, as mandated by NEPA.*

**Sample Comments:** *Stop playing games with local governments and meet with them, talk to them, listen to them and you will find that they can be a great help in finding solutions to the problems at the grass roots level by using custom, culture and common ordinary horse sense. (County Agency, Lander, WY - Letter #B3839)*

*It is mandated in NEPA that local governments are to be granted joint planning opportunities with ALL Federal Agencies. The Counties and States are no less important and must be given the same credence as the Tribes you are so focused on. (Individual, Kila, MT - Letter #B4563)*

*I can't emphasize strongly enough that as this process continues, our local governments and county commissioners must be given a major role in shaping the final version of ICBEMP. There are 104 counties within the ICBEMP boundaries. County commissioners are best equipped to evaluate the social and economic impacts this will have on their counties. (State Agency, Olympia, WA - Letter #B77186)*

*Objective HU-02 calls for increased coordination. This differs from collaboration, and it is unclear why this objective does not call for a fully collaborative process. (Federal Agency, Seattle, WA - Letter #W881)*

*Analysis cannot be permitted to block and unreasonably slow proper action. Analysis processes in the Final EIS, including interagency consultation, must be focused, timely, and efficient. (County Organization, Salem, OR - Letter #W4555)*

*[Regarding] EM-02 Objective - notify affected agencies -- opportunities for participation - reasonable deadlines. Is this realistic in relation to other agencies having time, people, etc. to address this? (Individual, McCall, ID - Letter #B75382)*

*EM-O2 could be widely interpreted and implemented. This section should clearly define which entities will be involved in what processes at what level. A standard should state that the best, most recent scientific information will guide analysis and management. (Federal Agency, Portland, OR - Letter #W4641)*

*ICBEMP's interagency, intergovernmental collaborative approach especially during analysis processes provides for early involvement which could increase efficiency and credibility of the products of all agencies. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** ***The project should reach its Record of Decision free from disproportionate local influences.***

**Sample Comments:** *I am very concerned about the potential for disproportionate influence over the final decision is being granted to certain groups or individuals (FACA free or otherwise) with agendas that are clearly inconsistent with the scientific findings and proposed management. I'm particularly concerned about the evolving relationships between the ESC and the Eastside Ecosystem Coalition of Counties... and the possible deals that might, or already have been cut behind closed doors. (Individual, Grangeville, ID - Letter #B4705)*

**Issue:** ***The Final EIS should have a mechanism to resolve conflicts that may arise with local plans.***

**Sample Comments:** *I am hereby requesting information for King & Pierce Counties in Washington State which indicates the inconsistencies between the ICBEMP DEIS and the county plan required by Washington State's Growth Management Act as well as any other local and county land use regulations.... If Washington State amends the Growth Management Act so that it conflicts with ICBEMP in the future, how will these issues be resolved in a timely manner? (Natural-Resource-based Business or Business Group, Auburn, WA - Letter #W623)*

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## **Section 1.6 ~ Relationship to Other Planning Processes**

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**T**his section contains public comment on the relationship of the project to various Federal, State, and local laws; interim strategies; other planning processes; and effects on other public and private lands.

Some argue that other State and local plans conflict with direction found in Draft EISs. These respondents warn that the project will overlap and sometimes negate local plans which are now effectively working. They also fear it will create economic hardships in the area.

Another concern is that the project will negatively affect adjoining Federal, state, and private lands. The greatest concern is how the project will cause increased pressures on private lands, including more wildlife use and increased restrictions on private land use. As access to public land is decreased, they believe, more commodity and recreational pressures will be put on private property.

### **1.6.1 Relationship to Existing Forest Service and BLM Plans**

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Many respondents note that Forest Service and Bureau of Land Management units already have their own plans as mandated by the National Forest Management Act (NFMA) and Federal Land and Policy Management Act (FLPMA). They feel that these plans enjoy broad local support, use valid scientific methods, and are the result of years of hard work, planning and compromise. Respondents worry that a decision made on this large a scale will prohibit flexibility for local managers. Many people suspect the project will supersede these plans. Some state that supplanting the plans would violate NFMA and FLPMA, which establish rules for revising or amending plans, and would also add yet another layer of regulation and procedure which many see as unnecessary.

Apparent conflicts between the project and existing plans confuse and alarm many respondents. They fear that strategies and commodity output levels established in the individual plans will be superseded by project's more general broad-scale output goals, in violation of NFMA, FLPMA, and the Forest and Rangeland Renewable Resources Planning Act Draft Program of 1995. Suggestions are made to provide a well-defined Forest Plan amendment/revision process before proceeding with a Final EIS and Record of Decision.

Some note that planning has occurred prior to the development of any guidelines or direction for planning at this scale, generating confusion regarding the planning process for both BLM and Forest Service. The respondent asks how a Record of Decision can be signed amending current BLM and Forest Service Land and Resource Management Plans, Forest Service Regional Guides, and BLM State Director guidance, when each has a different process to follow for amendment. Another asks when an EIS became a vehicle for setting policy, noting that both agencies already have established procedures and that policy can always be mandated by law, something many respondents express has not been done in this instance. Some people ask both agencies to either follow existing regulations or amend them before going around them.

Hoping to only minimally alter existing plans, some support Alternative 3, which they state continues with existing plan's direction more than any other alternative. Many respondents feel the best use of the project is to give local managers the scientific data that was gathered and not continue towards a Final EIS and Record of Decision.

**Issue:** *The Record of Decision should amend or revise existing Federal plans only as permitted under Federal law.*

**Sample Comments:** *Current federal fire policies mandate the development of new fire management plans that provide for the reintroduction of fire into fire-dependent ecosystems. ICBEMP clearly did not share this perspective nor even acknowledge the existence of new federal fire policies.... How does ICBEMP address the Federal Wildland Fire Management Policy and Program Review? (Individual, Eugene, OR - Letter #W4828)*

*Alternative Three updates existing agency use plans rather than initiating yet another planning effort... Such plans are uniquely suitable to the specific areas they address... Alternative Three would minimize changes to local plans, addressing only priority conditions that most hinder effectiveness or legal conditions. (Individual, Vale, OR - Letter #B75314)*

*Is there a better game in town with general support? Yes. The forest plans that were locally established and have general local support. Other than Eastside Ecosystem Coalition of Counties there is no general support for ICBEMP. Let the federal land managers use the peer reviewed and peer accepted science documents to help administer the plans that are already in place. (County Agency or Elected Official, Canyon City, OR - Letter #B4726)*

*Existing Forest and Area Management Plans - Appendix 3-1: Develop and include in the DEIS and ROD an interagency process that includes a defined time line for amending or revising plans that will resolve conflicts as they may arise between current management area designation or land allocations and those resulting from required processes (e.g., SBR, EAWS, water quality management plans, transportation management plans, and the results of ICBEMP monitoring and adaptive management processes). (Federal Agency, Seattle, WA - Letter #B78714)*

*Local USFS plans have extensive public input during forest planning revisions that reflect changing public needs and 'healthy functioning conditions' that meet the geographic concerns. Current planning processes have the ability to make quick and timely revisions due to climate, weed expansions and other measures needed to address changing conditions. Current planning is at a reasonable scale to plan management that provides sustainable goods and services that directly affect people. (Individual, La Grande, OR - Letter #W3806)*

*At minimum, the Eastside DEIS must show how the alternatives will affect the existing forest plan resource output schedules. The NFMA requires that these tradeoffs be considered during a significant forest plan amendment. Remarkably the Eastside DEIS makes no estimate of effects for individual forests which would provide for meaningful comparisons to existing forest plans.... The Eastside DEIS assignment of the management output emphasis to land clusters... affects what lands are suitable for timber production and the level of resource outputs.... The NFMA and forest plans prohibit changing the land assignments to management areas and management emphasis without revising the forest plan.... Rather than serving as a foundation for efficiency, such a process will generate 75 additional headaches.... From a resource user's standpoint, the specter of a plan that cannot be implemented to produce tangible outputs, being overlaid on a suite of nearly dysfunctional plans, is a nightmare. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*ICBEMP has no way around significant amendments to forest plans because the end of the 10-year life of the plans is fast approaching, and NFMA requires that the Secretary review the land classified unsuitable for timber production in the plans at*

least every 10 years and shall return these lands to timber production whenever he determines that conditions have changed so that they become suitable for timber production. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)

Tables 3-6 and 3-7 essentially revise the commodity outputs, such as timber allowable sale quantities, in current land-use plans. This has been proposed without mid-level or fine-scale analysis. Recommendation: Broad-scale data should not be used to directly or indirectly modify commodity output expectations of fine scale plans without adequate analysis. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)

**Issue:** *Before a Final EIS is completed and a Record of Decision is signed, administrative planning rules should be modified to regulate and direct broad-scale analysis and decisions.*

**Sample Comments:** *The relationship of the ICBEMP to forest-level land-use plans and site-specific environmental analyses of projects are not adequately explained. This needs to be rectified. Please explain the procedures and outcomes whereby the ICBEMP results will be integrated with forest plans and project analyses. Please explain how this new approach will improve the ability of the agencies to withstand legal challenges to existing plans. Appendix B of the UCRB DRAFT EIS is a good place to start, but the discussion should be more precise and clear. Please feature this analysis prominently in the Final EIS and Record of Decision, not buried in a Appendix 7. (Individual, Moscow, ID - Letter # B77884)*

## 1.6.2 Relationship to Interim Strategies: PACFISH, INFISH, and the Eastside Screens

PACFISH, INFISH, and the Eastside Screens (the screens) are three interim management strategies that affect management of Forest Service- and BLM-administered lands in the project area in relationship to anadromous fisheries (such as salmon), native fresh water fisheries (such as bull trout), and old forest stands in eastern Oregon and Washington respectively. Few respondents commented on these strategies, but those that did disagree on whether the project should rescind or continue them. Some say the interim strategies have hurt local economies. Others feel the riparian protections in these strategies are necessary and the project should incorporate them into the Final EIS.

Some individuals are suspicious of what the screens will really could be used for. For example, they ask whether the screens are going to be used to exempt activities on Forest Service- and BLM- administered lands? Some believe that if used properly, screens would be necessary to determine how the activities should be changed to comply with the ROD. One respondent feels that the Forest Service should remove the interim guidelines (21-inch DBH [Diameter at Breast Height] maximum cut tree size and the PACFISH guidelines) and use the existing Forest Plans, while a representative from a Federal Agency asked for the opposite: expansion of the interim standards.

**Issue:** *The selected alternative should rescind the interim strategies: PACFISH, INFISH, and the Eastside Screens.*

**Sample Comments:** *Recognize the implementation of revised ICBEMP aquatic/riparian standards and rescind PACFISH, INFISH, and Eastside screening direction. (Professional Society, Eatonville, WA - Letter #W573)*

*The USFS should remove the interim guideline (21" DBH max cut tree size and the PACFISH guidelines) and use the existing forest plans. (Individual, La Grande, OR - Letter #W2484)*

*The Eastside DEIS claims that commitments made through the interim direction of PACFISH, INFISH, and the Eastside screens provide the requirement and authority for permanent ecosystem-based management... But the Forest Service in the Prairie Wood Products case argued to the court that the interim direction did not make commitments and thus was not a significant amendment to any existing plans. To that extent the PACFISH, INFISH, and the Eastside screens interim directions represented predetermined decisions. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*The impact of the interim strategies (PACFISH, INFISH, and the Eastside screens) have already negatively impacted thousands of job. These strategies are said to be discontinued with the acceptance of ICBEMP. They are for all intent and purposes incorporated into the standards, objectives and guidelines. We already have some history with the economic and social impacts of these strategies. Such information, we believe, has not been completely or properly addressed in the economic analysis. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4831)*

**Issue:** *The selected alternative should incorporate PACFISH, INFISH, and the Eastside Screens.*

**Sample Comments:** *ICBEMP must ...permanently adopt the Eastside screens. (Individual, Eugene, OR - Letter #W4541)*

### 1.6.3 Relationship to Other Planning Processes

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Many respondents believe the Draft EISs failed to recognize many existing local, state, and Federal plans, though ignoring plans that work, causing overlap, and creating conflicts. Some claim the project fails to recognize the successes of other plans, such as Best Management Practices in Montana and numerous county zoning or land-use plans.

A few respondents claim that the project is strikingly similar to the Northwest Forest Plan (NWFP), which they feel is destructive to western Oregon; they urge project planners not to emulate NWFP too closely. Taking an opposite view, another respondent suggests the problem with the proposal for biological reserves is they allow no active management, a stand the Northwest Forest Plan did not take. This respondent believes if the project would reevaluate this policy and emulate the NWFP by allowing active, silvicultural, and restorative treatments aggressively while meeting species conservation objects, the project may have a better chance of success. The writer sees no scientifically valid reason why a similar integrated approach could not be applied to the rest of the interior Columbia River Basin.

On the state level, respondents mention Oregon Governor Kitzhaber's 11-point timber plan and Washington's Growth Management Plan as possible conflicts or models.

More than one county accuses the project of not coordinating with either existing or pending county plans in progress. They assert that local plans, such as at the county level, are the best way to manage local areas, and that Federal programs should conform to those plans. Some counties express disappointment in what they saw as good intentions in the beginning; they feel strongly now that the project became a political platform for the Clinton administration and leading environmental lobbyists. They now ask for a halt or at minimum a serious overhaul of the Draft EISs and a return to what they perceive as the original intent, to provide sound scientific data for local land managers.

One county points out that while Forest Service and BLM personnel insist they coordinated closely with the Eastside Coalition of Counties, this coordination did not happen and project cooperation efforts are not sufficient to be in compliance with NFMA

and FLPMA. They say that work with the Coalition did not include counties with existing planning and management programs.

Several respondents commented on the Rangeland Reform Regional Standards and Guidelines, stating that since these guidelines were issued after the Draft EISs were released for comment, they should be incorporated on a local level. A Federal agency points to some inconsistencies between the Healthy Rangelands effort and the project that need to be resolved before issuing a ROD; they strongly recommend that the selected alternative provide direction to restore rangeland conditions.

**Issue:** *The Final EIS should clarify its relationship with local, Federal, State, Tribal, and other plans.*

**Sample Comments:** *The Draft EISs are filled with erroneous and flawed information and analysis. Comments regarding such erroneous and flawed data and analysis are being submitted by individuals, companies, and associations.... Coordination of planning would have required that the Project Team take a hard look at information, data and analysis provided by those who regularly use the resource. Without such information, data and analysis, the economic stability of Owyhee County is endangered by the Draft EIS which can be used by management agencies to restrict grazing and recreation use regardless of the actual condition of the resource. That is not the result which we believe Congress intended for planning and management related to the federal lands. It certainly is not the result which should be reached under the clear coordinate planning language of FLPMA. (County Agency or Elected Official, Marsing, ID - Letter #B78644)*

*The Association of Idaho Counties is simply a lobbying and informational association which counties may join on a voluntary basis. The Association has no authority to speak for the citizens of Owyhee County. The Association has no authority to substitute for Owyhee County in planning activities with the federal planning teams...etc. (County Agency or Elected Official, Marsing, ID - Letter #B78644)*

*We believe all lands including state and federal lands should be subject to all provisions of local land use. This policy supports our belief that federal land management actions should support local land use planning and not contradict or work against local land use plans. ICBEMP seriously threatens local land use planning, particularly as they relate to agriculture in the form of livestock production. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4831)*

*The Project should revisit consistency review efforts. Out of 104 counties and 476 communities in the Project area, a sampling of 32 is not sufficient to be in compliance with 43 CFR 1610.3-2 and 30 CFR 1502.16 requiring a discussion of possible conflicts between the proposed action and the objectives of federal, tribal, regional, state, and local, land use plans, policies and controls for areas concerned.*

*....The DEIS then states that the scope involved over 100 counties which makes consistency review effort more challenging, the document further points out that one effort undertaken... involved the collection and review of many county land use, economic development, and other plans which were submitted in late 1994 and early 1994. Apparently these were summarized in a report. The County/Community Vision Statement Project, completed in August 1995. This report is not included as an appendix, nor can we find any significant discussion of it in the document other than this paragraph. (Natural Resource-Based Business or Business Group, Colville, WA - Letter #W698)*

*The ICBEMP project is partially fashioned after the President's Forest Plan for most of the west side of Oregon. Promised flexibility and continued use of the resources of the federal lands were promised as was a decline in litigation. None of this ever happened. The courts have stopped almost all timber sales in the region. While management actions based on the plan have threatened and caused livestock producers to lose permits or had their permits reduced to a point that their economic and practical management value have been lost. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4831)*

*The DEIS does not adequately evaluate county and community land use plans, economic development plans, zoning plans, and other resource related plans. (Natural Resource-based Business or Business Group, Colville, WA - Letter #W684)*

**Issue: *The Final EIS should incorporate existing plans that work.***

**Sample Comments:** *What do we need 400 pages of ICBEMP for when we already maintain our soil, water and harvest timber using voluntary guidelines contained in Best Management Practices? (Individual, Fortine, MT - Letter #W593)*

*We have made some mistakes in management... most of them cures, such as... Montana's Best Management Practices, Certified Logger Training, and other education programs have improved slash treatment, disease recognition, wildlife values, weed control, etc. We are making great improvements. (Individual, Trout Creek, MT - Letter #B4725)*

*I would urge you to look more closely at Oregon Governor Kitzhaber's 11-point timber plan as a good guideline for what can be done in protecting old-growth forests, riparian and roadless areas. (Individual, Eugene, OR - Letter #W479)*

*In reviewing Draft EIS contents I am concerned that there is no mention of the Northwest Power Planning Council which was established by Congress in 1980. This regional policy-making body concerned the Columbia River's energy resources and uses have spent mega-tax dollars on their studies for adaptive management programs. I believe they just completed their study in 1995. I'm concerned that your studies have not integrated their findings, particularly in the area of on-the-ground implementation. (Individual, Seattle, WA - Letter #W359)*

*What about Washington's Growth Management Act? The studies for almost all counties have been completed and are now being implemented through the development of regulations. How will this affect your planning strategies and management? Would you please clarify these issues? (Individual, Seattle, WA - Letter #W359)*

*This is in direct conflict with the Washington State Growth Management Act plan. (Individual, Republic, WA - Letter #W542)*

*...State programs such as the Forest Practices Act, Cumulative Watershed Effects Assessment Process, the Beneficial Use Reconnaissance Project, and the Governors Bull Trout Recovery Plan are in place and have been found effective through on-the-ground audits. Throughout the DEIS, existing state programs designed to provide efficient and effective resource use and protection are dismissed or denigrated. This oversight is a serious flaw and on its own is reason enough for reevaluation of the DEIS with full involvement of state agencies. This causes the DEIS to fall short of the standards set by the NEPA process, and robs the public of a clear, factual basis on which to make a decision. (State Agency or Elected Official, Boise, ID - Letter # B77849)*

*Granite County has developed and adopted the Granite County Natural Resources Land Use Plan. The Plan established dual sovereignty between Granite County and federal land resource management agencies... (County Agency or Elected Official, Philipsburg, MT - Letter #B77944)*

*Master Memorandum of Understanding between USDA Forest Service, Region 6 and Oregon Department of Fish and Wildlife, R.E. Worthington, Regional Forester, Region 6, Portland OR. , effective 30 March 1979. Has this MOU been replaced? If not, what is the relation of ERU-based analyses and proposed application of regulations linked to classification as a cluster with the statewide comprehensive fish and wildlife plans? How do the Policies and Guidelines for Fish and Wildlife Management in Wilderness Areas, developed by the International Association of Fish and Wildlife agencies and adopted as the foundation for management of fish and wildlife in the National Forest wilderness within Oregon, by State of Oregon and USFS in March 1979...how does this policy effect the Eastside DEIS effort? Particularly, are federal agencies required to evidence consultation with State of Oregon ODFW initiatives underway that may affect the success of the federal agencies proposed strategy? How are these state and federal efforts being explicitly integrated, since the state manages fish populations and federal agency manages habitat? Are federal agencies required to secure state certification of standards as adequate to meet state forestry or water quality or other best management practice requirements? Has the state offered or made such certification(s)? (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*Section 340-41-026(7) of the Oregon Administrative Rules effective in June 1980 indicates that logging and forest management activities shall be conducted in accordance with the Oregon Forest Practices Act so as to minimize adverse affects on water quality (citing authority of Oregon Revised Statutes Chaper 468). In May Director Ellson directed, in part, that ...the quantitative standards... are to be used as goals in USDA Forest Service planning and monitoring management activities.... The above mentioned standards supplement the Best Management Practices requirement of the Clean Water Act and provide a yardstick for evaluation of BMPs. Please explain how the proposed standards in the DEIS relate to the applicable standards in state ORS and OAR; please explain how Forest Service activities approved under the DEIS will comply with and be shown to comply with BMPs established by PL-95-217. Please provide examples of successful enforcement of the State Forest Practices act as directed for 17 years; if such information is lacking etc. Please explain fully how this time will be new - substantially different than every year for the last 17 years. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

**Issue:** *The Final EIS should better explain coordination efforts and planning considerations when analyzing cumulative effects of tribal plans.*

**Sample Comments:** *Within the Other Planning Efforts subsection, page 1/23, the DEIS states the tribal plans were considered in analyzing cumulative effects. But to the Yakama Indian Nation's knowledge there was and is great hesitancy on the part of ICBEMP staff to seriously consider the Salmon Recovery Plan adopted by the Yakama Nation. Can you explain this contradiction and be more specific about the amount of consideration given tribal plans, and the conclusions or assessments made after their consideration with respect to their use and influence? Similarly, page 1/25, with the Recovery Plan subsection the DEIS lists species with approved recovery plans, but does not list those species covered by the tribal Salmon Recovery Plan. Why are these species not listed? (Tribal Governement, Toppenish, WA - Letter #W4556)*

*The overall goals of ICBEMP (integrated scientific assessment for ecosystem management in the Interior Columbia Basin.... pages 30-37) are generally consistent with the Wallowa County Nez Perce Tribe Salmon Habitat Recover Plan, however, the specific objectives and standards throughout the DEIS make it incompatible with our local plan. (County Agency or Elected Official, Baker City, OR - Letter #B78802)*

**Issue:** *The Final EIS needs to be clear that the objectives and standards of the Northwest Forest Plan apply to all alternatives in areas of overlapping jurisdiction.*

**Sample Comments:** *State clearly that where the ICBEMP and Northwest Forest Plan overlap, entire watershed should be managed under the Northwest Forest Plan. Chapter 1 of the DEIS explains that where the ICBEMP overlaps with the NFP, the ICBEMP could not supersede without specific, subsequent amendments to the NFP. Chapter 3 describes the NFP as a component of Alternative 1, but does not mention it under any other Alternatives. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should address and incorporate the Rangeland Reform regional standards and guidelines into the selected alternative.*

**Sample Comments:** *The DEIS (p. 1-20) states that the fundamentals of Rangeland Health are the basis for the standards and guidelines on BLM lands; however, since the Rangeland Health standards and guidelines were not finalized until after the DEIS was issued, we suggest that the final EIS reflect the final standards and guides as well as the philosophy that they be local in nature. (County Agency or Elected Official, Roseburg, OR - Letter #W4835)*

## 1.6.4 Effects on Other Public Lands and Private Lands

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The effects of the project on private property is of great concern among the majority of respondents who discussed this subject. Many fear that the project's vast scope and philosophy of ecosystem management cannot help, but negatively affect private property values and the rights of property owners. They feel that the project only hints at its effects on private lands, a denial which many view with suspicion and anger.

Many assert that if the project plans to protect wildlife with corridors and buffer zones, private property owners will endure added restrictions on use of their own land. If the plan provides for more abundant wildlife, some suspect private landowners will suffer the consequences of unwanted big game or predatory animals. Several landowners state they are already burdened by restrictions on use, licensing requirement for various activities, and excessive taxes.

Others are suspicious of claims in the Draft EISs that deny the project will have a major effect on private property. They state that the Historical Range of Variability, for example, is a plan to revert the land to the way it was in 1850; they cannot imagine that this approach would preserve the rights of property owners from small owners, large corporate owners, to inholders on Federal lands.

A number of respondents fear that public use and resource production on public land will be curtailed by the project and the shortfall they anticipate will increase stresses on private lands, resulting in degradation of those lands and increased commodity prices.

Some feel that increased restrictions on private lands will inevitably arise if the preferred alternative is implemented, which they predict will lower land values and amount to an illegal taking. They state that such takings would violate the Fifth Amendment of the U.S. Constitution.

Several respondents believe the Final EIS should disclose the effects of land exchanges, both current and planned. Some respondents feel NEPA is being violated by (a) not addressing the effects of pending land exchanges and (b) not analyzing and disclosing the impacts of potential habitat loss and cumulative effects of other new ownerships with regard to unanticipated management activities such as extraction and development. A few disagree that the project will negatively affect private property. They feel that resource extractors might treat their private lands more responsibly than they would public lands.

Similar worries about the spillover effects of the project apply to those concerned with other public lands. Some state the project is unclear about its effect on numerous public lands other than those administered by the Forest Service and BLM. They say State's rights could be compromised, as well as the cultural and natural integrity of National Park Service lands. Several feel the Draft EISs fail to address these concerns.

The predominant argument with regard to private and other property rights lies in an expressed belief that this project will institute more regulations than are already in place. One respondent points out that the project emphasizes how ecosystems cross legal boundary lines, and the writer feels that because of this the project will intrude, infringe, and therefore regulate private lands. Others ask what legal right the project has to impose regulations in a basin consisting of 144 million acres, of which only 75 million are public, intermingled with 69 million acres of private.

***Issue: The Final EIS needs to include additional analysis as mandated by Executive Order and Congressional direction for effects on private property rights.***

***Sample Comments:*** *The DEISs do not include a Takings Implications Assessment as required by Executive Order. It does not include such analysis of impact on rural counties and provision for flexibility for rural counties as required by Congressional mandate. (County Agency or Elected Official, Marsing, ID - Letter #B78644)*

***Issue: The selected alternative should clearly protect the rights of private property owners.***

***Sample Comments:*** *Resources do not recognize boundaries between private and public lands. Water flows, wind blows, fire spreads, and flora and fauna move with no regard to human constructs and imaginary lines. This means that even though the proposed action applies only to lands administered by the Forest Service and BLM, private lands, especially ones adjacent to Forest Service and BLM lands will inevitably be affected. The concerns of private landowners as to how their property will be affected by decisions involving the public land under consideration is legitimate. (Individual, Unknown - Letter #B77287)*

*I want inholders to be left alone. (Individual, Wheaton, MD - Letter #W3598)*

*I disagree that although ICBEMP is proposed to manage Forest Service and BLM lands, it will significantly impact the adjacent landowners, causing conflicts with private property rights. The DEISs do not address the impacts of decisions such as road closures on the use and value of private lands. (Individual, Vancouver, WA - Letter #W3101)*

*Using the assumption that private land would counter the potential shortfall of available land for recreational uses could be construed as disregard for private property rights. (County Agency or Elected Official, Okanogan, WA - Letter #W4571)*

*Too much emphasis on wildlife habitat can cause serious overpopulation and resource damage on adjacent private lands and the landowner will have no say as to how many big game animals they can accommodate. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*We have seen how over-zealous enviro-bureaucrats have favored animals or land in favor of humans at the loss of private property rights, jobs and money. The spotted owl went too far, stopping hound hunting has shown an increase in cougar attacks against people and wildlife etc.... We fear the ultimate goals of these special interest groups is to deny virtually all access to federal lands by individuals and to limit private property access by over-regulation. (Individual, South Bend, WA - Letter #W1683)*

*The encroachment of regulations and the impact on adjacent private lands is a major source of fear to anyone who has ever read The Communist Manifesto. The type of land grabs which Clinton, Gore and Babbitt are implementing sound like the veritable text taken from that document. (Individual, Richfield, UT - Letter #W1609)*

*There are also several references to the fact that this process will transcend jurisdictional boundaries. This tends to say that any analysis of ecosystems will occur across boundaries - even onto private land. (Individual, Elko, NV - Letter #W892)*

*Since this project seeks to restore the land in question to the conditions of 1850...how will this affect the property rights of private citizens and the land they own. (Individual, Latah, WA - Letter #W485)*

*We are concerned about 'wildlife corridors' or natural corridors. How will this impact private land? (Conservation/ Environmental Group, Sagle, ID - Letter #W231)*

**Issue: *The Final EIS should consider its consequences on other public lands.***

*We are concerned that no apparent consideration was given to the effects of the proposed actions on National Park Service (NPS) lands. In general the actions proposed in all the alternatives are broadly described and specific implementation plans are still lacking. It is therefore difficult to ascertain the likely effects on NPS lands. We trust that we will be provided future opportunities for input as specific implementation plans are developed... We did not see any attention given to the effects of this plan on National Historic Landmarks (NHLs) or National Natural Landmarks (NNLs). There are six designated NHLs and 18 designated NNLs within the planning area managed by the Forest Service, BLM, NPS, U.S. Fish and Wildlife Service, Corps of Engineers, Washington State Parks, Oregon State Parks, Washington Department of Natural Resources, Washington Department of Fish and Wildlife, Whitman County, the Nature Conservancy and private landowners. It is important that the EIS address protection of natural and cultural resources of these sites.... (Federal Agency, Seattle, WA - Letter #W881)*

*There will be an infringement of states' rights because of the assertion of federal control over water rights and/or the assertion of control over the beds of navigable streams as a result of adopting ecosystem management. Ecosystem management cannot succeed without simultaneous management of wildlife and fish populations thereby infringing upon the rights of the states who are charged with management of these populations. (County Agency or Elected Official - Salmon, ID - Letter #B77161)*

## Section 1.7 ~ Implementation

A number of people feel that implementation and funding issues are not adequately covered in the Draft EISs. Some feel that the project is clearly too big, too expensive, and too cumbersome to be implemented in the manner proposed. Some question who will be held responsible for monitoring and implementing the Selected Alternative and its associated actions.

### 1.7.1 Priorities

Some of the respondents assert the Draft EISs do not adequately address how the project will be implemented. Several individuals believe implementation methodology will be ecologically unsound and not sustainable. They contend ambiguous wording in the alternatives will hamper implementation of the project. For example, a number question the differences between a Restore and a Produce category.

Pointing to studies of the effects of the project on individual National Forests, some people claim that the project is too vague, eliminates active management in some National Forests, and the proposed process could require increasing staff and budgets. Some people fear the project is biased toward theory and philosophy while downplaying tough analysis of specific actions and their effects on real ecosystems and communities. Several respondents cite past history of congressional members promoting, what some see as, ill-conceived individual Forest Plans; they believe a broad ecosystem-based project will never get off the ground for lack of congressional support. They feel the Final EIS and Record of Decision will never be successfully implemented and be another plan on the shelf “gathering dust.”

Setting specific implementation priorities in the Final EIS concerns many people who feel the question of where to begin is not addressed in the Draft EISs. They believe the Final EIS should set a schedule for conducting projects in local areas so communities will know what will occur. Some people assert that the Draft EISs provide little in the way of guidance for local land managers and community leaders, and they fear this could result in inconsistent application of project management guidelines. Others feel the timelines set in the alternatives are unrealistic and cannot be met.

***Issue: The Final EIS should set clear guidelines on how the project will be implemented.***

*ICBEMP is clearly too big, too expensive and too cumbersome to be implemented in the manner proposed. (Natural Resource-based Business or Business Group, Ellensburg, WA - Letter #B77305)*

*Plans to gain acceptance of Congress for any of the alternatives are lacking. In light of promotion of ill-conceived forest management plans by Senators and Representatives, any rational and well thought out plan has little chance of acceptance. What is the plan for gaining acceptance of this plan? Will all this work end up gathering dust on a shelf? (Individual, Spokane, WA - Letter #W1017)*

*My concern is with implementation.... Please use non-toxic, sustainable methods to achieve these ends or you will find that the means can defeat the ends. (Individual, Fayetteville, AR - Letter #B75390)*

*What is the implementation significance of an area in a restore category compared with one that is in a produce category? How does ecological integrity affect an area? This new and loosely defined terminology will likely impede implementation. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

Implementation of any of the alternatives is highly unlikely. There have been several efforts by the Forests to evaluate how the recommendations of this DEIS might be implemented. The Colville N.F. determined that additional 47 more staff persons would be required to meet all the process requirements - in a time where one reduction in force after another is reducing the size of the agencies. The Boise N.F. found it to be too vague and ill-defined to implement. The Kootenai N.F. took what they knew, assumed what was unclear and evaluated the plan as it would impact management on the ground and found that essentially it leads to no management on the ground. Stated differently, all lands are tied up in RCAs, BMU, etc. and no land is left to actively manage. With all the Standards in place, the restrictions preclude any significant activity or implementation. Current budget levels will also preclude the implementation of any of the Alternatives. The pending modifications to the planning regulations and the interim road building policy only add to the unlikelihood that implementation will be possible. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B77304)

**Issue:** *The Final EIS should set clear priorities for implementation.*

**Sample Comments:** *If the program is accepted and option 4 is selected, where in the 72 million acres will you start? If you accomplish option 4 in a given area, how do you propose to continue to keep the area in a proper state? How often do you propose to visit the area for cleanup? (Individual, Cle Elum, WA - Letter #W315)*

*The broad scale of priorities do not allow for local predictions of outcomes. The way priorities are described in Chapter 1 and 3 of the DEIS does not allow the public to predict what kind of management activities would occur where. How and at what time will localization of the plan information take place. Subbasin review? Local Forest Plan revision? What is the public's chance for comment on the localized prediction or to make changes to this plan based on more local problems. We recommend that the plan clearly states the relationship between these processes. (Individual, Portland, OR - Letter #W840)*

*Proposed management objective, standards and guideline create problems for implementation. The lack of clear guidance to the local managers in the proposed alternative will result in inconsistent application to the project area. The plan deals with such a large area with very diverse ecosystems within it. Standards are relied on for broad scale decisions where guidelines should be used so that the local managers can adapt to their special situations. (Individual, Pendleton, OR - Letter #W2979)*

*How will activities that deserve the highest level of ecological priority be determined? (Non-Natural Resource Based Business, Portland, OR - Letter #W868)*

*The Draft sets various timelines for implementation. Based upon our experience with the agencies involved, these timelines are not realistic and are doomed for failure. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B77161)*

## **1.7.2 Funding**

Some respondents fear that in a time of budgetary constraint, sufficient funding and staff will not be available for the BLM and the Forest Service to implement the project. Some others doubt that the Congress will approve a project that requires such large-scale funding. A few state they will ask their congressional representative to vote against the the project.

A number of people are adamant when discussing the amount of money being spent on the project to date, with their estimates ranging from 35 to 40 million dollars. Not only are they upset about the money spent, but they also questions spending more than 100 million dollars per year on implementation.

Many respondents believe any funding must come from the Congress and not from timber sales. Some people see the project as claiming that the vast majority of future revenue from public lands will be generated by recreation; they feel that funding existing recreational infrastructure should be emphasized. If the project is not paid through “logging returns”, some people wonder whether a back up plan exists should funding not become available.

**Issue:** *Funding sources to implement the Final EIS should be clearly identified.*

**Sample Comments:** *The money spent on the DEIS for a nebulous ecosystem management proposal seems to be misdirected when the money could go into the field offices for on the ground mitigation and access improvements. (Individual, Lewiston, ID - Letter #E19)*

*The preferred Alternative 4 estimates the annual cost of implementation to be \$118,573,000 (EIS, p.4-218). With federal funding constraints it is not realistic that this amount of additional funds will be appropriated. As with most plans this means planning goals will not be met or they will be deferred. (Professional Society, Eatonville, WA - Letter #W573)*

*My question to the ICBEMP staff: Knowing that you do not have the approval or support of Congress, state, and local governments and a good share of the local working and recreating public, how are you funding this Project? (Recreational Groups, Post Falls, ID - Letter #W756)*

*Include a standard to continue or increase funding emphasis on maintaining recreational infrastructure. Currently only Alternative 7 includes this emphasis. The DEIS and supporting scientific documents detail that federal lands provide 700 million recreational activity days per year, and that the value of this activity is estimated at \$1 billion a year (in terms of willingness to pay). Recent national news indicates that in future years, 90% of all public land revenue will be generated by recreation. This makes it imperative to emphasize, at a minimum, funding of the existing recreational infrastructure in all alternatives. (Individual, Portland, OR - Letter #W840)*

*Alternative 4 appears to be overly ambitious. The Forest Service and Bureau of Land Management (BLM) do not have the resources in personnel, equipment, or funding to implement the preferred alternative. The Forest Service budget does not and is not likely to match the emphasis in the preferred alternative. It is unreasonable to expect Congress will increase funding to meet the intent of Alternative 4. The deciding officials need to assure the public the selected alternative can be implemented given the agencies workforce and budget. The Forest Service is already near the fine line of misappropriation of funds in an attempt to balance fund allocation with ecosystem management needs. (Individual, Walla Walla, WA - Letter #W3793)*

*The cost analysis discussion in chapter 4 is vague and confusing. I believe the true costs of implementing this plan will be too high for Congress to approve funding. I will certainly recommend to my congressmen that it not be funded because of the cost and because it is not the proper way to manage our federal lands. (Individual, Lewiston, ID - Letter #W3670)*

*I'm concerned about the monetary cost of the preferred alternative. What fall back plan have you developed should the money not be forthcoming? (Individual, Uniontown, WA - Letter #B4806)*

**Issue:** *The Final EIS should consider the role that funds from timber sales will play in implementing the project.*

**Sample Comments:** *Above all, funding should come from Congress, not from logging sales. (Individual, Spokane, WA - Letter #W42)*

*For the sake of future generations and for a healthy, thriving Pacific Northwest environment, I strongly urge you to correct these problems. Get funding from Congress, not logging. (Form letter - #201)*

*The ecosystem plan needs to be funded by Congress rather than by logging returns. Our children's future is depending on us. (Individual, Airway Heights, WA - Letter #W312)*

*Presumably, timber harvest dollars would pay for forest restoration. But with timber harvest volumes as low as projected, the plan will be unable to support revenue-consuming restoration activities or rapidly increasing ecosystem management need and costs. The result would be that neither activity would be performed adequately to meet the project needs, and the future timber program will be incapable of bearing the costs of restoration and other ecosystem management programs. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*As for the \$125 million per year projected price, will Congress be willing to approve this huge appropriation? There is no shame in selling timber and offsetting a portion of the cost. It is the fiscally responsible thing to do and the timber harvest can achieve many of the forest health concerns we are trying to address. (Individual, Missoula, MT - Letter #B4302)*

### 1.7.3 Collaboration, Accountability, and Monitoring

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Many people assert that for the project to be successful, someone must be held accountable. However, they feel the project as written fails to list how each alternative's objectives will be monitored and by whom. Who, some question, will decide when an ecosystem is healthy?

Some respondents believe that working with the BLM and the Forest Service has not been productive in the past, and they fear this will continue with implementation of the project. They feel that many Federal agencies cannot work together, and that the project consequently will fall apart. Several respondents blame the regulatory agencies for getting the BLM and Forest Service off track with this project, leading to Draft EISs that they feel cannot meet the purpose and need because of so many "unnecessary" standards and guidelines exist. These respondents see no hope for success if this also happens in implementation.

A number of respondents feel that Federal agencies are not held accountable for producing results, and they advocate monitoring by others. They believe that an absence of objectives and standards requiring accountability means that an agency could do nothing and still be in compliance. Several individuals want the Final EIS to eliminate specialized language and "weasel words" such as "when practical."

Others believe the Draft EISs look at accountability only as meaning how well the different agencies collaborate, ignoring how actual production of goods and services is provided for. They feel that if the agencies fail to produce any commodities, they cannot be said to violate any objective or standard requiring accountability. Some assert a violation of FLPMA, NFMA, and NEPA if an estimate of goods and services is not included in the Final EIS, because of a failure to disclose effects of actions authorized and implemented as a result of the project. They also point out possible violations of the Endangered Species Act for not addressing foreseeable actions on a site-by-site basis.

**Issue:** *The selected alternative must decide who will be responsible and accountable for the implementation of the project.*

**Sample Comments:** *In discussing how the needs of forest-dependent wildlife species will be met, the desired future conditions for Alternative 4 state habitat attributes of old forest [will be] abundant (page 3:32). Habitat attributes are different from habitats. This statement reflects a confidence that we have the ability to accurately mimic the habitat requirements of old-growth-dependent species, without having to actually retain old-growth. Such an assumption requires close and constant monitoring. This monitoring needs to be explicitly called for in this plan. (Federal Agency, Seattle, WA - Letter #W881)*

*One way to tighten-up on responsibility and accountability is to have specialist input to the EA process be written in the form of contract clauses. The language should include measurable objectives and be free of weasel words or phrases like where practical' or if present. (Individual, La Grande, OR - Letter #W250)*

*One reason previous management plans have failed is the absence of anyone to accept ultimate responsibility. Therefore it seems that success in any future management plan will depend on the placement of accountability. The mandate for this plan fails to do that. Without it, objectives change from one administration to the next, monitoring could cease from lack of funding and it could be business as usual again in just a few years, which could set the whole process back another 20 years in a very short time. As it stands it is extremely vulnerable to political whims. This should be corrected by obtaining congressional authority in the form of legislation or at least a resolution in order to make it an effective and credible tool that won't soon lose its clout. (Individual, Moyie Springs, ID - Letter #B4692)*

*The DEIS lacks commitment to monitoring for special status species. Key populations and habitats should have been identified as part of the ICBEMP process, and a strong monitoring commitment made. The DEIS fails to identify or prioritize areas/habitats for reintroduction or re-establishment of rare native species. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

*EIS needs to state how the action under each alternative will be monitored and policed. For example, what will be done if logging companies take the big logs instead of the smaller ones, and how will you check to see if they do? (Individual, Weiser, ID - Letter #B2743)*

*The focus of accountability is to the processes of the ICBEMP Strategy, and to working with other regulatory agencies. Accountability, it seems has little to do with the actual production of tangible resources from the federal lands. If the agencies fail to produce one stick of timber or utilize one AUM, no accountable objective or standard has been violated.”(Natural Resource-based Business or Business Group, Portland, Or - Letter #W3751)*

*There should be regional and state oversight of compliance and effectiveness for progress toward DFC in the alternatives. This monitoring should not be left exclusively to the USFS or BLM local unit. (Professional Society, Corvallis, OR - Letter #W4635)*

**Issue:** *Collaboration among agencies should be thoroughly addressed in the Final EIS.*

**Sample Comments:** *I feel that with all the different federal bureaucracies that will be trying to implement this program that it is doomed from that aspect alone. There will be in my opinion far too much of internal control or a power struggle for any alternative to work efficiently. (Individual, Orofino, ID - Letter #B96)*

*The DEIS refers often to undefined intergovernmental collaborative processes, that would include tribes. However, it should be noted that it would be impossible for the CTUIR to effectively participate in the many annual USFS/BLM projects on our ceded lands. A few years ago the CTUIR took part on a project on the Upper Grande Ronde River. The process took two years and a great deal of staff time. Consensus was reached between USFS, Tribes, ODFW, and academics on conditions necessary to protect and restore anadromous fish habitat. Everyone agreed these were minimum requirements for fish habitat.*

**Issue:** *But the plan was never implemented. We cannot afford this level of commitment to Tribal staff and resources and we cannot justify expenditures only to find the USFS unwilling to implement the products. (Tribe, Pendleton, OR - Letter #W625)*

*Our RAC believe that the DEIS needs a clear process defined for interagency coordination. We recommend that this process must be developed and included in the FEIS before we can support a ROD. We are concerned about how much collaboration will be enough and who will control the process. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

## Section 1.8 ~ Relationship to Laws

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Many individuals express strong concern about what they see as the dismissal of an array of environmental laws regarding natural resource management and administrative rule-making. Compliance with specific laws—including the Multiple-Use Sustained Yield Act, Wilderness Act, Clean Water Act, and others—were of concern to many individuals. Some feel that interfering with National Forest planning processes would violate the National Forest Management Act (NFMA), the National Environmental Policy Act (NEPA) and other laws. A number of respondents cite specific laws and regulatory violations perceiving a failure of the project to comply with them. A prevalent issue brought forward is that ecosystem management is not a law passed by Congress and it is not an Executive Order from the President; therefore, they feel it should not replace or change the direction of the BLM and the Forest Service from a multiple-use management mission.

### 1.8.1 Specific Laws, Regulations and Executive Orders

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Others fear that the project will decrease or eliminate access to National Forest System and BLM lands for those disabled by physical constraints caused by age, health, or handicaps; consequently, some believe the alternatives would contradict the intent of the Americans with Disabilities Act by reducing safe access to remote facilities.

People also allege violation of their civil and human rights because they claim they are being denied the right to choose rural residency and occupation. They believe the Draft EISs do not adequately address whether there is a disproportionate impact on tribal communities or on their subsistence, religious, and social activities as required by Executive Order 12898, Environmental Justice.

**Issue:** *The Final EIS needs to better discuss the relationship of the project to Federal, State, and local laws and regulations.*

**Sample Comments:** *The discussion of the relationship of the EIS to Federal, State and local regulations is incomplete and fails to address the full realm of environmental regulation which must be met by BLM and USFS (page 1-17). At a minimum add a table or section on 1) Wild and Scenic River Act (Federal/State); 2) Safe Drinking Water Act; 3) Oregon Groundwater Act; 4) Resource Conservation and Recovery Act on Hazardous and*

*Solid Waste regulations including underground and above ground storage tanks; 5) Other programs under the CWA such as 401 certification, stormwater permits; 6) Toxic Use Reduction and Hazardous Waste Reduction Act; 7) Clean Air Act; 8) EPCRA Section 313; 9) TSCA; 10) Superfund Amendments; 11) Oregon Land Use Regulations; 12) Federal Livestock Grazing; 13) Surface Mining and Reclamation Act; 14) CERCLA; 15) Federal Water Pollution Control; 16) NEPA; 17) ESA and 18) The Oregon Plan... (State agency or Elected Official, Portland, OR - Letter #W3699)*

**Issue:** *The selected alternative should comply with Revised Statute 2477.*

This statute addresses access to rights-of-way. Some respondents are concerned about what they see as a potential loss or restriction of existing or future access to private or state lands that border or are intermingled with National Forest System lands. They also fear potential loss of access to traditionally used access routes, many of which they claim cannot be closed because the routes are public rights-of-way covered under Revised Statute (RS) 2477. Some warn of legal action if any moves are taken to close or restrict travel on RS 2477 routes.

**Sample Comments:** *Statutory authority exists for right of access in connection with natural resource development, transportation, energy transmission, water and for those roads and easements existing before 1976 that have been created by RS 2477 and other legislation. The DEIS does not adequately address the legal implications of these land use restrictions on both private and public lands. (Natural Resource-based Business or Business Group Boise, ID - #B77302)*

**Issue:** *The selected alternative should comply with the Clean Water Act.*

The goals of the Clean Water Act are to restore and maintain the chemical, physical, and biological integrity of the nation's water. Clean drinking water is a concern to many. They fear that without adequate protection the water quality in the Columbia River Basin will drop because of contamination.

Clean water is a concern for many who do not believe the project will have strong enough standards and objectives to enforce compliance with the Clean Water Act. The majority comment referencing this act are usually worried that there is too much compromise for active management, not enough protection of aquatic habitat, and not enough coordination with the States regarding existing management plans and regulations, such as Best Management Practices.

**Sample Comments:** *The DEIS fails to address numerous significant issues... The current failure of agency-administered streams to meet state and Clean Water Act standards. (Conservation/ Environmental Group, Bates, OR - Letter #W222)*

*The management plan must as a minimum: require that all streams and rivers are brought into compliance with the Clean Water Act. (Individual, Blackfoot, ID - Letter #B3873)*

**Issue:** *The selected alternative should comply with the Organic Act.*

Citing the Organic Act of 1897, which established National Forests for the purposes of improving and protecting forests, protecting water flows, and furnishing a continuous supply of timber for the United States, some people emphasize the need for National Forests to supply timber products. A number of respondents view the project as illegally reducing timber supply by denying access to roadless areas for harvesting.

**Sample Comments:** *The DEIS and the analytical process used to reach this point are insufficient from the legal standpoint. The purpose of the National Forests is being ignored. The organic Act of 1897 clearly stated that the purpose of National Forests are to provide favorable conditions for water flow and a continuous supply of the timber for the use of citizens of the United States. This DEIS totally ignores this when timber outputs are considered only as a by-product of ecosystem management. (Natural Resource-based Business or Business Group, Prineville, OR - Letter #W746)*

**Issue:** ***The selected alternative should comply with the National Forest Management Act and the Federal Land Policy and Management Act.***

The National Forest Management Act (NFMA) requires the preparation of Forest Service Regional Guides and Forest Plans and regulations to guide their development. The Draft EISs, some people feel, interfere with planning processes that are required by this law. The Federal Land Policy and Management Act (FLPMA) formally recognizes the mission pursued by the BLM and requires the BLM to manage public lands under the principles of multiple-use and sustained yield through land use planning. As with NFMA, many respondents perceive the Draft EISs as interfering with planning processes set out under FLPMA.

Other respondents state that by not falling completely under the Forest Service lead or under BLM, the process has been circumvented leaving decision makers the ability to decide anything they want without a binding by one set of rules alone. Several respondents question the motives of the Clinton Administration on allowing this decision-making process to continue.

**Sample Comments:** *The Preferred Alternative proposes even less protection than is currently mandated by the National Forest Management Act (NFMA), by requiring only that species be managed to avoid listing under the Endangered Species Act. This is difficult to understand, given the clear intent of NFMA requiring viable populations of vertebrates will be maintained throughout their ranges on the National Forests. The Preferred Alternative (4) Offers no special protection for identified diversity hot spots, which should be part of any credible management plan based on current state of scientific knowledge on the preservation of biological diversity. (Conservation/Environmental Group, Seattle, WA - Letter #W2008)*

*The DEIS fails to adequately address or deal with the economic needs of resource dependent communities as required by the Charter as well as NFMA and other legal mandates. (Natural Resource-based Business or Business Group, Heppner, OR - Letter #W866)*

**Issue:** ***The selected alternative should comply with the Forest and Rangeland Renewable Resources Planning Act (RPA).***

Some view the project as violating the principles of multiple-use and sustained yield. Respondents ask how RPA is incorporated into the analysis process; they claim a violation of NFMA by not following RPA for amending/revising Forest Plans. They believe that if the project will be automatically amending portions of Forest Plans, then it must follow the planning regulations. One respondent also believes the project should be stopped until the 1995 RPA Draft Program is signed, as it provides program guidance for the Forest Service, which might be contradictory to the project, such as changing from multiple-use to ecosystem management.

**Sample Comments:** *The ICBEMP should be stopped and the Forest Service should be required to revise Forest Plans in compliance with the Renewable Resources Planning Act of 1974, as amended by the national Forest Management Act of 1976. The Congress has the responsibility to see that is accomplished. (Individual, Libby, MT - Letter #W1067)*

**Issue:** *The selected alternative should comply with the Endangered Species Act.*

The goal of this Act is to establish programs to conserve and maintain endangered and threatened species. There is a perception by some that the Draft EISs abdicate responsibility to provide minimum baseline protection and restoration measures as established under this Act.

**Sample Comments:** *....with respect to BLM Resource Management Plans, we urge you to stay on top of [the Endangered Species Act consultation] process. The BLM has a specific legal obligation under the ESA to ensure that its plans do not harm endangered species or their habitat. Not only is BLM legally vulnerable if it has not yet finished consultation, but the decisions made by the agency in this plan may be harming fish and their habitat while we all engage in the ICBEMP process. (Conservation/ Environmental Group, Seattle, WA - Letter #B75255)*

*WITHOUT THE CERTAINTY OF AN ACCEPTABLE PLAN THERE WILL BE MORE ESA LISTINGS AND A CONTINUING LOSS OF FLEXIBILITY...there is no flexibility in the standards associated with this plan without further costly analysis. With this plan we are codifying what were interim guidelines and applying them to a broader area. There is nothing in this plan that will prevent or assure no further listings under the ESA. (County Agency or Elected Official, Canyon City, OR - Letter #W626)*

**Issue:** *The selected alternative should comply with the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act.*

Congress passed the Regulatory Flexibility Act (RFA) in 1980 to make sure Federal regulations did not place an unfair economic hardships on small businesses. Some respondents express concern that the Draft EISs do not properly follow the procedures laid out in the RFA. The RFA is strengthened under this Small Business Regulatory Enforcement Fairness Act, which allows small businesses to seek a judicial review of any new Federal regulations to make sure they comply with the RFA. Some feel the project ignores the concerns of small businesses.

**Sample Comments:** *Forest Service and BLM violate Regulatory Flexibility Act and the Small Business Regulatory Enforcement Act. Because ICBEMP can be considered a rule that sets standards, we believe the RFA applies. Congress passed the RFA in 1980 after learning that uniform Federal regulations produced a disproportionate adverse economic hardship on small entities. (Natural Resource-based Business or Business Group, Lebanon, OR - Letter #E48)*

**Issue:** *The selected alternative should comply with the American Folklife Preservation Act.*

**Sample Comments:** *In 1976, the U.S. Congress passed the American Folklife Preservation Act (P.L.94-201). In writing the legislation, Congress had to define folklife. ICBEMP seeks to ignore a culture that has been defined over two centuries and it is no more or less significant than any other culture present in America. (Natural Resource-based Business or business Group, Olympia, WA - Letter #W3747)*

**Issue:** *The selected alternative should comply with the Presidential Executive Order 12866, Regulatory Planning and Review.*

**Sample Comments:** *Have each of the Federal requirements listed been addressed with all local governments in the area? Presidential Executive Order 12866-Regulatory Planning and Review; National Environmental Policy Act (NEPA). (Natural Resource-based Business or Business Group, Connell, WA - Letter #W4631)*

**Issue:** *The selected alternative should comply with the 10th amendment of the Constitution, associated with State jurisdictions.*

**Sample Comments:** *The Tenth Amendment gives States jurisdiction over all matters not expressly designated to the federal government by the Constitution. Not only does the Constitution not designate watersheds to the federal government, but the Supreme Court has given jurisdiction of water to the states in case after case. Therefore, the Columbia Basin should be managed by whatever state that portion of it is within, with respect for state boundaries. (Individual, Custer, MT - Letter #B77091)*

**Issue:** *The selected alternative should comply with the Multiple-Use/Sustained Yield Act of 1960.*

**Sample Comments:** *...While we commend the agency's steps toward an adaptive, ecosystem management approach to national forest management, we are concerned that a legal basis may be lacking in federal statutes for your principal goal of national forest management to maintain or restore ecosystem sustainability. Under the Multiple Use-Sustained Yield Act of 1960, the national forests are not established to maintain and restore ecosystem sustainability, but "are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes, in supplement to purposes established in the Act of June 4, 1897. (Professional Society, Moscow, ID - Letter # W546)*

**Issue:** *The selected alternative should comply with the Americans with Disabilities Act.*

Some respondents feel there is not enough emphasis on access and recreation, that when recreation is even mentioned it is in the form of monitoring it for ecological reasons, not to ensure the recreational experience. Some worry this is a forecast for fewer and fewer recreational opportunities, especially for people with disabilities who have limited access.

**Sample Comments:** *I am handicapped and cannot walk great distances (1 mile or more). For this reason I require the use of my 4 x 4 vehicle to enjoy our public lands. Your DEIS basically ignores the motorized recreation community. The only time you acknowledge motorized recreation is when you propose to restrict and deny access to vehicles by eliminating an unspecified number of trails in your DEIS. (Individual, Ridgecrest, CA - Letter #B75548)*

*My oldest son is handicapped. He is in a wheelchair. His only means of viewing and learning about our beautiful surroundings is in a motorized vehicle. To deny him that means by closing roads in the Kootenai Forest, and elsewhere, is an act of discrimination. One we intend to fight. (Individual, Eureka, MT - Letter #B4675)*

**Issue:** *The Final EIS should comply with the spirit and intent of the National Environmental Policy Act (NEPA).*

Alleged violations of the National Environmental Policy Act (NEPA) are scattered through most of the procedural and effects comments. Some people believe that NEPA is violated because the “decision” does not sufficiently consider the economic impact on small rural communities. Some think the Draft EISs do not comply with NEPA because they are not seen as meeting agency procedural requirements to do a consistency review, especially with other county and tribal land management plans.

Others believe the Draft EISs do not comply with NEPA for a number of other procedural reasons. Allegations of bad science and analysis leads many respondents to accuse the project of having inadequate cumulative effects models, not disclosing missing information, not taking connected actions into account, having a proposed action and alternatives that don’t meet purpose and need, and having a range of alternatives insufficiently broad enough to fulfill public needs and environmental encompass compliance questions within the Administrative Procedures Act.

**Sample Comments:** *To comply with NEPA, if a commitment is made to binding management direction in an ICBEMP Record of Decision, it must be preceded by adequate detailed analysis of the significant environmental effects of implementing that direction. Shoosing a large geographic scale for analysis and decisionmaking is not excuse for lack of detail in NEPA assessment. (Natural Resource-based Business or Business Group, Bosie, ID - Letter #B75569)*

*Your DEIS violates the spirit and intent of NEPA. Your decision does not sufficiently consider the economic impact on small rural communities. (Individual, Ridgecrest, CA - Letter #B75548)*

**Issue:** *The project needs to prepare a Supplemental EIS.*

A number of respondents advocate the need for the project to prepare a Supplemental EIS prior to a Final EIS . They feel that the additional socio-economic work presented in the *Economic and Social Conditions of Communities* report needs to be further elaborated upon in a Supplemental EIS. Others expressed the sentiment that additional science work has been completed since the Draft EISs were released and that this “new information” needs to be incorporated into a Supplement. By doing this many people feel will allow them to be able to better respond to the information once it is in one document.

**Sample Comments:** *Please protect the Columbia River Basin by pushing the passage of a Supplemental EIS. I have read the FSEEE which could serve as a model and is backed up by solid scientific data. (Individual, Chattanooga, TN - Letter # B77870)*

*In general, I believe that the DEISs require a major rework because of the alternatives adequately support the “aggressive active management approach” determined as needed by the Project’s own scientific findings. Management direction is light on guidelines and heavy on standards, which are inappropriate for a land use management DEIS...I recommend that the Project remove most of the standards, especially the highly prescriptive ones, and create a plan that is more like a Regional Guide. This new would then be the subject of a Supplemental DEIS. As an alternative, the DEISs could be suspended and the extensive material produced by the Project could be used to support the next round of individual Forest Plan revisions at the local level. (Individual, Riggins, ID - Letter #B78506)*

*It is absolutely essential that supplemental Draft Environmental Impact Statements be undertaken and released. The comment period is closing without the public having the benefit of commenting on the Terrestrial Species study, which has not yet been released. Further, it has only been a short while since the release of the new Economic and Social Conditions of Communities: Economic and Social Characteristics of Interior Columbia Basin Communities and an Estimation of Effects on Communities from the Alternative of eastside and Upper Columbia River Basin Draft Environmental Impact Statements. (Natural Resource-based Business or Business Group, Billings, MT - Letter #W4823)*

**Issue:** *Preparing one decision for the lands administered by the BLM and Forest Service will result in legal “gridlock.”*

Several individuals feel that by preparing one, broad-based decision for the BLM-and Forest Service-administered lands in the interior Columbia river Basin, a legal battle will ensue that will prevent any decisions from occurring while the courts render a decision. They feel that this will result in legal gridlock where no management activities will occur for several years.

Others advocated the need to complete a Final EIS and Record of Decision to overcome what they believe is a system already bound by court decisions and legal battles. They feel by completing the project it will provide a coherent strategy for lands administered by the two agencies addressing some of the courts concerns.

**Sample Comments:** *We would expect the current management gridlock to worsen as litigation over the meaning and intention of this document mushroomed. Natural Resource-based Business or Business Group, Mountain Home, ID - Letter #B111)*

*...We comment the Forest Service and BLM for undertaking such an ambitious project as the ICBEMP. We too are concerned with the current grid-lock and lack of agreement on how public lands should be managed. We were hoping that a Basin-wide approach would develop more of a consensus. We feel that a consensus has not yet been achieved and desire to be involved in future planning to reach this goal. (Professional Society, Eatonville, WA - Letter #W573)*

*What this entire process [with unproven concepts & undefined ecosystems] will create is a massive administrative nightmare leading to uncertainty, lawsuits and delays in decision making processes. The entire management proposal in the DEIS is fatally flawed with the public paying the price. (Individual, Pacific, WA - Letter #W532)*

*...Termination of the Project would lead to litigation that would result in lockouts of federal lands similar to what nearly happened on the Westside of the Cascades in the wake of the northern spotted owl listings. Benton County does not wish to have public lands uses and access decided by the courts. (County Agency or Elected Official, Prosser, WA - Letter 3 W3079)*

**Issue:** *The selected alternative should comply with the Wilderness Act.*

**Sample Comments:** *The 1964 Wilderness Act was enacted to assure that “an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions. Leaving no lands designated for preservation and protection in their natural condition.” Two million acres of Oregon’s public forest are protected, 14 million acres remain unprotected. The U.S. Forest Service predicts a 35% erosion of our unprotected forests by 2010 with complete elimination in 50 years. (Individual, Ashland, OR - Letter # W1674)*

**Issue:** *The selected alternative should comply with the 1872 Mining Law.*

**Sample Comments:** *Rather than regulating for multiple use while meeting resource needs, the objectives stated in the Preferred Alternative mandate habitat preservation on a watershed scale. This makes habitat conservation and preservation the dominant use. Therefore, activities previously allowed on public lands when those lands were being managed for multiple uses, such as mineral exploration and development, may no longer be allowed under the Ecosystem Project or could be regulated to the extent that they are not economically feasible. This is in direct contravention of the limitations contained in these authorities and of the General Mining Law. (Natural Resource-based Business or Business Group, Boise, ID - Letter # B78680)*

*Why is that mining law, so damaging to the public, that came out of the 19th century still on the books? (Individual, Klamath Falls, OR - Letter # W374)*

*So let's get back to using the still valid 1872 Mining Law. We have had enough overkill with laws already on the books. (Natural Resource-based Business or Business Group, Blaine, WA - Letter # W2048)*

*While the leasing and sale systems used to regulate federal land mining prevent some of the serious threats to salmonids, the current, archaic location system under the 1872 Mining Law actually magnifies hardrock mining as a threat to salmonid biodiversity. Where mining claims occur under the 1872 Mining Law, mineral extraction is considered the best and most appropriate use of the land. This system not only disregards existing land and fisheries values, but there is no guarantee that lands claimed under the Mining Law will even be used for legitimate mineral development. Reform in mining must start with an overhaul of the 1872 Mining Law for hardrock minerals. (Conservation/Environmental Group, Portland, OR - Letter #B4789)*

**Issue:** *The selected alternative should comply with Presidential Executive Order 12898, Environmental Justice.*

**Sample Comments:** *There should be an evaluation criterion that addresses environmental justice, including impacts to minorities and economically disadvantaged citizens. Executive Order No. 12898 requires that NEPA documents address the issue of environmental justice. Add a criterion to evaluate environmental justice factors for each of the alternatives. This is particularly important for some topics such as recreation, where, under alternatives such as Alternative 7, access to federal lands will be severely limited for elderly and physically challenged individuals. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

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# Chapter 2

## Affected Environment, Management Direction, and Environmental Consequences

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### Introduction

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Chapter 2 discusses and analyzes public comment specifically related to the affected environment as described in Chapter 2 of the Draft EISs. It also presents comments regarding the proposed management alternatives and the environmental consequences of the alternatives as described in Chapters 3 and 4 of the Draft EISs. These discussions include general and technical areas such as the consequences of the proposed management actions on soil, water, air, terrestrial wildlife, aquatic wildlife, forests, rangelands, vegetation, and riparian areas. This section also includes narratives about the consequences of roads and disturbances such as fire and insect or disease infestation. While some legal and policy issues related to these specific resources appear in this chapter, more specific legal concerns are found in Chapter 1 of this document.

Social and economic aspects of resource issues, such as commodity outputs from public lands, recreation, and the effects of management actions on the people, communities, and economies of the project area, are discussed in Chapter 3 of this document.

## Section 2.1 ~ Soil Quality and Productivity

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People with an interest in soil productivity used the terms ‘opinion-based’, ‘qualitative’, and ‘unsubstantiated’ to describe how they view ICBEMP efforts as summarized in the Draft EISs. They ask, given what some assert is a lack of adequate information on soils in the region, how the project team will determine current soil productivity and conditions in any given area. They feel the project has little or no scientifically substantiated information with which to make good decisions, other than descriptions of series and soil mapping units identified during analysis.

### 2.1.1 Soil Health, Quality, Productivity

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Fearing strict basin-wide standards and objectives, some respondents maintain that the data on soil quality described in the Draft EIS is too broad, opinion-based, qualitative, and unsubstantiated. Soil data, they say, must be gathered on a finer scale. Many challenge statements that soil productivity is generally stable or declining, noting that the Draft EISs acknowledge having inadequate data. A few question whether project scientists have a clear definition of soil quality and productivity. Some are unclear about cause and effect regarding the alleged declining productivity; these respondents demand a

more detailed analysis. Some say that any new inventory should provide a summary of trends in annual forest productivity across the entire basin as a fundamental basis for why soil productivity should be considered an issue. These respondents want clarification or scientific evidence to back up such statements as “many soils take less than 50 years to recover naturally from compaction.”

Respondents also question the accuracy of Draft EISs’ statements on historical soil productivity. One writer points out an inconsistency in the Eastside Draft EIS, which states that carbon and nutrients tied up in woody debris have increased (page 2-68) while also stating (page 2-18) that coarse wood has decreased.

**Issue:** *The Final EIS should reanalyze the information on the state and history of soil productivity.*

**Sample Comments:** *Summary of Conditions and Trends, Bullet 1. The statement ‘soil productivity across the project is generally stable to declining’ lacks order of magnitude importance and conflicts with text on Chapter 2, page 4, paragraph 1 which states that soils are improving. Eliminate the statement if it cannot be scientifically supported. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*We note the DEIS (2-22) states that soil conditions in the planning area are stable or declining but does not make any quantitative analysis to validate this statement This statement also contradicts an earlier statement that best management practices are causing a positive trend in soil productivity. We suggest a more complete historical context be provided or utilize a baseline that is better documented. (County Agency, Canyon City, OR - Letter #W4580)*

**Issue:** *The Final EIS should contain a new inventory and analysis of soil productivity to address the existing analysis of soil conditions and trends which is inadequate for determination of effects of the alternatives.*

**Sample Comments:** *The soils data presented is woefully inadequate when compared to the information and data presented and considered for above ground components of the ecosystem. (State Agency, Boise, ID - Letter #B77849)*

*With due respect to members of the expert panel, an opinion-based inventory should not form the underpinnings of changes to management of soil at the scale of this project. As important as soil is to the ecosystem, it can only be appropriately evaluated at finer scales and, as such, cannot be adequately analyzed in this EIS. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Serious contradictions and/or over-generalizations occur in the soils and soils productivity section and there is a general lack of information about the improvements to soil productivity that can occur through land management. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should validate the statement that soil productivity is generally stable or declining.*

**Sample Comments:** *Fragile soils which should be protected from wheeled vehicles and cattle trampling were not mapped or protected. (Individual, Moscow, ID - Letter #W38)*

*The document states: 'Soil productivity across the project area is generally stable to declining. Determination of the exact status of soil condition for any given area is difficult because of the lack of inventory and monitoring data.' If there is a lack of inventory and monitoring data, how can ICBEMP make ANY conclusion with regard to soil productivity or condition? To my knowledge, the existing soil inventories did not address soil condition, they only included a description of soil series and mapping units. (Individual, Clarkston, WA - Letter #W3111)*

*[Eastside Draft EIS, Chapter 2] Soils page 3 last paragraph. The first sentence stating 'soil productivity is generally stable or declining' cannot be substantiated by scientific data. This statement should be removed. The statement that greater declines in soil quality and productivity are associated with greater intensities of vegetation management, roading and livestock cannot be substantiated either. It should also be removed. (Individual, Joseph, OR - Letter #W4538)*

**Issue:** *The Final EIS needs to clarify terms such as soil quality and soil productivity.*

**Sample Comments:** *[Eastside Draft EIS, p.2-18] Summary of Conditions and Trends, Bullet 1. The term soil quality is nebulous. The term's meaning cannot be determined from the text or from the glossary. Remove it or define. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.1.2 Management Activity Effects on Soil Productivity

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A few respondents note that management activities can and do affect soil conditions and productivity, a perception they believe the Draft EISs fail to recognize. These people question how the Draft EISs can alternately argue that (1) impacts from current forest and range activity require improvement and (2) the method for achieving this end under the preferred alternative is through aggressive management actions for forest restoration. In the opinion of these respondents, the emphasis must be on prevention of management impacts as opposed to mere mitigation or restoration. For example, some individuals feel that without drastic changes in grazing practices, soil standards to maintain productivity cannot be achieved.

In contrast, one respondent asserts that the Draft EISs fail to note that not all ground disturbance is harmful to soil. He asks that descriptions of ground-disturbing factors clearly identify those that are beneficial to soil productivity.

Some charge that the scientific evidence does not support claims in the Draft EISs that mitigative approaches such as Best Management Practices (BMPs) can substantially reduce decreases in soil productivity. These respondents suggest adequate analysis of the effects of the proposal and other specific activities on soil productivity will require new and more exhaustive inventory and study. Others claim that State programs such as BMPs have been successful in improving post-harvest soil quality, and that the Final EIS should acknowledge and promote such arrangements.

**Issue:** *The Final EIS should address the effectiveness of Best Management Practices.*

**Sample Comments:** *The soil section overgeneralizes the effects of bulk density increases on soil productivity and fails to separate the effects of pre- and post- Best Management Practices effect (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*It remains unclear how Best Management Practices could have resulted in improvements to soil productivity over the last 10 to 20 years (Chapter 2, page 4, Positive Ecological Trends) and yet management activity level remains a surrogate for soil productivity loss in this section. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The DEIS inappropriately assumes that Best Management Practices and mitigation will substantially reduce declines in soil productivity. This simply has not been shown to be true. We have been mitigating soil effects for years, yet the soil is still seriously affected by livestock grazing, ground-based harvest activities, and ever-proliferating roads. Scientists agree that soil effects cannot be mitigated in any reasonable amount of time. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

**Issue:** *The selected alternative should contain management direction for soil productivity that emphasizes the prevention of negative impacts before mitigation or restoration.*

**Sample Comments:** *The Interior Columbia Basin Ecosystem Management Project should be written with an emphasis on protection of...soil resources. (Individual, Bozeman, MT - Letter #B4358)*

*The DEIS admits on page 4-11 that current levels of activity are causing soil declines. The aggressive forest restoration plan proposed here will make things worse instead of better, because of all the new roads and multiple harvest entries that will be required. The emphasis must be on prevention of soil impacts not restoration/mitigation of management impacts. The Region 6 Soil Manager believes this to be true. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*According to information in the document and overall concerns about forest health, existing decline of soil productivity becomes a questionable conclusion. Soil disturbing factors can include those that improve soil productivity as well as degrade it. (Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.1.3 The Effects of Management Objectives and Fire on Soil Quality

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Some respondents note that soil productivity is a dynamic process, not, as one puts it, “a nutrient and moisture bank account.” These people argue that any analysis of soil health and the necessary mitigation of impacts to its productivity must observe the fact that soils are made up of both abiotic and biotic components. In their view, this becomes particularly important when considering how to mitigate impacts, restore soil productivity, or do both simultaneously.

Several contend that the Draft EISs have not adequately considered the detrimental effects of fire on soil quality. While many respondents believe that prescribed and natural fire can have beneficial effects, some feel that fire’s destructive capabilities, especially compared to logging, could outweigh the benefits. For example, some note that logging affects only localized sites, whereas severe wildfires can consume organic soil matter and volatilize soil nutrients over large areas.

Many feel the statements regarding vegetation management and downed woody debris with respect to soils are counter-productive, contradict other objectives, and contribute to the risk of catastrophic wildfire. Some respondents say that project documents have failed to prove a link between decreased vegetation levels and decreased soil quality. Another respondent holds that the Draft EISs fail to describe or prescribe the levels of coarse woody debris needed to reach desired goals, particularly in Objective PE-O4 and Standard PE-S1 in the preferred alternative. Some note that simply addressing these issues in the Final EIS, without a chance for public response, would violate NEPA.

**Issue:** *The Final EIS should address Coarse Woody Debris Requirements which may create a fire risk that is detrimental to soil quality.*

**Sample Comments:** *Coarse woody material and standing snag requirements do not appear to have been integrated with goals for prescribed burning. (Resource Advisory Council, Bend, OR - Letter #W3080)*

*I am concerned about the removal of biomass to prevent catastrophic fires. Although on the surface this appears to be a win/win arrangement, it will deplete nutrients of the soil, & possibly encourage erosion. (Individual, Kansas City, MO - Letter #W280)*

*[Standard PE-S1] Requirements for leaving coarse woody debris appear excessive and conflict with scientific literature. In Table A, define: 1) whether “total/acres refers to all downed material greater than 3 inches or only coarse wood greater than or equal to 8 inches; 2) whether the ‘Minimum pieces’ are on a per-stand, per-acre, or some other basis; and 3) how much reduction in coarse woody debris or organic matter is needed for a site to be labeled ‘disturbed’; explain why a specified quantity of small diameter downed wood cannot be substituted for large-diameter material. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should offer a comparison of fire and logging effects on soils.*

**Sample Comments:** *The authors fail to completely discuss the role of fire in soil productivity losses and weight their discussions of impacts toward active management. Since research has shown that fire can have a significant negative impact on the productivity of soil, fire should receive equal treatment in both the ‘Affected Environment’ and ‘Environmental Consequences’ analyses. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Without logging, forests become fire hazards. Fire is harder on the ecosystem than logging - it leaves the soil un-protected so it washes away, silts the streams and the land un-protected and useless for hundreds of years. (Individual, Seeley Lake, MT - Letter #B79298)*

*Page 12, first paragraph. Severe wildfire on poor sites can be a real disaster - to return to pre-fire conditions may take a hundred years. But logging would expose mineral soil for seed germination and possible new cover in less time. (Individual, Klamath Falls, OR - Letter #W3798)*

*The statement ‘Soil fertility on some site has been depleted through timber harvest practices or from multiple fires,’ [Eastside Draft EIS, p. 2-80, Paragraph 3] does not support the broad-scale generalization of declining soil productivity associated with vegetation management. If multiple fires are a contributor to declining soil fertility, roaded areas and vegetation management may be essential to controlling multiple fires and indirectly contributing to soil productivity. Reduce bias in this section through a balanced review of referred journal information to support conclusions. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Your study indicated that Native Americans have been and are presently ideal environmentalists. Their past record doesn’t substantiate this. They were responsible for the burning of the old prairie grass of the western plains in the spring, for they thought in so doing would make the buffalo meat sweeter not realizing they were burning future top soil. (Individual, Aitkin, MN - Letter #W847)*

**Issue:** *The Final EIS should address how vegetation loss effects soil quality.*

**Sample Comments:** *[Eastside Draft EIS, p. 4-15] Paragraph 4. The text states that vegetation manipulation in the direction of HRV (that is, selective tree removal) is more likely to sustain soil productivity, but the fifth bullet on page 10 implies that vegetation loss contributes to loss of soil function. Remove the conflicting assumption that vegetation loss contributes to the loss of soil production. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## Section 2.2 ~ Air Quality

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Addressing the need for a more comprehensive analysis of air quality in the Draft EISs, some people feel the Draft EISs should consider: compliance with Federal laws and State strategies; impacts to human health from proposed increases in prescribed burning; impacts of other sources of air pollution on management options; and the use of data and modeling of the impacts on air quality from management actions.

### 2.2.1 Air Quality Data

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Some people suggest that a lack of data provided in the Draft EISs makes it difficult to determine the anticipated change in effects from current to future air quality conditions. They contend the Science Integration Team did not conduct a full air quality analysis of the basin, but instead studied conveniently located areas. One writer urges a more thorough assessment of current and historical conditions using existing State, Federal and local data.

According to some, cumulative effects on air quality also lack appropriate study; one writer says it is “unacceptable” that “limitations of the analysis” prevent comparisons of the predicted emissions with existing ambient air quality. This respondent also maintains that assumptions made in the Draft EISs regarding the Historical Range of Variability are inaccurate, because acreage burned in pre-settlement conditions, as examined by the Draft EISs, fails to take into account other variables such as fuel type and vegetation density.

Some of the methods used in the Draft EISs to assess the air quality impacts of prescribed fires come under criticism. One writer says that the public is deprived of meaningful data if the EIS simply addresses impacts as being above or below the National Ambient Air Quality Standards (NAAQS).

**Issue:** *The Final EIS should better analyze air quality in the interior Columbia River Basin.*

**Sample Comments:** *The DEIS provides no information on current air quality conditions in the ICRB (Interior Columbia River Basin) or on observed trends (and causes for the trends) in recent years. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Preparation of a ‘programmatic EIS’ is no excuse for not conducting fine-scale air quality analyses that would be extrapolated to the entire broad-scale planning area. The SIT (Science Integration Team) has performed the scientific assessment and evaluation of alternatives inconsistently, selectively choosing to pursue detailed analysis where convenient. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*We believe... that the Draft EISs do not adequately disclose air quality impacts from increased levels of prescribed burning. They should more fully disclose the modeling results. The actual ambient air quality levels predicted by the model should be displayed in the Final EIS - as opposed to the general statement relative to whether national ambient air quality standards are exceeded or not. Because the model predictions did not include emissions from any sources other than wildland burning, the presentation of modeling results in terms of grid cells above and below National Ambient Air Quality Standards (NAAQS) concentrations is somewhat misleading...*

*...The National Ambient Air Quality Standards are ambient concentrations that reflect contributions from all sources. Only by evaluating the cumulative effects of all pollution sources would the analysis be able to say that the NAAQS is violated or not. By failing to disclose any modeled numeric ambient concentrations from fire, and by solely reporting the modeling analysis in an 'exceeds' v. 'not exceeds' fashion, the write-up misleads the reader into believing that concentrations below 150µg/m<sup>3</sup> are insignificant and safe. We suggest that this be modified in the final EIS. (Federal Agency, Seattle, WA - Letter #B78930)*

**Issue:** *The Final EIS needs to re-address the discussion of air quality in pre-settlement conditions.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-26] Presettlement conditions. The first paragraph in the section does not address presettlement air quality. Information on the average annual wildfire acreage is relevant only if other information needed to estimate emissions is known (for example: fuel type; average fuel loading; weather and fuel moisture conditions; and fire intensity). This information should either be used to estimate smoke production in the presettlement period, or removed from the FEIS.... The suggestion that a higher number of acres burned prior to settlement translates to a greater quantity of smoke emissions is not necessarily true. In some vegetation types found in the ICRB, presettlement fires burned with much greater frequency and under lower average fuel loadings than fires today. Although larger in size, presettlement fires might have produced lower total emissions. The text should be revised to clarify the relationship between fire and smoke. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should include improved methods and methodology in air quality modeling of the effects of prescribed fire.*

**Sample Comments:** *[Eastside Draft EIS, pp. 4-21 to 4-23] Use of Models. The approach that was used to predict air quality impacts has greatly underestimated the effects of wildfires and prescribed burns. Fire impacts should be remodeled by using one of two alternative approaches: 1) model with the current approach but use smaller gridded source areas, or 2) use a non-gridded approach that treats individual fires as discrete point area sources. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Visibility. The statement is made that, '...the visibility impairment is fairly equivalent between the March and May scenarios (Table 4-8 and 4-9), while the October scenario (Table 4-10) has much greater loss of visibility.' This statement does not match the results shown in Tables 4-8 through 4-10. It appears that the wrong values were entered for Table 4-10. Make the appropriate corrections to the visibility impairment data in Tables 4-8 through 4-10. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.2.2 Legal Issues Related to Air Quality

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Many people believe that future prescribed burning activities on BLM- and Forest Service-administered lands need to comply with Federal and State requirements such as the Clean Air Act. They feel the Draft EISs inadequately addresses how prescribed burning will affect State and Federal air quality standards. Some people emphasize that certain requirements of the Clean Air Act should be met, including: the Prevention of Significant Deterioration, Visibility Protection, and changes to the Environmental Protection Agency (EPA) Particulate Matter (PM) regulations (from the previously approved measure of 10-micron particulate (PM<sub>10</sub>) to the newer 2.5-micron (PM<sub>2.5</sub>) measure).

Some say other State and regional plans and Memorandams of Understanding have also been ignored in the Draft EISs.

**Issue:** *The selected alternative should ensure that smoke resulting from prescribed burning complies with Federal and State air quality requirements.*

**Sample Comments:** *If an activity in an attainment area causes indirect emissions increases within a non-attainment area, they may have to be analyzed.... Given the program scale of the Draft EIS, it would be difficult, if not impossible, to conduct a conformity analysis. Nor does the DEIS include sufficient information to determine if 40 CFR Part 93.15 (c) is fulfilled to allow for exemption from conformity requirements. (State Agency or Elected Official, Boise, ID - Letter #B77873)*

*There are three Clean Air Act requirements that we believe need further analysis in the DEIS: 1) National Ambient Air Quality Standards (NAAQS). One of the reasons we are concerned about the high level of prescribed fire under Alternative 4 is due to the Environmental Protection Agency's new NAAQS for fine particles (PM 2.5). These new standards will result in much greater emphasis on reducing emissions from smoke sources such as prescribed burning... 2) Prevention of Significant Deterioration (PSD). Another concern is the impact of the selected alternative to PSD requirements. We note that while PSD is mentioned in Chapter 4, no PSD air quality analysis was conducted... We believe that some general PSD impact analysis is needed. 3) Visibility protection in federal Class I areas. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

*The effect of increased levels of prescribed burning on air quality and the ability to meet EPA and state air quality standards was not specifically addressed, even though concerns over air quality were a significant reason for the declines in recent years of the use of prescribed burning as a forest management tool. (Professional Societies, Eatonville, WA - Letter #W573)*

**Issue:** *The Final EIS should consider existing state and regional air quality plans and Memorandams of Understanding.*

**Sample Comments:** *The preferred alternative needs to be consistent with state airshed protection strategies such as the Forest Health/Air Quality Memorandum of Understanding developed for the Blue Mountains in northeastern Oregon. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

## 2.2.3 Management Activity Effects on Air Quality

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The proposal to increase prescribed burning on BLM- and Forest Service-administered lands prompts some people to question the effects of increased air pollution on human health. They feel the Draft EISs do not sufficiently consider the potentially adverse effect of increased smoke to human or ecosystem health.

While most people addressing air quality question the effects of prescribed burning on air quality, a few voice concerns about pollution input from other sources. They believe management must account for urban and industrial contributions to air quality degradation, and they wonder how these pollution sources will affect management options.

Some note that the Draft EISs fail to address the impacts on air quality from sources other than fire, such as emissions from mining, industrial, and transportation sources. They urge the Final EIS to correct this shortcoming.

A few assail the methods used to model the effects of prescribed fire. One writer says the assumption of a 400 square kilometer area (98,800 acres) for fire sources inaccurately dilutes the apparent impacts of a fire.

**Issue:** *The Final EIS should better analyze the effects of smoke from prescribed burning on human health.*

**Sample Comments:** *You talk of burning in the forest to reduce the fuel load, but I have seen in many places where timber could be harvested first to clean up a lot and then burn. First beware of pollution when you burn, the more fuel left, the more smoke (a health hazard). (Individual, Columbia Falls, MT - Letter #B76333)*

*Ozone from wildfires and prescribed fires should be acknowledged as a possible contributor to ecosystem and human health effects. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*We believe that any effort to return fire to the ecosystem must be balanced with the need to protect public health and air quality. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

*The major increases in prescribed fires being proposed under the DEIS, in our view, pose a threat to public health and air quality. Smoke from both prescribed fire and wildfire contains particulate matter (PM) and gaseous compounds that can have serious health effects. Medical evidence has shown that exposure to the fine particles in smoke can penetrate deep into the lungs, overriding the body's natural cleansing abilities and resulting in various respiratory and cardiovascular ailments. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

**Issue:** *The Final EIS should address impacts of air pollution from non-burn sources on air quality and proposed management options.*

**Sample Comments:** *The air quality sections in the 'Affected Environment' chapter (page 2:26-31) and the 'Environmental Consequences' chapter (page 4:18-28) dismiss any discussion of air pollution from urban and industrial sources and concentrate only on the pollutants generated by natural resource management activities within the Basin. Comprehensive discussion and analysis is needed for all sources of air pollution which could have adverse impacts on resources within the (Interior Columbia) Basin, including stationary and mobile sources within and outside the Basin. (Federal Agency, Seattle, WA - Letter #W881)*

*A significant shortcoming in the analysis of prescribed burning impacts is that neither background particulate levels nor cumulative impacts from other sources were taken into account, and therefore compliance with NAAQS under the highest proposed level of prescribed burning is not known. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

*Other planned actions that affect air quality include fire suppression, prescribed wildfire policies, and the rate and intensity of fuels treatment. It needs to be acknowledged that management inaction is a deliberate decision to not reduce fire risk. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The DEISs fail to consider air-borne pollution from mining operations in any context. (Conservation/Environmental Group, Portland, OR - Letter #B77923)*

## 2.2.4 Air Quality and Class I Areas

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Some respondents say project documents fail to consider visibility impacts such as haze, particularly in Class I areas, which could suffer great impact from nearby prescribed burns. One writer warns that prescribed burns within 100 kilometers of a Class I areas are subject to NEPA and the public participation process. This writer states that relevant scientific materials are not referenced in the Draft EISs.

**Issue:** *The Final EIS should consider the air quality impacts of prescribed fire on Class I areas.*

**Sample Comments:** *Visibility protection in Federal Class I Areas. The (EPA) will be adopting new Regional Haze rules later this year. The DEIS should acknowledge that the major increases in prescribed burning under the selected alternative could lead to regional haze impacts in Class I areas of the Interior Columbia Basin, and therefore should include a visibility impact analysis as part of the overall air quality analysis provided in Chapter 4. (State Agency or Elected Official, Portland, OR - Letter #W4710)*

*An air quality assessment... was prepared for the Science Integration Team.... This assessment needs to be included in the air quality discussion in the Affected Environment and Environmental Consequences chapters of the EIS. Two other major documents should also be referenced: (1) Status of Air Quality and Effects of Atmospheric Pollutants on Ecosystems in the Pacific Northwest Region of the National Park Service (Technical Report NPS/NRAQD/NRTR -- 94/160, November 1994), and (2) Ozone and Particulate Matter Air Quality Scoping Study for the Pacific Northwest (Draft Report, SYSAPP-97/51d, September 1997, Systems Applications International, Inc., prepared for the Washington Department of Ecology and the Environmental Protection Agency Region X, Seattle). (Federal Agency, Seattle, WA - Letter #B75568)*

## Section 2.3 ~ Wild and Prescribed Fire Effects

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Comments addressing fire management mostly reflect support or opposition to prescribed fire standards. Many viewed prescribed fire as an effective management tool insist on its implementation to properly restore lands. Others who are concerned with the “locking up” of the land feel that aggressive management such as salvaging and thinning practices in conjunction with the use of fire is necessary to preserve forest, riparian, and rangeland health.

Many people feel that the requirement to rest burned areas from grazing practices is a disincentive to cooperate with managing agencies on fire management plans. They believe grazing can help restore burned areas. Contrary to this belief, others deem the standards are not strict enough, insisting rangeland health would decrease if vegetation and riparian areas were not properly restored.

A number of respondents note that disturbance processes play a critical role in altering ecosystem function and structure; therefore, management strategies in the Draft EISs received numerous comments focused mainly on prescribed-fire management, rehabilitation standards for disturbed areas. Others believe that the Draft EIS programs for using fire as a management tool lack clarity and the guidelines necessary to make its implementation truly effective.

Believing that lands “will be left to fend for themselves,” some people claim “bonafide” restoration of disturbances is necessary, even when it means managing before disturbances occur. Some suggest that accommodation of disturbance into land management plans is necessary, and that some flexibility in the Draft EISs standards is needed to effectively manage for ecosystem health.

## 2.3.1 Restoring Fire as a Process

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Arguing that fire will help restore ecosystem health, many support the prescribed fire goals of the project. Several believe that fire plays an integral role in ecosystem processes, but some question how fire should be managed and, if prescribed, how burning should be used as a management tool. A few would like to see fire suppression curtailed and more natural fires allowed to burn.

Others are more skeptical of fire’s role in establishing ecosystem health. They feel fire management decisions should be made on a site-specific basis and only under proper conditions. Some respondents feel that the Draft EISs do not accommodate disturbances such as fire because of “multiple-use zoning” and varying management emphases, such as Conserve, Restore, and Produce. These people argue that management direction should be based on a holistic approach, with flexibility in standards to accommodate disturbances.

**Issue:** *The selected alternative should manage ecosystems flexibly to accommodate disturbances.*

*Understanding and incorporating disturbance regimes is essential to successful ecosystem management. It is generally accepted the disturbance processes have been altered over the last 100 years. Management must adjust to disturbances, both anticipated and unforeseen, in order to achieve desired future conditions and ecosystem integrity. The current multiple-use zoning with emphasis areas do not accommodate disturbances. Neither will the ecosystem management strategies of “conserve,” “restore,” and “produce” unless there is some flexibility built into the strategies. Recommendation: Base ecosystem management on the whole-unit approach with flexibility built into management strategies to accommodate disturbances. Use effective monitoring and adaptive management techniques. Design periodic activities that move the area towards the desired future condition. (Professional Society, Eatonville, WA - Letter #W573)*

*We further support the importance of fire management decisions being based on the on-the-ground situations. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*One approach to maintaining or improving ecosystem health and integrity would be by designing management activities to emulate natural disturbance processes and patterns, while providing goods and services. (Wise-Use Group, Eureka, MT - Letter #B78881)*

**Issue:** *The Draft EISs do not adequately consider the role of natural fire as a tool for restoring ecosystems on public land. The selected alternative should abandon fire suppression policies and practices and increase use of both prescribed and natural fire.*

**Sample Comments:** *There is no substitute for the many ecological functions- some known and many yet to be discovered - of fire. Silvicultural treatments can make at best, crude attempts to 'mimic' the structural outcomes of severe fires, but no credible agency scientist will claim logging of any kind is an adequate surrogate for fire. It is time for federal land management agencies to fully renounce the legacy of past fire suppression policies, programs, and practices not only in word, but in deed. (Individual, Eugene, OR - Letter #W4828)*

*Besides the use of prescribed fire, we also need to allow more natural fires to burn, especially during low-moderate fire years. (Individual, Fortine, MT - Letter #W4666)*

*For healthy forests, ecosystems and communities, we need to follow the scientists' recommendations to restore the ecosystems on public lands including reducing fuel loads through non-commercial practices including prescribed fire. (Individual, Portland, OR - Letter #W1694)*

*We wholly support prescription burning as a management tool in order to manipulate vegetation and prevent catastrophic fires. It has been a proven practice for thousands of years. (Conservation/Environmental Group, Lakeview, OR - Letter #W387)*

*We in all probability will or would have more fires and consequently more erosion under these proposed rules... Let wild fires burn! They need to burn on a regular basis to perpetuate a healthy forest. (Individual, Twin Falls, ID - Letter #B4870)*

*The preferred alternative fails to allow natural fires to return to the analysis area. Instead, it take the misguided position that logging (mechanical thinning) performs the same function as fire! That is ludicrous for the following reasons. Logging removes standing material which otherwise would have remained standing and provided shade and wildlife habitat. Logging compacts the soil, adversely altering habitat for a myriad of plants, fungi, and animals. Logging does not cause the nutrient recycling that fire does. Logging almost always requires roads, which are extremely harmful as stated above. Fire is a chaotic process, while logging is systematic and non-random. (Natural Resource-based Business or Business Group, Moscow, ID - Letter #B78807)*

## **2.3.2 Fire Effects on Fish and Wildlife**

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Some people feel that the Draft EISs does not adequately consider the effects of fire's impacts on fish and wildlife habitat. Others are concerned about spring and fall burning as described in the Draft EISs. These people contend the potential negative effects of this type of prescribed fire are inadequately addressed. They suggest more detailed analysis of these effect on flora and fauna adapted to summer and fall fire regimes.

There is also strong concern the Draft EISs overlook the impacts fire could have on aquatic and riparian habitats. Some believe fuel loads in riparian areas need to be reduced to lower the potential of a catastrophic wildfire. Others want more discussion of how natural disturbances such as fire relate to the development of aquatic habitat.

**Issue:** *The Final EIS should adequately address the cumulative effects of prescribed fire on plants and animals.*

**Sample Comments:** *The forests of the Interior Columbia Basin evolved with summer and fall fire regimes. Plants' and animals' survival strategies need to be recognized prior to implementation of large scale spring prescribed fire programs. Inherent conflicts and trade-offs between Desired Seral Stages and habitat requirements for aquatic species, big game, and woodpeckers need to be displayed. (Individual, Libby, MT - Letter #B4167)*

*Two themes which run through all or most of the alternatives are commerce and pre-scribed burning... Prescribed burning —any deliberate firesetting— is insane. It is incalculable how many animals perish in wilderness fires. (Individual, Sacramento, CA - Letter #B75376)*

*Please address more specifically the timing of these burns. (e.g. spring burning would decimate some nesting bird populations locally and may displace birthing wildlife of numerous species, while fall burning may disrupt migration or lead to inadequate time for forage recovery before peak erosion or winter dormancy seasons.) (Individual, Kennewick, WA - Letter #W1844)*

*Fire would make a much bigger mess and burn a lot of animals and birds. (Individual, Canon City, CO - Letter #W2160)*

**Issue:** *The Final EIS should adequately address the cumulative effects of prescribed and natural fire on aquatic and riparian habitats.*

**Sample Comments:** *Even though we agree that wildfire is not a major threat to healthy aquatic systems the majority of our watersheds do not meet the healthy watershed definition relation to fuel loads. The prevention of catastrophic wildfires through fuel load reduction is a low priority in the DEIS. When a fire burns a riparian area, serious damage is done. Catastrophic fires have and will occur in the future. (County Agency, Baker City, OR - Letter #B78802)*

*The aquatics section says that active management could be used in riparian areas to reduce the severity of wild fire. This is an important point that needs to be emphasized for the benefit of field units. The lack of management in riparian areas, such as would happen in Alternative 7, leaves these areas at an increasing risk of loss from fire as well as from insects and disease outbreaks. This point has been demonstrated repeatedly in recent years on a number of national forests, especially where large intensity wild fires have occurred. (Natural Resource-based Business or Business Group, Prineville, OR - Letter #W746)*

*Discussion of natural disturbance regimes is limited to forest wide events. Both documents should include discussions of how natural disturbances relate to the development and alteration of fish habitat over time. There is no discussion of the relationship between natural and human - induced disturbance events - as it pertains to the development and maintenance of productive fish habitat in either DEIS. Anthropogenic disturbances must be managed within the framework of unavoidable natural disturbances to ensure that ecological processes and functions are maintained and to allow for the development of needed habitat conditions in the future. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*Even though we agree that wildfire is not a major threat to healthy aquatic systems the majority of our watersheds do not meet the healthy watershed definition relating to fuel loads. The prevention of catastrophic wildfires through fuel load reduction is a low priority in the DEIS. When a fire burns a riparian area, serious damage is done. (County Agency or Elected Official, Enterprise, OR - Letter #W1649)*

### 2.3.3 Silviculture and Fire

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Fearing that there is a fire management problem or “a lack of management,” as one person states, many who are opposed to the prescribed fire objectives of the Draft EISs argue that too many fuels have already built up and that active management (such as salvage logging) is needed to lower the risk of fires. They believe that prior management such as salvaging and thinning is necessary in order to keep prescribed burns from turning into major conflagrations. Some claim the standards supporting the natural disturbances objective are weak and in need of a requirement for risk assessment associated with the development of prescribed fire plans.

Taking exactly the opposite stance, many other people believe timber harvesting and thinning adds to the fuel loads and increases the potential for catastrophic fires. Many of these people feel timber harvest and thinning alone should not be considered a substitute for fire.

**Issue:** *Because of the potential of catastrophic wildfire, the Final EIS should analyze a proper balance among timber harvesting, commercial thinning, and prescribed fire.*

**Sample Comments:** *Forest scientists agree that an aggressive program of fuel removal needs to be implemented to avoid catastrophic losses of timber and rangelands in the coming decades. The threat of severe lethal fires has increased by at least 20%. Will removing roads provide the access needed to the forests to provide programs for fuel removal? How will this threat be handled? Controlled burns are much more likely to get out of control currently than historically. Wildfire management is different today as we have different conditions as a result of our years of fire suppression. (County Agency or Elected Official, Cascade, ID - Letter #W1861)*

*With the enormous build-up of fuels currently on the ground, the ability to contain prescribed burns and prevent them from escaping and burning out if control needs to be addressed. Pre-commercial thinning prior to burning will not remove all of the risk. (Professional Society, Eatonville, WA - Letter #W573)*

*Without reducing the fuels prior to burning, a wildfire condition will occur. The Report to Congress from the USFS (1997) states that less than 10% of the USFS land can be safely burned without fuel rearrangement. Limiting entries and the amount of woody material that can be removed will continue to exacerbate unhealthy forest conditions and create even higher risks of catastrophic fires. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W1360)*

*Much of the science, with the notable exception of the socio-economic assumptions used in the analysis confirms what many of us who live in the West have known for years. We know that if we are to avoid huge catastrophic fires, aggressive management is necessary. This includes logging and thinning to reduce the amount of fuel built up from decades of fire suppression. ICBEMP calls for dramatically increasing the amount of prescribed burning, yet we know that the fuels (dead trees, etc.) must be removed prior to that prescribed burning if we are to avoid disastrous results. (Wise-Use Group, Whitehall, MT - Letter #W4665)*

*If forests were managed better, fire would not be such a threat. (Individual, Portland, OR - Letter #W865)*

*The impact of poor management is hard to evaluate, but its effects are clear. Something as apparently innocuous as fire suppression can have adverse results, such as beetle damage, which is so severe in some areas. The point to be understood here is that the Federal Agencies charged with managing their public trust are, in general, full of well-meaning people, but the living systems they oversee are immensely complex. (Individual, Springfield, OR - Letter #B77271)*

**Issue:** *The Final EIS should consider additional methods other than timber harvest and thinning for management of fire-prone areas.*

**Sample Comments:** *Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other human activity. If not accompanied by adequate reduction of fuels, logging increases fire hazard by increasing surface dead fuels and changing the local microclimate. Fire intensity and expected fire spread rates thus increase locally and in areas adjacent to harvest. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*Thinning of the forests, especially pre commercial thinning, adds greatly to the fuel for the next three to five years. This is laying a tinder bed for hot fire. Select cut logging thins, and removes much of the fuel to the mill rather than leaving it in the forest to increase fuel levels and fire potential. (Individual, Fortine, MT - Letter #B4591)*

## 2.3.4 Fire Management Effects

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Some people believe that fire is not always an appropriate technique for addressing ecosystem management. They feel the Final EIS should consider areas where fire may not be an advisable means of restoring disturbance processes, especially near private property and urban-wildland interfaces. They feel that the Forest Service should be actively managing these areas through thinning and clean-up techniques without damaging soils, streams, and wildlife habitat. Others believe that the Final EIS needs to address the impact of fire on noxious weed growth. Many people are concerned about fire's effects on air quality, which is addressed in Section 2.2, Air Quality.

**Issue:** *The Final EIS should address impacts of fire management on private property.*

**Sample Comments:** *Although this project is intended to be implemented only on federal lands, ecosystems don't follow administrative and ownership boundaries. Implementation of the project will have financial and economic impacts on adjacent land owners and local communities. Department-managed trust lands in eastern Washington are adjacent to many federal lands and lands under other ownership's. We also have responsibility for fire prevention and suppression for both state and private lands in the plan area. While we support the effort to restore ecosystem health and integrity, we're concerned about extensive use of prescribed fire suggested by the preferred alternative. It could have impacts on the department's responsibility and expenditures related to fire prevention and suppression. It is our expectation that the cooperation between us will be financially supported from federal partners. Our ability to meet trust management responsibilities depends on a fair sharing in this cooperative effort. (State Agency, Olympia, WA - Letter #B81208)*

*Forests have to be managed or all they will do is burn and when they do they also take towns and lives with them. We are talking about people dying here: moms, dads, kids and family pets. (Individual, Whitefish, MT - Letter #B79049)*

*A clear priority for projects is needed that will reduce fire hazard where it is the greatest: previously logged dry forests adjacent to private property. The Forest Service should be thinning small trees and cleaning up slash, without damaging soils, streams, and critical wildlife habitat. (Individual, Seattle, WA - Letter #W490)*

*The DEIS should identify specific areas where the use of prescribed fire would pose too great a risk and only non-burning treatments should be considered, such as in 'urban/wildland interface' areas, either from a fire hazard standpoint due to heavy fuel loadings, or from a smoke impact standpoint due to the close proximity of surrounding populated areas. (State Agency, Portland, OR - Letter #W4710)*

**Issue:** *The Final EIS should address fire's role in the spread of noxious weeds.*

**Sample Comments:** *There is no discussion of the role of prescribed burning in the spread of noxious weeds. (Conservation Group, Bates, OR - Letter #W222)*

*The effect of prescribed burns upon noxious species is not addressed well. Are native species more fire adapted? Which ones? Who decides which species to favor? (Individual, Kennewick, WA - Letter #W1844)*

## **2.3.5 Fire Management**

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Some respondents assert that some of ICBEMP's fire management programs need to be strengthened and their standards and objectives clarified for the programs to be successful. They suggest that the coordination of management programs should be required (not optional). Others believe that the standards supporting the natural disturbance objectives are weak and in need of a requirement for risk assessment associated with the development of prescribed fire plans. One person stated that the Final EIS needs to state the methods and rationale for computing wildfire acreages.

**Issue:** *The coordination of fire management programs should not be optional, but should be a requirement for the region to ensure successful implementation of Final EIS goals and objectives.*

**Sample Comments:** *The coordination of fire management programs should not be optional. This should be a requirement for the regions if they expect to succeed in implementation of these actions. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should re-evaluate Objective TS-O2 which fails to give resource managers the guidelines necessary to implement the stated fire strategy.*

**Sample Comments:** *The objective to restore natural disturbance process is excellent. The standards supporting the objective are weak. The standards lack a requirement for risk assessment associated with the development of prescribed fire plans. Establish risk evaluation standards. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The objective to use prescribed fire is a good one. It is interesting that this section lacks substance when other areas have specific standards that go beyond the intent of the broad scale nature of the plan. It is a feel good objective but offers no direction on what is expected. (County Agency, Boise, ID - Letter #78624)*

*Good objective but how much, when and by what means is this to be accomplished. Great caution should be used in planning and implementing prescribed fire. (County Agency, Baker City, OR - Letter #B78802)*

**Issue:** *The Final EIS needs to provide the methods and rationale for computing annual wildfire acreage.*

**Sample Comments:** *The DEIS does not indicate whether the incidence of wildfire in a grid cell influences the future probability of wildfire assigned to that cell. The methods and rationale for computing annual wildfire acreage need to be stated. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.3.6 Rehabilitating Burned Areas

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Some people are convinced that Standard TS-S4 in the Draft EISs to maintain soil productivity by resting burned areas from grazing, discourages the ranching community from become involved in fire management on rangelands. As one person puts it, “[the standard] constructs a barrier to becoming part of the overall solution.” If funding for monitoring rangelands should decrease, they believe monitoring effectiveness will decline as well, resulting in less prescribed fire than planned. Some people claim that since fire can burn in diverse mosaic patterns producing site-specific effects, not all burned areas require the prescribed resting period; they view standard TS-S4 in the Draft EISs as lacking strategies to involve livestock grazing as a tool to rehabilitate these lands.

In comparison, others assert that grazing in recently burned areas should be delayed until the implications of grazing can be better understood. Some feel standard TS-S4 is insufficient to restore rangeland health, suggesting that soil crusts as well as vegetation and litter need to be established or rangeland health will be jeopardized.

Some people feel the Draft EISs standards (TS-S2 and TS-S3) to rehabilitate disturbed areas with ecologically appropriate species is unclear. They questioning how a perennial species is defined and how management activities for fire are developed. Native species, they suggest, should be used in revegetation and restocking programs. Some assert that restoring soil crusts and not just vegetation should be a priority of any post-fire management. Others feel that because the primary goal of restoration is to prevent erosion, using faster growing non-native species would be appropriate under certain conditions.

**Issue:** *The Final EIS needs to completely display the effects of Standard TS-S4, including effects on economics and cooperative relationships.*

**Sample Comments:** *TS-S4 requires resting burned areas from grazing until monitoring data indicates recovery. This seems to be a disincentive to the permittee to become a partner in the prescribed burn. It directly affects the permittee’s livelihood, and the wording is too subjective to be helpful. Can the site-specific planing for a particular burn address how it will be done and its potential effects? The effect of fires on the landscape can vary, so treatment should be based on what has happened on the specific site. In addition, livestock grazing can be used to decrease competing vegetation. (County Organization, Salem, OR - Letter #W4555)*

*TS-S4 will require either a reduction in grazing areas or reduction in proposed prescribed fire. (Individual, Walla Walla, WA - Letter #W3793)*

*The requirement to wait until 'monitoring data indicates that desired vegetation and litter have 'recovered' is placing a restrictive standard on what should be a professional range manager's decision. Also, the continued reduction of monitoring dollars available strain the ability to extensively monitor each acre. This requirement could result in less prescribed fire and less cooperation amongst permittee and adjacent land owners. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W1360)*

*On the Crooked River National Grassland we have had Rx burns where one of the objectives was to consume old plant material (bunchgrass) to improve forage quality. We normally end up with a mosaic of burned and unburned area, so we have been grazing the burned area immediately following the burn to graze down the portion that did not burn. This results in a more even forage base the following year rather than very palatable feed where the fire burned and rank, unpalatable feed where the Rx fire did not burn. We normally graze the fall after the burn. Not all burn areas need to be rested after fire. (Individual, Madras, OR - Letter #W206)*

**Issue:** *Standards TS-S2 and TS-S3 for rehabilitating disturbed areas with ecologically appropriate species are unclear. Native species should be used in revegetation and restocking programs and should be clearly defined and discussed in the Final EIS.*

**Sample Comments:** *Standard TS-S3, which directs managers to use native plants in seeding, also allows for exceptions whenever it is established that natives are predicted to have little chance of success. How this is determined is not stated, leading to the possibility that exceptions will become the rule. (Conservation/Environmental Group, Republic, WA - Letter #W4660)*

*The rationale for TS-S2 reveals the patent absurdity of the DEIS sanctification of fire, and DEIS-imposed values - seed with desirable species so the area can be returned to its desired fire regime. What are desirable perennial species? Does this include crested wheatgrass? Does this include intermediate wheatgrass, which due to its aggressive nature, is completely incompatible with most rangeland ecosystems? What parameters are used to determine a desired fire regime? We also stress here that ICBEMP must specify the use of only native species in any revegetation efforts. Does TS-S3 imply that areas with less than 10" precipitation will be purposefully disturbed, then seeded with exotics such as crested wheatgrass? (Conservation/Environmental Group, Boise, ID Letter - #W3690)*

*TS-S3 should state a preference for native species, local ecotypes in reseeding and restocking programs. This preference preserves native plant population genetic diversity and is required by NFMA (16 USC 1604(g)(3)(A) and the regulations (36CFR 219.26, 219.27(g), 219.27(a) and 219.3). Both require preservation of the tree species diversity. Such guidelines are also necessary to prevent permanent impairment of the resource and loss of long term productivity under FLPMA multiple use requirements. (Individual, Missoula, MT - Letter #W3801)*

**Issue:** *The Final EIS should consider the use of non-native species in revegetation programs.*

**Sample Comments:** *A primary goal of reclamation is to stabilize the site to prevent erosion and reduce sedimentation. Several non-native species are typically included in the reclamation seed mix that grow quickly and are more effective at controlling erosion in the short term than are native species. The species selected are intended to be non-persistent, and native species in the seed mix and those that colonize from surrounding areas eventually will out compete the non-native species to result in a native plant community established on the reclaimed site. Thus, the requirement for only native species should be deleted from the FEIS. (Natural Resource-based Business or Business Group, Englewood, CO - Letter #B78926)*

*Introduced species absolutely have a place in achieving resource management goals relative to water quality, soil stability, wildlife habitat and forage, and livestock forage. Placing an inordinate emphasis on native species for reseeding will increase costs, and has the potential to fall short in meeting management goals associated with base resources. (County Agency or Elected Official, Philipsburg, MT - Letter #B77944)*

**Issue:** *The Final EIS should analyze the effects of grazing on burned areas.*

**Sample Comments:** *The [Fish and Wildlife] Service strongly supports delaying grazing until the effects of fire and implications of livestock use are fully understood. However, fire and other dramatic events are not presently a trigger for conducting [Ecosystem Analysis at the Watershed Scale]. We suggest that major fires should precipitate EAWS and that the information gained be used to determine when regular management actions like grazing can resume. Absent EAWS, this Standard should include specific information about what monitoring is required and how managers should decide when grazing may resume. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should consider post-fire management as part of the restoration process for rangeland health.*

**Sample Comments:** *Management after fire must include an explicit effort to restore soil crusts, not just vegetation and litter. Soil crusts in range ecosystems serve important ecological functions and they require long rest to re-establish. If vegetation and litter are the only goals, not enough rest will be required to re-establish ecosystem functions. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

## Section 2.4 ~ Insects and Disease

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Some individuals argue that government land managers in the project area have not taken responsibility for the effects of what they perceive as poor or inadequate management of pests on Forest Service, BLM, and other Federal lands. They note that harmful forest insects and diseases may spread from Federal to private lands. These people feel that a past inability to effectively confront forest pest problems has left current managers with fewer options, putting private lands and wilderness areas at risk. Healthy forests, they argue, will continue to fall prey to insects and disease, and treatment will become increasingly difficult. One individual suggests that the need for more future emphasis on forest health could negatively affect other parts of ecosystems in the basin.

## 2.4.1 Management of Forest Insects, Pests, and Disease

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Some individuals feel that while the Draft EISs state fire suppression may be a main cause for insect disturbances, they fail to consider even-aged management effects on insect disturbance rates. Suggesting more prescriptive measures to control insect disturbances, they deem it a mistake not to treat areas which represent what they believe to be a forest health crisis.

In contrast, other people view planned activities such as prescribed burning and thinning of forest stands (both suggested in alternatives as tools for improving forest health) as potential catalysts for increased tree insect infestation and root disease in the interior Columbia River Basin. Ecosystem management for general forest health in infected areas, they suggest, may itself be detrimental to ecosystem health, leading to credibility problems in future planning. Still others believe the Draft EISs ignore the role many insects play in maintaining ecosystem health, as pollinators, food sources, and biological control of potentially damaging species.

Some individuals are concerned with the clarity of the Draft EIS' language regarding disturbance management, citing the content in tables TS-G115 through TS-G121 and supporting narratives as confusing. They feel this part needs to be rewritten more clearly. In particular, these respondents assert that the Draft EISs fail to adequately characterize the implications of management guidelines under the alternatives. For example, one notes that management of riparian areas may call for little treatment. This person and others argue that depending on the alternative and the percentage of land base allocated to riparian conservation areas, significant portions of the project area may escape forest health treatments. In their opinion, this potential effect needs to be better captured in the analysis of alternatives. They ask that the Final EIS clearly identify how many acres will be excluded from treatment for insects and disease under each alternative.

**Issue:** *The Final EIS should fully address insect disturbance management responsibilities and effects on non-Federal lands.*

**Sample Comments:** *Please do not let the bugs eat it and destroy good produce. We do not let this happen in a garden in our home. We take pride in raising good crops. This is like taking food from the table of children. One example is the Lodgepole pine coming out of the Pyramid Mountain Pass in Montana. This happens to be in a buffer zone for the Bob Marshall Wilderness. Here Lodgepole pine is being eaten by the Pine beetle. Pine beetles are killing the forest and are not being stopped. How long will it take for them to eat their way out of Forest Service timber and make private timber or the wilderness their dinner? Who's responsibility is it to not let this cross over? This could be happening in most states. (Individual, Seeley Lake, MT - Letter #B103)*

*Problems on their [National Forest] property spread to ours and they accept no responsibility nor do they take the steps to correct the problem, Spruce Bark beetles in this case. (Individual, Cedar, UT - Letter #W3380)*

*The favored proposal #4 is an ecological disaster. I suggest they look at the Alps. First they stopped all harvesting, consequently, they stopped planting, because harvesting pays for planting. Next the trees began to die. The loggers were gone. The experts were gone. The equipment was gone. They piled diseased trees to make erosion barricades. The insects left the dead trees and moved on to kill healthy trees. The diseased trees should have been burned but who knew that? The Alps today face devastation because they were managed based on theological ideals rather than hard real facts. This mistake has already been made, don't make it here. Don't do it again. Already in our country the epidemics are starting on wilderness land then moving into managed forests. (Individual, Eureka, MT - Letter #B4606)*

*The Eastside DEIS and its supporting science material have not adequately identified forest ecosystem health hazards and risks as they relate to wildfire, insects, and disease potential. Because of this failing, many other important ecosystem components and conditions will not meet expectations. The forest health crisis has been acknowledged by many scientists and managers. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** ***The Final EIS should incorporate management activities to treat insect disturbances.***

**Sample Comments:** *Insect and disease mortality remain higher than historical levels for all alternatives, suggesting that levels of harvest, thinning, and burning need to be increased. (Professional Society, Eatonville, WA - Letter #W573)*

*Commercial logging used to thin stands is more specific to species. (Individual, Fortine, MT - Letter #B4591)*

*Make faster decisions that will help the forest get rid of diseases. Let us log before the trees are unharvestable. (Individual, Orofino, ID - Letter #B79413)*

**Issue:** ***The Final EIS should address negative effects of insect disturbance treatments.***

**Sample Comments:** *In Douglas-fir and grand fir on the west side of Region 1 USDA-FS, thinning /(fire) exacerbates the armillaria root disease. ...Without more exact wording against thinning in Douglas- fir/grand fir forest types, where root rot is present throughout the EIS, you are presenting a platform against the observations of your pathologists. And, the result will be to discount the necessity for regeneration cutting when it is the correct decision to be made. (Individual, Trout Creek, MT - Letter #W2851)*

*I believe burning as you describe, damages remaining trees, some to a point that they are not healthy and insects take over, and good species of new trees are slow to start. (Individual, Bonners Ferry, ID - Letter #B4678)*

**Issue:** ***The Final EIS should be clear in its prescription for insect disturbance treatments.***

**Sample Comments:** *Problem Statement: Guidelines TS-G115 through TS-G121 concerning control of tree diseases are also required within RCAs. Supporting Evidence: If RCAs are left untreated, effective control of disease across landscapes and watersheds will be much more difficult, if not impossible. This is particularly true if the selected alternative calls for a percentage of the project area to be included in RCAs . Alternatives 4, 6, 7 would classify approximately 1/3 of entire Dry Forest watersheds as RCAs, and on the order of 2/3 of Moist Forest watersheds. Recommendations: The text of Chapter 4 in the DEIS should clearly state that a large percentage of the landscape would be untreated for insects and disease. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Table 4-28. Very difficult table to understand. Do we know if the spring prescribed burning might increase insects/decrease problems? Assumption with Alternative 4 seems to be we will be covering lots of acres with prescribed burning and/or harvest. I doubt that. (Individual, McCall, ID - Letter #B75382)*

**Issue:** *The Final EIS should acknowledge the role many insects play in maintaining ecosystem health.*

**Sample Comments:** *The 'Evaluation of Environmental Consequences' in 'Explanation of Terrestrial Species' completely ignores many phyla or organisms. There is no discussion of arthropods, including the Class Insecta, which alone contains more species than all other animals put together. Insects play many roles in the ecosystem including pollinators, food sources, biological control of potentially damaging species, and recycling of nutrients. These species have great potential for negatively disrupting ecosystems. This omission raises serious questions regarding the ecosystem management aspect of the DEIS. (State Agency or Elected Official, Boise, ID - Letter #B77849)*

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## Section 2.5 ~ Forest Health

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Many people believe the urgency to improve forest health is an important issue to be addressed in the EIS process. However, when contemplating how forest health should be improved, people differed on the concepts and strategies presented in the Draft EISs. Claiming that past management activities are the root cause for current forest health decline, many individuals promote a passive approach to the management of lands in the project area. Others champion the need to increase management activities, suggesting that active management is the only way to address declining forest health in a manner benefitting local economies dependent on management activities such as timber harvesting.

### 2.5.1 Forest Health/ Forest Clusters

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While most people concur there is a need to address forest health in the interior Columbia Basin, opinions diverge on the level of activity needed. Questioning exactly what a healthy forest consists of, some individuals feel this issue has not been adequately answered in the Draft EISs.

There is no consensus among respondents about what the composition and structure of forested stands in the project area should be. Some individuals stress the need to increase the amount of larger diameter trees in the basin, and they commend the Draft EISs as a positive step in improving forest ecosystems. Others view this as a continuation of unwise limitations on the harvest of older and larger trees.

Many individuals contend that past management activities, such as road building and commercial harvest, on BLM- and Forest Service-administered lands have resulted in the current decline of forest health. Other people believe that the agencies are overstating this deterioration in forest health and assert not only that there has been an increase in the amount of forested lands in the interior Columbia Basin but that forest conditions are improving. Management at the local level, many maintain, will adequately address forest health in the region. Others perceive a failure in managing forest health at the local level. Some respondents argue that there should be strict basin-wide standards and monitoring applied to all management activity.

Other individuals are concerned that the Draft EISs attempts to manage for forest health will have negative impacts on private property owners and other Federal lands. Some believe that any reduction in timber harvest on public lands and the resulting closure of mills could have an adverse impact on family-sized tree farms. Some believe that National Park lands also could be affected. One Federal official points to the intensity of forest management called for along the east side of Crater Lake National Park, which he feels could contribute to “the fragmentation and isolation” of the park. Still other respondents wonder why the Douglas-fir ecosystems of central Idaho were not mentioned in the Draft EISs.

Citing what they call vague and inconsistent criteria for the establishment of forest and range clusters, many people criticize the Draft EISs for rendering the concept of clusters less effective as a management tool. Respondents note that some clusters were identified by aquatic and terrestrial habitat conditions, while others were identified by climatic and vegetation conditions. A few respondents believe that the clusters are too large to establish crucial differences in ecosystem integrity. Others complain that the Draft EISs do not list whether the clusters are designated for active or passive restoration.

**Issue:** *The Final EIS should address and clearly spell out forest health definitions and guidelines.*

**Sample Comments:** *[We] recognize the scientific conclusions of the report, as they relate to the unhealthy condition of public forest lands, are basically accurate. (County Agency or Elected Official, Cascade, ID - Letter #W1861)*

*Forest health is a highly desirable goal, as is human health. But I fear we have no near consensus on what is a healthy forest. Is absence of man's presence an indication of forest health? I think not. If it were then insect areas, disease pockets, and unaltered wildfires would be our goal results. Each of these have been major causes of erosion and other negative results. (Individual, Post Falls, ID - Letter #B75429)*

*The UCRB plan correctly identifies serious forest health problems across the Intermountain west, but I believe it is impossible to implement because it set forth too many conflicting management requirements. (Individual, Missoula, MT - Letter #B75855)*

**Sample Comments:** **THE AGENCIES HAVE A POOR RECORD OF MANAGING FOREST HEALTH**

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*You have not been able to stop the spread of disease on your own lands. You have never had a successful salvage operation in a timely manner on any of your own land. All blamed on lack of funding or personnel or courts. Now you want a hundred times the acreage on a background of failures. (Individual, Dayton, WA - Letter #W3677)*

*[T]he very necessity for the entire ICBEMP effort arises because Districts and Forests are balkanized in their efforts to respond to system level ecological crises - we are not naive enough to call for a 'one-size-fits-all' rule, but we must insist on tough, Basin-wide standards that apply to every timber sale, road construction effort, etc. The most damning evidence against any more direction at the local level is the abysmal failure throughout both agencies to effectively monitor the conditions written into projects for over 20 years - the DEIS itself cannot analyze monitoring data in support of such discretion, because it does not exist...Given that local agency personnel have proven they do not comprehend (much less agree with) national policy and regulations, and that local Line and Staff simply will not determine existing conditions for not wanting to shut down any projects, it is essential that the ICBEMP produce mandatory baselines, content and timelines for monitoring for all future projects. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*One of the many factors which has caused the decline of this ecosystem is the mismanagement by the agencies who are entrusted to manage this area. One of the factors is the volume of logging that has occurred in the past allowing Douglas-fir to come in and compete with the pines, suppression of fire, grazing in forests, grazing in deserts and grasslands, allowing old growth logging, etc.... (Individual, Portland, OR - Letter #E27)*

*We want healthy productive forests that are well managed and available for all to use and enjoy. (Individual, Newport, WA - Letter #B79142)*

**Issue:** *The Final EIS should use strict guidelines in identifying and classifying forest clusters.*

**Sample Comments:** *It is not clear from the DEIS that finer-scale information would replace the broad-scale information that was assembled by the Science Integration Team. Cluster designations were made at a gross level, with resolution at one square kilometer, and they are used as a basis for prioritizing analysis and action. The [Fish and Wildlife] Service suggests that the revised EIS should clearly state finer-scale information replaces any conflicting, broad-scale data...An additional problem is that the logic for identifying clusters in the document is not parallel. Forest clusters are separated by conditions with respect to aquatic and terrestrial habitat conditions, mostly distinguished by the level of human perturbation. By contrast, some of the range clusters are isolated in the same way, while others are identified in terms of climatic and vegetative factors. This renders the clusters much less useful as a management tool. We suggest that clusters be identified either by the difference between present conditions and site potential as influenced by human action, or that areas be categorized by climatic and vegetative conditions. Otherwise, this 'apples and oranges' approach to categorizing lands will confuse management priorities and reduce the consistency of treatment of lands throughout the planning area and over time. (Federal Agency, Portland, OR - Letter #W4641)*

*The minimum size of cluster analysis units is too large to identify important differences in ecosystem integrity within clusters. Cluster analysis should be redone using smaller analytical units, which would subsequently be aggregated for broad-scale applications. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*In Chapter 3, Pages 30 and 31, the Draft EIS illustrates the Management Emphasis for Forest and Ranger Clusters for Alternative 4. The bulk of lands in Idaho would fall under the Restore Emphasis. Earlier in the chapter, on Page 3, the Draft EIS discusses what is meant by restoration. Different categories such as Active Restoration and Passive Restoration are explained. It would be very useful to know which clusters the ICBEMP EIS Team is designating for Active Restoration and Passive Restoration under the different alternatives. This would enable our department to assess the impacts that these different emphases will have on recreation resources. (State Agency or Elected Official, Boise, MT - Letter #B77953)*

*I question whether the forest cluster designations are ecosystem based. Certainly the areas with current low integrity would generally be best suited for production and restoration outcome and those with high integrity would generally be best suited for wildlife and aquatic resources priority. And this approach would probably be the least expensive in general. (Individual, Issaquah, WA - Letter #W1431)*

*Maps displaying Alternative Management Emphasis for Forest Cluster (example Map 3-9) need to identify the strategy for all forested lands. The strategy for portions of the Umatilla National Forest in the Walla Walla and Snake-Tucannon subbasins are not displayed because these subbasins are not considered Forest Clusters. Tables with the Desired Seral Stages (example Table 3-2) should also include patch size range. (Individual, Walla Walla, WA - Letter #W3793)*

*Key Terms. In the definition for 'cluster' the statement that management opportunities and risks within clusters are similar is misleading. In reality, there is great dissimilarity within clusters. The statement should be revised and qualified to indicate that similarities are relative to other clusters and do not reflect the diversity of conditions within clusters that a finer scale assessment would reveal. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should address dry Douglas-fir ecosystems.*

**Sample Comments:** *Throughout the Draft EIS, it appears that the document avoids discussion of dry Douglas-fir ecosystems (without ponderosa pine) which were historically maintained with non-lethal fire to develop large diameter trees, similar to those typical of ponderosa pine ecosystems. These dry Douglas-fir ecosystems make up a significant portion of the forested ecosystems of central Idaho and they need to be addressed. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

**Issue:** *The Final EIS management objectives for forest health needs to take into consideration impacts on private property owners and other Federal lands.*

**Sample Comments:** *There are thousands of family-sized tree farmers who border federal land included in the Upper Columbia Basin Ecosystem Management Plan. Their ability to stay in the tree farm business instead of converting their land to some other use is determined to a large degree by the manner federal lands are managed. One of several determining factors is as follows: Reduced harvest under Natural Management means fewer logs for local mill. Mill closures will be inevitable. The long truck haul to a surviving mill increases logging costs to the point that those furthest away can no longer afford to stay in the business. Those who must haul beyond the 'break-even' point will convert their land to a more profitable use. A major objective of the Washington Farm Forestry Association is to promote conditions that are an encouragement for landowners who live in the Upper Columbia Basin. However, the proposed ICBEMP will produce just the opposite condition. It will force many family-owned tree farms to be converted to something else, because few can afford the newly imposed risks contained in the Plan. (Natural Resource-based Business or Business Group, Olympia, WA - Letter #W1711)*

*Active management is needed now to restore the health of the region's forests. The plans short term goal of protecting the environment greatly increases the risk of catastrophic wildfires or severe insect and disease attacks throughout the region. Sawyer Lumber Co. believes that we must manage our forests to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic which integrates the growing nurturing, and harvesting of trees for useful products with the conservation of soil, air, and water quality, and wildlife and fish habitat. This is Sustainable Forestry and that's America's and the World's future. (Natural Resource-based Business or Business Group, Fredericksburg, VA - Letter #W2946)*

## 2.5.2 Proposed Management Actions for Restoring Forest Health

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Restoring forest ecosystem processes through proposed management activities such, as timber harvesting, thinning, and burning, draws the attention of numerous individuals who question the Draft EISs for their terminology and desired future composition and structure of forests in the interior Columbia River Basin.

Suggesting the project is a "thinly veiled" attempt to increase timber harvest levels, several people contend the proposed silvicultural practices would require access to roadless areas, which they believe to be high in ecological integrity. They question the validity of some management activities, primarily clearcutting, in restoring forest ecosystem processes. Some argue that clearcutting increases stream siltation, raises the risk of fire, and disrupts wildlife habitat. Others wonder why lands they see as having the highest ecological value need to be logged or thinned to improve forest health. Expressing their desire to reduce or stop active management, such as road building and commercial harvesting, in these areas they feel will allow these lands to heal themselves over time if future management activities are limited.

Conversely, others believe an active management role on these lands is the only way to restore forest ecosystem health, claiming that timber management activities provide benefits to the public through improving wildlife habitat and increasing recreational access through road construction. They assert that without the removal of salvageable timber and reductions in fuel levels, the ICBEMP is setting these lands up for future catastrophic fire events. Numerous people declare that because the shift from active management to passive strategies stems from the standards proposed in the Draft EISs, no Final EIS and Record of Decision should be issued. Others suggest commercial thinning be allowed in forest reserves under strict conditions.

The use of potential vegetation groups (PVGs) received criticism from many people for being vague and lacking adequate information for determining the need for restoration. Some were confused about how riparian shrub and herb PVGs were addressed in the Draft EISs and which forest vegetation types have decreased.

By providing specific data on timber levels in Table 3.6, some are convinced the Draft EISs set up false expectations for the public, influencing future decisions in timber outputs. Questioning whether the harvest levels in the table will replace Allowable Sale Quantities of existing Forest Plans, some want adequate analyses performed if broad-scale activity levels will lead to changes at the finer scale.

There was confusion over the standards set for forest composition and the kinds of silvicultural practices to be used to meet the standards. Some argue that justifications exist for cutting larger/older trees under certain conditions. They assert that such decisions (on whether or not to harvest large trees) should be made on a site-specific basis. Some feel that tree densities and the Desired Range of Future Conditions established in the Draft EISs seem inconsistent because they feel the Draft EISs fail to take into account disturbances such as windthrow.

Some believe that Alternative 4 falls outside of the realm of the National Environmental Policy Act because it allows timber harvest in Riparian Conservation Areas only after major disturbances. These people argue that silviculture is thus effectively removed as a management tool to improve riparian conditions. In contrast, some people argue that standards should be established to limit the diameter of trees logged for restoration purposes.

***Issue: The Final EIS should not consider commercial logging and road building for restoration.***

***Sample Comments:*** *Advantages of clearcutting are limited to the short-term economics of extraction. The purported superiority of clearcuts for achieving fast early growth of seeding and sapling Douglas-fir and some other species is far outweighed by the adverse impacts on nesting birdlife because of edge effects; on many mammal, other vertebrate and invertebrate species; on habitat connectivity in general and by the evidence internationally that clearcuts will lead to total failure of regeneration beyond the third rotation. [Former Forest Service Chief] Robertson's advisory accomplished nothing because of the many loopholes it contained. More than advisories and guidelines are needed. An outright ban may not be desirable, but some progress should be attempted. The agencies should not be leaving a significant reduction in clearcutting and in similar even-age variants to the appeal and litigation process. (Conservation/Environmental Group, Helena, MT - Letter #B78706)*

*I question what these 'restoration' activities are and what adverse effects they will have on the environment. In my mind this is a veil for logging. I fear areas will be labeled in acres of thinning as a means of restoration when in fact there is no need. (Individual, Storrs, CT - Letter #W468)*

*The DEIS not only fails to define what types of logging are restorative, but also does not restrict 'restoration' logging to specified priority or previously managed and degraded stands. Because, 'forest health' treatments remain experimental, in most alternatives they should be restricted to a limited number of previously harvested areas. This is because (1) areas that have been previously harvested tend to be more degraded than non-harvested areas and, therefore, are more likely to require restorative measures, (2) study results and anecdotal evidence suggest that treatment efficacy is highest in areas that have been previously harvested, and (3) conducting treatments in non-harvested areas exposes the least degraded landscapes to the adverse impacts of 'restoration' treatments. Without statistically significant empirical evidence of their effectiveness, Alternatives 3 through 6 allow experimental and potentially damaging treatments to be conducted even in the most ecologically important and sensitive areas on the Eastside, such as roadless areas and old growth forests. (Conservation/Environmental Group, San Francisco, CA - Letter #W4834)*

*The earth's ecosystems can maintain themselves without the intervention of chainsaws and bulldozers! (Individual, Libby, MT - Letter #W563)*

*After all the effort, I am still disappointed that we are going to maintain the status-quo: business as usual. (Individual, Bellevue, WA - Letter #W198)*

*When I hear the Forest Service use words like thinning and control of noxious weeds, I confess that a cold shudder goes down my spine. These are euphemisms for the same practices that have abused the land for decades. When I see clearcuts in our National Forest, I label that a desecration. I am glad to see the Forest Service is finally trying to slowly stop this process and I hope there is not a political process to start this abominable practice all over again. (Individual, Helena, MT - Letter #B201)*

*The preferred alternative calls for the opening of essential roadless areas to logging under the guise of 'commercial thinning.' It seems unreasonable at the least to increase the practices that are causing such harm with the hope that increased logging will improve the health of the forest ecosystem! (Individual, Tonasket, WA - Letter #W211)*

*Approximately 23% of forest lands in the Interior Columbia Basin are rated as having high ecological integrity. Assuming that this rating is accurate, these lands should not be in need of "forest health" logging, and certainly should not be prioritized for treatment. However, the DEIS assigns restoration emphasis even to clusters with the highest integrity. For instance, in the preferred alternative, no forest clusters - not even the clusters with the highest integrity - have been assigned to the conserve management emphasis. All clusters are designated as either conserve/restore or restore. This suggests that (1) the EIS team's ecological integrity rating system is not useful for determining the location and levels of restoration treatments, or (2) the EIS team believes that intensive restoration will benefit areas of high ecological integrity. (Conservation/Environmental Group, San Francisco, CA - Letter #W4834)*

**Issue:** *The Final EIS should consider the use of management activities in restoration.*

**Sample Comments:** *Our forests have to be managed or we will lose them all to fire and bugs, and then they will not have anything to protect the soil and water. (Individual, Heppner, OR - Letter #W1220)*

*Your plans should be revised to show certain, guaranteed levels of hazards reduction via removal of forest fuels. Levels of material removal must be quantified and mandated, both to insure economic viability and certain, proven forest protection. Any alternative that prevents timely, active management should not be considered. (Individual, Hillsboro, OR - Letter #W1308)*

*Timber is the only renewable resource we have. It is proven there is more timber growing now than in 1900. Let's work for the Forest working for us not letting it die or burn up. (Individual, Eureka, MT - Letter #W802)*

*Timber production plays an important role in supporting other National Forest activity. Thinning provides more forage for wildlife, and roads provide access for recreational use. (County Agency/Elected Official, Cascade, ID - Letter #W1861)*

*We believe more active management of the timber resource will avert catastrophic fires, improve the lives [of those] dependent on timber industry jobs and create and help the habitat necessary for the diverse wildlife. Isn't that really the bottom line? (Individual, Bridgewater, ME - Letter #W2850)*

*TS-S14 and TS-S20. These standards effectively ban commercial harvest in dry and moist forests inside reserves. If "scheduled timber harvest" includes restorative thinning, this is the standard that renders Alternative 7 non-viable for restoring natural disturbance regimes in dry and moist forests. Commercial thinning from-below-the-canopy or to remove understories of in-grown shade tolerant species should be allowed inside reserves where it meets the following criteria: 1) it can be shown that the proportion, within the appropriate landscape unit, of multi-layered late-seral stands is outside the historical range of variability; 2) thinning can be accomplished without significantly disrupting populations of concern or hastening the spread of noxious weeds; 3) where it can be conducted using the existing road system; and 4) where thinning in dense stands is warranted to restore historical fire behavior. The DEISs should be revised to include an integrated alternative that incorporates these guidelines. (Conservation/Environmental Group, Seattle, WA - Letter #W4611)*

**Issue:** *The Final EIS should further explain the use of potential vegetation groups (PVGs) in determining the need for restoration.*

**Sample Comments:** *The SIT concluded that dry and moist forest Potential Vegetation Groups have been highly altered by logging, grazing, and fire exclusion, and that some formerly open stands now contain dense thickets of shade-tolerant species and multiple canopy layers. However, the dry and moist forest PVGs include a wide variety of forest types and conditions, and many stands in these PVGs may have high ecological integrity. Therefore in and of itself, the PVG classification is not an adequate standard for determining need for restoration. The SIT's landscape analysis does not provide any guidance for the types, percentages, or locations of dry and moist forests that are likely to most affected by past management and appropriate candidates for "restoration" harvest. (Conservation/Environmental Group, San Francisco, CA - Letter #W4834)*

*The [Fish and Wildlife] Service is concerned that vegetation management occurring anywhere throughout the basin following direction applicable by Potential Vegetation Group is too open ended and general to evaluate what will really occur on the ground. These standards lack the necessary specification to make them true standards, capable of determining whether objectives have been achieved. It is extremely difficult to identify how vegetation management, and the outcomes from*

activities, will effect the needs of species. Without the necessary spatially allocated specification and time lines identified (other than by cluster 'within the next decade') it is nearly impossible to analyze potential effects to species and habitat requirements. Species habitat requirements should, in fact, drive the management activities, which would then incorporate the necessary specificity. (Federal Agency, Portland, OR - Letter #W4641)

Analysis of potential vegetation groups is reported inconsistently. This paragraph suggests that riparian shrub and riparian herb PVGs were addressed separately. The Eastside summary, Pages 4 and 5, suggest that only a single 'riparian shrub land herb' PVG was used, and Chapter 2, Page 129, indicates that three PVGs (riparian woodland, shrub, and herb) were grouped together. The apparent confusion in PVG classification needs to be rectified. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)

The summary of changes in forest vegetation types focuses on the increases in various vegetation types. Information is needed on what types have decreased in order to offset these increases. It does not seem that increases in early-seral forest would be due to the fire suppression so extensively discussed. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)

**Issue:** *The Final EIS should address the consequences of projecting activity levels in Table 3-6.*

**Sample Comments:** *It appears that management activity Table 3-6 and 3-7 (Rangelands, see Section 2.6) will impose changes in management activity levels at the fine scale without the support of an adequate fine-scale assessment....Table 3-6 on Eastland Forests (Eastside Draft EIS), is used in the User's Guide to essentially replace the timber ASQ's of individual forest and land management plans. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The Activity Tables created unreasonable expectations that may drive future decisions. The presence of the Activity Table in the Draft Environmental Impact Statements is troubling. In other contexts, we have seen that activity tables create expectations of actual board feet to be logged and Animal Unit Months to be grazed. Indeed, both the conservation community and resource extraction interested will focus on the numbers in any given table. (Conservation/Environmental Group, Seattle, WA - Letter #B75255)*

**Issue:** *The Final EIS should establish standards for forest composition and structure and the silvicultural practices that should be used to achieve those standards.*

**Sample Comments:** *Limiting the size of trees to be removed will prohibit the removal of diseased or genetically inferior trees. Limiting even-aged openings to less than 40 acres will reduce the ability to convert to other species, requiring the increase of early successional, shade intolerant species does not allow for the development of climax forests where they historically existed. The seed is not available to plant the recommended blister rust resistant white bark pine. (Individual, St. Maries, ID - Letter #W3792)*

*Silvicultural manipulation should be limited to selective cutting to enhance the return of Ponderosa pine and western larch where it has been high graded and reproduction is being crowded by shade tolerant fir. (Individual, Moyie Springs, ID - Letter #B4692)*

*Your forester on the team seems to be unaware of the past history of reforestation. There have been tens of thousands of acres of moist eastside sites that have been planted with Ponderosa pine. Many of these plantings have been [with] off-site trees. Many were poorly planted. (Individual, Baker City, OR - Letter #W282)*

*The tree densities called for in standard PE-S3 seem inconsistent with the desired future conditions, stated earlier in this chapter, to moderate the intensity of disturbances such as windthrow. The densities prescribed here would be very conducive to loss due to windthrow. (Federal Agency, Seattle, WA - Letter #W881)*

*Alternative 2 is unacceptable and was written outside of the NEPA. Standard A2/AQ-S1 prohibits timber harvest in Riparian Conservation Areas except after catastrophic events. The standard is objectionable on both scientific and economical grounds. The standard effectively eliminates silviculture as a tool to improve riparian conditions... Allowing one discipline (fisheries) to dictate management violates NEPA requirements for the interdisciplinary process. Imposition of this standard without disclosure of the impacts is an obvious violation of NEPA. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B75417)*

*Harvest of large trees: All of the action alternative 'focus strongly on reversing the decline in large trees.' Foresters recognize the full range of values large trees provide. We hope this strong focus does not mean that no large trees can be harvested. Decisions as to whether or not a tree should be harvested depend on the function of each individual tree. The key to determining whether an individual tree is functional or not is how silvicultural objectives are defined. Does the tree and its function help attain the objective? If so, leave the tree. If not, it is a candidate for harvesting. The determination of silvicultural objectives are site-specific decisions that require training and judgement. Forestry schools generally teach that the worst way to manage a forest is by specifying a diameter-limit cutting rule that precludes making decisions on the contribution of individual trees. (Professional Society, Moscow, ID - Letter #W546)*

*The DEIS alternatives, other than the made-to-be-rejected Alternative 7, lack silvicultural standards that maximize the chances that logging will have a remedial impact. Standards are needed that limit the diameter of trees logged for 'restoration' purposes, ensure that fire-tolerant species are not removed in the name of 'fire-proofing,' and guard against excessive drying out or wind throw susceptibility caused by over-zealous reductions in stocking levels. Alternatives 3 through 6 address these needs only in vague, hortatory language. (Conservation/ Environmental Group, San Francisco, CA - Letter #W4834)*

## **2.5.3 Mature and Old-Growth Forest**

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Perceiving mature and old-growth forests to hold ecological importance and intrinsic value, the majority of people commenting on these forests fear a lack of standards in the Draft EISs may jeopardize these areas. By providing adequate standards it will protect these areas from future logging, grazing, and other resource extraction. By protecting these forest types, they feel fish and wildlife habitat, clean drinking water, and recreational opportunities can be preserved for long-term health and future generations. Others argue these forest habitats harbor insect and disease infestations, and they claim wildlife and underbrush presence is rare. They believe that active management is needed to effectively restore these forest ecosystems.

Some people say that the information in the science documents contains far lower estimates on the acres of mature forests than was previously identified by the agencies. Some believe that a more detailed mapping exercise, such as the grid-based field

sampling and remotely-sensed imagery used in the Sierra Nevada Project, should be used by the ICBEMP team. Arguing that both types of forest should not be lumped together in management decisions, some individuals declare mature and old growth forests need to be adequately defined in the objectives and standards of the plan.

A number of individuals contend that several of the alternatives, including the preferred, would not provide for mature and old-growth protection existing under interim management directions. As an alternative to forest management strategies proposed in the Draft EISs, many suggest the EIS team consider other alternatives prepared by groups such as the Natural Resources Defense Council (NRDC) and the Forest Service Employees for Environmental Ethics (FSEEE).

Many people feel that Standard HA-S6 is not clearly defined. A few respondents assert that the standard should be rewritten to allow more local-level management, while others believe it should be rewritten to ensure the protection of old-growth forests.

**Issue:** *The standards and alternatives in the Final EIS should include long-term management direction for mature and old-growth forests.*

**Sample Comments:** *By lumping the two successional stages together, it is impossible to distinguish the effects of different management activities on old growth alone. Old growth forests in the western United States have classified as endangered by one scientific review. Lumping mature forests with the old growth group obscures the analysis of the effects and impacts of different management alternatives on these endangered ecosystems. Consider planning looking at the range of resolve values, as required by NFMA, FLPMA, and MUSYA cannot occur by lumping the old growth ponderosa pine ecosystems with dissimilar ecosystem types. (Individual, Missoula, MT - Letter #W3801)*

*...Even if society is in total agreement about forest restoration, the overwhelming geographic scale posed by the fire exclusion problem assures a premature demise for many old growth stands. Once lost, such stands will likely never be back. (Individual, Kalispell, MT - Letter #W891)*

*Some stands of old growth do require thinning and/or prescribed fire to resist fire and represent single layer old growth forest habitat for dependent species (together with a natural understory), such as the flammulated owl. This should not be a uniform prescription, however, for every stand of old growth ponderosa pine, due to reasons of adaptive management and consideration of other species that have shifted to these habitats due to a loss of similar forest structure from past silvicultural activities. (Individual, Missoula, MT - Letter #W3801)*

*This plan must not allow for any more old growth logging. The meeting I went to it was stated that old growth would be allowed to be cut if it was in competition with other trees. These old growth trees are not in competition they are in a symbiotic relationship with the rest of the forest plants. (Individual, Portland, OR - Letter #E27)*

**Sample Comments:** **PROTECTION FOR MATURE AND OLD GROWTH FORESTS -** *[Roadless areas] also contain the old growth forests which need to be protected from harvest. We need to keep all of these pieces of the puzzle intact while we continue to work on our knowledge of sustainable forestry by working in areas that we have already impacted. (Individual, Whitefish, MT - Letter #B71)*

*I feel that it is critical that the management plan: Protect all remaining stands of old growth (trees larger than 20 inches in diameter and 150 years or older). (Individual, Dayton, MT - Letter #B3911)*

*The DEIS fails to protect old growth forests. Large blocks of actual old growth 250 acres or greater should receive priority retention. The Society of American Foresters stated that 'the best way to manage for old growth is to conserve an adequate supply of present stands and leave them alone.' The FEIS should show clear evidence that a scientifically 'adequate supply of present stands' has been conserved particularly below 5,000 feet in elevation in active life zones areas... (Conservation/Environmental Group, Hungry Horse, MT - Letter #B81)*

**Sample Comments: ACTIVE MANAGEMENT TO RESTORE FOREST TYPES -**

*In the old mature stands we see in our area, mistletoe, root rot, and pine beetle infestations are widespread, as are stands quite simply dying of old age. If through restoration activities, only the understory is removed from these areas, how will these problems be remedied? Until such time that some type of active management plan is developed, for these types of forest conditions, these diseases will continue to encroach on the adjacent forest structure. Under natural conditions, I believe these stands would succumb to stand replacing fires as the fuel levels increased, and I do not foresee low-intensity prescription burning as a solution. With the current public sensitivity to harvest activities in these so called 'old growth' areas, I would question the path this project appears to be leading us down. It's easy to envision these old mature forests locked up for perpetuity simply because misguided public sentiment, continually fueled by special interest groups, prohibits future management in this type of forest structure. (Individual, Rexford, MT - Letter #B75564)*

*In the 1950's, Lincoln County still had a lot of area that today would be considered old growth timber. I think the outsiders have a fantasy of what old growth timber stands look like. They believe it consists of huge trees with little underbrush that gives the impression of a manicured park with flowers, shrubs, and animals living in a miniature paradise. The actual picture is much different. Trees are one of nature's most powerful species. Left unchecked by the natural forces of fire and logging, old growth trees take over an area leaving the ground underneath the canopy dark, dry, and devoid of virtually any underbrush or edible plants. (Individual, Kalispell, MT - Letter #B76036)*

*Provide strategies for restoring unhealthy forests and maintaining healthy forests by active forest management. Use silviculture practices to maintain and restore forest health in the most cost-effective manner possible. (Natural Resource-based Business or Business Group, Kettle Falls, WA - Letter #W974)*

*I want full restoration of clearcuts. (Individual, Eugene, OR - Letter #W884)*

**Sample Comments: CONSIDERING OTHER ALTERNATIVES-**

*I urge the Forest Service to adopt and implement the scientifically sound recommendations contained in the Forest Service Employees for Environmental Ethics plan, which would lead to watershed protection and protection of old-growth reserves. (Individual, Jefferson, OR - Letter #B77309)*

*I support NRDC's (Natural Resource Defense Council's) management plan for many reasons. Here (is a personal reason) of my own: We need our remaining old-growth forests for our health and for that of future generations, no matter the duration of the physical earth as it now is as projected by either theologians or scientists. If we don't preserve our old-growth forests now, we could be facing dire consequences in the near future - even our lifetime. (Individual, Kaysville, UT - Letter #W55)*

**Sample Comments: MANAGE AS ALREADY PROVIDED UNDER THE INTERIM DIRECTION FOR OREGON AND WASHINGTON (EASTSIDE SCREENS) -**

*The science team found that large-diameter trees, or old growth, have declined in the basin to levels far below what had been estimated by earlier Forest Service and*

*BLM models. Yet even given this fact, your Preferred Alternative presents no standards to protect old growth trees. Even current protections protect trees larger than twenty-one inches in diameter. (Conservation/ Environmental Group, Sandpoint, ID - Letter #W202)*

*Alternative 4 provides significantly less protection for old-growth than current interim guidelines. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*The scientific assessment found that old-growth acreage is much less than historical levels; however, Alternative 4 would not protect old-growth acreage at the protection levels currently in effect under the current guidelines (Alternative 2). Instead of the ban on logging in most old-growth in these guidelines, logging would proceed so long as large remnant trees are left in stands 100 acres or larger. (Individual, Seattle, WA - Letter #W4618)*

**Issue: *The Final EIS should clarify Standard HA-S6.***

**Sample Comments:** *Standard HA-S6 contains a number of vague statements that may be interpreted to impose more onerous requirements than intended. For example, the statement that in the absence of analysis on distribution, occurrence, and connectivity of mature/old structure stands, the agencies are to ‘retain large remnant trees in mature and old, single and multi-layer stands 100 acres or larger..’ could be interpreted to require all trees of this nature to be left on site. Considering that the definitions for ‘mature and old forest’ have not been established (See HA-S5) this standard as currently worded imposed uncertainty and gridlock. Similar concerns are raised by the provisions that ‘connectivity should be in a contiguous network pattern in two or more directions’ is probably a good concept on an undisturbed system, but is questionable whether it can be attained under current stand conditions and still achieve the economic and community goals. We suggest that this standard be modified to provide more clarity and management discretion. (State Agency or Elected Official, Roseburg, OR - Letter #W4835)*

*We are concerned that Standard HA-S6 calls for adequate occurrence, distribution, and connectivity of ‘mature/old-structure standards.’ This differs from ‘mature/old stands.’ At a minimum, effectiveness monitoring is needed to assess whether what we see as important components of ‘structure’ are, in fact, providing the habitat needed by the full spectrum of old-forest-associated fauna species. We also recommend that, wherever possible, mature/old stands be retained. (Federal Agency, Seattle, WA - Letter #B75568)*

*[Standard HA-S6] does not clearly define numerous key terms that are critical in order consistently to determine appropriate management direction. Not only does Standard HA-S6 fail to specify the number of large remnant trees that must be retained in 100+ acre [late-stage/old growth] stands, it also does not define these trees in terms that could be easily lead to their identification in the field (e.g. age and/or size criteria). Nowhere in the DEIS and accompanying documents is the term ‘large remnant tree’ specifically described. (Conservation/Environmental Group, San Francisco, CA - Letter #W4834)*

**Issue: *The Final EIS should include detailed mapping techniques for old-growth management.***

**Sample Comments:** *To develop a basis for an old-growth management framework in the DEISs, the Scientific Assessment should have included a mapping exercise similar to that conducted by [Sierra Nevada Ecosystem Project] (1996). SNEP used remotely-*

*sensed imagery and grid-based field sampling to classify land units according to their relative degree of old-growth structural character. In dry, fire-prone pine and mixed-conifer forests such as those in the Sierra Nevada range and Interior Columbia Basin, patch sizes with old-growth structure can be very small (e.g. < one half acre). Moreover, the degree of old-growth structural development is highly variable between and within patches. For this reason, SNEP used a scale to rank land units by their relative degree of old-growth character, using a number of criteria for old-growth structure across a density or distribution spectrum. This ranking system allows forests to be mapped by the degree to which areas are providing late-seral or old growth functions. SNEP thus provided a model for mapping old-growth structures in forests prone to fire and insect outbreaks and with small patch sizes. SNEP's methodology for mapping old-growth and delineating 'Areas of Late-Successional Emphasis' is thus directly applicable to forests at low to mid-elevations in the ICBEMP project area. (Conservation/Environmental Group, Republic, WA - Letter #W4660)*

## Section 2.6 - Rangeland Health

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Nearly all the comments submitted for rangeland health focus on livestock grazing and its effects on other range ecosystem processes. Many feel this grazing and rangeland health interaction is inadequately addressed within the Draft EISs. Calling the scientific information used in the standards and objectives unclear and misleading, some people insist the agencies need to become more specific and descriptive in their reasons for the decisions they make.

Impacts of grazing on riparian and aquatic health are addressed more fully in Section 2.7

### 2.6.1 Impacts of Livestock on Rangeland Health

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Maintaining that the project will negatively affect the ranching community, some respondents promote ending the project at this time. Many believe that nature and humans can work together, yet they feel that the Draft EISs give priority to ecological concerns at the expense of ranchers and their way of life. They attest that livestock grazing provides food and materials for the country and jobs for many living in the interior Columbia Basin. They feel that too much blame for rangeland problems is pointed at them, claiming that project documents fail to address other factors such as recreation impacts and wild horse grazing. They believe that most livestock operations are responsive to past overgrazing and mismanagement of their areas, and they insist that only those who do not manage rangelands properly should be penalized.

Some suggest that proper livestock management can benefit the land and restore ecosystem health. They note that grazing animals reduce fuel loads, decreasing the risk of wildfire. Some remind planners that ranchers build fences and preserve open space and viewsheds, all with little or no public funding. Many assert that with a long-term stake in the quality of the land, those who raise cattle and sheep have every incentive to maintain ecosystem health. They feel that further restrictions or fees will not help the ranchers or the land.

In contrast, some individuals point to what they see as degradation of riparian areas and rangelands from livestock, as support of their claim that the Northwest is unsuitable for grazing; they insist that grazing should be removed entirely from public lands. A few resent what they feel is a "taxpayer subsidy" of ranching. Some assert that the Draft EISs lack standards to improve livestock grazing, making the Draft EISs inadequate for restoring rangeland health. Noting that high percentages

of rangelands are rated as “low integrity” or “non-functioning,” many argue that too much grazing is emphasized in every alternative of the drafts. From their review, they contend that because the scientific data in the Draft EISs indicates grazing as a major cause of rangeland degradation, the agency’s decisions are contradictory to its own science. These respondents feel it is impossible to use grazing as a management tool to restore rangeland health.

Some respondents say fire is a natural part of healthy ecosystems including rangelands, and fire should be a part of range management. Others claim that livestock grazing mimics the impacts of fire but with less erosion and soil damage.

**Issue:** *The Final EISs should consider livestock grazing as part of rangeland health improvement.*

**Sample Comments:** *Grazing cattle on forest lands has numerous assets. The grazing cattle reduce fuel loads of grasses, fertilize the ground and provide food, leather and other by-products for our society. Without grazing in our forests, we could not raise enough cattle to supply the world. The cattlemen build miles and miles of fencing at very little or no cost to the taxpayers. (Individual, Omak, WA - Letter #W1168)*

*The draft is negative as to grazing, always emphasizing the adverse conditions which can result from overgrazing. It fails to recognize the positive results of grazing which include increased wildlife in and around public lands where livestock are grazed. It also fails to recognize the improvements in the public lands which have resulted since the Taylor Grazing Act required issuance of permits to individual ranchers who have proprietary interest in improving the lands for perennial use. (County Agency or Elected Official, Murphy, ID - Letter #B77171)*

*Rangeland health would not be improved with more restrictive use than current agency plans offer. To improve rangeland faster than current methods, planning will require the use of these lands and contributions being made by permittees to increase, not decrease grazing. Rangelands are in the best condition now than in years past, is a premise that the DEIS has already stated. That trend is positive. It has come about by people cooperating with agencies at a local level. Use of the resources is monitored and documented. Improvements continue to be measured. (Individual, La Grande, OR - Letter #W3806)*

*[Upper Columbia River Basin Draft EIS, p. 2-89] Paragraph 1. The conclusion is misleading and inaccurate. Ranchers have made adjustments when necessary, and improvement in allotments has been evidenced. This draft makes no mention of the improvements to allotments made by ranchers and federal agencies. (Individual, Joseph, OR - Letter #W4538)*

*Grazing cattle or sheep on grassland areas cheaply and effectively eliminates late summer fire hazards. (Individual, Gardnerville, NV - Letter #W4113)*

**Issue:** *The Final EIS should analyze the effects of fire to maintain and restore the health of rangelands.*

**Sample Comments:** *With juniper encroachment and sagebrush densities out of balance, I think the rangelands need fire just as much as the adjacent ponderosa pine forest types. Fire is a part of healthy ecosystems in Eastern Oregon and the Snake River Plain. Fire should be part of project level management in rangeland ecosystems. (Individual, Boise, ID - Letter #B75281)*

*Because of past and present livestock grazing, formerly healthy grasslands and shrub communities are being invaded by noxious weeds, fire frequencies in many communities are reduced, shrubs and trees are invading or increasing in density, and the loss of the microbiotic crust is reducing plant productivity and soil stability. Anderson (1991) reviewed the literature on grazing on bluebunch wheatgrass in the Northwest for the Idaho BLM Office and concluded that grazing damages bluebunch wheatgrass, the most important native bunch-grass in the Basin, during all seasons of the year, including during the dormant season. He found that grazing was especially damaging during the spring. And Sauer (1978) found that standing dead litter is beneficial to bluebunch wheatgrass, which declines with overuse in the winter. These conclusions in the scientific literature about spring and winter grazing are important because these are the seasons ICBEMP recommended for grazing activities. (Natural Resource-based Business or Business Group, Hailey, ID - Letter #B79405)*

**Issue:** ***Livestock grazing is destructive to rangeland health and should be curtailed on public rangelands.***

**Sample Comments:** *Over fifty years of research and experience have shown that our northwestern rangelands are too dry and too fragile for heavy livestock grazing. Once degraded beyond a certain threshold, they are permanently altered. This threshold has been exceeded throughout the Columbia Basin -- in spite of 60 years of BLM and 100 years of Forest Service management. Those few rangelands that are still relatively healthy should be permanently excluded from livestock grazing. This action is critical for protecting native species and endangered ecosystems and for protecting for posterity, the last of our unique northwestern grassland ecosystems. (Conservation/Environmental Group, Bend, OR - Letter #W36)*

*Within the grazing section you talk of weeds and cheatgrass. These are mainly signs of overgrazing. We have lots of overgrazed lands in the northwest that I have seen overgrazed since the free range was going on. We have streams that have no banks at all, just shallow ditches. In order to bring back native grasses and shrubs, the cattle need to be removed from government land for a minimum of ten years and perhaps forever. (Individual, Corvallis, MT - Letter #B7)*

*The EIS proposes no changes in current grazing standards or livestock numbers. How can this be? Is the livestock lobby so strong in these ecosystems that your people fear its backlash. (Individual, Spokane, WA - Letter #W208)*

*(The plan must also lessen the ) damage done by sheep and cattle grazing on public lands. (Individual, Portland, OR - Letter #B75489)*

*The scientific Assessment found most of the grazed rangelands of the Interior Columbia River ecosystem to be in abysmal shape. Only 5 percent of the Basin s rangelands were rated as having high ecological integrity. None of the management alternatives — including the Preferred Alternative — will protect or restore rangelands of the Columbia River ecosystem. The DEIS fails to adequately describe the past management practices that damaged this part of the ecosystem. This failure pertains not only to the assessment and management practices that damaged this part of the ecosystem. This failure pertains not only to the assessment and management of grass- and shrub-dominated communities, but to grazed forested ecosystems as well. (Conservation/Environmental Group, Spokane, WA - Letter #B78639)*

## 2.6.2 Use of Science

Viewing what they see as the overuse of livestock grazing as responsible for current range conditions, some individuals question why the Draft EISs do not reduce Animal Unit Months and do not include provisions to improve grazing systems. Respondents feel that the Draft EISs standards are contrary to the conclusions of the Science Integration Team. They claim that grazing will continue to impose a negative effect on range and riparian health, especially if grazing is shifted from already degraded areas to allotments in better condition. Some suggest that prescribing fire on rangelands could help improve rangeland health by balancing vegetation densities. However, because of their apprehension of agency management they question whether vegetation management under the project would actually improve range ecosystem health.

Many feel that discrepancies in science need to be cleared up or the agency's credibility will be lost. Some writers note that different government information sources, such as the Bureau of Land Management's Internet web site, present a more positive picture.

Perceiving that scientific conclusions vary from agency to agency, they question whether standards derived from this information are valid. A few attack the Federal agencies' commitment to accurate science, noting what they call inadequate funding and staffing. Because some people believe issues or standards are misleading because of incomplete or invalid information, they feel the agency needs to adequately address the available science and not disregard it in favor of subjective decision making. As one individual commented, "either both the beneficial aspects and detrimental aspects must be explored, or neither should be."

**Issue:** *The selected alternative should address the use of accurate science in decisions in relation to rangeland health.*

**Sample Comments:** *The project made no effort to hire seasoned professionals with the ability to develop programs that would protect and restore 50 million acres of Columbia Basin rangelands. Instead, the rangeland program has been left woefully understaffed, with only one range scientist at a time working on both the scientific assessment and the DEIS. This is a far cry from the Northwest Forest Management Plan. The scientific justifications in the DEIS for not reducing grazing are embarrassing and contradictory. The grazing strategies mentioned in ICBEMP documents are widely known to lead to loss of native bunchgrasses and native shrubs, damage to wet soils and streambanks, loss of plant vigor and seed crops, and loss of soil fertility. In fact, many well known and respected range scientists report that the grazing systems recommended in the DEIS have 'generally failed' to improve range ecosystems. It is obvious that the project, not keeping up with scientific literature, is willing to overlook this information to avoid making substantive changes in public lands management. (Individual, Bend, OR - Letter #B75642)*

*[Upper Columbia River Basin Draft EIS, p. 2-227] Paragraph 2. What is the current condition of the project area? Comparing BLM figures to ICBEMP figures presents a massive dichotomy. How does ICBEMP explain this real and unreal dichotomy especially when one considers that the BLM report is based on scientific inventory data which was collected and ICBEMP's information was a totally subjective assessment of Range Integrity which ICBEMP admits has no precise definition, no direct measurement and no clearly stated goals or objectives? (Individual, Clarkston, WA - Letter #W3111)*

*[Upper Columbia River Basin Draft EIS, p. 2-87] The conclusion is reached that 'unlike wildlife species, livestock do not migrate. Livestock tend to stay in one place as long as they have food, water, and other needs.' That statement is unscientifically broad. If it were true, why has there been a need for drift fences throughout the history of livestock grazing? (County Agency or Elected Official, Murphy, ID - Letter #B77171)*

*Initially, I was very encouraged by the scientific analysis, which accurately documented that the rangelands of the interior Columbia Basin were more degraded than had previously been thought. In fact, 70-80% of the rangelands in eastern Oregon and Washington were found to have low ecological integrity, meaning that the ecosystems were severely disturbed and had lost much of their natural resiliency. This degradation was attributed to overuse by stock and improper livestock grazing. But in spite of these analyses, the DEIS team has neither reduced livestock numbers nor included standards that would improve grazing practices. I hope you will give these problems your consideration. Continued degradation of Western ecosystems will harm the species, the waters, and the human inhabitants of the Columbia Basin. (Conservation/Environmental Group, Bend, OR - Letter #W36)*

*The DEIS makes no changes in current grazing standards or livestock numbers even though the Science Integration Team found that 80% of eastern Oregon and Washington rangelands have low ecological integrity and that grazing will continue to have negative environmental impacts on aquatic ecosystems. (Conservation/Environmental Group, Sandpoint, ID - Letter #W202)*

### 2.6.3

## Grazing and Rangeland Structure and Composition

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Some respondents assert that weeds and other intrusive plants are encouraged by livestock. They feel that noxious or exotic weeds have taken over much of the basin's rangeland, while others dispute that the Draft EISs have any credible evidence to bolster that claim.

A number of individuals challenge the Draft EISs on a variety of issues related to rangeland composition and structure. Several dispute the Draft EISs assertion that most area rangelands are degraded. Others question the calculation of certain statistics, such as the Eastside EIS's statement that dry grasslands comprise four percent of the project area, down from nine percent historically. A few note what they feel are inaccuracies in the Draft EISs' inventory of pre-livestock conditions and composition on the range.

Many respondents interested in grazing and rangeland health agree that western juniper and other woody plants have encroached on other plants, but writers disagree on whether livestock is the primary cause. A few also attack the Draft EISs' estimates of the costs of weed and juniper control.

**Issue:** *The Final EIS should more carefully examine the relationship between livestock and encroachment of western juniper on rangelands.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-5] Paragraph 1. Description is incorrect. The statement 'Only a few tree species including juniper and lodgepole pine and ponderosa pine are native to grasslands,' is completely false and needs to be completely rewritten. This list does not include all the conifers let alone the deciduous species. (Individual, Joseph, OR - Letter #W4538)*

*[Eastside Draft EIS, p. 2-98] Paragraph 5. Juniper is not a shrub! Figures shown for Range Improvements in Alternative 1 and 2 appear to be very low. Using data published in BLM facts and conservative costs for various range improvement projects such as juniper control, pipelines, fences, etc. - the range cost for a typical year has been \$350,000 - 400,000 which is approximately double the \$168,000 shown on the table. (Individual, Clarkston, WA - Letter #W3111)*

*Cattle are also probably the main cause of the dreaded juniper encroachments, as it could be around that cattle actively promote this phenomenon by eating the grasses while providing them with an unaccustomed dose of nutrients. (Individual, Prineville, OR - Letter #W237)*

**Issue:** *The Final EIS should clarify statements regarding rangeland structure and composition.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-91] In discussing rangeland, the text states that dry grasslands makes up 4% of the project area, reduced from 9% historically. The maps on the following pages indicate that this decline is not due to conversion to another type, but that these areas no longer exist as rangeland, or perhaps they are no longer federally owned rangeland. Maps 2-9 and 2-10 do not show an expansion of forest into these areas. Information is needed on the cause of this change in the extent of dry grassland. (Federal Agency, Seattle, WA - Letter #W881)*

*The rationale for TS-O15 states: 'Dry grasslands, dry shrublands and cool shrublands are highly departed in frequency and composition from historical levels and conditions.' The preceding statement is directly contradicted by BLM ecological status data shown on its web page. The DEIS states 'areas with native large bunchgrasses with sagebrush overstories would not be common across the planing area under Alternatives 3 through 7, but would be much more apparent than under Alternative 1 and 2. Evidence to support the preceding assumption is highly doubtful. The assumption apparently came from (1) assumptions which were made about the Dry Shrub Potential Vegetation Group of Ch. 3 and (2) assumptions as to the description of historical conditions of Ch. 2. In other words, subjective assumptions have been made on subjective assumptions. By the time it gets to the comparison of alternatives, the assumptions on assumptions are three times removed from the original broad based assumption which in itself is at best a professional estimate on which several professionals would have varying opinions. (Individual, Clarkston, WA - Letter #W3111)*

*The section on Dry Grass Potential Vegetation Groups is too general and lacks any adherence to known facts about dry grasslands. This section is representative of an attempt to synthesize literature from research across the region, through the years, at site-specific locations, with site-specific hypotheses. What has been generalized as limited by rainfall and shallow, rocky, or clay soils is untrue of many areas. Geologic formations prescribe the soil types of many sites in NE Oregon that are not limited by rainfall. Dry grasslands can have deep loam soils, good precipitation during spring and fall, an area not limited by rainfall. Native grasslands may or may not be diverse depending in the soils that they occupy... Potential Vegetation Group: (Chapter 2, Page 98-115) 'If there is adequate sunlight to allow photosynthesis,' favorable moisture and ground temperatures in winter may or may not promote growth. The DEIS is synthesizing publications and study material conducted at different times on different species. There is no definitive conclusion that such a statement can be made with credibility... This again is merely an attempt to manage a vast and varied area with one plan which diminishes the focus of thousands of unique microsites. Mention of a few will hardly suffice for a plan that addresses all of them. (Individual, La Grande, OR - Letter #W3806)*

## 2.6.4 Grazing, Dry Rangelands, and Drought

Some individuals assert that the Draft EISs are weak and inaccurate regarding livestock grazing in dry areas or after droughts. They say that project documents over-estimate the effects of livestock on dry areas and the time needed for drought-stricken lands to recover. Several say that scientific data and historical photographs prove that the land recovers more quickly than project documents admit. Others complain that drought was discussed only in reference to dry plant vegetation types, when, these writers maintain, droughts can happen on any rangelands in the project area.

**Issue:** *The Final EISs should accurately address the effects of livestock on dry rangeland and after droughts.*

**Sample Comments:** *[Upper Columbia River Basin Draft EIS, p. 2-90] Paragraph 1. The comments as to drought and the adverse impact of livestock grazing are directly contradicted by such scientific data as Dr. Lee Sharp's collection of slides representing 40 years of research. (County Agency or Elected Official, Murphy, ID - Letter #B77171)*

*[Eastside Draft EIS] Pages 85 and 93 assume that grazing will be limited during droughts throughout the planning area, yet the standards on page 3-114 only limit grazing in one plant type. This is inconsistent and undermines the entire grazing effects analysis. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*This standard [TS-S23] only addresses the effects of drought on dry shrublands. This is inadequate. All ecosystem types are susceptible to drought effects and are adversely affected by grazing during and after the drought. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

## 2.6.5 Grazing Standards

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A majority of the comments pertaining to livestock management and grazing issues reflect opposition to range standards listed in the Draft EISs. Seeing previous grazing effects as detrimental to rangeland health, many individuals feel the alternatives presented in the Draft EISs will do little to reduce livestock grazing impacts, and they want stricter control of grazing practices in riparian areas, forest lands, undisturbed grasslands, wilderness areas, and areas of low ecological integrity where noxious weeds can thrive. They feel that if rangeland capability and suitability studies are performed on all public-land grazing areas within the interior Columbia Basin, numerous lands that are currently unsuitable for grazing practices because of poor or fragile soil, water, and vegetation conditions, could be effectively restored by removing livestock and resting these lands.

One group recommends that grazing should be restricted where substrate, water temperature, and bank stability standards are not met. Suggesting the government needs to find uses of the land other than livestock grazing, some believe the land will still be degraded regardless of management practices.

Some individuals contend that improved grazing standards exist, citing personal observation of active management that has improved the land. They question why the better standards are not implemented in current management standards and in the Draft EISs. Some assert that ranchers do not want to harm their way of life and are likely to protect their source of livelihood.

Others counter that under stricter standards it would not be economically feasible for livestock owners to continue using public lands for grazing purposes. They feel the pro-posed Riparian Conservation Area provision and other standards in the Draft EISs are too strict. Arguing that the Draft EISs do not follow existing standards such as state guide-lines or the Standards for Rangeland Health implemented recently by the BLM, they want these issues to be incorporated in the Final EIS. Many perceive a mosaic of landscapes in the basin, with different management needs for each area, and they insist that local decision-making and site-specific standards are necessary for effective range management.

**Issue: *The Final EIS should set grazing standards for lands in the interior Columbia River Basin.***

**Sample Comments:** *[Eastside Draft EIS, p. 2-61] Paragraph 7. This section should include a discussion of the potential for longer lasting and larger acreage of forage under forest canopy. (State Agency or Elected Official, Malaga, WA - Letter #W4534)*

*[Eastside Draft EIS, p. 2-12] A capability of suitability analysis of all public lands for livestock grazing should be part of this. Both suitability and capability should be established before livestock use continues to be authorized. (Conservation/ Environmental Group, Boise, ID - Letter #W3690)*

*In watersheds where substrate standards (such as sediment, cobble embeddedness) are not being met, temporarily suspend grazing until the standards are met, or a statistically significant improving trend over the course of five years is documented through monitoring and total sediment delivery is estimated to be less than 20% over natural...*

*Where water standards (generally 60 degrees F) are not being met, livestock grazing should be suspended within the riparian reserves until temperature standards are met or a statistically significant improving trend over at least five years is documented through monitoring. Where bank stability standards (= or > 90%) are not met temporarily suspend grazing within half a tree height of floodplains (or streams where floodplains are absent) until standard is met or monitoring documents improving (sic) trends over at least five years...*

*Where all standards are met, carefully control and monitor all grazing within riparian reserves to ensure that degradation does not occur. Livestock should be restricted from access to spawning reaches during and after the spawning season. If access cannot be prevented, livestock should be removed from watersheds prior to onset of spawning season...*

*Eliminate grazing from environments clearly incompatible with aquatic resource protection (e.g., wet meadows with fine-grained, non-cohesive soils and without woody back vegetation) unless fenced and all habitat standards are met. (Tribe, Pendleton, OR - Letter #B2)*

*Cattle should not be allowed until all annual wildflowers have already made and dropped their seed. (Individual, Pullman, WA - Letter #W3021)*

*I am a cattle rancher, but I hold no brief for those who put a feedlot on a creek, allow confined animal waste to enter a water shed, or overgraze riparian areas. Most cattlemen are extremely sensitive about overgrazing their lands. We can't afford to kill what feeds our herds. (Individual, Klamath Falls, OR - Letter #W773)*

*I personally have seen both ends of the spectrum on this grazing issue. Some of my neighbors up the Chewuch River do a darn good job of moving their cows around and have built impoundments around riparian areas to protect the vegetation, and the fisheries. There are also other Valley residents who are not as fastidious in their range management and their allotments are nothing but weed infestations. Currently the Forest Service is considering spraying FS roadways with herbicides to control the noxious weeds. The weeds are definitely a problem in the Valley, but I would rather see the allotment management change to reflect a tighter control on moving the cows around, thereby giving the remaining grasses a chance to recover from being over grazed, like the rest of the bio-region. (Individual, Winthrop, WA - Letter #W1289)*

*AFSEEE [Association of Forest Service Employees for Environmental Ethics] proposes a scientifically credible set of criteria for determining grazing suitability based on Desired Outcomes and Ecosystem Management Standards. AFSEEE's preferred approach seeks to eliminate livestock where grazing would prevent or retard attainment of ecosystem health and integrity. In Appendix 2 of the report, AFSEEE lists indicators of ecosystem health, including soil quality, nutrient cycling, watershed functions, riparian values, stream morphology, water quality vegetative life cycles, diversity of plant and animal species, and viability of wildlife populations. To be credible, the Forest Service must address these factors. In AFSEEE's view, the bottom line is ensuring that livestock grazing on public lands will contribute to restoration of damaged ecosystems and never interfere with attainment of ecosystem health. AFSEEE is hopeful that the ICBEMP will set an example for a new generation of forest plans by using sound science to determine and identify lands suitable for livestock grazing. Livestock grazing is not a benign land management activity. Grazing can alter the composition, structure, and function of terrestrial, riparian, and aquatic ecosystems. Livestock grazing affects fish and wildlife populations, watershed hydrologic functions, soil structures, nutrient cycling, habitat characteristics, vegetation succession patterns, and disturbance processes over wide areas of the Eastside National Forests. Some past and present livestock management practices no longer meet the needs and expectations of the American people. Although there has been limited progress in developing, implementing, and monitoring some grazing allotment plans, a more comprehensive reform of grazing management is clearly needed to accelerate improvements in public lands health. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*Since cattle grazing has been and is so injurious to riparian health, safeguards need to be implemented to prevent cattle from further degrading these areas. Moving cattle from ruined areas to healthy riparian areas, as alternative 4 seems to suggest, will exacerbate the problem. (Individual, Corbett, OR - Letter #W358)*

*The ICBEMP found serious ecosystem problems in the region. The grasslands and streambanks have been seriously degraded by cattle and sheep. Management of cattle and sheep grazing is important to enabling the restoration of this area. Protecting selected streams and important grassland will allow areas to rejuvenate. The best areas need to continue to not have grazing. (Individual, Seattle, WA - Letter #W635)*

*Native grasses need to be restored across the West by getting the cows off the deserts and grasslands where they do not belong. It is well known that with the disappearance of native grasses not only do the native plants and animals decline but the non-native cows lose their food source as well. Cheatgrass is a major problem and will not be eradicated by shifting the cows to areas that are in excellent shape and that have not been grazed yet. The cows need to go. The loss of native grasses is affecting the entire ecosystem including birds of prey which depend on the Blacktail Rabbit for food which depends on native grasses for its food. (Individual, Portland, OR - Letter #E27)*

*Much of this bioregion is grasslands, and these grasslands are in peril. Livestock grazing is degrading riparian areas and threatening to degrade previously ungrazed grasslands. (Individual, Seattle, WA - Letter #W633)*

## 2.6.6 Range Management Objectives and Emphasis

The activity tables in Chapter 3 of the Draft EISs are confusing to some. They state that the tables, if not clarified or omitted, may lead to unwarranted expectations from the public. This is based on their perception that the figures in the tables do not differentiate among management emphasis, such as restoration by thinning vs. commercial timber harvesting.

Many find the range clusters and their management emphasis to be problematic. Some state that the clusters are too broad and fail to take into account local details including history, moisture, and range composition and condition. Some find the ‘emphasis’ — Conserve, Restore, and Produce—confusing, vague, and arbitrary. Numerous respondents say local decision-making, free of basin-wide standards, would allow local managers to react more quickly to local circumstances than they could if held back by broad-based standards. These people say that site-specific guidelines are needed. They also feel the documents fail to consider the advice of local Resource Advisory Councils.

A few encourage grazing on more Federal acreage, stating that increased grazing acreage need not mean more livestock but could be a management tool for relieving pressure on other areas. Some suggest that grazing can contribute to silvicultural objectives, such as fuel reduction; therefore, grazing and timber activities should be coordinated.

**Issue:** *The Final EIS should clarify and justify the range management emphasis of restore, conserve, and produce.*

**Sample Comments:** *Range management objectives [TS-O12] are too vague and inadequate. ‘Restore’ and ‘maintain’ are too vague. Reference to PFC and RMOs would be slightly better. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

**Issue:** *The Final EIS should incorporate site-specific measures for grazing management.*

**Sample Comments:** *The DEIS perhaps is failing to see that grazing is a site specific issue. A blanket policy will not work, as areas where grazing occurs are different from one area to another, and no single plan will work. It needs to be left to those who know these lands specifically to manage them in cooperation with the local officials familiar with the federal lands and the people who use them. (Individual, Heppner, OR - Letter #W890)*

*The DEIS claims that the conditions and trends in watersheds are affected by ‘improper livestock grazing.’ It fails to identify an amount of grazing which would be considered ‘improper’ in a particular area, and fails to evaluate the effects of grazing in specific ecosystems. The DEIS fails to recognize that grazing is a site-specific issue. (Individual, Jordan Valley, OR - Letter #B77118)*

*The rationale for standard TS-S23 states that improper grazing during drought years is a major impact to range health. Many times, it is too late to significantly alter a grazing plan in the middle of a season because of drought. It is often not known that it is a drought year until the end of the season. In our area, a single storm can significantly change the amount of available forage for livestock. Recommendation: Only local land managers will have the information needed to make quick decisions in this type of situation. Make this standard an objective to allow more rapid decision making. Also, provide language that allows for permittee participation in this process so that he has ample time to prepare in the event of a drought situation. Most livestock handling facilities are already outside of riparian and sensitive areas and sensibly lie on dry ground. There may be some potential problems that arise if this document succeeds in expanding RCA widths to accommodate Zones 1, 2a, and 2b, which was previously discussed as not necessary. Make this standard a guideline to be administered by local personnel. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

**Issue:** *The Final EIS should re-evaluate the system of range clusters. Management standards appear too broad in the Draft EISs.*

**Sample Comments:** *This lumping of categories is so broad and unexplained as to be meaningless at any level. Large portions of public lands are wilderness study areas, areas of moderate ecological integrity, or hot spots of biodiversity or special status species.... It would be a violation of current management and direction, including agency policy manuals, to Produce/ Manage much of this land. The huge land mass - every acre of BLM land in the Basin? - placed by the DEIS in the Restore (disturb) management emphasis in Map 3-10, Alternative 4, does not present the public with any reassurance that any prudent management whatsoever will occur. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

*The use of Range clusters is a good approach for management planning across such a broad area. However, provision needs to be made for special management zones within these clusters. Examples include administratively withdrawn areas such as recreation sites, as well as areas adjacent to Wilderness Areas and units of the National Park System, where a gradual transition zone would have ecological value. The statement in Objectives TS-013 that Range Clusters 1,5, and 6 have equal priority for treatment is unclear. (National Park Service, Seattle, WA - Letter #B75568)*

**Issue:** *The Final EIS should explain criteria for the primary management emphasis of rangelands.*

**Sample Comments:** *The rationale and reasons for proposing management activities and primary management emphasis such as Livestock/Recreation or Livestock/Timber or Conserve/Restore are never fully explained to the public, and... appear to be in violation of current law and current national agency direction. For example, how did ICBEMP determine that lands in Owyhee County should be placed in a Restore vs. a Conserve/Restore category shown in Map 3-18, Alt. 6? How did ICBEMP determine that large acreages of crested wheat grass in the Bruneau River drainage in Owyhee County should be placed in the Conserve category in Map 3-21, Alt. 7? (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

**Issue:** *The Final EIS should consider the advice of local Resource Advisory Councils.*

**Sample Comments:** *In reviewing the rangeland objectives and standards, we are unable to determine whether they are consistent with the "Recommended Versions of Standards for Rangeland Health and Guidelines for Livestock Grazing Management" as developed by the RACs and PACs. As noted in the above-referenced document, the standards and guidelines incorporated therein were to also be incorporated into the DEIS. (County Agency or Elected Official, Roseburg, OR - Letter #W4582)*

*Our RAC believes that the DEIS needs to fully incorporate the Standards for Rangeland Health recently adopted by the BLM in cooperation with the 3 RACs and 3 PACs. We do not feel that we should have to hunt for them or infer that they are covered by other statements. We also believe that these standards should apply to all landscaped and land uses. While the guidelines for grazing management are appropriate for all EIS covered lands, the EIS is not the appropriate level for their incorporation. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

## 2.6.7 Grazing Fees

Noting what they call unwise government spending, many feel perceived grazing subsidies must be eliminated and Animal Unit Month fees increased to compensate for costs of management. Others maintain that if the fees increase it will be even more difficult for ranchers, already hindered by a variety of restrictions and regulations, to raise livestock profitably.

**Issue:** *The Final EIS should compare grazing fees to management costs.*

**Sample Comments:** *I would strongly urge the agencies to limit livestock grazing to situations in which it can be used to increase the palatability of forage to native ungulates and to areas where it will not degrade riparian areas or fisheries. Since the EIS reports that the federal government spends approximately \$1.50 per AUM more than it collects in grazing fees to allow grazing on public land there should be enough non-monetary benefits returned to the land to balance out the cost. (Individual, Moyie Springs, ID - Letter #B4692)*

*The Columbia Basin is comprised of arid grassland and high desert and these lands are frequently leased to ranchers. This practice is a wise use of marginal land, but if these areas are over-grazed, and livestock are allowed to ravage the tributaries of the Columbia, the whole process becomes questionable. This is compounded when fees don't even cover management costs. (Individual, Springfield, OR - Letter #B77271)*

*Having worked on BLM projects in the Lakeview district, I'm aware of the serious damage routinely being done to native ecosystems by over grazing, particularly in streambanks. The Columbia Basin plan should strongly address the effects of overgrazing and cease public subsidy of ecosystem degradation. (Individual, Coos Bay, OR - Letter #B75779)*

*By no means should over-grazing be permitted, and grazing fees on public lands should be consistent with fees charged for grazing on private land. (Individual, Richland, WA - Letter #W480)*

## 2.6.8 Grazing and Conflicts with Other Land Uses

Some respondents say that possible conflicts may arise between grazing and other management objectives, particularly wildlife and recreation. Some maintain that grazing has no conflict with recreation, saying that most recreation in rangeland is on rivers and streams, which often are off-limits to livestock. Some argue that rangeland actually enhances recreation, by preserving open space for hunters and fishermen. Some complain that grazing conflicts are overstated and that Range Management Emphasis should not be affected by potential recreation conflicts. On the other hand, some who recreate on rangelands complain that livestock and associated wastes ruin the experience of hiking, camping, and other activities.

A few believe that negative impacts caused by recreation are underestimated, and that the Draft EISs unfairly blame grazing for all rangeland damage. These respondents allege that the fault for rangeland degradation is due to recreational land users who continually cause damage to the land, to aquatic health, and to private property.

**Issue:** *The Final EIS should address the conflicts between grazing and recreation.*

**Sample Comments:** *I have spent much time in the Quilomene and Colockum areas and have camped extensively in many parts of the Columbia Basin.... Grazing... is a MAJOR problem. (Individual, Seattle, WA - Letter #W422)*

*Take the cattle off the land and turn the people loose to roam where livestock roamed and see what happens. Some people have absolutely no respect for property, no matter who it belongs to, and will destroy anything in their path. (Individual, Myrtle Point, OR - Letter #W811)*

*I am concerned with the areas of focus of the ICBEMP: Eastern Oregon and Washington, Idaho and Western Montana. These areas are a vital recreational resource of the Inland Northwest. Their maintenance is integral to that of the heritage of the Northwest. In order to protect them we must take measures to limit human impact on water quality, wildlife populations, and vegetation. There is no question that protection of these ecosystems serves the public interest. I would like to see the following actions taken: Reduce cattle grazing to allow recovery of riparian areas and prevent degradation of ungrazed grasslands. (Individual, Spokane, WA - Letter #B81212)*

*The team also found that grazing has had negative environmental impacts on aquatic ecosystems - which I can attest to from hiking and hunting, fishing and paddling these areas my entire life. The damage is great, in my opinion, throughout Eastern Washington. (Individual, Spokane, WA - Letter #W208)*

## 2.6.9 Grazing and Wildlife

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Some individuals feel the Draft EISs fail to adequately address the impact of livestock on wildlife and the kinds of conflicts that arise from grazing. A few note that wild horses and burros, protected by Federal law, cause many of the same impacts as domestic stock, yet the Draft EISs blame only domestic animals for rangeland damage. Grazing, say some, improves forage for big game such as deer and elk.

Others say the potential for conflict between re-introduced wolves and livestock also calls for comment and resolution in the Final EIS. A few complain that domestic sheep can transmit disease to their wild bighorn relations, creating another conflict some feel was ignored in the Draft EISs. Some assert that the act of consuming forage and trampling the ground affects the food chain at its most basic level, from microorganisms to insects to frogs and rodents to raptors and predators. A few suggest mitigative measures, such as ungrazed areas along fences that serve as wildlife corridors.

**Issue:** *The Final EIS should better address the effects of grazing on wildlife. This includes effects on predator/prey relations involving raptors, coyotes, grouse, turkeys, small rodents, and frogs.*

**Sample Comments:** *Insufficient treatment of role of predation upon decline of sage grouse and sharptail grouse. e.g. Has favoring raptors (by pesticide reduction and hunting protection) reduced grouse populations? To what extent? What effect would reduction of coyotes have upon these grouse? (Individual, Kennewick, WA - Letter #W1844)*

**Issue:** *The Final EIS needs to address the interactions between domestic livestock and wildlife.*

**Sample Comments:** *At a minimum, there should be a brief discussion of the affects of... the Wild Horse Act, WSA's and ESA. (Individual, Clarkston, WA - Letter #W3111)*

*Grassland, to remain healthy, must be grazed by domestic animals thereby getting new growth in the fall for deer and elk.... Ungrazed is half dead. (Individual, Biddle, MT - Letter #B78328)*

*I feel there needs to be a plan to move grazing permits that are in the middle of large tracts of wildlife habitat. Case in point, there are a couple of permits in Bear Valley on the Lowman Ranger District on the Boise National Forest. Recently there were wolves re-introduced in this same area, it borders the Frank Church Wilderness Area. These cows are hauled over 100 miles into this area that has not a single acre of private holdings within at least 25 miles.... (Individual, Mountain Home, ID - Letter #B56)*

## Section 2.7 ~ Aquatic Health

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The health of aquatic ecosystems under implementation of the Interior Columbia Basin Ecosystem Management Project is the subject of many respondents' comments. They wonder if an exact definition of riparian health exists. Another central question is the appropriateness of active management techniques such as timber harvest, grazing, prescribed burns, and other activities in riparian areas. While some favor active management in riparian areas, many people feel these very activities are responsible for the general degradation of fragile aquatic ecosystems.

This section also addresses public comment related to management strategies, standards and objectives, the effects of various management activities on riparian health, and the relationship of the Draft EISs to existing plans.

### 2.7.1 Restoring Aquatic Health

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Most people addressing aquatic health believe restoring aquatic and riparian health should be one of the goals, if not the primary goal, of the Final EIS. They note the importance of healthy streams for aquatic wildlife and of clean ground water for private and municipal drinking water supplies. With only a few exceptions, most respondents who discuss this issue believe the primary causes of poor aquatic health are grazing, logging, and mining. Many believe that other significant sources of aquatic pollution include non-point source run-off from agricultural fields, waste from dairy operations, inadequately treated waste from sewage plants, drainage from highways, and dams.

Believing that controls on grazing, logging, and mining are too lenient, many respondents concerned with aquatic health propose an immediate and permanent ban on these activities. A number of respondents view regulators as hostile or at best indifferent to controlling resource use. They believe that the preferred alternative will double timber harvest and allow more grazing, and they wonder how this can help restore watersheds. They question the utility of a preferred alternative that they feel fails to call for sufficient funding for restoration.

Conversely, other writers believe the preferred alternative is overly restrictive and unclear. Many people feel the Draft EISs fail to recognize significant progress in recent years by local people who have constructed new wetlands and grass strips to protect river and creek banks. They protest what they see as a lack of proper surveying of streams and rivers to objectively determine whether or not aquatic conditions are poor. A few people believe that grazing stream banks actually improves aquatic health. Others feel that logging and mining can continue in riparian areas because of improved technology and techniques. Some of these respondents maintain that restrictions on logging in riparian buffer zones will lead to an unacceptable risk of wildfire.

**Issue:** *The Final EIS should determine the state of aquatic and riparian health and, where necessary, identify areas to be restored.*

**Sample Comments:** *Your aquatic evaluation must include identifying the important riparian and key watersheds, and these must be protected and restored. (Individual, Roseburg, OR - Letter #W429)*

*To bring back salmon runs and improve grizzly population health will require strict standards on conserving and improving the Columbia Basin wilderness areas. The standard I propose is healthy and stable salmon populations and runs, populations that are sustained at the levels measured 25 to 50 years ago. (Individual, Eugene, OR - Letter #B4762)*

*Use the Alternative 6 requirements wherein restoration actions are efficiently prioritized and adaptive management is maximized. (Individual, Spokane, WA - Letter #W223)*

*Restore watershed to enhance wildlife habitat. (Individual, Ann Arbor, MI - Letter #278)*

*Restoration of the watersheds should be the prime motivation. Nothing should be implemented that will in any way further degrade or risk these damaged areas. (Individual, Stevensville, MT - Letter #W221)*

*The strictest practical measures should be taken to protect riparian areas from devegetation and erosion, to safeguard water quality. (Individual, Milltown, MT - Letter #B3937)*

*It [ICBEMP] fails to keep our water clean. (Individual, Billings, MT - Letter #B4338)*

*...Particularly lacking is an overall regional concept to protect watershed and water quality. (Individual, Helena, MT - Letter #B4396)*

*My main concern is the fact that so many of the bodies of water are becoming contaminated by sewage, crop chemicals, and other more dangerous things. Without water, nothing can live! (Individual, Caldwell, ID - Letter #B76458)*

*...Riparian areas have not been given anywhere near the level of protection that they need or deserve by the Preferred Alternative.... Stronger protection is needed for these areas if real restoration is to take place within them and if the plan is to truly protect habitat for aquatic species. (Conservation/Environmental Groups, Portland, OR - Letter #W502)*

*Your plan is weak and nothing will happen to improve water quality the way the Columbia Plan is drafted by the USFS, BLM and EPA! Clean Water is a Public Right. (Individual, Bellevue, WA - Letter #W4)*

*The EIS fails to protect our clean water, healthy fisheries, and old-growth forests to restore damaged rivers and streams back to health. (Individual, Seattle, WA - Letter #B76400)*

**Issue:** *The Final EIS must provide for clean and safe drinking water.*

**Sample Comments:** *[Alternative 4] ignores the issue of clean drinking water for municipalities in this area. (Individual, Eugene, OR - Letter #W375)*

**Issue:** *The Final EIS should prevent riparian damage from logging, grazing, mining, and agriculture.*

**Sample Comments:** *...Agriculture in all its forms, from row-cropping to grazing absolutely must be controlled! (Individual, Gresham, OR - Letter #W739)*

*I'm concerned about clear-cut logging - and mines that fail to clean up their dangerous toxins. (Individual, Boise, ID - Letter #B4196)*

*Increase emphasis and 'beef up' the management tools necessary to assure an effective watershed restoration program. This includes road removal, no logging and no cattle grazing. (Individual, West Richland, WA - Letter #W472)*

*Dairy farms and livestock cause many damages to Washington's waterways.... (Individual, Belfair, WA - Letter #B75632)*

*....The Bitterroot River in Montana. This river was a primary bull trout stream. Now infested with small landowners working fields to the high water mark. (Individual, Missoula, MT - Letter #B75275)*

*Doubling the amount of logging over current levels will increase road building.... Erosion and sedimentation will have an adverse impact on waterways and fishery habitat. (Individual, Cleveland, OH - Letter #W722)*

*No logging, roading or grazing should be permitted within riparian areas anywhere. No No No!!! (Individual, Hamilton, MT - Letter #W475)*

*The pollution of the lower Yakima River (by agriculture runoff) is a disgrace and in urgent need of a remedy. (Individual, Pasco, WA - Letter #W162)*

*Restore and rehabilitate rivers and streams that have been damaged by past logging, mining and agricultural activities. (Individual, Seattle, WA - Letter #B3899)*

**Issue:** *The Final EIS should acknowledge that management activities such as logging, grazing, road building, and mining are not entirely responsible for declines in aquatic health.*

**Sample Comments:** *Too much emphasis is placed on protection of water courses. Some water courses have been adversely affected by logging and road construction. But most of that damage was done long ago in the past when machinery and technology that we have today didn't exist. We can build roads today, doing a minimum of damage, and we can log steep slopes with much less damage than in the past. (Individual, Libby, MT - Letter #W973)*

*We are also concerned because alternatives 3-7 could ultimately restrict use based on supposition rather than fact....Much progress has been made through various watershed enhancement programs and we are seeing the construction of new wetlands as well as the use of grass strips and other technique to improve water quality. (County Agency or Elected Official, Gooding, ID - Letter #W674)*

*This section assumes that any changes on the land by any means has been detrimental to streams. This is not true, cannot be proven, and is not appropriate for establishing foundation to write a plan on one acre or 75 million acres. (Individual, La Grande, OR - Letter #W3806)*

## 2.7.2 Clean Water Act

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any people believe that as a minimum standard the Final EIS should ensure all waterways within its jurisdiction satisfy the Clean Water Act. Some say that “Properly Functioning Condition” of a riparian area alone does not assure compliance with the more comprehensive Federal laws. Some warn that extensive monitoring will be necessary for compliance, under any alternative.

**Issue:** *The Final EIS must conform to the Clean Water Act.*

**Sample Comments:** *The ICBEMP Water Quality Working group has been working on further detailing federal land management strategy for meeting obligations under 303(d) of the Clean Water Act creating a ‘Federal Agency Decision Framework for 303(d) Listed Waters.’ The product of these efforts is a positive step in addressing State concerns regarding water quality issues in the DEIS. The State would like the opportunity to comment on how this approach is incorporated into the final DEIS and ROD and how these policies are implemented. (State Agency or Elected Official, Boise, ID - Letter #B77873)*

*Any alternative proposed by a federal land management agency must be held accountable to the over-arching environmental water quality policy of the nation; ICBEMP-DEIS presents a wholly inaccurate and substantially flawed summary of status of water quality in the assessment area, for example, from the Blue Mountains of Oregon.... Any selected alternative in a federal EIS must account for the existing condition and potential effects of proposed action on three programmatic elements of water quality compliance achievement required by the Federal Water Pollution Control Act (33 USC 1251, etc.)... including [1] status and effectiveness of existing ‘Best Management Practices (BMPs) as opposed to the benefits and effects, etc. of standards proposed in the ICBEMP-DEIS, etc. [2] status, component procedures, results, effectiveness, etc. of monitoring these BMPs; [3] status of both these program elements in relation to how well they have achieved the ‘antidegradation’ requirements set out in 33 USC 1251, et seq., etc. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*The aquatic standards for grazing management rely upon attainment of ‘proper functioning condition’ (PFC) to achieve standards. It is important to note that the Clean Water Act (CWA) goal is to ‘restore and maintain the CHEMICAL, PHYSICAL, and BIOLOGICAL integrity of the Nation’s waters.’ The focus of PFC is on assessment of PHYSICAL conditions (i.e. hydrologic, vegetative and geomorphic conditions) along riparian areas.... We recommend that the Forest Service and BLM include in the aquatic standards for grazing management, a clear standard indicating that allotment management plans and grazing permit revisions shall ENSURE COMPLIANCE WITH APPLICABLE STATE WATER STANDARDS. It may also be helpful to include in the Draft EIS... a brief discussion of specific water quality parameters that may be affected by grazing (e.g., D.O., temperature, nutrients, coliform, sediment, etc.) And a listing of acceptable indicators of water quality in livestock management areas. (Federal Agency, Seattle, WA - Letter #B78930)*

## 2.7.3 Data and Definitions

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The data, assumptions, and definitions in the Draft EISs come under scrutiny from some respondents. Their comments assert that the project area has not been adequately surveyed and that the broad-scale data used in the Draft EISs are inadequate. Some state that as a result, important features such as strongholds of aquatic health have not been identified.

A few maintain that not only have areas of special concern not been identified, but the Draft EISs provide no clear and detailed goals and objectives for restoring and maintaining aquatic health. Some believe that these goals should identify the important

components of ecosystem health and provide clear and measurable goals. A few note that individual streams in the project area have not been surveyed, making it difficult to decide which streams might require buffer zones and possibly leading to widespread application of less precise default standards.

Some say that certain assessment categories, such as hydrologic integrity, are ill-defined in the Draft EISs and are not useful to the public.

**Issue:** *The selected alternative must identify and protect aquatic strongholds.*

**Sample Comments:** *The Preferred Alternative fails to correctly identify aquatic habitat strongholds that are essential to the protection and restoration of healthy ecosystems. These areas are often referred to as 'Key Watersheds' or 'priority Watersheds.' Compounding this fundamental error, the Preferred Alternative fails to provide management standards which will adequately protect these strongholds.... Activities in Priority Watersheds should be constrained because the identified watersheds are particularly crucial to conservation of aquatic habitats and recovery of imperiled aquatic species (Conservation/Environmental Group, Eugene, OR - Letter #W3786)*

**Issue:** *The Final EIS should include detailed statements related to key aquatic ecosystem components.*

**Sample Comments:** *ICBEMP's strategy is not comprehensive. It lacks several important components and lacks needed specificity in some existing components. Detailed goal and objective statements related to key aquatic ecosystem components necessary for promoting the conservation and recovery of anadromous salmonids and their habitats (e.g., like physical channel integrity, sediment regime, instream flows) are absent from the DEIS. The first nine aquatic ecosystem objectives have no standards that specify how to accomplish implementation or measure success. NMFS' recommendation: Develop detailed goal and objective statements related to key aquatic ecosystem components.... Provide standards that specify how to accomplish implementation or measure success of achievement of the first nine aquatic objectives. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** *Streams have not been adequately surveyed to determine which ones might require buffers; this lack of surveys may lead to widespread use of default standards.*

**Sample Comments:** *In estimating the effects of the Aquatic Conservation Strategy, the agencies appear to have learned little from the Northwest Forest Plan where the planners painfully became aware that they had grossly underestimated the area encompassed in these reserves. The primary problem was that during the planning process too few streams were identified that required buffers. This underestimation was significant under the Northwest Forest Plan. These gross errors are caused by large scale maps (i.e., 1:100,000 or greater). These scales are too poorly defined and will always underestimate the stream network of a finer scale map (i.e., a scale of 1:12,000). The smaller perennial streams and intermittent draws, which are part of the reserved network, typically account for much of the total stream mileage and simply cannot be seen on the large scale maps. While the Eastside DEIS provides some discussion of this problem, the ICBEMP Strategy process uses only a sample of 1:24,000 maps to generate an expansion factor to apply to the 1:100,000 scale estimate. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

**Issue:** *The Final EIS should adequately explain what hydrologic integrity is.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-228] Bullet 2. The explanation of hydrologic integrity leaves the reader without an understanding of what was measured or how the measurements were interpreted. There is no indication that basin hydrology was assessed; that is, watershed hydrology beyond the stream channel and riparian zone. Address the specific hydrology measures and watershed hydrology needs. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.7.4 Management Actions to Maintain and Restore Aquatic Ecosystems

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Many people believe that management actions to maintain and restore aquatic ecosystems are necessary. Only “dramatic and decisive” action, will stop what they see as current degradation and begin the process of restoration. Some warn against “analysis paralysis,” reflecting a common sentiment that there is no need for more watershed analyses. A few take the opposing view and feel the Draft EISs fail to require meaningful analysis at the watershed or subbasin level before proceeding with management activities they see as possibly destructive. Such reviews, some say, are vital to the implementation of the entire project. They demand such surveys get a viable timeline and adequate funding.

Several respondents contend that aquatic management standards should not be applied across the landscape because they feel such standards often are too broad and vague and do not allow for local on-the-ground adjustments to local conditions and multiple-use goals. These writers favor more local control over riparian standards and objectives. In numerous contexts they protest basin-wide regulations that might ignore local conditions or needs, such as geology, history, climate, and existing circumstances such as roads, farms, and development. Others attack the management concepts or Restore, Conserve, and Produce as subject to inconsistent interpretation.

No matter what the Final EIS contains, many fear inadequate funding will make implementation of the project impossible. They feel the Final EIS should take into account this possibility.

Some respondents find Proper Functioning Condition (PFC) as a management goal to be problematic. A few claim that PFC does not go far enough or provide enough detail. Others call PFC impossible to attain.

A few writers claim the Draft EISs fail to assess the risks and tradeoffs inherent in the project.

**Issue:** *Watershed management activities must be more clearly defined in the Final EIS.*

**Sample Comments:** *Include an explanation of watershed restoration management activities so the reader can understand what activities will result from the decisions following this DEIS. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Clear and meaningful watershed restoration requirements should be included with funding alternatives. (Individual, Ashland, OR - Letter #W217)*

*Important watersheds that are readily restorable should be protected from new impacts and have the lingering effects of past management restored. Unfortunately, the objectives are not supported by clear management standards which prevent activities already known to be incompatible with the attainment of the objectives for priority watersheds. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

**Issue:** *The Final EIS should not rely on upland treatments, but instead conduct subbasin and watershed analysis to identify areas for restoration.*

**Sample Comments:** *Alternative 4' themes place management priority on restoring upland conditions and assumes healthy aquatic ecosystem conditions will follow.... Rather than relying on the broad-scale assumption that aquatic restoration will follow from upland treatments, the need, priority, and focus for aquatic and upland restoration should be determined through sub-basin review and Ecosystem Analysis at the Watershed Scale. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** *The Final EIS must better explain and justify the data and surveys required for implementation.*

**Sample Comments:** *Intricate watershed analysis has been mandated before projects can go forward. This will take months or even years and isn't necessary. (Individual, Elgin, OR - Letter #W1819)*

*The Preferred Alternative misuses the subbasin classification scheme, and ignored the expressed warning of the scientists not to do so; fails to require watershed analysis in some critical areas; fails to establish a network of key watersheds that can serve as anchor points for recovery; fails to impose the dramatic and decisive standards that actually ensure areas with the greatest aquatic integrity are not degraded; and expressly fails to propose the needed 'dramatic and decisive' restoration program. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W549)*

*Most waterways in our region have not been surveyed by anyone to determine if conditions for the fish communities are poor or not. (County Agency or Elected Official, Gooding, ID - Letter #W674)*

**Issue:** *The Final EIS should ensure local control over riparian management, and should not provide basin-wide standards and objectives.*

**Sample Comments:** *The Aquatic Management Standards are not equally applicable to every geographical area. The standards must be achievable by management on the ground. Aquatic objectives and standards are addressed in a manner that preclude land management, except for aquatic species. This does not allow for multiple use management of the resource base or make it possible to improve and restore the land in order to make management for aquatic species a practical and implementable part of any management plan. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*This plan requires wider riparian management areas than the current standard. The scientific data does not appear to support these widths. (Individual, St. Maries, ID - Letter #W3792)*

*AQ-S8, Alternative 4: This standard unnecessarily and improperly exposes vegetation management activities in RCA's one-size-fits-all direction. It should not be a goal to move all riparian Zone 2a areas to 'mature and old forest conditions.' In fact, young- and intermediate-aged stands will be better 'adapted to natural disturbance regimes' than mature and old forest conditions. Recommendation: Remove this and other standards that arbitrarily set one-size-fits-all purposes for federal land management, and conflict with known scientific principles. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The EECC strongly encourages that the FEIS put emphasis on monitoring and efficient and streamlined consultation, rather than potentially long-term, one-size-fits-all default prescriptions. (County Organization, Salem, OR - Letter #W4555)*

*We can manage our own watersheds on an individual basis. We do not need a blanket policy. (Individual, St Maries, ID - Letter #B80199)*

**Issue:** *The Final EIS should better clarify the management emphasis (Conserve, Produce, Restore).*

**Sample Comments:** *Use an interagency team to edit the definitions of ‘conserve, restore, and produce’ so they represent clear differences in management emphasis and can be consistently interpreted by administrative unit’s personnel. Edit the definition of ‘restore’ to include concepts contained in ‘UPSTREAM’ (National Academy Press, 1996): passive and active restoration strategies, protection of remaining intact areas, re-establishment of normative aquatic and upland ecological processes, and encouraging natural regenerative processes. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** *The Final EIS should acknowledge the unpredictability of water supplies.*

**Sample Comments:** *When and where water will be stored and released is not predictable over the long term so aquatic standards probably cannot ever be met on a sustained basis. When the amount of water available in a given spot at a given time cannot be a known quantity, it cannot be planned for a specific use. Availability is the only thing we can manage for. (Resource Advisory Council, Prineville, OR - Letter #W1830)*  
*The streamflow discussions are too broad-brushed and lack substance on the subject. McIntosh et al. 1994 is a poor citation for stream flow discussions since most of this work is mere speculation and opinion rather than collected data that was properly analyzed. Most streamflow in eastern Oregon and Washington results from surface runoff or shallow ground water flow into stream. How much is most? Streams in the Blue Mountains are dependent on winter snow pack in the high elevations for good streamflow during the summer. (Individual, La Grande, OR - Letter #W3806)*

**Issue:** *The selected alternative should ensure funding of watershed management.*

**Sample Comments:** *The need to first define management activities that would contribute to watershed restoration for cost estimation presents an interesting dilemma. The difficulty in doing so reflects a problem the public or land managers will have in making this determination from the poorly described elements and activities of watershed restoration and the very coarsely defined objectives and standards that apply. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The last thing we want to see is recurrence of what is now common on the national forests where a timber sale is funded, but associated restoration work or monitoring is not done due to lack of commitment to funding. We believe that if management is to proceed in a watershed, the entire planned suite of treatments must be implemented. We understand this is difficult within the current budget structure, but there should be management objectives related to this concern. (State Agency, Salem, OR - Letter #W4827)*

Where will the funding come from to accomplish these objectives? (Individual, Coeur d'Alene, ID - Letter #W447)

**Issue:** *The Final EIS should re-evaluate the use of Proper Functioning Condition (PFC) as a management goal to restore aquatic health.*

**Sample Comments:** *Aquatic strategies under the Action Alternatives rely heavily on use of properly functioning condition (PFC) as a goal for management of stream habitats. The [Fish and Wildlife] Service views this as problematic because attainment of PFC is not an end point, but rather a minimum level of stream and riparian health and function indicating that the systems are at a point where it is possible to begin the sometimes long process of self restoration. The plan needs to expand beyond simply attaining PFC to direct management that assures stream systems will progress beyond this point toward recovery to their potential community structure. Time frames for achieving PFC need to be identified. We recommend that PFC be required for all streams by 5 - 10 years after the Final EIS goes into effect. If PFC is not attained in that time, then the source of the problem should be actively removed, whether it is excessive livestock grazing, poor upslope road conditions, or other activities impairing the stream's ability to rebound. Land managers should also get clear direction from the plan on management expectations beyond PFC. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should adequately assess risks and tradeoffs in relation to aquatic systems.*

**Sample Comments:** *[Upper Columbia River Basin Draft EIS, p. 4-132] Summary of Key Effects and Conclusions for Aquatic Systems, bullet 4. The statement that Alternative 4, 'with its higher activity levels' could be greater than management activity risks of Alternative 6 is exceptionally vague and unsupported. The analysis continues with the flawed logic that management activity, any management activity, increases risk to aquatic resources, even when those activities are designed to restore natural ecological function. Consistently provide an analysis of the trade-offs of active versus inactive management risks to aquatic systems in the FEIS. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.7.5 Relationship to Other Plans for Restoring Riparian Health

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Some writers state that numerous local, State, Tribal and regional plans address some of the riparian issues in the Draft EISs, but that project documents ignore them, creating overlap and possible legal and logistical conflicts. Among those cited frequently are PACFISH, INFISH, and State Best Management Practices (BMPs) and Streamside Management Zones. Some worry that analysis requirements in The Draft EISs will delay or stop existing plans and recovery efforts.

**Riparian standards in the Final EIS should take into consideration existing plans including PACFISH, INFISH, Tribal plans, and Best Management Practices.**

**Sample Comments:** *The riparian management direction in PACFISH is well organized, stated in clear language, and communicates an unmistakable conservation strategy for riparian zones and aquatic features. PACFISH provides flexibility for field units that have the resources to appropriately define needed departures from default values and*

*anchors these changes in riparian management objectives (RMOs). PACFISH provides clearly defined default widths which gives field units who lack the resources to implement the more complex direction a simple, reliable conservation tool. The minimum required default widths provide a level of assurance that most riparian zones will not incur adverse effects from management practices in the near-term. (Federal Agency, Seattle, WA - Letter #B78714)*

*Include a discussion of the applicability of the PACFISH RMOs for project area streams within the alternative 2 and 3 RMO discussion. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The DEIS has not adequately considered the specific factors affecting ecosystem health to the Klamath River watershed, and does not clearly describe the scientific methodology that will be employed at the local level to assess ecosystem health problems, and to determine specific and appropriate restoration needs. In 1994, the Klamath Tribes adopted a management concept to address functional ecological relationships for the Klamath Basin. This approach considered the relevant hierarchical elements of a watershed and quantification of abiotic and biotic relationships. The analysis, which is designed to be implemented at the watershed scale, defines the parameters of hydrology, soils, nutrients, plants and animal response that could be realized in an area. It also incorporates consideration of human needs. This technique was presented to both the Chief of the Forest Service and Director of the Bureau of Land Management. Since that time, there has been little discussion on this specific issue with the Tribes. (Tribe, Chiloquin, OR - Letter #W4671)*

**Issue:** ***The selected alternative should be compatible with the National Marine Fisheries Service Snake River Recovery Plan.***

**Sample Comments:** *The National Marine Fisheries (NMFS) has been delegated the responsibility of restoring the ESA listed coho and chinook salmon on the Snake River. They concluded that: an ecosystem-based approach that considers entire watersheds and river sub-basins is needed. Such an approach will ensure that all physical, biological, and chemical processes and conditions that contribute to the development of productive salmon habitat are maintained. Furthermore, NMFS stressed in their Snake River Recovery Plan that management and planning is needed at both the ecosystem (Columbia Basin) scale and the watershed sub-basin scale, and that ecosystem planning must be integrated. It seems the project missed yet another opportunity to include a federal agency currently implementing plans and stressing ecosystem management within the geographic scope of the ICBEMP DEIS. (Individual, Seattle, WA - Letter #B77286)*

**Issue:** ***The Final EIS objectives and standards should be compatible with the Wallowa County Nez Perce Tribe Salmon Habitat Recovery Plan.***

**Sample Comments:** *The overall goals of ICBEMP... are generally consistent with the Wallowa County Nez Perce Tribe Salmon Habitat Recovery Plan. However, the specific objectives and standards throughout the DEIS make it incompatible with our local plan... This plan, which was developed in collaboration with the local government, Nez Perce Tribe and various state and federal agencies, has been adopted into the Land Use Plan for the county and is currently being implemented through an MOU between the county, USFS and the Nez Perce Tribe. (County Agency or Elected Official, Enterprise, OR - Letter #W1649)*

**Issue:** *The Final EIS should consider how required watershed analyses will not hinder the implementation of on-the-ground projects.*

**Sample Comments:** *Projects need to be able to proceed during and prior to any watershed analysis. (County Agency or Elected Official, Enterprise, OR - Letter #W1649)*

## **2.7.6 Standards Regarding Riparian Conservation Areas (RCAs) and Riparian Management Objectives (RMOs)**

Riparian Management Objectives (RMOs) and Riparian Conservation Areas (RCAs) are the subject of much debate, as writers suggest different kinds and strictness of standards and objectives they feel are appropriate. Some assert that regulations are too weak while others claim the same regulations are too strict with regard to stream sedimentation levels, water temperatures, vegetation density, downed wood, pool frequency, canopy cover, the feathering of buffer zones, and the size of buffer zones. Several respondents feel strict riparian standards are counter-productive and will unduly inhibit management activities, while others feel such standards, or stricter standards, are necessary to restore degraded aquatic ecosystems. Many are troubled by the quantity of new standards (one writer counts 56). Some maintain that even Class 1 Watersheds and those in wilderness areas and National Parks cannot meet the standards and objectives proposed in the Draft EISs.

Some people believe that fish, macroinvertebrates, and other food sources for fish are negatively affected by sediment in the water, citing studies that suggest salmon embryo survival declines as fine sediment increases. They feel that meeting the RMOs for fine sediment is not enough, and they want stricter measures and measurements. However, there is disagreement about how much sediment is natural or tolerable. Some people believe that the threshold value of “estimated sediment delivery greater than 20 percent over natural” (Standard AQ-S4, Alternative 7) is not scientifically supportable, and that exceeding the threshold has not been shown to produce measurable instream effects in the project area. Others view sedimentation in streams as natural, even for areas with no grazing, logging, or roads, and they suggest that fish can tolerate a great deal more than scientists claim.

Some believe that stream temperature standards in the Draft EISs are neither realistic nor attainable. They believe that these standards are based on ideal conditions for particular cold water fish species, and that these fish can, in fact, tolerate higher temperatures and still be productive. Some feel that temperature standards for streams with bull trout could be 59 degrees Fahrenheit, rather than 50 degrees Fahrenheit, which some believe is imposed by the Draft EISs.

Some claim a strict vegetation density standard, including old or mature growth, is necessary to absorb pollution and prevent erosion, bank calving, and sedimentation. Others add that downed woody debris standards are needed, while others assert that such standards will restrict management activities, reduce harvest levels, create fire hazards, and fail to contribute to the restoration of aquatic health. Some note that increased vegetation density could reduce downstream water flow.

**Issue:** *The Final EIS should re-examine the standards for sediment levels.*

**Sample Comments:** *The threshold value of ‘estimated sediment delivery greater than 20 percent over natural’ in Standards AQ-S4 for Alternative 7 is not scientifically supportable. Sediment delivery of 20 percent over natural has not been found to produce measurable instream effect in the project area. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Meeting the fine sediment RMOs is not enough. There must be a plan, as in AQ-S4, to relate fine sediment levels to natural levels. (Individual, Portland, OR - Letter #W2931)*

*RM-S46 is unrealistic. Rather than 'prevent sediment delivery,' it should read 'minimize sediment delivery.' (County Organization, Salem, OR - Letter #W4555)*

*Standards AQ-S4, AQ-S12, AQ-S16 and AQ-S45 deal with sediment in streams, grazing, mining and transportation. Generally, these standards are unclear or poorly worded and should be re-examined. Specifically only Standard AQ-S4 has been adequately addressed across the alternatives. (Resource Advisory Council or Provisional Advisory Committee, Bend, OR - Letter #W3080)*

*Standard AQ-S4 provides for decisions to be made based on sediment delivery relative to natural rates or deviation therefrom. Determination of either one of these measurements is extremely problematic. Other criteria should be used. (Natural Resource-based Business or Business Group, Wallowa, OR - Letter #W3761)*

**Issue:** *The Final EIS should consider the effects of sediment on aquatic habitat.*

**Sample Comments:** *A review of the literature generally supports the hypothesis that salmonid embryonic survival declines in substrates as quantities of fine sediment increase. Fine sediment in suspension or deposits can also reduce macroinvertebrates and other food sources for fish. The Okanogan River bottom is currently buried in sediments and aquatic biota are severely stressed.... Research consistently shows that erosion from clearcuts and logging roads has negative impacts on native fish populations. Other research found a 94% reduction in numbers and weight in large game fish due to sediment loading. (Conservation/Environmental Group, Tonasket, WA - Letter #W495)*

**Issue:** *The Final EIS should set more realistic standards for stream temperatures.*

**Sample Comments:** *The stream temperature standards - 64 [degrees F] in some habitats and as low as 48 [degrees F] in others are particularly onerous. These standards are derived from research documenting ideal conditions for particular cold water species, and do not reflect what they can tolerate and still be productive. Even more troublesome is the widely accepted fact that they are neither realistic nor attainable under either natural or historic conditions in many eastside streams. (Natural Resource-based Business or Business Group, Baker City, OR - Letter #W669)*

*The relationship between land practices and water temperatures has never been studied nor has it been proven that there is a relationship. Saying it is so in a published report does not make it true. (Individual, La Grande, OR - Letter #W3806)*

*The example provided by the DEIS, where increased stream heating resulting from reduced shade is offset by increased subsurface flow and reduced evapotranspiration, is contrary to well-known thermal balance relationships and monitoring results published in the literature. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*While the old trees are dying, the forest itself under-goes changes negative to the environment in which we all live. By changing the volume and pattern of the run-off, and by oxidization of organic waste, the water temperature can also be increased. (Individual, Bliss, ID - Letter #B77939)*

**Issue:** *The Final EIS must have Riparian Management Objectives that are realistic and attainable.*

**Sample Comments:** *[Upper Columbia River Basin Draft EIS, p. 4-143] Riparian Management Objectives, paragraph 2. The statement that ‘implementation of Alternative 7 could result in greater short-term benefits to aquatic resources than Alternatives 2, 3, 4, and 6’ is demonstrably incorrect. The Alternative 7 RMOs are rarely achieved in project areas streams even incompletely natural circumstances. Where these unrealistic RMOs are not achieved, management activities necessary for healthy ecosystems will be prohibited. Include a discussion of the negative aquatic effects of Alternative 7 in the FEIS. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The Standard (EM-S13) needs to be more flexible so that site-specific conditions can be addressed. It is unreasonable to assume that one set of standards will fit the myriad ecosystems that occur in the UCRB project area. If the numerous standards listed in the table, including standards for RMOs and RCAs, cannot be modified without going through the time and expense of performing and EAWS, there is very limited opportunity to modify the standards to be tailored to a particular watershed or sub-watershed. (Natural Resource-based Business or Business Group, Englewood, CO - Letter #B78926)*

**Issue:** *The Final EIS should clarify standards regarding retention of large, old trees in riparian areas.*

**Sample Comments:** *Standard AQ-S7 implies that large trees are to be retained in all situations ([Eastside] DEIS 3-127). We suggest that it be clarified to allow management discretion. (County Agency or Elected Official, Roseburg, OR - Letter #W4582)*

*The width of Riparian Conservation Areas designated in the DEIS is arbitrary and unscientific. What specifically is the rationale for a 200-year old site potential tree height to determine the width of Riparian Conservation Areas? If there is a scientific relationship between this tree height potential and the stated objectives for riparian management, we would appreciate seeing the documentation. It appears as though the DEIS makes a quantum leap assumption that bigger is better. Little decreation is left to the highly qualified specialists who are employed at all levels of the federal agencies. (Natural Resource-based Business or Business Group, Helena, MT - Letter #B78799)*

*Following the direction of FEMAT and PACFISH, the EIS Team created riparian buffer strips as part of the mandatory riparian management Standards that are 300 feet or more wide, which in most cases is excessive to provide for the water quality protection functions offered by riparian areas. (Professional Society, Moscow, ID - Letter #W546)*

**Issue:** *The Final EIS should clearly define “Restoring” and “Maintaining” in the context of RCA management.*

**Sample Comments:** *Standard AQ-56 requires that any vegetative management activity in RCA (Zones 1 & 2) will only be for the purposes of restoring and maintaining riparian and instream process and function ([Eastside] DEIS 3-125). We suggest that to avoid any confusion as to what activities are allowed, the terms “restoring” and “maintaining” as used in RCA management context be defined. (County Agency or Elected Official, Roseburg, OR - Letter #W4582)*

**Issue:** *The Final EIS should re-evaluate the number of riparian standards necessary to address resource protection and implementation feasibility.*

**Sample Comments:** *All together, there are a total of 166 standards, 56 of which are aquatic standards. Without discussion of overall aquatic and terrestrial strategies and how they relate to one another, the list of standards will be difficult to implement. (Federal Agency, Seattle, WA - Letter #B78714)*

**Issue:** *The Final EIS should clarify and justify canopy closure standards.*

**Sample Comments:** *What is the definition of “maintaining Riparian Canopy Closure?” This is not clear as states, is it related to AQ-S6? This decision should be made on a site-specific basis to attain Properly Functioning Condition. (County Agency or Elected Official, Baker City, OR - Letter #B78802)*

**Issue:** *The Final EIS should allow for flexibility in Riparian Management Objectives to account for variations in local geology.*

**Sample Comments:** *The buffer width required for controlling sediment delivery presented in the EIS is only appropriate for highly erodible granitic soils that comprise less than 10 percent of the area. Research on other types of soils suggest buffer requirements should be from one-half to one-tenth those given in the EIS.... (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

## **2.7.7 Size of Riparian Conservation Areas**

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Many people believe that RCAs are too small to effectively protect aquatic health. They contend that wide buffer zones, strictly off-limits to management activities, should be established for all waterways. These respondents believe that scientific evidence supports reducing active management in riparian areas. Some feel that the best way to set a workable default standard for the size of an RCA is to use either the extent of riparian vegetation or the extent of the flood prone area, whichever is greatest. Many maintain that seeps and springs in rangeland areas should have added protection, including prohibition against confining them to provide water troughs for foraging animals.

Conversely, some people view broadening RCAs as placing unrealistic restrictions on activity near and in riparian areas. They feel that buffer zones should be smaller than current standards mandate. One individual states that an area that floods once every 100 years can “hardly be called flood prone,” and many other people feel that analysis should more accurately reflect the impact of floods on riparian zones. Many assert that other factors—such as distance from waterways, slope, vegetation type, and height—should play a role in defining the scope of RCAs. Several people fear that if the size of RCAs is

increased, too much public forest land will be locked up and managing land squeezed in between RCAs will be impossible.

Some claim that much of the damage to streams, such as sediment loading, comes from upstream rather than streamside, so buffer zones will accomplish little. These respondents generally also disfavor default standards, which they feel could unduly restrict activities in the absence of thorough survey and analysis.

The concept of feathering the buffer zones also comes under attack from some, who feel this management concept becomes an excuse to expand protected areas with buffers upon buffers.

Some assert that the Final EIS should establish strict default standards for RCAs to ensure riparian health in the event that required surveys and analyses never take place. Others feel default standards are unreasonable.

Some respondents applaud sizable buffer zones for streams, saying that these buffers are the only way to ensure management activities will not impair riparian health. Some feel the buffer zones are not wide enough.

**Issue:** *The selected alternative should include buffer zones to protect riparian health.*

**Sample Comments:** *Our valuable sources of clean water and fisheries need do-not-disturb buffer zones along their banks to keep logging, livestock grazing and other water polluting activities at a distance. (Form Letter #208)*

*Riparian areas - no cutting for 500 feet each side of waterways for preservation of the habitat. (Individual, Noxon, MT - Letter #B3935)*

*I wish no logging in riparian areas (300' minimum buffer) (Individual, Arcata, CA - Letter #W4554)*

*I have been cutting timber about all my life and I think we need to keep cutting these draws in order to keep a healthy stand of trees in these areas. I have seen the difference it makes. So therefore I don't see no need in a change. (Individual, Coeur d'Alene, ID - Letter #B80432)*

**Issue:** *The Final EIS should better address how buffer zones control only some sources of sediment.*

**Sample Comments:** *The EIS team misinterpreted the sediment protection function of riparian buffer strips. Sediment can be delivered to water bodies by landslides, overland flow, or channelized flow. Buffer strips are designed to protect against sediments carried by overland flow. Streamside buffer strips are 'of little value in handling erosion from side slopes above the buffer in most of the mountainous West.' (Brown, 1985, page 32; quoted by Belt et al. 1992, page 15) The EIS team failed to recognize that most sediment in mountainous regions comes from channelized flows or landslides, even though the Science Integration Team recognized this point.... The ICBEMP response is to make buffer strips wider when slopes above the buffer are steeper. This approach is of little value.... (Professional Society, Moscow, ID - Letter #W546)*

**Issue:** *The Final EIS should reconsider Riparian Conservation Area widths. The RCAs in the Draft EIS are too large and will place too much timber off-limits.*

**Sample Comments:** *The stream buffer width of 300 feet on both sides of fish bearing streams seems excessive in light of research on buffer widths. 150 feet width on both sides would have been adequate. Increasing the buffer widths reduces management opportunities and reduces suitable acres for timber management. (Individual, McCall, ID - Letter #B99)*

*I am concerned about bigger setbacks - here in our area setbacks from streams will cut timber harvest and affect any recreational uses here, causing economic hardships. (Individual, Bonners Ferry, ID - Letter #B4678)*

*RCAs are so extensive and restrictive in Alternatives 3,4,6 and 7 that a substantial reduction in the acres available for commercial harvest is expected. It seems the extremely restrictive Riparian guidelines will be a detriment to forest integrity, will do little to reduce fuel loads in these areas, and will produce little in the way of goods and services for our local communities. (Individual, Rexford, MT - Letter #B75564)*

*The Eastside DEIS vastly understates the area constrained by RCAs. The RCA standards essentially place resource production off-limits throughout an interconnected reserve network across a vast portion of the planning area. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*The EECC is alarmed that the estimated percentage of forested land in Riparian Conservation Areas for Alternative Four is not 24% but rather an average of 35%. Moreover, the DEIS states that the RCAs would 'in some cases render land between these areas inoperable.' At a minimum, crossings under controlled conditions should be permitted for restoration and production. (County Organization, Salem, OR - Letter #W4555)*

*Some critical streams need to be identified and afforded a preservation type of protection, but requiring this degree of protection on over 25% of the landscape is foolish and is in stark contrast to the ICBEMP goals of ecosystem management, sustainability, and healthy forestlands. (Individual, Walla Walla, WA - Letter #W3793)*

*According to congressional testimony, Alternative 4 adopts a so-called slope adjustment factor that significantly expands the reach of riparian conservation areas thereby effectively diminishing Idaho's current timber base by perhaps 30 to 40 percent. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter #B77931)*

*I make my living in the timber industry in Eureka, MT. Your EIS requires a 300 foot 'buffer zone' on all streams. Do you realize this will essentially eliminate timber production on Federal lands? Are you aware that the higher quality and greatest volume of trees grow near water? I urge you to revisit this portion of your document. (Individual, Eureka, MT - Letter #B4595)*

*What are the consequences of removing the most productive lands of the national forest from the timber base? This could result in a 60+% reduction in an already severely reduced annual timber sale program. (Natural Resource-based Business or Business Group, Eureka, MT - Letter #B77868)*

*The rationale states that Zone 2a is a buffer zone for Zone 1 against outside disturbances and supports additional riparian area processes and functions. Furthermore, the DEIS then introduces the concept of ‘feathering’ of management activities adjacent to RCA zones as part of the rationale. These are ‘buffer the buffer’ concepts that are not technically defensible. The only rationale for the RCA zone 2 concept provided in the DEIS is based on microclimate effects, which have not been demonstrated to have any effect upon aquatic environments. How other ‘outside disturbances’ are of importance to streams and aquatic resources and how Zone 2 would somehow facilitate management of them is never discussed. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

**Issue:** *The Final EIS should better clarify the “Feathering” of RCAs.*

**Sample Comments:** *Standard AQ-S6 incorporates the concept of ‘feathering’. Since ‘feathering’ has the potential to expand the number of acres affected by the RCA beyond what has been discussed earlier in the DEIS, we suggest that this concept be closely prescribed and be clarified that it is intended only to apply in Zone 2a. (County Agency or Elected Official, Canyon City, OR - Letter #W4580)*

*In the ‘Rationale’ section for this standard [AQ-S6], the discussion of ‘feathering’ the boundary of the RCA should be included in the text of the standard itself. Otherwise, it will appear to be a recommendation and not part of the standard. (Federal Agency, Portland, OR - Letter #W4641)*

*It is inappropriate to base vegetation management standards for RCAs on the one-size-fits-all concept of ‘feathering’. Many if not most riparian areas in the planning area have naturally abrupt transitions to adjacent plant communities and ecosystem. The transition line is usually set by seasonal moisture availability. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

**Issue:** *The RCA standards in the Final EIS should sufficiently protect riparian health.*

**Sample Comments:** *Page 3-124: AQ-S6-10, Timber management in riparian areas should be guided by the definition under Alternative 7, this standard will offer the most protection to the riparian area. The entire functional riparian area needs protection; breaking the riparian area into zones allows too much timber management to ensure rapid restoration of riparian functionality. (Tribal Government, Toppenish, WA - Letter #W4556)*

*The proposal to exclude RCA Zone 2b from the restrictions identified in AQ-S6 (Alternative 4) makes no sense, since Zone 2b is even more sensitive to erosion and sedimentation, due to slope steepness, than the Zones 1 and 2a. If the Alternative 7, AQ-S6 is not adopted as suggested above, AQ-S6 Alternative 4 should be amended to also apply to RCA Zone 2b (Federal Agency, Seattle, WA - Letter #W78714)*

*The identified riparian areas are too limited. For perennial and intermittent streams, direction for delineation alternatives should specify selection of the delineation alternative which is ‘greatest’ in terms of size rather than ‘whichever maintains, protects and restores.’ In fact, the Project seems to be playing word games with the riparian identifications, instead of providing readily implementable and adequately conservative default standards that can be consistently applied. The agencies must acknowledge the convenience and straightforwardness of a distance option as a useful and perhaps necessary tool to ensure the implementation of a default standard prior to watershed analysis in rangeland areas, seeps and springs are of*

*critical importance to aquatic resources and should have added protections. Ranchers often box in seeps and springs to provide a water trough for foraging animals. This practice should not be allowed. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*NMFS supports the zonal concept in riparian management and removing RCA Zone 1 from the timber base. The riparian management direction, however, does not provide the specificity needed to ensure adverse effects to RCAs will be avoided. NMFS' Recommendation:*

*Complete through the interagency process more specific and extensive (covering Zone 1, 2a, and 2b) direction on disturbance limits, the use of RMOs and EAWS, and the collaborative process.*

*Reword existing ICBEMP riparian management standards to include the need to meet or exceed RMOs in all Zones (Zone 1, 2a and 2b) when evaluating for adjustment of RCA widths.*

*The interagency process should be expanded from addressing commercial timber harvest in Zone 1 to participating in all decisions for vegetation management actions in all RCA Zones. (Federal Agency, Seattle, WA - Letter #W78714)*

*The aquatic standards of Alternative 4 should adopt the more restrictive standards for RCA's and operational strongholds listed in Alternative 7. (Individual, Rexford, MT - Letter #B77062)*

*The riparian management objectives (RMO's) and standards and guidelines in the FEIS's must ensure that the protection and rate of recovery of aquatic and riparian areas is greater than that currently required by existing LRMP's, RMP's or interim management direction pursuant to PACFISH or INFISH. Each FEIS should be exceedingly clear that all activities occurring or proposed to occur in riparian areas cannot 'retard' or 'prevent' the attainment of RMO's in order to ensure a recovery rate in these fragile areas that is near the 'natural state of recovery.' (Conservation/Environmental Group, Portland, OR - Letter #W381)*

## **2.7.8 RCAs/RMOs and Forest Vegetation Management**

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Arguing that “natural conditions” can best be achieved through management such as logging and prescribed fire, many people question the ecological and economic feasibility of what they regard as overly inclusive buffer zones. Many people estimate that broader RCAs will include from 23 percent to more than 40 percent of all public forest land. They believe that placing this much land off-limits to management will drastically decrease timber harvests, increase fire danger, and harm local economies.

Some state that standards for vegetation density and downed woody debris are contrary to other objectives regarding fuel loading. Several individuals believe that catastrophic wildfire will degrade riparian health far more than timber harvests will. Others state the opposite: that the concern over catastrophic wildfire is simply an excuse to justify silvicultural treatments from thinning to the harvest of mature trees. A few assert that mid-seral vegetation, rather than old and mature growth, is the best vegetation regime for riparian areas.

A number of people feel that Riparian Management Objectives (RMOs) incorrectly attempts to micromanage to the point of dictating how many pools per-mile a stream must have, how much woody debris must exist, and what water temperatures must be. Some believe that a “one-size-fits-all approach” cannot hope to properly address site-specific issues. Suggesting the Science Integration Team was biased against management activities, many people question the team's assumptions about the impacts of management activities on riparian areas.

Others fear that new aquatic management standards that increase vegetation density will reduce the quantity of water available for agriculture, fish, and human communities. These respondents note that increased vegetation requires more water and thus reduces downstream quantity. Some people believe that while the quantity of water may be impossible to predict, the Final EIS should include silvicultural treatments to increase water yields.

**Issue:** *The Final EIS should not contain Riparian Conservation Area standards that restrict forest management in riparian areas.*

**Sample Comments:** *One concern regards the Riparian Management Objectives. This was described as a broad scale ecosystem management plan, but these objectives spell out how many pools there will be per mile of stream, how many pieces of what size woody debris, and the stream temperatures which are particularly onerous... These objectives are most likely unrealistic and unattainable for many eastside streams. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*How long will it take for people to recognize that vegetation in riparian buffers needs management to achieve your objectives? Placing arbitrary restrictions will not do the job. (Individual, McCall, ID - Letter #B75382)*

**Issue:** *The Final EIS should evaluate if mid-seral vegetation, rather than old growth, provides the best buffer against pollution in riparian areas.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-19] Bullet 5. It is incorrect and misleading to suggest that 'where riparian vegetation has been reduced or removed' that 'water quality may have less buffer from pollution.' This statement should be corrected to read that water quality improvement functions are greatest where mid-seral riparian vegetation stages are present. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should consider the effects of logging in Riparian Conservation Areas.*

**Sample Comments:** *Removing riparian vegetation--an inevitable consequence of logging, grazing, mining, road-building, and other land management activities--can lead to increased water temperatures, destabilized stream banks, increased sedimentation, reduced large woody debris, and simplification of the stream channel. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*I liked the idea in your RCA system of riparian protection but they do not go nearly far enough. All steep lands should be off limits to the extraction industries. The inner zones should never be logged. (Individual, Hamilton, MT - Letter #W475)*

*No commercial logging in riparian areas. Adequate buffer zones must be established in all riparian zones to ensure that water temperatures remain normal. Broken canopy cover and logging along streamsides results in increased water temperature, which has a deleterious impact on fisheries. Grazing must also be controlled in riparian areas to protect water quality and to allow for recovery of previously grazed areas. (Individual, Seattle, WA - Letter #W3010)*

**Issue:** *The Final EIS should better address the damage logging can cause to riparian health.*

**Sample Comments:** *The implicit assumption of AQ-S12 is that timber management and management for aquatic resources are incompatible in all riparian areas of all streams throughout the project area. However, the project provides no information that demonstrates that this is the case. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*This document fails to demonstrate the scientific need for further restriction of timber management to achieve riparian management objectives. (Individual, Mobile, AL - Letter #B75847)*

*The underlying approach of the SIT suggests a pervasively biased attitude against management activities. The SIT 'assumes that harvest and thinning activities have potentially negative net effects on aquatic systems,' and that 'most timber harvest activities have an ecological downside and higher risk potential.' The alternatives should be evaluated on the basis of the facts at hand and our current understanding of watershed processes, not on pre-supposed 'potential' effects of proposed activities. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*I think we should keep cutting a controlled distance within these creek boundaries to keep the timber select cut where there is not so much build up on the forest ground and that way it wouldn't be a risk of fire when you address these areas you're opening up the ground to where there's not so much fire risk if you set this 400 feet rule in other areas than one you're going to be passing areas that need to be cut. (Individual, Coeur d'Alene, ID - Letter #B80433)*

**Issue:** *The Final EIS should address how the risk to aquatic health from potential catastrophic wildfire does not exceed the danger from management activities such as logging.*

**Sample Comments:** *The final Columbia Basin plan must include: No commercial logging or road building near streamside areas. (Individual, Tigard, OR - Letter #B4749)*  
*I do not wish to endorse nor be asked to fund policies that would allow commercial logging or road building in stream-side areas. (Individual, Walla Walla, WA - Letter #B4777)*

*...The risk to the integrity of aquatic ecosystems from fire was considerably less than the risk inherent in silvicultural 'forest health' treatments. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W549)*

*The Science Team concluded that timber harvest and associated activities pose a risk to aquatic integrity. They found that even where there are concerns with respect to upslope disturbances, the risks to the aquatic environment generally are greater from implementation of so-called 'forest health' harvest activities than from fire. It is disingenuous to propose standards that purport to conserve aquatic resources through timber harvest. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*Protect streamside riparian areas from road-building and commercial logging. (Individual, Gold River, CA - Letter #W3108)*

sue:

**Issue:** *The Final EIS should address how increased vegetation density could reduce water yield.*

**Sample Comments:** *The ICBEMP's abandonment of active forest management across tens of millions of acres will result in significant water yield reduction as growth continues to exceed harvest on our national forests.... Managed timber harvest significantly increases water yield without damaging water quality. (Individual, Wellington, CO - Letter #W3783)*

*Many paired watershed studies show an increase in water yield from timber harvest, roughly equal to the basal area of trees removed. If ever there was a resource suited to a basin analysis it is the benefits to be derived from increased water yield. (Individual, St. Anthony, ID - Letter #B75365)*

## 2.7.9 Fire and Fuels Management in Riparian Areas

Critics of the Draft EISs' treatment of fire and fuels management in riparian areas believe the project has failed to conduct proper analysis of wildfire's effect upon riparian areas. They reject as "not good enough" the reason given in the Draft EISs for the lack of analysis of wildfire effects, namely the high variability of mechanisms affecting watershed response following fire. These respondents point out that management effects on mechanisms and watershed response are also highly variable, but that they believe these variabilities are certainly controllable and dependent on current and future standards.

Several individuals stress that many riparian areas may face unnaturally intense and catastrophic wildfire because of heavy fuel-loading, dead and dying trees, and insect infestation. They fear that when wildfire erupts in riparian areas, prohibitions against traditional firefighting methods will cripple suppression activities. For example, these people assert that restrictions against delivery of retardant, foam, or additives to surface waters will eliminate many effective ways of controlling wildfire. Some people feel that standards for fire suppression in protected riparian zones are inappropriately absent, including discussion of such basic equipment and techniques for fighting wildfire as heavy equipment, fireline construction, backfire operations, and even pumping water. They suggest the selected alternative specify an aquatics specialist be included in incident and rehabilitation teams.

Many people believe that only through scientific investigation and objective literature review of effects of wildfire on aquatic ecosystems can the project vindicate itself of a major oversight. They insist each alternative must evaluate the comparative risks of wildfire vs. those of management activities.

**Issue:** *The Final EIS should fully analyze potential effects of fire and fuels management on riparian areas.*

**Sample Comments:** *Chapter 3, page 136. This standard [AQ-S29] does nothing to encourage management practices that prevent catastrophic damage to riparian and aquatic resources caused by unnaturally intense wildfire. Provide balanced discussion of wildfire risks to riparian and aquatic functions versus management risks. (Natural Resource based Business or Business Group, La Grande, OR - Letter #W686)*

*[Eastside Draft EIS, p. 2-118] Summary of Conditions and Trends, bullet 2. Factors influencing changes to watersheds because of vegetation should include the fact that fire exclusion has resulted in an unnatural increase in widespread and intense wildfires. Incorporate this fact consistently in the aquatic discussions. (Natural Resource based Business or Business Group, La Grande, OR - Letter #W686)*

*The DEIS statement that watershed effects from wildfire are short-term and may be offset by compensating watershed responses is not true. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*[Upper Columbia River Basin Draft EIS, p. 4-138 and 4-140] The failure of the project to evaluate the effects of wildfire on riparian and aquatic environments can only be rectified through scientific investigation and objective review of the existing literature that addresses these effects. Evaluation of effects of the alternatives must include evaluation of wildfire risks versus management risks, and evaluation of management risk by alternative must be based upon effects of the management activities as constrained by alternative management standards, not merely upon levels of activity. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The riparian management zone and buffer zone is ridiculous. It could reduce the suitable timber base to near zero. To eliminate the opportunity to manage the most productive land of the forest in order to create an overmature, decadent forest to be harvested by fire with no benefit to society or the United States is wrong. The SMZ law in Montana is non-exclusionary and achieves a managed, productive treatment of this sensitive zone. (Individual, Eureka, MT - Letter #B78762)*

*Catastrophic wildfires lead to direct and indirect catastrophic impacts to stream habitats including long-term serious hydrology impacts, sediment impacts, and channel and riparian impacts. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*AQ-S29 & 30 place other priorities over the supposed priority of watershed protection. These standards for Alternative 7 are clear and concise, giving the watershed and fish the priority over fire management and fuel suppression actions. (Individual, Portland, OR - Letter #W2931)*

**Issue:** *The Final EIS should address appropriate means of fighting fire in riparian areas.*

**Sample Comments:** *Prohibiting the delivery of retardant, foam, or additives to surface waters is going to limit the ability to combat wildfires. (Individual, St. Maries, ID - Letter #W3792)*

*The DEIS discourages many appropriate and strictly controlled treatments for fuel management. The severe threat of catastrophic fire is ignored. (County Organization, Salem, OR - Letter #W4555)*

*The aquatic standards in the Preferred Alternative are completely silent on standards governing many fire suppression activities (i.e., heavy equipment use, construction of fire lines, backfire operations, pumping of water). (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*The Preferred Alternative does not specify the participation of an aquatic specialist in teams making decisions on incident activities nor on rehabilitation. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

## 2.7.10 Roads in Riparian Areas

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A number of respondents believe that roads and road building have been a major source to degradation of aquatic health, and they favor plans that would reduce or restrict the density of roads in the project area. These respondents assert that studies show a relationship between road density and sedimentation and other indicators of compromised aquatic health. Others maintain that science fails to prove this connection, and that roads are necessary to conduct the management activities needed for restoration.

**Issue:** *The selected alternative should contain restrictions on road density to restore aquatic health.*

**Sample Comments:** *Pool and wood frequency are generally less in areas with higher road densities and high logging emphasis. The percent of channel bed covered with fine sediment increases with road density. (Conservation/Environmental Group, Swan Lake, MT - Letter #B78929)*

**Issue:** *The Final EIS should analyze the effects of road densities on aquatic health.*

**Sample Comments:** *[Eastside Draft EIS, p. 2-121] Paragraph 1. The statements regarding increased runoff because of roads has become even more controversial in the scientific community. At least one study (King, 1989) conducted in the project area indicates no discernible increases in runoff or peak flows attributable to roads. Revise the FEIS to reflect this uncertainty of roads upon peak flows and water yield, or delete the discussion. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*[Eastside Draft EIS, p. 2-126] Paragraph 1. Consistently revise all discussion in the FEIS to clearly acknowledge that level of harvest and road activity do not predict future level of aquatic impact of the alternatives. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.7.11 Grazing in Riparian Areas

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Some contend that domestic livestock spend a disproportionate percentage of time congregating near water when they have access to it. These people believe that livestock concentration in riparian areas does great environmental harm; therefore, they advocate curtailment of riparian area access by domestic grazing animals. Other people, however, conclude that grazing animals do little if any harm to riparian environments. They take issue with what they believe is the Draft EISs' supposition that all or most damage to riparian areas should be attributed to cattle. For example, they contend that the proliferation of exotic plant species and the spread of western juniper into rangeland can be attributed to fire exclusion.

There is considerable debate on the issue of grazing as it relates to aquatic health, including: how to define a riparian area; how much damage, if any, domestic grazing animals actually do to riparian areas; how lasting the damage is or might be; and what can or should be done about it.

Most of those addressing the effects of grazing on riparian areas believe that some form of grazing control is needed. Suggestions for the future of grazing range from an immediate, permanent grazing ban on all public lands, to allowing local land managers to construct and monitor grazing plans in cooperation with local grazing permittees, to continuing the current grazing permit system with no changes.

Few people feel the preferred alternative adequately addresses grazing in riparian areas. Many object strongly to the preferred alternative's proposed continuation of grazing, even if it is tightly controlled and monitored. Equally vehement in their opinions are those who fear that the preferred alternative would eliminate grazing from Forest Service- and BLM-administered lands through stricter standards and closure of additional areas to grazing.

Opinions are divided about whether environmental conditions of riparian areas within rangeland are deteriorating or improving under current management. The Draft EISs are taken to task by some people for what they think is its assumption that riparian habitats are seriously degraded, getting worse, and desperately in need of protection. They feel the Final EIS should recognize that degradation of riparian rangeland has been slowed or stopped and, in fact, rangeland in the project area is in better shape now than it has been for at least a decade. Some people point out that the BLM's Internet web page states more than 90 percent of the inventoried wetland acreage in Oregon and Washington is in Proper Functioning Condition (PFC), but some respondents assert that PFC is merely a starting point and indicates a degraded but functioning condition.

A few people comment on restrictions on livestock handling activities in riparian areas, such as watering, yarding, loading, and salting. Some protest that removing all such activities and facilities from RCAs would be logistically and economically impossible. A few state the Final EIS should ensure these activities do not interfere with RMOs.

**Issue:** *The selected alternative should ensure that grazing should be severely restricted in riparian areas.*

**Sample Comments:** *Riparian areas are not adequately protected under your Preferred Alternative. In the federal district court case on Onda v. Thomas (940 F.S. 1534 [1996]), the Forest Service acknowledged that grazing damages riparian areas and causes pollution of the water. Despite these facts, your plan fails to implement any meaningful controls on livestock grazing adjacent to streams. (Natural Resource-based Business or Business Group, Bend, OR - Letter #W820)*

*The fragile streamside riparian areas should especially be freed of the threat of livestock grazing. (Individual, Norwell, MA - Letter #W3105)*

*Livestock tend to congregate near water in both time and space and cause disproportionate damage to the most important ecosystems on the eastside. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*I would like to express my disappointment over the 'preferred alternative' for the public lands east of the Cascades. It continues grazing along streams. (Individual, Monroe, OR - Letter #W543)*

*Please revise the FEIS to keep cattle out of riparian areas (or better, off public lands altogether) (Individual, Portland, OR - Letter #W841)*

*Any final alternative created needs to substantially reduce cattle numbers as well as exclude them from reserves and riparian areas! (Individual, Portland, OR - Letter #W4730)*

*Keep cattle away from riparian zones and enforce ecologically safe grazing practices so native vegetation is not destroyed. (Individual, Pocatello, ID - Letter #B76739)*

*Livestock grazing should be allowed only in those riparian areas that have achieved both 'proper functioning condition' and the RMOs. (Conservation/Environmental Group, Eugene, OR - Letter #W3786)*

*These provisions are inaccurate for several reasons. First, it allows damaging grazing to continue until there is some assessment of PFC/RMO status. Neither alternative sets any timetable for assessment of status or management revision. Second, the standards allows existing grazing management to continue, if RMOs and PFC are attained, even if the grazing management system has degraded the system DOWN to the RMOs and PFC. PFC is a considerably degraded riparian condition. Some of the RMOs for Alt. 4 and Alt. 6 represent degraded conditions for many streams. A third, and related issue, is that PFC and RMOs for Alt. 4 and Alt. 7 do not assure that all important attributes of anadromous fish habitat that are affected by grazing are not degraded. Grazing strongly affects stream shade, water temperature, bank stability, substrate, and channel morphology, but not all of these attributes are included in both of the two options for RMOs for Alt. 4 and Alt. 6; some of the RMOs, such as those for fine sediment and pools, represent degraded conditions that do not protect salmonid survival, but instead are based on sampling.... Fourth, because the standard does not require annual and seasonal monitoring of RMOs and PFC, grazing damage is allowed to persist without detection. Fifth, grazing suspension is not required in highly degraded systems.... Sixth, the standard only appears to apply to grazing management within RCAs. In rangelands, the RCA is too narrow in many systems to ensure that riparian functions critical to water quality and anadromous fish habitat are included within the RCA. (Tribal Commission, Portland, OR - Letter #W4733)*

*New grazing strategies that avoid the riparian zone will result in more stable stream banks and stream channels; reduced soil erosion and, consequently, reduced stream sedimentation; improved streamside vegetative cover; improved water quality; increased riparian forage; and increased fish production. Improvement of streamside vegetation also will increase the diversity and sustainability of riparian ecosystems. In the long run, proper management of livestock may occur when overused and degraded riparian communities are put under proper management, but increased forage production should ultimately be a result of improved resource management. (Conservation/Environmental Group, Portland, OR - Letter #B4789)*

**Issue:** *The Final EIS should revisit the size of Riparian Conservation Areas.*

**Sample Comments:** *Using the information for determining the RCA widths on rangelands with a B-type channel draining a 10-square mile area, the RCA for the stream would be only 45 feet from either side of the stream, which is plainly too narrow in many systems to include all areas and vegetation providing wood, shade, sediment detention, and other vital functions. (Tribal Commission, Portland, OR - Letter #W4733)*

**Issue:** *The selected alternative should ensure that grazing is allowed in riparian areas.*

**Sample Comments:** *This standard (AQ-S12) assumes that grazing is the limiting factor if progress toward PFC (Properly Functioning Condition) is not occurring. It needs to be made clear that PFC may not be attainable due to some other attributes that can not be corrected for socio-economic reasons, such as a highway next to a stream. In these cases grazing should be allowed to continue the same as if PFC is obtained. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W1360)*

*...Wild animals and livestock utilized riparian areas decades before the salmon problem was a problem. (Natural Resource-based Business or Business Group, Walla Walla, WA - Letter #W3089)*

*'Within riparian shrub lands, there has been extensive spread of western juniper and introduction of exotic grasses and forbs, primarily due to processes and activities associated with improper livestock grazing.' Who made this connection? What about fire exclusion as a factor in juniper spread? (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*There is no language to include the grazing permittee in the decision making process. Again, this type of decision is better made at the local level. (County Official, Salmon, ID - Letter #B77161)*

*...It has been proven that livestock grazing is an essential component of a healthy ecosystem and not all watershed are degraded. Temperature is a criterion to gauge water quality, but temperature exceeding the maximum standard is not necessarily a result of poor management but a nature-caused condition that even total elimination of livestock is not going to change. (Individual, Burns, OR - Letter #W791)*

**Issue:** ***The riparian standards regarding grazing in the Final EIS should be revisited to assure that they are not unreasonably strict.***

**Sample Comments:** *AQ-S50 says 'livestock shall be managed to prevent unauthorized physical disturbance of redds for threatened, endangered, or proposed species of fish.' Does this then require protection for every species that is proposed for listing until a determination has been made on listing?... This will result in miles of fencing or other management techniques to control livestock movement. Economics makes this infeasible. (Professional Society, Moscow, ID - Letter #W546)*

**Issue:** ***The Final EIS should better address the implementation and enforcement of grazing standards in riparian areas.***

**Sample Comments:** *The standards presented for guiding livestock management are vague, and only two of them, AQ-S50 and AQ-S51, expressly state actions that must be taken - that livestock be managed to prevent them from disturbing spawning grounds of endangered fish species, but they don't state how that should occur. (Tribal Government, Toppenish, WA - Letter #W4556)*

**Issue:** ***The Final EIS should recognize that degradation of riparian rangeland has slowed or stopped.***

**Sample Comments:** *Recognition that riparian degradation for range has been slowed or stopped is a very important point. Unfortunately, this issue seems ignored in the 'Affected Environment' and 'Environmental Consequences' chapters. Throughout the DEIS it is assumed riparian habitats are seriously degraded, are getting worse and desperately need protection. This is an inaccurate impression. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*BLM's web page shows that over 90% of the inventoried wetland acreage in Oregon/Washington is in Proper Functioning Condition. This acreage represents nearly 60% of the total wetland acres. (Individual, Clarkston, WA - Letter #W3111)*

*We see this as one more attempt to remove resource users from public lands in the West for political purposes by bending science to justify a desire. Riparian areas are capable of supporting resource utilization also. (County Official, Salmon, ID - Letter #B77161)*

**Issue:** *The selected alternative needs to be in compliance with Federal law regarding wild horses.*

**Sample Comments:** *There is a federal court decision (American Horse Protection Association, et al., vs. James G. Watt, et, al., No. 76-1444) directing the management of wild horses in our area. This order gives direction as to the total number of horses allowed, timing of roundups, etc. Recommendation: Acknowledge and abide by the court order. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

**Issue:** *The Final EIS should clarify restrictions on livestock handling facilities in riparian areas.*

**Sample Comments:** *Regardless of riparian or stream condition, livestock facilities should be located or relocated outside riparian areas. (Conservation/Environmental Group, Eugene, OR - Letter #W3786)*

*Can AQ-S13 (livestock handling to obtain RMOs) be implemented without a herder always present? Should it be limited to salting grounds and loading facilities? Livestock needs to be watered. 'Trailing, bedding, and watering' should be deleted. In S14, 'or closed' should be deleted so that facilities will be relocated. The FEIS needs to give users of the land options where possible to continue their livelihoods. (County Organization, Salem, OR - Letter #W4555)*

*Most livestock handling facilities are already outside of riparian and sensitive areas and sensibly lie on dry ground. There may be some potential problems that arise if this document succeeds in expanding RCA widths to accommodate the Zones 1, 2a, and 2b, which was previously discussed as not necessary. Recommendation: Make this standard a guideline to be administered by local personnel. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

**Issue:** *Livestock restrictions should not exempt recreational livestock.*

**Sample Comments:** *It is not clear why recreational stock is excluded from this standard [AQ-S13]. Some of the most degraded areas are caused by the improper handling of recreational stock, especially in campgrounds that allow stock, and near water sources. This usually occurs because recreational users are not acutely aware of these types of problems. Recommendation: These types of decisions are a classic example of what should be decided at the local level. We suggest that you make this standard a guideline. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

## 2.7.12 Mining Effects

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The majority of people addressing mining in riparian areas feel that environmental rules governing mining in and around riparian areas need to be clarified and tightened. They say that the current Draft EISs, as written, are insubstantial and unenforceable, and they suggest the Final EIS either clarify its language or redesignate 'standards' as 'guidelines'.

Urging prohibition of all surface mining from any area where it might possibly contaminate any water source, several people suggest underground mining be permitted only if it can be accomplished without creating any danger of pollution to surface or ground water. A number of people demand the mining industry be forced to clean up its old waste sites and be obliged to clean up mining waste already contaminating streams and lakes.

A few feel the Draft EISs fail to acknowledge and address many of the destructive activities associated with mining, such as road building and chemical transport. At least one recommends the Final EIS deal with bonding requirements for miners.

Some warn that strict RMOs could violate existing mining rights and the 1872 General Mining Law. They recommend the Final EIS clearly account for potential conflicts. Some mention the need for raw materials, the importance of mining to local economies and national interests, and the improvement of mining methods over a history of destructive practices. Some feel that the RMO and RCA standards are arbitrarily strict and that mining is already strictly regulated by State and Federal laws.

**Issue:** *The selected alternative should not allow for mining contamination in riparian areas.*

**Sample Comments:** *The plan fails to protect habitat and water quality from mining. Simply 'minimizing unavoidable adverse impacts' is vague and open to abuse and lax enforcement. In fact, it is unenforceable. (Individual, Seattle, WA - Letter #W828)*

*Potential conflicts with other laws notwithstanding, the Forest Service is not obligated to permit minerals operations that cause such harm. The standards should require that adverse impacts be avoided. If such harm is impossible to avoid, the standards should require that the mineral operation not be approved. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*These standards use vague terms such as 'minimize', 'all practicable measures' and 'no practicable alternative.' The use of such terms suggests that these standards are guidelines and [they] should be designated as such. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W1360)*

*AQ-S18 through 21 are too weak. Is watershed protection the priority or is mining? There can be no exceptions made for mining to destroy a watershed. The use of 'should' here should be changed to 'shall.' (Individual, Portland, OR - Letter #W2931)*

*Only underground mining which is distant from riparian or underground water supplies should be allowed. (Individual, Spokane, WA - Letter #W2451)*

*Clean up mining waste from our rivers and lakes and prevent more from entering. (Individual, Pocatello, ID - Letter #B76739)*

*Under all alternatives except Alt. 7, mining activities are explicitly allowed to degrade RCAs, water quality, and other aquatic resources. This is a serious flaw because although mining is not as widespread as other activities, it can cause long-term and severe damage to anadromous fish habitat. Any alternative selected must be fully protected from mining; and that where mining is adversely affecting habitat, water quality, and other aquatic resources, that steps are taken to reduce and reverse those effects; Only Alt. 7 has any promise for meeting these requirements.... Alts. 1-6 fall far short of ensuring that aquatic resources are protected from new and ongoing damage from mining. (Tribal Commission, Portland, OR - Letter #W4733)*

*This standard [AQ-S18] falls short of assuring attainment of aquatic and riparian recovery in several ways. First, it fails to acknowledge that mining activity outside RCAs can have significant deleterious effects on riparian and aquatic habitat. The massive scale of ground disturbance associated with mineral exploration and extraction, even in uplands away from streams, poses a significant risk to aquatic resources from mass failure, mobilization of large volumes of soil, and changes in overland surface water. Second, the [Fish and Wildlife] Service's experience with mining clearly indicates that it is not possible to mine in RCAs without significantly degrading habitat, both in the short- and long-term. This Standard does not specifically prohibit mining in RCAs. Mineral extraction at any scale, from small placer operations to major mining projects, is, by definition, detrimental to habitat because ground disturbance is inherent to the activity. Third, the Standard fails to deal with risks associated with support and ancillary actions such as road building, chemical transport, water use, wastewater disposal, storage of overburden and waste, among many other components of mines of any size. While AQ-S19 and S20 approach those issues, nothing in the Standards specifically precludes such facilities from being placed in RCAs, and the DEIS fails to acknowledge issues of effects they will have on aquatic resources regardless where those facilities are located. Fourth, the Standards should specify that bonding will always be required and that it will be at a sufficient level for the land management agency to completely restore mine sites in the event that the operators fail to. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *Aquatic standards for mining are too strict.*

**Sample Comments:** *These regulations do not recognize that mining activities, while admittedly disruptive, are temporary in nature, and that reclamation of most project components generally occurs at appropriate levels contemporaneously with continuing mine operations....Standard AQ-S19 should be amended to provide that if a certain alternative's analysis had already been performed under other environmental authorities, such as NEPA or Section 404 of the Clean Water Act, an additional alternatives analysis is not required under these standards. This will avoid needless duplication of effort and expense by both the agencies and other federal environmental permitting agencies, and by project proponent...*

*This standard, as stated, would have a profound affect on the ability to explore for and develop new mineral resources (Natural Resource-based Business or Business Group, Boise, ID - Letter #B78680)*

*The 'Aquatic Standards' proposed for 'Minerals Management' are particularly unnecessary, confusing, and overly restrictive.... Mining operations in or near [RCAs] will be subject to particular scrutiny. No justification is provided for establishing basin-wide direction such as this, applicable to particular mining operations, in addition to the environmentally protective standards that already exist in agency regulations and applicable laws. (Natural Resource-based Business or Business Group, Boise, ID - Letter #B75569)*

## 2.7.13 Recreation Effects

Citing water-oriented recreation as a primary attraction of public lands, most people responding to issues of recreation and aquatic health believe the Draft EISs provide little direction for management of water-oriented recreation.

Some assert that recreationists, particularly stock users and motorized vehicle users, degrade riparian areas, but that these impacts are not clearly addressed in any of the alternatives. They question whether the Draft EISs sufficiently scrutinize probable ramifications of proposed new policies limiting access to and development of citizen-demanded shoreside recreational facilities.

**Issue:** *Impacts from recreation should be considered in the Final EIS.*

**Sample Comments:** *A statement is made that ‘there may be losses in water-based recreation stemming from extensive Riparian Conservation Areas.’ This is potentially a significant impact and needs to be addressed in detail.... Water-oriented recreational settings are a main attraction on federal lands. If new policies are to limit access and development of new shoreside facilities to keep up with citizen demand, then this impact needs to be addressed in the DEIS.... The recreational analysis is unacceptable in that it provides almost no information on impacts, no spatial desegregation of impacts, and no measurement of impacts by type. This analysis needs to be completely redone to comply with NEPA. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *Recreation standards and guidelines for aquatic areas should be clarified in the Final EIS.*

**Sample Comments:** *AQ-24 needs to be clarified that a recreation facility ‘to be constructed’ or located outside of RCA’s if it will have adverse effects. Here again Sub-Basin Review seems to be used inappropriately. AQ-S26 (recreation facilities inside RCA’s) and AQ-S27 (interpretive facilities inside RCA’s) could require relocation or closing of water use facilities. Rather than a standard of adverse effects that ‘cannot be avoided,’ the EEEEC recommends ‘cannot be mitigated.’ (County Organization, Salem, OR - Letter #W4555)*

*The aquatic standards regarding recreation management set an inconsistent standard. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*The appropriate standard for management of recreation, as with all other land management, must be that where conditions are good, no harm results from land management activities, and where conditions are less than desired, land management activities should promote recovery. If such is impossible, the land management activity should be prohibited. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

## **2.7.14 Toxic Chemicals, Fuels, and Herbicides in Riparian Areas**

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People responding to the topic of toxic chemicals, fuels, and herbicides in riparian areas were concerned primarily about insecticides. Some believe there is no standard prohibiting insecticide spraying in riparian areas. Another believes control of insects by other than natural means causes short-term results with problems of residual effects. Others believe that non-point source pollution is extensive, yet, they say, the preferred alternative would choose not to require completion of ecosystem analysis at the watershed scale in all subbasins. They perceive this information is needed across the entire project area in order to characterize the interior Columbia Basin’s overall conditions. See Section 2.8.3, Implementing Integrated Weed Strategy, for additional comments about herbicides and pesticides.

**Issue:** *The Final EIS should more clearly address present and potential effects of toxic chemicals, fuels, and herbicides on riparian areas.*

**Sample Comments:** *There is no standard prohibiting spraying of insecticides in riparian areas. (Individual, Portland, OR - Letter #W2931)*

*Insecticide applications are studied for their effects and control of insects by means other than natural have had short-term results with problems of residual effects of the insecticide applications.... Enhancing the development of native bird populations to remove insects has been the most reasonable approach to solving damaging insect... evidenced by the USFS promotions of research to protect native bird populations. (Individual, Portland, OR - Letter #W1389)*

*It is puzzling that despite documentation of the dramatic declines in over half the basin's native fish species and indications that non-point source water quality problems are extensive throughout the Basin, the Preferred Alternative would choose to not require completion of Ecosystem Analysis at the Watershed Scale in all subbasins. The characterization of the overall condition of the Basin that was presented in the Assessment would seem to indicate that development of a solid basis upon which to make management decisions would be a prudent, minimum step. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*As with most of the aquatic standards, many of these provisions are too tentative. They call for harm to be 'minimized' rather than 'prohibited.' (Natural Resource-based Businesses or Business Group, Eugene, OR - Letter #W4658)*

## 2.7.15 Lands, Permits, Facilities

Some people believe that permits to use rivers and streams within the project area need to be much tougher to obtain or keep. They believe the preferred alternative does not establish clear standards regarding lands, permits, and facilities to guarantee that aquatic and riparian resources will not be harmed. Many people believe that salmon should have sufficient water for their activities, especially during the spring. They feel that barge operators, irrigators, and users of electrical power should have to bear with any inconvenience. Some argue that dams should be permanently removed.

Existing permitted activities, some people believe, should be closely monitored. They urge that, (a) all existing conveyances and diversions on Federal land be cataloged, (b) compliance with mitigation measures policed, and (c) cumulative impacts on both aquatic and riparian resources be frequently evaluated. Some feel that any permit for conveyance should be modified if detrimental impacts are found, or revoked if conditions have been violated or if a valid right to use the water is not found.

A few state that any dams or hydroelectric proposals should provide for recreational opportunities, and the furthering of aquatic health goals.

***Issue: The selected alternative should allow for new and existing permits to be closely controlled, monitored, and considered for revocation if violations or non-compliance are found.***

***Sample Comments:*** ...The U.S. Forest Service and the Bureau of Land Management... must address the issue of dams, and seek a solution for the problems these dams cause. (Individual, San Diego, CA - Letter #B78001)

*Drawdowns of reservoirs - Yes. Save the salmon. Barges, irrigators and power users must share with salmon especially in the Spring. (Individual, Hamilton, MT - Letter #W475)*

*We are concerned with relicensing (FERC) of dams on the Clark Fork and if Montana Power Company (MPC) sells the dams. (Individual, Missoula, MT - Letter #B75950)*

*Breaching of the lower Snake river dams should be considered. (Individual, Corvallis, MT - Letter #B76061)*

*The aquatic standard in the Preferred Alternative regarding lands, permits and facilities do not adequately or clearly establish a standard that would ensure aquatic and riparian resources are not harmed. The Preferred Alternative must prohibit issuance of new permits unless it can be shown that water conveyance facilities and other surface water developments do not retard or prevent attainment of RMO's and do not cause adverse impacts to aquatic and riparian resources and beneficial uses. The Preferred Alternative needs to require that all existing conveyances and diversions on federal land be catalogued; compliance with the mitigation measures be confirmed; cumulative impacts on aquatic and riparian resources be evaluated; and that permits for conveyance be modified where detrimental impacts are found and revoked where conditions of the permit have been violated or where valid right to use of the water is not held. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

**Issue:** *The selected alternative should require that new development proposals include plans for recreation and restoration or maintenance of riparian resources.*

**Sample Comments:** *Suggest the first sentence (of AQ-S36) read: 'For hydroelectric and other surface water development proposals, instream flows and habitat conditions that provide for a balance of recreation opportunities, and restore or maintain riparian resources, favorable conditions of flow, and fish passage, reproduction, and growth shall be required.' (Individual, Portland, OR - Letter #W840)*

## 2.7.16 Water Rights

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Most people addressing water rights (adjudication) hold steadfast that the use of water is a personal right governed by the States, not the Federal Government. They are concerned their rights may be compromised by the Final EIS and demand to know how the Federal Government intends to manage waters for irrigation and other uses.

**Issue:** *The selected alternative should recognize private and state water rights.*

**Sample Comments:** *I am concerned what impact these proposed regulations will have on my water rights that have been part of my original Homestead Land grant. Will my supply of irrigation water be limited? (Natural Resource-based Business or Business Group, Methow, WA - Letter #W478)*

*Private property rights and western waters laws are strongly supported by our citizens. (County Agency or Elected Official, Okanogan, WA - Letter #W4574)*

*We should challenge the constitutionality of taking the public interest out of the state water plan. (Individual, Boise, ID - Letter #B75653)*

*The DEIS violates, in our opinion, existing state water law and water rights, thereby making it illegal due to the fact that water is the property of the individual states, guaranteed in state constitutions, which were ratified by Congress upon acceptance of the States into the Union. You can not violate those agreements. (Individual, Casper, WY - Letter #B65639)*

*I feel that water in Idaho is just that - Idaho's. (Individual, Oakley, ID - Letter #B75053)*

**Issue:** *The selected alternative should not allow illegal use of water.*

**Sample Comments:** *AQ-S39 states.. 'water conveyances across federal land will be compared against state water rights, and where there is no legal right, the conveyance permit will be revoked.' I do not see why this standard, which identifies illegal uses of water from federal lands with federal permission as something to be remedied, should not be applied in all places at all times. (Individual, Portland, OR - Letter #W477)*

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## Section 2.8 ~ Plants

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**V**egetation management is a concern for many respondents in terms of its relation both to disturbance factors and to overall ecosystem health. Some people have strong opinions regarding vegetation management decisions that may determine future access, development, and resource management activities for public lands. This section focuses on special status and native plants, non-native or exotic plant species, noxious weeds and weed management strategies, and strategies that people feel are necessary to retain plant species diversity.

### 2.8.1 Special Status and Native Plant Species

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A number of respondents blame grazing, with associated disturbances, as the primary cause of population decline for many plant species throughout project area ecosystems and particularly in the Upland Shrub PVG. Some want all grazing forbidden on public lands.

Many people feel that protection for native plant species will not be sufficient without additional actions in combination with alternatives such as Alternative 4. Some suggest a need for new alternatives that better preserve plants. These respondents disagree with the Draft EIS conclusion that Alternatives 4 and 6 would have the most optimal outcomes for plants. These people believe Alternatives 4 and 6 would further alter habitat conditions through proposed intensive manipulation and prescribed fire in sagebrush communities. A few think that Alternatives 3, 5, and 7 would result in less favorable habitat conditions due to the spread of exotic species, habitat conversion to non-native seedlings, grazing, and changes in fire regime.

Several respondents are concerned that inventories are not sufficient to protect different plant communities within the interior Columbia River Basin. They assert that there would be little change in the overall outcomes for the majority of species under any of the alternatives. Many people believe that since the Draft EISs acknowledge locally endemic plants are difficult to analyze at the broad-scale, these species must be in danger of extinction. A least one respondent feels the Final EIS should clarify whether there is a lack of scientific evaluation or if the alternatives will have little impact on plant communities.

Some note that non-vascular plants have been virtually ignored in all aspects of the Draft EISs. Some express concern that not even a table (such as the C3 table in the Northwest Forest Plan) is available to identify non-vascular plants. Others feel the *Assessment of Ecosystem Components* and the *Evaluation of EIS Alternatives* fail to address most rare plant species in the interior Columbia River Basin because of the broad scale of assessment. A few note that known impacts of forest management on fungi are also absent from the Draft EISs; they claim the documents overlook negative effects of soil compaction caused by timber harvest and yarding, roads, and livestock grazing. Some respondents argue that there is a need to address the effects of livestock grazing and trampling on microbiotic crusts. Others feel that information in the Draft EISs is inconsistent with regard to the number of endangered species in the project area.

Some accuse the Draft EISs of expounding undue rhetoric and alarm regarding the problems faced by native plants. They say that plants have gone extinct before the coming of humans and will continue to do so after humans are gone. According to some people, native plant populations are not the final word in ecosystem management. They assert that even weeds can be native plants, and that the ICBEMP's broad-scale attempts to address plant communities in such a large area lack integrity and sincerity.

**Issue:** *The Final EIS should adequately protect native plant species.*

**Sample Comments:** *Vascular plants. (PNW GTR - 406) Analysis here reveals how deficient DEIS Alternatives are - the best is outcome 3 for all but one species. This alone should have been motivation for DEIS preparers to develop new alternatives that would meet needs of species...The DEIS claims that Alternative 4 and 6 reduce grazing, but does not provide any concrete guidelines for doing so. Also [project documents-Appendix E recognize] that Alternative 3, 5, and 7 will result in less favorable habitat conditions due to the spread of exotic species, habitat conversion to non-native seedlings, grazing and changes in fire regime. But, the GTR fails to acknowledge that Alternatives 4 and 6, through proposed intensive manipulation and prescribed fire in sagebrush habitat will alter conditions and result in spread of exotic species such as cheatgrass and resultant changes in fire regime. GTR assumes taxa would benefit from 'rest' of Alternative 4 and 6, but late successional taxa in Upland Shrub Group will not benefit. (Conservation/ Environmental Group, Boise, ID - Letter #W3689)*

*Bullets 9 and 11. It is stated that 'there would be little change in the overall outcomes for the majority of plants under any alternative'. However, the bullet goes on to indicate that the evaluation did not evaluate habitat change at the broad scale....and goes on to reveal that locally endemic plants 'are difficult to analyze at this scale.' Clarify whether the lack of species effects are the result of the alternatives or whether they result from a lack of scientific evaluation. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Alternative four can improve greatly. There should be key provisions that protect native species from grazing, logging, and other forms of development that damage these lands. (Individual, Arlington, VA - Letter #E22)*

**Issue:** *The Final EIS should adequately address sensitive, rare, or threatened and endangered plants.*

**Sample Comments:** *Page 2-39. Known impacts of forest management on fungi are not discussed, such as the effects of soil compaction caused by timber harvest and yarding, roads, and livestock grazing, as well as the impacts of timber harvest in killing the tree's mycorrhizal associates. Mycorrhizal fungi are absolutely essential to the continued functioning of the eastside forests and the DEIS did not fully discuss their importance or the likely effects of future management on fungi. (Conservation/ Environmental Group, Eugene, OR - Letter #W4622)*

*The statement that, in the project area, two plant species are endangered and two are threatened is inconsistent with Chap. 2, p. 40 which lists three threatened plants and one endangered plant for the project area. It is also inconsistent with the Eastside summary which states that two endangered and three threatened plants occur in the project area. Revise the text to correct the inconsistent use of 'project area' and 'planning area' eliminated. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The Columbia tiger lily, is rare or endangered in all areas - yet you propose to log small areas. (Individual, Pullman, WA - Letter #W3021)*

**Issue: *The Final EIS should adequately address microbiotic crusts and non-vascular plants.***

**Sample Comments:** *Two other issues in the science team's analysis caught my attention. First, their analysis of the effects is incomplete without a study of effects to non-vascular plants. Non-vascular plants are virtually ignored in all aspects of the DEIS. There is not even a table of species considered vulnerable in the area, such as a Table C3 of the Northwest Forest Plan. (Individual, Portland, OR - Letter #W2931)*

*For reasons that do not withstand scrutiny, none of the DEIS alternatives includes measures that will protect microbiotic crusts (or cryptogams). The critical importance of microbiotic crusts to rangeland ecosystems for stabilizing soils, increasing soil fertility, etc. is thoroughly acknowledged in ICBEMP ecological assessments. Their conclusions were well documented in peer-reviewed papers, and are the consensus of academic as well as BLM scientists (e.g. Dr. Roger Rosentreter and Julie Kaltenecker, Boise State BLM Office). These sources make it clear that a key to restoration of damaged rangeland communities is the recovery of these crusts. In spite of this,, the DEIS states that microbiotic crusts would not be considered for management purposes explaining the role of crusts in not conclusive at this time....Throughout the West, scientists are concluding that for long-term sustainable management of arid communities, careful consideration of the role of cryptogams (i.e. microbiotic crusts) in the ecosystem is required. (Conservation Group, San Francisco, CA - Letter #W4834)*

*Cattle grazing is a major source of degradation in all elements of eastside ecosystems. Cattle based disturbance of soil ecology, especially the biotic crusts (cyptobiotic/microbiotic/etc.) is highly significant. Unfortunately it is poorly dealt with in the scientific assessment, and it is totally inadequately dealt with in this DEIS. (Individual, Portland, OR - Letter #W4730)*

**Issue: *Analyzing various management options should be emphasized by the Final EIS.***

**Sample Comments:** *Page 27. Some species are near extinction. What of it? 16,000 species became extinct before mankind ever appeared. Do we suffer because of that? What difference does will three or four more make? We occasionally observe protective notices in the field for almost invisible (because of size) plants, sometimes no more than one plant per acre...do we spend time and tie up assets for this sort of activity.? (Individual, Fort Collins, CO - Letter #W649)*

*Native species are not a magic wand that disperses and promotes all that is good and wondrous. Species that normally live and thrive in a particular ecosystem may be weeds themselves... there are groups who promote native species preservation, but ecology is not bound by those agendas and cannot use such a narrow perspective when addressing management decisions that affect people's livelihood. This is not to imply that communities with native species should be ignored, but conveniently stating some attribute of a native species in a generalized statement, that addresses plant communities in a far-sighted view among 75 million other acres of plant communities, lacks integrity and sincerity in what is being conveyed. (Individual, La Grande, OR - Letter #W3806)*

## 2.8.2 Exotic Plants and Noxious Weeds

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Many people feel that the problem of noxious weeds is not adequately addressed in the Draft EISs. One person points to the presence of knapweed on the Selway River Corridor as an example of the Draft EIS's failure to give an appropriate response to the problem.

Another person is concerned about a statement in the Draft EIS that noxious weeds will only get worse under all the alternatives, since none of the alternatives deal with weed vectors, particularly roads, livestock, and the use of prescribed fire and thinning as management tools. Others believe that grazing has no more negative effect on rangeland than the buffalo did, and that removing the livestock will not improve the range condition. Some fear that removing juniper from rangeland will only increase the amount of noxious weeds already present.

Some attack what they see as a lack of scientific evidence either supporting or negating the information presented in the Draft EISs. For example, some people question the severity of the threat by noxious weeds to native flora. Others suggest the Final EIS should take another look to determine if noxious weeds can be used beneficially. Some argue the Draft EISs lack what they see as crucial information, such as specific locations and current acreage information for noxious weeds within the project area.

Many people question which plant species are considered noxious weeds and to what extent they are harmful. Some want a clear definition of a noxious weed. Some complain the Draft EISs portray all non-native plants as bad and disturbance and abuse by humans as the key factor in the spread of such plants. Some argue that weeds have long established themselves in undisturbed territory without the influence of humans. They believe that weed invasion is not new; therefore, a hands-off, passive approach to management is suggested.

**Issue:** *The Final EIS should adequately address the problem of noxious weeds.*

**Sample Comments:** *The alternatives presented to combat weed problems offers nothing on how these problems will be met to improve weed populations on federal lands... Exotic weeds are not necessarily improved by alternatives above the current methods. (Individual, La Grande, OR - Letter #W3806)*

*Chapter 4, page 15. The DEIS admits that noxious weeds will only get worse under all alternatives. None of the alternatives deal adequately with the weed vectors: mainly roads and cows. Less grazing, less roads are desperately needed. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*Prevent weed encroachment by controlling disturbance, i.e. livestock grazing.... Recommendation: Remove or significantly alter livestock grazing on all lands at risk for weed/cheatgrass invasion. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

*The noxious weeds seem to be uncontrollable in most areas where they are already established. The goal of preventing further spread is probably all that can be expected at this point. Recommendation: ...perhaps another look should be taken to determine if the weeds are in fact a real threat to native flora and if there is any way they can be utilized beneficially. (Individual, Moyie Springs, ID - Letter #B4692)*

*If you think the noxious weeds will die out when you have the cattle moved off, you have been misinformed. The great grasslands of the mid west evolved under the hooves of great herds of buffaloes that would tramp out the vegetation much more than our present cow herds and then fire would rage unrestrained. (Individual, Pima, AZ - Letter #W4715)*

*Grasslands in poor condition are proposed for herbicide treatment... Recommendation: ...while the causes of weed spread---primarily overroading, overlogging, and overgrazing---go unchecked. (Individual, Winthrop, WA - Letter #W253)*

*Drought which has influenced disease and insect occurrence cannot be controlled. Fire suppression, another factor of disease and insect occurrence, has been controlled with these long-term controversial consequences. It is also plant species mix and spacing that can successfully manage outbreak, which forest management has yet to determine. Monoculture has contributed to this. Recommendation: Enforce natural and native plant succession to follow timber harvest. Natural plant succession has been more than the timber interests have afforded in the past. (Individual, Portland, OR - Letter #W1389)*

*Attempting to remove the junipers will likely result in more expansion of noxious weeds anyway which are already a widespread problem in the UCB. (Individual, Moyie Springs, ID - Letter #B4692)*

*Exotics are common components in most plant communities in this group. Even though, this statement is likely true, it is very misleading without also saying that in many of the communities, exotics comprise a very small percentage of the composition in those communities. (Individual, Clarkston, WA - Letter #W3111)*

**Issue:** ***The Final EIS should address whether additional scientific data is needed to address the problem of noxious weeds and non-native plants.***

**Sample Comments:** *The problem of noxious weeds in rangeland (pages 2:104 - 106) is a good one. The problem of noxious weeds in forest land needs to be better addressed. (Individual, Seattle, WA - Letter #W881)*

*Chapter 2, page 89...the document states: Noxious weeds are spreading rapidly, in some cases exponentially, on rangelands in every range cluster. The document does not present evidence to support this exaggerated conclusion in even one range cluster, not to mention 'every' range cluster. To make any scientifically supported conclusion concerning the spread of noxious weeds, there must be current and historical data which identifies the extent of the problem at different point in time. Chapter 2, page 105. The document states: Specific location of and current acreage information for noxious weeds is not available for the project area.. This statement is conclusive evidence that ICBEMP does not have data to support the conclusions...the question becomes what data DOES exist to support ICBEMP's conclusion? (Individual, Clarkston, WA - Letter #W3111)*

*The Selway River Corridor and Trail heads leading into the wilderness from the east and west, and north and south are loaded with knapweed. To say there is no susceptibility is ridiculous (DEIS maps of susceptibility to cheatgrass and spotted knapweed invasion). Weeds are our biggest problem. Your ignorance does not help. (Individual, Corvallis, MT - Letter #W548)*

*Specific locations of and current acreage information for noxious weeds is not available for the project area. Without such information, how can the DEIS address this issue? The DEIS should be revised to reflect a better description of this subject. It is not using data and facts that are meaningful nor complete enough. (Individual, La Grande, OR - Letter #W3806)*

*We are led to believe all non-native plants are bad (low integrity) which in itself is wrong. Are corn, potatoes, gold seal, hybrid poplar, improved elm, blister rust resistant white pine, alfalfa, wheat, grasses, etc. wrong just because they didn't originate to grow here earlier (as far as we know)? Should there be a bias against them even though they may be more productive, hardier, disease free, drought tolerant, etc. than a given native? We don't think so; especially when particular plants are better able to thrive in a given area because they are part of the system where another given exotic (weed) we now have come from. (Individual, Kettle Falls, WA - Letter #B77206)*

## 2.8.3 Implementing Integrated Weed Management Strategy

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Some feel the Draft EISs do not establish specific guidelines for implementing a weed management plan. Some respondents believe that the predominance of noxious weeds is the result of disturbances associated with human activity, such as livestock grazing and mechanized logging, mining, and recreation. They point out that noxious weeds are invasive because of high seed production rates and successful seed dispersal into disturbed areas.

Some assert that implementation of any weed management program should be handled on the local, county and state levels, because Federal agencies lack the budgets and tools necessary to implement such programs. Others recommend establishing an infrastructure of business and funding for weed control that would use a combination of chemical and biological controls to control weeds. Because of the mosaic of public and private lands in many places, some people believe that no integrated weed program will be effective unless there is an "all out mobilization of everyone who has weeds on their property."

Some assert that any plan for the treatment of noxious weeds in the Final EIS should start immediately; they feel that five years is too long to wait for implementation. Others argue that funding and staffing of a weed treatment program will have to be clearly spelled out in the Final EIS.

Respondents disagree about the use of herbicides and pesticides as a management tool. Some express concern about the duration of chemical persistence after spraying and the potential for pollution of ground and water. Some wonder what effects of chemical spraying will be on wildlife and salmon habitat. Most who address this issue feel the use of chemicals should be a last-resort management technique. Others favor active management of weeds. Some believe that prescribed fire and grazing by goats and predators will reduce the spread of weeds. For additional comments regarding pesticides, see Section 2.7.14, Toxic chemicals, Fuels, and Herbicides in Riparian Areas.

Some feel that chemical-free reserves established for the purpose of site-specific analysis of noxious weed encroachment would offer an opportunity to keep weeds in check on a small scale.

**Issue:** *The Final EIS should establish clear guidelines for the implementation of the Integrated Weed Management Program.*

**Sample Comments:** *Weed invasion is a forest service management issue for the purpose of native habitat protection. The predominance of noxious species was attributed as a result of human disturbance; of livestock and/or machinery...The noxious weeds are invasive by the high seed production rate and successful dispersal in disturbed areas. Recommendation: Develop native plant seed resources. As a requirement to logging, replanting those can be an effective rehabilitation effort by a profiting timber company. (Individual, Portland, OR - Letter #W1389)*

*Noxious weed infestations have been observed for many years, in many areas and their encroachment and containment will never occur with planning for 145 million acres. On-site, local implementation of proper treatment methods and revegetation for species control is activated by communities through State, county, and city project. Federal agencies at the current time lack budgets and tools to address the needs on public lands. (Individual, La Grande, OR - Letter #W3806)*

*I expect incredible dilemmas in weed control over large areas. Chemical control does not improve ground conditions for desired plants, and should be accompanied by funding for seeding and planting for several years. Biological controls may not become established for a few years and, when successful, the need for the biological product declines.. Establish an infra-structure of business and funding for weed control. Then using an integrated management of methods of weed control might work. (Individual, Joseph, OR - Letter #W704)*

*The integrated approach to weed management on all lands has not proven very effective. In western Montana, for example, there are just too many private land owners and small parcels of land that have to be treated. Ditches, fence lines, vacant lots are just a few of the examples where weeds are not treated and can spread again to lands which have been treated. In order to be successful, there is going to have to be an all-out mobilization of everyone who has weeds on their property. (Individual, Missoula, MT -Letter #B52)*

*There is definitely a need to manage noxious weeds on public lands. But, any plan to control these weeds needs to be properly funded and implemented. Additionally, 5 years is too long to wait to start to get control of weeds. We have seen noxious weeds take over many acres of land because of the current inability to adequately fund and control this problem. Recommendation: Create a plan to start controlling noxious weeds now. Explain how it will be funded, and provide aggressive directives as to how many acres per year will be treated or controlled. (Natural Resource-based Business or Business Group, Challis, ID - Letter #B78800)*

*Although the development of this strategy is possible within five years, major changes in funding and staffing will have to occur before implementation is feasible. (Natural Resource-based Business or Business Group, Colville, WA - Letter #W698)*

**Issue:** ***The Final EIS should include an Integrated Weed Management Program which considers the option of not using herbicides and/or pesticides.***

**Sample Comments:** *If by 'prevent noxious weed spread' you mean controlled burns, goats, and natural 'predators' -good! If you mean chemical herbicides -bad! (Individual, Fayetteville, AR - Letter #B75390)*

*Chemicals such as the sinister herbicide Tebuthiuron proposed for sagebrush control kill non-target species, persist in the ecosystem for long periods of time, and leach into ground water. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

*TS-O5 does not apply to Alternative 7 reserves. Integrated weed management should be applied in reserves as well, but should emphasize non-chemical management methods wherever possible to produce effective control and minimize the threat to native vegetation. (Individual, Missoula, MT - Letter #W3801)*

*Use Integrated Weed Management within reserves. Emphasis should be on non-chemical methods within the reserves as long as effective control (containment) is possible. Non-chemical methods are preferable to avoid aquatic impacts (e.g. picloram and 2,4-D see EPA 1195) and impacts on native plants. Care should be taken to avoid release of undesirable (i.e. cheatgrass and some brome) vegetation that simply replaces noxious weeds. Use of 2,4-D should be forbidden to avoid endocrine disrupting effects (Colburn et al. 1993) on humans and wildlife. TS-O5 needs to be modified to allow Integrated Weed Management as described above to occur in reserves. (Individual, La Grande, OR - Letter #W3806)*

*Will Alternative 4 advocate chemical herbicides? This may affect water quality and wildlife propagation. Seven by Ortho is supposedly so safe, but it can cause miscarriages. What if the herbicides get into the water and affect salmon viability - I don't know the answer but I am concerned. (Individual, Nashville, IN - Letter #W523)*

## Section 2.9 ~ Wildlife

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Because wildlife issues expand into many areas of the ICBEMP, comments reflect a diversity of concerns, ranging from those related to broad-scale strategies to those concerned with specific effects on individual species' needs. Many individuals focus on the planning strategy of the Draft EISs and their effectiveness in providing suitable habitat for wildlife in the interior Columbia Basin. Many people believe that the Draft EISs inadequately examine the requirements of wildlife habitats and are deficient in protecting effective habitat for a legion of species, including those listed under the Endangered Species Act.

Conversely, many other individuals assert that wildlife requirements, especially those of threatened and endangered species, are overriding the needs of humans. They argue that laws such as the Endangered Species Act are counter-productive to proper resource management and jeopardize numerous jobs dependent on the active management of natural resources.

### 2.9.1 Management Effects on Wildlife

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With responses often reflecting frustration and distrust, many individuals view management practices such as road building, logging, and grazing as being harmful to wildlife habitat. These people insist the decisions in the Draft EISs do not consider the effects of past management activities, which they perceive to be detrimental to habitat quality. Many contend that off-road vehicle use is soaring in many sensitive and fragile areas and will destroy this much-needed wildlife habitat. They feel that proper conservation measures are necessary for the long-term viability of species in light of increasing human use, extraction, and development.

Others maintain that some wildlife populations have flourished because of management activities, and they say that wildlife can co-exist with operations that support all species, including humans. They dispute the notion that human impacts are necessarily detrimental to wildlife, noting that some human creations, such as clearcuts and roads, are regularly used by wildlife and may have increased their populations and improved wildlife habitat. These respondents assert that resource necessities of humans and wildlife are compatible. They claim that moose and elk populations have moved into logged areas and waterfowl numbers have increased, suggesting to them that management practices improve wildlife habitat.

**Issue:** *The Final EIS should address effects on wildlife from other management practices.*

**Sample Comments:** **NEGATIVEEFFECTSFROMMANAGEMENTACTIVITIES-**

*The herd maintenance of the wild horses in certain locations has changed the game animals' habitat and movements. The cost of herd management must be improved and the money saved can be used to help native species. (Individual, Klamath Falls, OR - Letter #W3798)*

*I am writing to you concerning the current Columbia Basin plan which disproportionately represents logging and grazing interests at the expense of wildlife. Why do you allow members of Congress and county officials who represent a minority of people in logging and ranching to determine the terms of this plan? (Individual, Island Park, ID - Letter #W3116)*

*Wildlife habitat is slowly disappearing due to unrestricted development -- for example, allowing commercial harvesting of huckleberries in the National Forests. No wonder bears get into people's orchards. (Individual, Missoula, MT - Letter #B4030)*

*Being from Whatcom County Washington, I know what poor forest management is. It's clearing so much timber and not replacing it with more trees, that the elk have suffered so much that the hunting of elk in units 405 and I believe 418 have been shut down for the last few years. The elk had no where to hide, so they became easy targets of hunters and predators. The mass clearcuts in Whatcom County have also led to spring run Chinook salmon on the South Fork of the Nookrack River to almost extinction. (Individual, Pierce, ID - Letter #B80268)*

*Logging, mining, and /or roads fragment wildlife habitat and stress out or disturb wildlife. Logging, mining, grazing and/or roads along stream and rivers disturbs fish populations of steelhead, salmon, westslope cutthroat and bull trout. Clean waters must be protected for these fish as well as other wildlife up and down the food chain which together form the interlinking web of life. (Individual, Yellowstone National Park, WY - Letter #B76808)*

**Sample Comments:** **BENEFITSFROMMANAGEMENTPRACTICES-**

*Timber management is what has grown and sustained wildlife populations on the Kootenai National Forest. Before clear-cut timber harvest, we had no moose populations. We had no sustainable elk population and both mule deer and whitetail habitat were not outstanding. With timber harvest we have grown and sustained the moose population without augmentation, and we have grown and maintained the elk population that have been augmented several times. Mule deer and whitetail habitat has substantially improved. In just the last ten years that the Forest Service has significantly reduced timber harvest, the moose and elk habitat has been reduced and those populations are declining. That is the kind of information that the data gatherers, inventory people, and planners have, conveniently, not included in the DEIS. How could they? The people who did the inventories were not locals. (Individual, Libby, MT - Letter #W973)*

*The animals that we all like to see more of like the clearcuts and the roads and use them regularly. The animals feed off the roads in the winter and also bed on them. (Individual, Thompson Falls, MT - Letter #B76326)*

*Because of logging, moose, elk, and martin have come into our area. If you propose to go back 150 years, what will you do with these animals? Will they have to move out as well as us? (Individual, Troy, MT - Letter #B76312)*

No logging means no winter range for animals. (Individual, Whitefish, MT - Letter #B79040)

It is a proven fact that big game animals increase in numbers and health where timber is managed as a renewable crop rather than a stagnant enterprise. (Individual, Kamiah, ID - Letter #B79745)

The beneficial effects of timber harvest on the forest: It is a fact that deer have increased a hundred fold since the turn of the century. This increase parallels the timber industry's major activities. Logging clear and thin allows sunlight, increasing growth of grasses, and brush. This increases both food quality and protein. Logging of larger (mature) timber also allows new tree starts which renews the forest.' (Individual, Fortine, MT - Letter #B4679)

The wildlife also love clearcuts and selectively logged areas, they can get around in this so much better. More vegetation grows in these areas and they also like grazing on reseeded beds. (Individual, Rexford, MT - Letter #B4736)

**Issue:** *The Final EIS should address road-related effects on wildlife habitat and viability.*

**Sample Comments:** Please protect the wildlife of the Northern Rockies by preventing new logging roads. This ecosystem is much more important!! (Individual, Missoula, MT - Letter #B76403)

Standard HA-S18 does not explicitly call for reducing road densities to below the thresholds recommended by the Interagency Grizzly Bear Committee. We know that grizzly bear, wolverine, and marten require areas with road densities below a maximum threshold. There is no scientifically credible reason why the preferred alternative should not prescribe the reduction of road densities to below maximum thresholds in IGBC recommended recovery areas. (Conservation/Environmental Groups, Boise, ID - Letter #B78654)

**Issue:** *The Final EIS should address the impacts of off-road vehicle use in wildlife habitat.*

**Sample Comments:** As far as I can tell, your DEIS simply ignores ORVs. This is inexcusable, in as much as the proliferation of ORVs is one of the greatest problems facing land managers and wildlife today. ATV, 4x4, motorcycle and snowmobile trails impact wildlife needs as much as roads do. The DEIS needs to acknowledge this basic fact, and proceed from there to common sense protection of wildlife and recreation experiences. The impacts on wildlife are less obvious, but no less real. It is instructive to consider a recent position statement by the Montana Chapter of The Wildlife Society, which called on land managers to 'fully evaluate wildlife sensitivity and programs,' and to 'obtain and evaluate information necessary to make informed decisions about implementation of motorized recreation proposals on public land wildlife habitats.' The Wildlife Society recognizes that motorized recreation is exploding into new areas, and in new numbers into old areas, without an adequate evaluation of impacts. Your DEIS should as well, and should provide protection for sensitive areas. (Individual, Missoula, MT - Letter #B76811)

ORV impacts are often indirect and difficult to document. Roads do not kill grizzly bears directly, for example, yet low road density is indisputably one of the keys to the survival of bears. Wolverines may abandon natal dens after even a single

human disturbance, making 'documenting' snowmobile impacts on wolverines next to impossible. They are nevertheless real. Agency response, including the DEIS, to both the difficulty of studying impacts, and the impacts themselves, seems to be a sort of head-in-sand-hope-no-one-sees approach. In the face of the exploding numbers cited above, this is fundamentally dishonest, and will not serve to protect the Upper Columbia from continued degradation and decline. (Individual, Missoula, MT - Letter #B76811)

**Issue:** *The Final EIS should address grazing effects on wildlife habitat and populations.*

**Sample Comments:** *Livestock also adversely impact wildlife by destroying their habitat and competing with them for food and water. Cattle even harbor the cowbirds that are currently increasing in number and parasitizing native songbirds. (Form Letter - #B48)*

*Why was livestock grazing in forested ecosystems not evaluated? This approach ignores the impacts grazing on hundreds of thousands of acres of public lands, most importantly in riparian areas included in National Forest grazing allotments. Discussion of the effects of grazing on terrestrial wildlife habitats is inadequate. (Conservation/Environmental Groups - La Grande, OR - Letter #W3146)*

**Issue:** *The Final EIS should address the compatibility of mining and sufficient wildlife habitat needs.*

**Sample Comments:** *The DEISs, by failing to analyze the historical, existing, and potential cumulative impacts of mineral mining operations on the regional ecosystem, ignore the full effects of habitat disturbance on species viability. The failure of the DEISs to fully recognize effects on species viability impedes national goals for the recovery of species and reduces the potential numbers of species federally listed as threatened or endangered. Furthermore, this omission undermines the self-stated purpose driving the proposed action aimed at restoration and maintenance of long-term ecosystem health by covering up a root cause of habitat degradation. (Conservation/Environmental Groups, Portland, OR - Letter #B77923)*

*The actions detailed in the Preferred Alternative will have major impacts on the members of the NVMA, and along with others whose livelihood is tied to the development and wise use of our natural resources. The 'support for viable populations of terrestrial species' has always been supported by the mining industry in Nevada and elsewhere. However, the manner in which the Preferred Alternative prescribes protection for wildlife populations would unnecessarily hinder all field activities for both mining and exploration without any benefit above what is achievable under the No-Action Alternative for all types of plants or animals. (Natural Resource-based Business or Business Groups, Reno, NV - Letter #B78932)*

## 2.9.2 Habitat Management Approaches

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Many believe that the interior Columbia Basin has some of the most healthy intact ecosystems left in the country, and they want these areas protected for wildlife habitat. Many responses reveal concern for the standards and scientific data in the Draft EISs. Some individuals feel that unclear and ambiguous guidelines must be clarified. Those who advocate the modification of standards want the Final EIS to address such issues as the trade-off of species in habitat management and the needs of species displaced from their normal habitat because of management prescriptions.

Many comments about private property issues reflect a perception that there is an increase in Federal land control. Those opposed to Federal ownership of lands in the project area perceive this project as an imposing more standards (such as HA-S4) that would adversely affect private land owners.

Some people promote the inclusion of site-specific analyses for habitat management because wildlife habitats throughout the project area are variable. They feel that blanket approaches may not be suitable for some species and may prove to be detrimental to some populations. However, others contend that wide-ranging species such as grizzly bears need adequate protection over large tracts of land, making basin-wide standards for habitat protection more suitable for the long-term viability of many species.

Others argue that bias influenced which species were selected for habitat analysis. They insist that draft standards should be based on an ecosystem approach for all species, not just a species-specific strategy. Many feel the viability analysis of the Draft EISs are unproven and unclear; they claim that the agencies will not be able to estimate the long-term capabilities of the ecosystem regarding wildlife habitat.

A few individuals believe that large-scale habitat analyses of these ecosystems should consider species populations at the centers of habitat range, not just in the fringe areas where habitat conditions are different and wildlife may be exposed to increases in stress and other negative impacts. They declare that only selected species that are negatively affected by humans were chosen for the viability analysis, which may lead to negative consequences for thousands of other species inhabiting the ecosystem.

Several people question whether the draft standards are based on accurate science; they claim that habitat provisions will adversely affect certain wildlife populations. For example, one person cites recent scientific data indicating that the northern goshawk prefers mature forests for foraging, yet the scientific conclusions in the Draft EISs indicate mixed forests and openings as preferred habitat. Maintaining that forest openings are unfavorable for the goshawk and may favor competitors of the bird, this person feels new effects analysis should be performed.

***Issue: The Final EIS should correct inaccurate or incomplete tables and data found in the Draft EISs.***

***Sample Comments:*** *It is not possible to understand what is meant by 'key linkage areas' from the text or from Map 2-11. Without such explanation, many proposed objectives and standards in Table 3-5 cannot be implemented successfully. Explain the concept of 'key linkage areas' and state its criteria and assumptions. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Map 2-7. The legend is based on the total number of disjunct species, but the total number is not provided. Provide the total number of disjunct species. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Map 2-6 displays rarity/endemism and biodiversity Hot Spots. The FEIS should describe the deviation of this map, what the mapped areas mean, and how they relate to on-the-ground management. Map 2-7 displays disjunct vertebrate species, but 'disjunct' is not defined on the map or in the text, it should be defined. Since the map implies there may be very important areas for species diversity, further description or references should be provided in the FEIS. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should reexamine the standards for habitat planning and effectiveness.*

**Sample Comments:** *Objective HA-O2 is vague and overly inclusive and lacks the specificity to be evaluated for relative success among alternatives and for meeting project goals. This objective should define or list terms like 'identified important habitats.' The list of topics to be considered, such as centers of biodiversity, endemic vertebrates, disjunct vertebrates, and rare plants, includes important ecosystem components, neither this objective, nor any other wildlife objectives attempt to measure overall ecosystem health. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*In Standard HA-S2, we are concerned about the non-specific call to increase patch sizes. Patch sizes could be increased, increasing the size of forest habitat retained between harvested areas, but increasing the size of harvested areas would also be increased. We are concerned that the latter may be necessary to meet the timber volumes called for elsewhere in the EIS. We request that the term Patch size be more clearly defined as referring to the unharvested, unthinned habitats. (Federal Agency, Seattle, WA - Letter #W881)*

*Standard HA-S3 is too broad and non-descript, and would be difficult to interpret and implement. As written, it could wrongly be interpreted to improve habitat connectivity for one species at the detriment of other species. Furthermore, this standard lacks guidance for managing habitat connectivity temporally to acknowledge the dynamic change that terrestrial ecosystems undergo. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Standard RM-S6 requires the agencies to develop habitat effectiveness ratings with an emphasis on areas with large forest carnivores/omnivores. The ability to conduct this habitat effectiveness analysis will be dependent upon the existence of models for all of the affected species. We question whether habitat effectiveness models are available for all of these species. Furthermore, while it appears the intent of this standard is limited to large carnivores and omnivores (i.e. bears), the language as written is considerably broader, and as written it only places an emphasis on those 'areas' wherein these large animals are found, however the analysis is limited to only large animals. As currently worded, a habitat effectiveness model will be required for every species in the area. Since this standard is overly broad, requires extensive time and cost, and requires a level of analysis that may not yet be available, we suggest that it be deleted or limited in its scope. (County Agency or Elected Officials, Roseburg, OR - Letter #W4582)*

**Issue:** *The Final EIS should address the effects of past management activities on displaced species.*

**Sample Comments:** *The needs of species displaced from their usual habitats into the higher canopy cover and density stands that have been generated in many forest types have not been adequately considered. The broad management prescriptions of Alternative 4, for instance, advocate application of a set of tools at a high intensity, without adaptive management potential. The consideration of species displaced by past management and the effects on the restoration of stands/ranges to former habitat types was inadequate in the DEIS. (Conservation/Environmental Groups, Missoula, MT - Letter #B78643)*

**Issue:** *The Final EIS should address concerns over effects of habitat management on private property.*

**Sample Comments:** *Standard HA-S4 speaks to movement of terrestrial species through habitat 'bottlenecks' through the use of land exchanges. We have been assured repeatedly that the ICBEMP process relates strictly to federal lands. This standard appears as an attempt to circumvent that reassurance by taking private land and putting it under federal jurisdiction. Nearly two-thirds of the land within Granite County is currently under federal ownership. It is not in the interest of the economy to increase the percentage of federal ownership. Granite County cannot remain economically viable as a national park. (County Agency or Elected Official, Philipsburg, MT - Letter #B77944)*

**Issue:** *The Final EIS standards should allow for site-specific analysis of habitat needs.*

**Sample Comments:** *The ICBEMP goals for ecological integrity and habitats for threatened, endangered, and candidate species cannot, in our view, be achieved without a site-specific strategy for maintaining the full spectrum of plants, animals, and natural communities whose survival is dependent on the ecological health of the Interior Columbia Basin. The Conservancy's ecoregional plans provide such a site-specific strategy including identifying those federal lands that are essential to this purpose. (Conservation/Environmental Group, Boulder, CO - Letter #W3676)*

*The effects of the existing patterns of 'openings' was not explicitly considered in the goshawk analysis as far as I can tell. Even small openings that mimic natural scale disturbance can have significant cumulative impact with these existing openings. There seems to be the assumption that because the openings might mimic natural disturbances in scale (if not frequency), that will be harmless. Such an assumption is unjustified. Reaching conclusions as to the impact of different alternatives based on these assumptions is misleading. Resolution of these issues might require finer scale analysis. If so, then management standards and guidelines should not be issued which will affect the capacity of forests and resource areas to conduct these more site-specific analyses and vary management accordingly. (Individual, Missoula, MT - Letter #W3801)*

*HA-S6 The standard applies to Wildlife Priority Areas without defining these areas or listing criteria for the implementation of a standard to supposedly protect them. Also, in the absence of a strategy to secure mature/old growth structure stands, the standard sets blanket standards for static set-asides. Rewrite this standard to describe Wildlife emphasis Areas, to emphasize the appropriate site-specific analyses and to delete the blanket requirements for static old forest set-asides. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should include basin-wide standards for habitat protection.*

**Sample Comments:** *The present current plans put wildlife habitat in the Columbia Basin at serious risk because there are no standards to limit logging and grazing in critical roadless and old-growth forests areas of the Columbia Basin Ecosystem. The limits that the agencies set are alterable by site-specific amendment. This plan would fail to protect the wildlife and habitat and would discredit the entire concept of regional ecosystem planning. (Individual, Ormond Beach, FL - Letter #W2992)*

**Issue:** *The Final EIS should address management approaches for wide-ranging species.*

**Sample Comments:** *No information is given in the DEISs about distinct species populations which lack a central location, or about these species' relative strength and viability. This information was to be compiled in a list of species within the forest. However, the DEISs fail to provide a mechanism to create this list. Without this information, there is no basis for determining if these species are in danger and what the consequences of various courses of actions will be on their future. The large-scale commercial manipulation of forest structure, without knowledge of the effects on these freely moving species, could prove to be damaging to their restoration. The damage would be in direct conflict with the purposes of the ESA and will undoubtedly lead to litigation and judicial management. This same problem has been endemic for the west-side forests covered by the President's Forest Plan in which the implementing agencies are going to great lengths to avoid doing surveys for the FY1999 survey and manage species that rely upon old-growth habitat. It is a tragedy that these large-scale forest plans fail to honestly account for species that cannot relocate to reserve systems. (Conservation/Environmental Groups, Portland, OR - Letter #W4830)*

*The DEISs and the Scientific Summaries fail to address the habitat linkage needs of wide-ranging mammals like the grizzly bear. Biological corridors must be addressed to ensure species viability for a number of species. Without assuring linkage for genetic flow and other biological needs, such as re-colonization after natural disturbances like wildfire, even high quality habitat, if isolated, spells eventual extinction for species. (Conservation/Environmental Groups, Bozeman, MT - Letter #B78928)*

*Specific information about broad-range species habitat is not included. Many species require a large unbroken area for foraging, a condition which is unlikely to occur under the proposed management strategy of structure based management in certain areas. Intra-habitat travel also promotes genetic diversity and transfer. (Conservation/Environmental Groups, Portland, OR - Letter #W4830)*

*The discussion of large carnivores and omnivores notes that these large, mobile species have large home ranges and often run into conflicts with humans and livestock when wildlife habitat is reduced. We are concerned that no information is given on critical movement corridors and other key habitats for these species, and we question the adequacy of the analysis in the absence of this information. (Federal Agency, Seattle, WA - Letter #B75568)*

**Issue:** *The Final EIS should address the parameters for selecting species for management.*

**Sample Comments:** *The species selection for analysis is biased and does not present a view of the health of the whole biological community. Only species known to have been directly and negatively impacted by human activities have been selected for analysis. Even the listed threatened and endangered species have been selectively picked for the viability analysis. For example, the listed peregrine falcon was not included because a clear relationship between peregrine falcons and the direct effects of human activities on federally administered lands is not evident. This selective inclusion process biases any analysis attempting to determine long-term viability as a whole. Therefore, the Eastside DEIS provides few assurances that ecological integrity will be maintained or restored, or that species viability will be achieved for individual species. Revise the discussions of ecological potential throughout this document to include a serious discussion of wildlife community potential for the whole ecosystem. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## 2.9.3 Specific Habitats

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Most people responding to specific habitat issues feel the public and wildlife would benefit from clearer, more precise, and accurate management descriptions. They believe the agencies need to return to the drawing board and revise their management standards and objectives regarding wildlife habitat. Numerous individuals point out what they believe to be conflicting and vague management prescriptions.

Some feel that because this project is a broad-scale plan and encompassing a large land base, an excellent opportunity is presented to employ migration corridor and connective habitat provisions for wildlife populations. Noting that wildlife need connective areas and habitat to foster genetic exchange and long-term viability, many people assert that habitat corridors and linkages should be incorporated into the standards of the Final EIS. Some individuals claim that many of the alternatives would not protect portions of habitat that would link terrestrial and aquatic areas. Some feel that Alternative 7 would be the most effective in protecting habitat and want standards similar to Alternative 7's incorporated into the other alternatives. They contend guidelines should be strengthened to increase the likelihood of connectivity of habitat for wide-ranging species. Some state that adaptive management and monitoring are important management prescriptions to assure the linkage of habitats.

Several suggest that landscape connectivity can be affected by forest patch size. Stating that inner patch distances need to be smaller, some individuals warn that large patches would jeopardize landscape connectivity and are catalysts for high intensity wildfires. They assert that applying restorative measures to these areas will bring back natural patch sizes.

Opinions diverge on the project's selection of habitats within a species' range. Some propose that fringe populations should receive priority because they are vital to maintaining genetic diversity and integrity. Opponents of these views claim that viability studies should be performed from the centers of habitat ranges; they declare that fringes are subject to outside influence and have less importance to species viability.

Many believe that mature and old-growth forests are a vital element in forest ecosystems and need to be preserved and managed properly for wildlife needs. Some argue that the Draft EISs fail to analyze separate old-growth stages, which may compromise continuing health for species requiring unique mature forest stands. Some assert that none of the alternatives propose a framework to protect and conserve old growth habitats. These respondents want all patches of old growth protected for wildlife habitat, including those patches smaller than 100 acres. Others argue that the Draft EISs just set more limiting standards with more criteria, stating that the proposed measures are too restrictive and are a waste of taxpayer money.

Snag and downed wood standards have also received considerable discussion from respondents, with most comments suggesting that a more comprehensive planning strategy is needed. Some believe that snag densities for wildlife habitat cannot be applied across the entire project area; they advocate that regional standards are better suited for effective habitat. In contrast, others view the project area habitats as variable, and they do not want blanket standards for forests with different vegetation groups. Although some individuals feel that minimum snag and downed wood standards are a good baseline management approach, they believe that standards should vary accordingly with specific land conditions, where more restrictive measures may be needed to ensure proper management. Some add that biological considerations and green tree replacement provisions should be incorporated into these baseline standards and should be directed toward species that depend on snags.

Some individuals consider snags to be “match sticks” and suggest harvesting these trees to reduce fuel loading and add to local economies. They say that basin-wide standards will sway restoration and commercial harvest decisions. Others recommend including snag standards in preservation measures. They defend snags as being essential for habitat needs, noting that dead wood has an important ecological role in aquatic and terrestrial habitat ecosystems. Most respondents feel there is a lack of scientific accuracy in the standards, which need clarification in the Final EIS.

Numerous respondents call for the inclusion of reserves or Wildlife Conservation Areas in the plan as a safe-zone approach to wildlife protection. They insist areas within the interior Columbia River Basin are vital refugia for species and these species will face a crisis under the standards proposed in the Draft EISs. Many add that roadless areas would provide ideal habitat for these reserves since active management is limited there. Objecting to the creation of reserves, some others feel there is too much emphasis on wildlife protection and a decreased level of management activity occurring on these lands. They believe that sustainable use of these areas can benefit wildlife populations and humans.

**Issue:** *The Final EIS should include specific connectivity and linkage plans to maintain long-term viability for wildlife.*

**Sample Comments:** *The Forest Service and BLM should be fully committed to managing for connectivity and demographic interchange among populations, and to the recovery of species throughout their historical range of federal lands. Anything less than a clear commitment to maintaining well-distributed populations is unacceptable. (Conservation/Environmental Groups, Boise, ID -Letter #B78654)*

*Add specificity to Objectives and Standards to address connectivity among terrestrial and aquatic habitats. The desired future conditions for Alternative 4 for Forest Wildlife Habitat calls for an increase in amounts and distribution of habitat attributes where needed to be sufficient to meet the needs of endemic species and species with large home ranges. Blocks of old forest habitat are large and well connected with similar forest types. Connectivity of terrestrial and aquatic habitats is not well described, and protection or enhancement of large blocks of habitat is not assured under any of the action alternatives. The [Fish and Wildlife] Service understands that mechanisms for assuring connectivity among habitats are not well understood. Given that, adaptive management and monitoring will be important to assuring linkages among habitats. We recommend that Objectives and Standards be strengthened and further developed to increase the likelihood of attaining connectivity to accommodate wide ranging species and to promote restoration of species to suitable habitats. (Federal Agency, Portland, OR - Letter #W4641)*

*I suspect that there will remain a long-term need to offer support for this project so I am sending my belated encouragement to you to support the protection of lands surrounding wilderness areas. In our own area, there is a migration corridor between the Bitterroot and Selway wilderness area that crosses a very busy highway, resulting in wildlife deaths and traffic fatalities. Protecting wilderness areas without protecting the surrounding and connecting areas results in wilderness islands. This type of wilderness structure isolates wildlife, alters migratory habits, and limits breeding opportunities. (Individual, Missoula, MT - Letter #B3910)*

*Of equal importance is that a plan be found to connect these areas through wildlife corridors. This wild species that exist here must be allowed to interbreed with their own species. Genetic mixing for their survival is imperative. (Individual, Wallace, ID - Letter #B76743)*

*A scientifically sound conservation alternative would be based upon the preservation (and reestablishment, where necessary) of large, relatively undisturbed roadless areas that are connected by roadless migration/propagation corridors, to allow the movement and exchange of genetic material between populations in different reserves. (Individual, Yakima, WA - Letter #W631)*

**Issue:** *The Final EIS should address patch size effects on wildlife habitat.*

**Sample Comments:** *In standard HA-S2, we are concerned about the non-specific call to increase patch sizes. Patch sizes could be increased by increasing the size of forest habitat retained between harvested areas, but the size of harvested areas would also be increased. We are concerned that the latter may be necessary to meet the timber volumes called for elsewhere in the EIS. We request that the term 'patch size' be more clearly defined as referring to the unharvested, unthinned habitats. (Federal Agency, Seattle, WA - Letter #B75568)*

*The DEISs' comparison of alternatives determined that Alternative 7 would result in larger patch sizes in the short term than occurred within the historic range of variation. Large patch sizes are the result of altered stand structure and landscape patterns. These are predicted to elevate the frequency and magnitude of high-intensity, stand-replacing fires. In other words, larger patch size is an effect of fire suppression. It is not a phenomena inherent to reserves established in fire-prone, Inland Northwest systems. The obvious solution is to apply restorative treatments inside reserves such that natural disturbance events again operate within the historic range of variability. Patch sizes would then return to an acceptable size and natural disturbance events could gradually be left to operate more freely over time. (Conservation/Environmental Groups, Republic, WA - Letter #W4660)*

**Issue:** *The Final EIS should consider the importance of fringe habitats in viability analysis.*

**Sample Comments:** *The plan should provide a clearly-defined, comprehensive mechanism to identify and prioritize protection and restoration of at-risk habitats and populations of sensitive species or species of concern, such as depressed or fringe populations that occur outside Category 1 areas. As the document is written, only those at-risk resources that co-occur with listed species would be considered for Category 2 and 3 areas. Such mechanisms should be incorporated into existing processes, like EAWS and sub-basin review. This is important to note because these species have the highest potential of being proposed for listing and the fringe populations of a species range may be vital to maintaining genetic diversity and integrity to support recovery or reintroduction. (Federal Agency, Portland, OR - Letter #W4641)*

*A shortcoming in this standard [HA-56] is the view that connectivity is provided only by contiguous habitat of the same seral stage or structure. As landscape ecologists are increasingly becoming aware, an equally important consideration is the degree of contrast between habitat types. Retaining only fragments of older stands, as this standard prescribes, is thus inadequate alone as a strategy to maintain connectivity and buffer interior habitats against edge effects. (Conservation/Environmental Group, Seattle, WA - Letter #W4611)*

*The concept of ecological scales/evolutionary time frames, is speculative, extremely simplistic, and of minor consideration for ecosystem management.*

*This evolutionary concept, the third component of terrestrial integrity, focuses on fringe populations of species on the edge of geographic distributions. Fringe populations, as defined here, are located at the limits of the species' tolerances for any number of physiological, behavioral, or ecological parameters. These populations are theoretically the most stressed, the most subject to random catastrophic events, and most likely have lower population densities and higher mortalities than populations from the geographic and biological centers of the species range. Also, it is well-documented in the scientific literature that fringe populations are typically less variable and more homogeneous. It should be obvious that the focus of a large-scale analysis of ecosystem management should consider the status of species populations from the center of their ranges where they have evolved, where they are more genetically diverse, where they are most adapted to existing conditions, and where population surpluses provide the genetic source materials for dispersal to fringe areas. To focus on the fringes and to ignore the population centers is penny-wise and pound-foolish, ecologically speaking. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**Issue:** *The Final EIS should contain management strategies that address wildlife dependency on old-growth health and stand structure.*

**Sample Comments:** *Many species of wildlife (e.g., pileated woodpecker, boreal owl) do not just require old growth of any age, but require distinct old growth stages to remain viable and meet all their life history needs. By failing to analyze old growth stages within old growth categories, the effects on these species will be missed and the analysis is inadequate to protect them and maintain their viability. Thus, the wildlife effects analysis is hampered by the lack of distinction between old growth stages. If the agencies choose not to analyze these effects at this scale, they must mandate that it occur at the Forest Plan or District Plan level to ensure that the legal mandates for wildlife effects analysis and protection are met. (Conservation/Environmental Groups, Missoula, MT - Letter #B78643)*

*None of the DEIS alternatives propose a management framework specifically aimed at rehabilitating and protecting the last remnants of old-growth while replacement habitat develops. The DEISs do propose retaining mature and old single and multi-story patches 100 acres or larger (a grossly inadequate protection). In addition, prescribed fire and thinning from below the canopy are proposed to obtain structural objectives in mature and old stands. A scheme for mapping and designating specific areas as late-seral/old growth management emphasis areas fits best within a reserve-based management approach. It too should have been a central element of Alternative 7. But at a minimum, Alternatives 4 and 6 should also have specified areas where management activities to restore functioning late-seral/old growth systems should be targeted. (Conservation/Environmental Groups, Seattle, WA - Letter #W4611)*

*These actions [road building, logging, and mining] jeopardize old growth trees, which provide homes to birds and wildlife. I encourage protection for all remaining old growth stands, against road building, clearcutting, and logging. (Individual, Eugene, OR - Letter #B1432)*

**Issue:** *Standards relating to old-growth and mature forests conflict with other management standards and objectives and should be clarified and rewritten in the Final EIS to better reflect their effects on forest management.*

**Sample Comments:** *Standard HA-S6 calls for an analysis that will provide for adequate distribution, occurrence and connectivity of mature/old forest stands. However, it allows management activities in the absence of an analysis, provided that certain conditions are met. Those conditions, while mitigating impacts, still allow some impacts to mature/old forest structures. Without an analysis, management actions under this standard could result in further reductions of mature/old forest stands. While this may be acceptable under alternative 3 and 5, it seems inappropriate under alternatives 4, 6, and 7. No 'conservation/restoration' alternative should allow an unnecessary reduction in this relatively rare ecosystem component without an adequate analysis to support that decision. (State Agency or Elected Official, Helena, MT - Letter #B78887)*

*This standard [HA-S6] is confusing. The section on retaining large remnant trees, etc., consistent with the desired future range of conditions does not make it clear if these trees are allowed to be cut to meet other standards and objectives that require manipulation of vegetative structure to create historic mosaics, patch sizes, age classes, etc. We are concerned that this interim standard would be similar to the existing interim Eastside screens. (State Agency or Elected Official, Salem, OR - Letter #W4827)*

*While the amount of old growth has declined, remaining dry-site old growth has reportedly become more dense due to fire suppression, benefiting more closed canopy species such as American marten, northern spotted owl, red-backed vole and, we would add, pileated woodpecker. PA efforts to actively restore such old growth via commercial thinning will undoubtedly render the habitat less suitable for these species, which have already lost much of their naturally dense old growth habitat to the chain saw. Is it possible that the thickening of old growth forests has served as a counterbalance to the decrease in the amount of old growth forest? Where are these species to turn if their former habitat is already gone and their current habitat is rendered unsuitable in the name of restoration? (Conservation/Environmental Group, Kalispell, MT - Letter #B78701)*

*This one-size-fits-all standard for mature/old forest connectivity is inappropriately focused on static, steady-state management of forest structure, and would conflict with other structural management goals, as well as habitat connectivity for species not dependent on mature and old forest structures. Furthermore, this standard lacks guidance for managing habitat connectivity temporally to acknowledge the dynamic change that terrestrial ecosystems undergo. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*HA-S6. Retaining only patches of mature and old forest that are >100 acres is inconsistent with studies of pattern and process in dry Eastside forests such as ponderosa pine and mixed-conifer forests. Small patches of open-canopied old-growth provide fully functional habitat for some old-growth species. Given the current rarity of late-seral stands documented by the Scientific Assessment, it is essential that all remaining old-growth be protected. This should cover all patches including those less than 100 acres in size. There is no scientifically credible rationale for excluding patches less than 100 acres from protection. The standard should be revised. (Conservation/Environmental Group, Seattle, WA - Letter #W4611)*

**Issue:** *The Final EIS should include scientifically accurate and consistent standards and objectives for snags and downed wood levels and their effects on wildlife.*

**Sample Comments:** *The standards [HA-S7, HA-S8] for snag retention and downed wood levels are internally inconsistent. On one hand, they state that vegetation actions are to be delayed until administrative units “review existing or conduct new local snag analysis.” On the other hand, in the absence of analysis, default standards are to be used. Which is it? Remove these standards, they cause unnecessary implementation delays and analysis. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Lack of integration across disciplines was evident in the often contradictory direction contained in the standards and objectives. This was particularly evident for snag and down wood retention levels: different set of guidelines for the same resource were found in the soils, terrestrial strategies, and fuels management sections (PE-S1, PE-S3, HA-S7, HA-S8)... In the case of snag and down wood retention, removal of wood to the point where fuel guidelines where fulfillment might result in declines or even local extirpation of woodpecker populations. Aside from the negative aspects of losing an important biological control agent for forest insects, continued and widespread losses of habitat resulting from such direction could eventually lead to additional state or federal listings... Snag retention levels specified in HA-S7 are very low, and are generally inconsistent with recent Forest Service research on the role of deadwood in terrestrial and aquatic ecosystems. Standard HA-S7 should be re-written to require retention of all snags that do not pose safety hazards. Assumptions in the terrestrial species analysis indicate that snags standards will be based on historic conditions and/or species habitat needs. The levels specified in the standards are not consistent with this assumption... We did not find adequate treatment of this important issue in the DEISs. Researchers are just beginning to understand the critical contribution of deadwood to many aspects of post-fire recovery, both in terrestrial and aquatic systems. At the same time, there is an increasing pressure in many areas to reduce fuel loadings in green and in burned forests. Managers at the District and Forest level desperately need solid, science-based information on which to base decisions relative to deadwood retention after wildfire. (Conservation/Environmental Group, La Grande, OR - Letter #W3146)*

**Issue:** *The Final EIS should include retention standards for snags and downed woody debris that are flexible and variable for different areas within the basin and should include biological considerations.*

**Sample Comments:** *HA-S7 & HA-S8. The minimum snag and CWD retention standards proposed for the preferred alternative are a good baseline. However, in systems characterized by heterogeneity in the effects of natural disturbance, variability is the key. Therefore, the retention standards should be revised into a range of retention levels (expanded upwards with the current standard representing a minimum retention level), with explicit instructions for implementing different retention levels in a variable pattern or distribution across the management unit. (Conservation/Environmental Group, Seattle, WA - Letter #W4611)*

*HA-S9. Somehow people forget the importance of snag removal as a safety item for users and where this issue fits in OSHA standards the firewood program allows a use that aids in the safety of forest users. There needs to be some consideration for the human side of the ecosystem. (Individual, McCall, ID - Letter #B75493)*

*HA-S7. The [Fish and Wildlife] Service supports development of clear standards for snags based on local conditions and there is good information provided here to contribute to developing them. However, a critical component has been omitted. This section should be amended to include biological considerations. Snag standards should be aimed primarily at local species that are snag-dependent. Abundance, distribution, and location of snags should be aimed expressly at providing habitat for endemic vertebrate and invertebrate species. Further, monitoring of those species should be a critical component of adaptive management for snag standards. (Federal Agency, Portland, OR - Letter #W4641)*

*Although there is a standard (HA-S7) for snags to be left as wildlife habitat, the DEIS fails to provide for green tree replacements for snags that have fallen. The standard merely states that 'it is desirable to leave green replacement trees in the same patches.' This is a very important aspect of wildlife habitat management, and it is doubtful that it can safely be left to local districts to determine appropriate green tree replacement levels to assure a maintenance of the necessary numbers of standing snags. This standard is much weaker than that provided by the interim Eastside Screens. ... There should be fail-safe default guidelines, or perhaps a set of guidelines applicable according to the six forest clusters arrangement expected to work with other types of standards, that will prevent the proposed snag standards from becoming a joke. The discussion of snags and downed wood in Appendix I, page 270 of the DEIS is encouraging. We will be looking for the promised development of 'a consistent methodology and criteria for determining the appropriate levels' between publication of the Draft and Final EISs. (Conservation/Environmental Group, Helena, MT - Letter #B78706)*

**Issue: *The Final EIS should address the inclusion of Wildlife Conservation Areas and reserves in management plans to preserve wildlife habitat.***

**Sample Comments:** *A huge wildlife refuge is not needed, especially when it restricts and eliminates the rights for people. (Individual, Olympia, WA - Letter #B77107)*

*A large wildlife refuge in the region will not only affect private property, and its inherent use, but will put many domestic animals at risk, and the human population in the region. This is a particular concern for the children. We are already finding problems with wildlife in areas close to wildlife conservation areas. (Individual, Olympia, WA - Letter #B76087)*

*Because the loss of critical habitat and impacts of large scale, high density development, the remaining roadless areas are of special importance and should be protected as Wildlife Conservation Areas. The strictest practical measures should be taken to assure that winter ranges are adequate to sustain healthy wildlife populations into the future. (Individual, Milltown, MT - Letter #B3937)*

*I agree with many that the plan should establish a reserve system to protect key areas of fish and wildlife habitat, including old growth forests and roadless areas; implement strong watershed and habitat enhancement measures in priority areas; and restore to the fullest extent possible, the important ecological role of fire and other disturbances... Habitat reserves provide a frame of reference for management activity, to ensure that natural processes are appropriately mimicked. (Individual, Cordova, AK - Letter #W276)*

*It is imperative that any EIS concerning this area provide a Wildlife Conservation Reserve system to protect long-term fish and wildlife in roadless areas. Manage these reserves to protect healthy lands and fix damaged habitats by removing roads and weeds and allowing fire. (Individual, Boise, ID - Letter #B3896)*

## 2.9.4 Management for Viable Populations

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Individuals contend there is no attempt in the Draft EISs to evaluate whether the proposed management directions can be implemented to satisfy the Desired Ranges of Future Conditions for species viability. Because some feel that certain wildlife species will eventually be listed as threatened or endangered, they declare standards should be revised with provisions to protect habitat for all viable populations. They warn that failure to address these issues now may lead to higher costs and complicated recovery in the future.

Perceiving little difference between objectives, standards, and guidelines among the alternatives in the Draft EISs, many claim there is no way to evaluate whether the standards and guidelines can achieve the intended differences. Even the word 'viability' is confusing to some, who suggest the term and its concepts need to be clearly defined in the Final EIS. Some individuals claim that standards and planning strategies are misrepresented because of the vagueness of the term.

Several argue that contrary to what the Draft EISs state, species do not all need wide distribution to be viable. Many people are convinced that wildlife populations are in healthy conditions. They feel that the agencies are discriminating against human use of these areas and feel the Draft EISs violate multiple-use planning strategies. Individuals claim that the *Scientific Assessment* proxies used in the analysis do not represent a broad array of habitat functions, processes, and conditions, and they recommend that the agencies include management approaches similar to the Endangered Species Act.

**Issue:** *The Final EIS should address how DRFCs and species viability will be achieved with current management strategies and alternatives presented.*

**Sample Comments:** *One of the desired future conditions for terrestrial species habitat with Alternatives 3 through 7 is for habitats to be 'suitable to maintain viable populations of listed and sensitive species.' Where habitats are inadequate to support viable populations of a species, the need to list the species will inevitably develop. Therefore, this desired condition should be revised to include provision of habitats to maintain viable populations of all species. (Federal Agency, Seattle, WA - Letter #W881)*

*No logical linkages exist between desired future conditions for wildlife and proposed management activities... Although 'precise relationships between the amount and the quality of habitat and future species populations are uncertain' (Chapter 4, page 5, line 1), terrestrial and aquatic species and habitat objective and standards impose species habitat management direction based on poorly known relationships. Management objectives and standards should be eliminated from the alternatives when supporting science is inconclusive. (Natural Resource-based Business or Business Group, Usk, WA - Letter #W4547)*

*The HA-O2 objective is vague and overly inclusive and lacks the specificity to be evaluated for relative success among alternatives and for meeting project goals. How could these management activities ever be implemented to achieve DRFCs? Revise objective to deal with specific wildlife ecosystem health issues. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*HA-S1: habitats shall be managed to foster long-term viable populations... Species viability should be maintained not just fostered by land management actions. Include in the species viability standard that habitats shall be managed to maintain (not just foster) viable populations of existing native and desired non-native vertebrate species within the planning area. (Federal Agency, Seattle, WA - Letter # B78714)*

**Issue:** *The Final EIS needs to define the term ‘viability’ and address its management consequences.*

**Sample Comments:** *Many populations of terrestrial and aquatic species in the project area are healthy and viable. However, throughout this section, there is no discussion of providing for multiple use of forest resources while maintaining these viable populations. Rather, the management direction proposed in these standards restricts many resource uses based on an unsubstantial need to maximize the health and viability of all species, including those not federally listed or in danger of becoming so. This indiscriminate focus of improving habitat for populations of species that are already healthy and viable, at the expense of the livelihood of many communities dependent on public land resources, is inappropriate. (Natural Resource-based Businesses or Business Group, Boise, ID - Letter #B78680)*

*Chapter 1 indicates that a viable population of species must be well distributed in the project area to be viable. Few species populations would meet the definition of viable if ‘well distributed’ is a requirement. Numerous species contain viable populations without being well distributed. In fact, the discussion of species viability infers that at least some species with high endemism have viable populations. Revise the definition of viable populations to reflect the fact that species do not need to be well distributed in the project area to be viable. (Natural Resource-based Businesses or Business Groups, John Day, OR - Letter #W4829)*

**Issue:** *The Final EIS should relate viability analysis and standards to other planning processes and laws.*

**Sample Comments:** *This direction [HA-O2] seems to weaken the NFMA direction related to maintaining viable populations. It will be difficult to define and measure the amount of habitat needed to maintain viable populations. It would be more straightforward to speak directly to viability of populations. (Federal Agency, Seattle, WA - Letter #B78714)*

*Notwithstanding that the regulations imposes a species specific approach as opposed to the community approach of the NFMA, the DEISs have further expanded the wildlife viability approach by adopting the more restrictive ‘shall be managed to maintain viable populations’ which is more akin to the ‘conserve’ approach set forth by the Endangered Species Act. While the viability regulation and the ‘conserve’ definition of the ESA are essentially the same, the ESA creates a number of essential steps that are excluded in the viability provisions, i.e. listing of species, designation of critical habitat, and the establishment of a recovery plan. These ESA steps are part of a carefully crafted process that incorporates a number of checks and balances that are not incorporated in the DEIS viability approach. We suggest that the viability analysis should incorporate, at a minimum, the same checks and balances as the ESA process. Furthermore, we suggest that the DEIS should use as its starting point the specific information developed in the listing, critical habitat, and recovery plan decisions for the listed species and develop similar information for the other species. The DEIS states that ecosystem integrity is difficult to measure directly and therefore assessment proxies are necessary to represent the broad array of functions, processes and conditions, in fact the terrestrial ‘proxies’ examined a very narrow array. The terrestrial proxies were the threatened or endangered species, candidate species, and rare plants; species that occur only in specific localized places; and, species assemblages and ecosystems that are at the edge or fringes of their range. None of these proxies meets the stated requirements to examine a broad array of functions, processes, and conditions. (County Agency or Elected Official, Roseburg, OR - Letter #W4582)*

## 2.9.5 - Wildlife and Human Interactions

Many respondents, unsure about the consequences of implementation, question the agencies' standards and rationale for management direction with regard to wildlife and human interactions. Some add that the science and data behind the standards and guidelines are inaccurate and need to be re-written with clear and precise language. Some want to know how the agencies define a conflict. Others say that the preferred alternative would hinder preventive control to minimize conflicts in the first place. If and when conflicts should occur, some people are uncertain about possible mitigating measures they feel the Draft EISs fail to describe.

To minimize wildlife and livestock conflicts, some individuals request that ranchers and permittees and private land owners be involved in the discussions and work collaboratively with agencies responsible for planning. (For comments specific to bighorn/domestic sheep issues, see Section 2.9.8.b.)

**Issue:** *The Final EIS should be clearer in its provisions and management direction for wildlife/livestock conflicts.*

**Sample Comments:** *On page 2-102 the ICBEMP report indicates that specific locations, where livestock and big game conflicts are a serious concern in the project area, have not been identified in the Scientific Assessment. However, it concludes that this conflict can be prevented by managing habitat so that vegetation health and diversity are maintained. I am wondering how the ICBEMP came to this conclusion in absence of scientific evidence... I think it is obvious that wherever livestock and native wildlife coexist, there is going to be conflicts. Available food supply is one limiting factor for populations of all animals... As the report points out, an extreme winter can be very hard on elk and deer populations. However, if that winter is extreme because a rancher is unwilling to remove some competing cattle from rangelands, then we as humans have established arbitrary boundaries. Certainly not the natural rangeland conditions. Therefore, the ICBEMP report must get down to business and define the human parameters by which the environment is being defined. What represents a conflict? What are acceptable ICBEMP populations of livestock to prevent rangeland degradation?... What are farmers willing to give up if wildlife conflicts occur? What is healthy and diverse rangeland? When I look at the widespread agriculture and lack of elk... it appears that farmers may not be giving up very much. (Individual, Kittitas, WA - Letter #B77280)*

*The DEIS contains an objective to 'Implement management practices that reduce the potential conflicts of livestock (domestic sheep, cattle, and horses) with carnivores and domestic sheep with wild sheep.' In regards to predators, this is to be accomplished by using livestock handling techniques that avoid key habitat for carnivores. Livestock operators have no other option than to graze their livestock in areas that are ideal habitats of predators. A prime example is the coyote, which is abundant and found throughout all areas of Idaho. The guideline goes on to say that only known offending animals should be controlled and only as a last resort. This would create problems for corrective control efforts and would make it impossible to do the preventative control work that is highly effective in protecting livestock. Preventative control involves applying wildlife damage management strategies prior to the occupance of damage in a specific area based on prior damage problems and expected likelihood of future damage in the area. (Natural Resource-based Business or Business Group, Boise, ID - Letter #B78633)*

*Two standards, HA-S20 and HA-S21, maintain that conflicts between wildlife and livestock should be minimized, but do not define a process to mitigate or arbitrate when conflicts occur. How do you intend to reduce the potential conflicts of livestock with carnivores? This [HA-S20] looks like a license for bounty hunters and poisons. (Tribe, Toppenish, WA - Letter #W4556)*

*The standards for wildlife and livestock conflicts need to be expanded to address species other than big game. Potentially serious conflicts exist between livestock and neotropical migrant birds associated with riparian, shrub-steppe and grassland habitats. Native fish species in grazed shrub-steppe-ecosystems were not adequately considered. Possible wording for an additional standard is suggested: Minimize conflict between domestic livestock and the maintenance of native wildlife that inhabits Riparian, Shrub-Steppe, and Grassland habitats. (Conservation/Environmental Group, La Grande, OR - Letter #W3146)*

*On the surface, the objective [HA-O7] sounds fine. But, there are some real questions to pose, like will this objective be implemented by decreasing grazing or managing predators? The objective must also realize that not all conflicts can be avoided. Alternatives 1 and 2 state that habitat for wildlife will be provided. This should be included in the preferred alternative. It should be noted however, that managed livestock grazing and range improvements have dramatically helped to improve rangelands for wildlife, and are partly responsible for the ever-increasing wildlife populations. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*The discussion on livestock-big game interaction fails to recognize the significant increase in most big game numbers throughout the planning area. In light of the burgeoning big game populations, it is hard to accept any contention that significant competition on the broad range scale is occurring between livestock and big game. (Natural Resource-based Business or Business Group, Boise, ID - Letter #B77303)*

**Issue:** *The selected alternative should allow for the opportunity to include ranchers and permittees in discussions over conflicts between wild and domestic animals.*

**Sample Comments:** *Ranchers and permittees should also be involved in discussions and work collaboratively to minimize conflicts. Wildlife uses private land as well as public land so it is important to involve those adjacent landowners in these discussions. (County Agency or Elected Official, Grangeville, ID - Letter #B78624)*

*HA-S21. The preferred alternative does not include permittee participation. Accept Alternative 5 as the preferred alternative because it provides the means to work cooperatively with the permittees to minimize disease transmissions. (Natural Resource-based Businesses or Business Group, Challis, ID - Letter #B78800)*

## 2.9.6 Species of Special Status

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Many people commenting on the Draft EISs hold as a top priority the protection of habitat for threatened and endangered species in the interior Columbia River Basin. Claiming that the standards and alternatives in the Draft EISs do not address the needs of these species, these respondents insist that measures or new alternatives be written to ensure the viability of these species.

Some feel that regionally and locally protected species should also be included in the standards. Some view the recovery measures listed in the Draft EISs as inadequate, stating that species will remain threatened after de-listing unless the Forest Service and BLM strengthen recovery standards and adhere to the recovery goals set forth by collaborating agencies. In particular, respondents mention grizzly bears, wolves, martens, lynx, wolverines, and fishers among the species they feel need special attention and are threatened by cumulative effects of management activities such as logging and road building. Advocates of species protection claim the agencies fail to include numerous species in their habitat analyses. They feel that species are referred to only generally and deserve specific attention in the planning process.

Others believe that positive management from the agencies should be incorporated to prevent species listing in the first place. Many suggest that without a certainty of planning direction, flexibility in management practices will be lost and money will be spent on ineffective measures. Some individuals state they do not want full protection given to sensitive and rare species. Several are unclear about the requirements for habitat planning for threatened and endangered species. For example, a few question why watershed analysis for species habitat must be performed when NEPA analyses would already be completed for site-specific projects. Some contend that considering human needs is just as important as considering wildlife requirements; they regret that wildlife considerations apparently are given what they see as a higher priority in management decisions.

**Issue:** *The Final EIS should set clear standards for the management of threatened and endangered species habitat.*

**Sample Comments:** *We note that while the DEIS lists the plant, animal, and fish species for which there are approved recovery plans, it does not identify the specific actions or quantitative population goals established in their respective recovery plans (see DEIS 1-24, 25). Information on the recovery plans and the ability of the proposed alternatives to address the federal lands component of recovery is important to the public in reviewing and knowingly commenting on the DEIS. Secondly we note that critical habitat decisions not only designate essential habitat, it also designates which habitat is in need of special management considerations. We are unable to find in the DEIS any discussion of the designated critical habitat or what special management considerations are required. Finally we note that the DEIS appears to adopt the same strategy for rare and threatened species as it does for ESA listed species... WE suggest that since recovery plans by definition incorporate 'objective, measurable criteria' (16 U.S.C. 1533(f)) they may provide a more scientifically appropriate basis to measure diversity than the methodology utilized in the DEIS. (County Agency or Elected Official, Canyon City, OR - Letter #W4580)*

*Both of the Draft EISs fail to meet the needs of forest predators such as the wolverine, lynx, fisher and marten. Roadless areas are not protected from new road construction under the preferred alternative nor are old growth areas protected from logging or other management activities. Doubling the level of timber harvest will further destroy habitat for species which require secure, undeveloped habitat for their survival. We urge you to reconsider the alternatives in the Draft EIS and adopt one which truly protects the habitat which the lynx, wolverine, grizzly bear, wolf, fisher, and marten need to survive and thrive on the lands under your care. (Academic, Boulder, CO - Letter #B4707)*

*Panels of experts commissioned by the government estimated that grizzly bears, wolverine, lynx, some bat species and several rare plant species would be pushed to the brink of extinction under the preferred alternative than if present levels of logging were to stay in place — just the opposite of the plan's purpose. None of the other alternatives presented would recover populations of these and other rare species either. (Individual, Copalis Beach, WA - Letter #W500)*

**Issue:** *The selected alternative should include objectives and standards that will provide protection for all listed plants and animals in the planning area.*

**Sample Comments:** *HA-06 should not be limited to federally listed species, it should include regional (e.g., Region 6 species), state and local protected species. (Individual, Portland, OR - Letter #W2931)*

*Develop Objectives and Standards addressing each of the listed plants and animals in the planning area. For example, the only terrestrial species identified in Objectives and Standards by name are the gray wolf and grizzly bear, and listed raptors are referred to generally. The list of threatened, endangered, and proposed species in the Interior Columbia Basin is, compared to other areas of the country, relatively short. Further, for most of those species, fundamental conservation needs are well known. Therefore, it is possible to identify specific management actions for conservation and recovery of those species. For instance, critical habitat has been identified for chinook salmon and many limiting factors for fish are widely understood. However, the DEIS fails to mention critical habitat or to provide land managers any clear direction for land management actions within those designated areas. (Federal Agency, Portland, OR - Letter #W4641)*

*I believe that the recently completed ICBEMP is seriously flawed -- indeed fatally so. It unfortunately fails to address the needs of endangered and threatened species in a positive way at all. For example, in its own words, the study states that 'both wolves and grizzly bears have a high likelihood of extirpation when cumulative effects are considered,' and yet no constructive alternative is offered. The net effect of ICBEMP's preferred alternative is nothing less than a de facto surrender to private interest, consumptive users, and enemies of forest predators... The Interior Columbia Basin is virtually the last stronghold for forest and other large carnivores in the lower 48 states. Please don't permit it to be developed to death. (Individual, Millersville, PA - Letter #B4791)*

**Issue:** ***The Final EIS should contain an alternative that specifically calls for actions that contribute to species recovery and preclusion of future listing.***

**Sample Comments:** *The plan should have as a basis an overall, basin wide strategy for recovery of listed species. The EIS team needs to design an alternative which ensures the short and long-term persistence and recovery of listed species, using new information provided by the Terrestrial Team and other sources. The [Fish and Wildlife] Service strongly recommends that an alternative be developed that specifically calls for actions that contribute to species recovery and preclusion from future listing. Objectives and standards should be developed that assure conservation of each of the presently listed and proposed species in the Basin. Specific, measurable standards should be developed that ensure adequate habitats for listed, proposed, and candidate species. Without such standards and an assurance accountability for their implementation, we must question whether these documents provide adequate protection for listed, proposed, candidate, and sensitive species. (Federal Agency, Portland, OR - Letter #W4641)*

*HA-S13: Habitats shall be managed to recover special status species and prevent the listing of these species as candidate, threatened, or endangered. Provide quantifiable measures that would be used to determine implementation success. (National Marine Fisheries Service, Seattle, WA - Letter #B78714)*

*Goals for Alternative 3-7 (summary page 12) include contribute to recovery and delisting of threatened and endangered species. The goals should also emphasize management that will prevent the need to list candidate species, sensitive species, and species of concern. (State Agencies, Helena, MT - Letter #B78887)*

**Issue:** *The Final EIS should not require Ecosystem Analysis at the Watershed Scale for management activities in special species habitat.*

**Sample Comments:** *EM-S8 for Alternatives 3,4,6 and 7 requires that EAWS be conducted whenever a proposed action 'would affect federally listed and proposed species or their habitats.' For Montana, this standard will mean EAWS will have to be conducted for all projects on all USFS and BLM lands. The time and effort involved in this level of analysis would be wasted as the final project decision will rest with the ESA section 7 consultation process and the responsible wildlife agency. THE whole idea of Ecosystem Management is to consider the whole, not individual 'special interest' species. (Natural Resource-based Business or Business Group, Kalispell, MT - Letter #B75686)*

**Issue:** *The selected alternative should include an effective strategy to prevent the further listing of species.*

**Sample Comments:** *I am tired of public money being wasted on ineffectual plans that only put off listings under the Endangered Species Act when we have a chance to prevent a listing by taking practical and effective steps to prevent a listing in the first place. (Individual, Portland, OR - Letter #W279)*

*Without the certainty of an acceptable plan, there will be more ESA listings and a continuing loss of flexibility. There is no more certainty in this plan than any other plan. Witness the current forest plans which were developed with local input at the local level but never got a fair chance at implementation. There is no flexibility in the standards associated with this plan without further costly analysis. With this plan, we are codifying what were interim guidelines and applying them to a broader area. There is nothing in this plan that will prevent or assure no further listings under the ESA. (County Agency or Elected Official, Canyon City, OR - Letter #B4726)*

**Issue:** *Too much attention is being given to threatened, endangered, and sensitive species.*

**Sample Comments:** *If a species is of the sensitive nature and slowly or suddenly diminishes or dies out in this area, then survival of the fittest should be allowed to rule. I do not want the politically correct notion that species should be preserved at the expense of our lives, liberty, and pursuit of happiness. If they adapt and survive like the white tail deer and coyote fine. If they don't too bad. I'll donate toward a monument for them! (Individual, Libby, MT - Letter #B1144)*

*There appears to be a strong bias toward using an endangered species count as a measure of ecosystem health. Could it be that the most adaptive species remain? May I just interject that you most healthy forest does not contain even one dodo bird. Perhaps, then it is by deduction, unhealthy? (Individual, Kennewick, WA - Letter #W1844)*

*I feel like I am more important as a human being, than some bug, ant, or plant that they the federal Govt Bureaucracy thinks is endangered. (Individual, Richfield, UT - Letter #B77812)*

*The Endangered Species Act has been the Holy Grail of Ecosystem Management. The fact that most of the species that have ever lived are currently extinct and that the extinction process was ongoing long before modern industrial civilization existed, should give us a clue that what we are dealing with here is not just a modern problem. (Individual, Usk, WA - Letter #B78742)*

## 2.9.7 Endangered Species Act

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Many feel the Draft EISs' habitat planning for sensitive, threatened, and endangered species does not comply with Endangered Species Act (ESA) regulations. Because as they note the Draft EISs state that several wildlife species may experience poor conditions for viability and that the probability for some species being extirpated is high. They feel that all of the standards in the Draft EISs fail to provide sufficient habitat for wildlife species.

Others believe that the Endangered Species Act is a detriment to beneficial management, claiming the act is too restrictive on management activities. Although they acknowledge that the project is required by the Endangered Species Act to consult with other agencies pertaining to species management, some people contend the Forest Service and BLM need not, and should not, incorporate ecosystem management principles in their management planning. One individual suggests a programmatic way of dealing with ESA issues by involving two levels of consultations with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, one at the regional or project level, and another at the Forest or BLM District plan level. Further consultation would be required only if project decisions digress from project standards.

**Issue:** *The Final EIS standards for sensitive, threatened, and endangered species should comply with the Endangered Species Act.*

**Sample Comments:** *Under the preferred alternative, the Draft EIS concedes that '... grizzly bears have a high likelihood of extirpation when cumulative effects are considered.' To adopt such a course of action violates numerous federal laws and is an egregious abdication of the responsibility the BLM and USFS have to protect imperiled species on federal lands. To consign carnivores to 'less favorable outcomes' is to fail in your responsibility to protect sensitive, threatened, and endangered species. (Academic, Boulder, CO - Letter #B4707)*

*The following excerpts from the Draft EIS are very disturbing: 'As a group, the carnivores have less favorable outcome scores compared to all other species groups in the analysis,' and 'several species (including grizzly bears, lynx, wolverines, fisher, and marten) would have poor outcomes in all alternatives.' This clearly indicates that you acknowledge noncompliance with the Endangered Species Act. (Form Letter - Letter #256)*

*What is the definition of restore in the context of special status species habitats? It cannot be the same as ICBEMP definition on page 10, which does not fulfill the Agency legal mandates. (Conservation/Environmental Group, Boise, ID - Letter #W3690)*

**Issue:** *The selected alternative should manage to prevent detriments and abuses associated with the Endangered Species Act.*

**Sample Comments:** *Just one example is the numerous abuses cited in the media to achieve compliance with the Endangered Species Act. So frequently this is done with insufficient documentation or an attempt to further a political agenda. The wolf re-introduction that has recently been proven to be in violation of the law, and the Bruneau Hot Springs Snail listing are examples. Many of these actions are counter-productive to good resource management. (Individual, St. Anthony, ID - Letter #B76216)*

*If we really want to preserve our wildlife from being on the endangered species list with our trees, we need to have flexibility on what is being done. (Individual, Lewiston, ID - Letter #B79019)*

*There is concern on the subject of endangered species becoming out of control. What is needed for species protection is not closures but proper co-habitation of using our natural resources. Replanting and keeping our natural forests in good condition provides areas for mobility. As one area is used, new ones should be up and growing for the animals, birds, etc., to move into. Animals adapt well in most cases. Management is our key to success. (Individual, Kamiah, ID - Letter #B79835)*

*Disciplines claiming to be better for us are suspect and possibly pushing an ideology - usually one that is not in our best interest and very dangerous to our well being. Bears and cougars are on the threatened and endangered species list and killing them is unlawful, yet they are threatening - and even killing grown people. They, along with smaller animals, are maiming and killing our own small children. Laws seem to protect them but not us. (Individual, Redlands, CA - Letter #W754)*

*The purpose of the of the Endangered Species Act has become one of stopping all activities of which environmental extremists disapprove. This act has raised havoc on property rights and economic development. The Clinton administration gave teeth to the act and a power that is dangerous to all Americans' best welfare and ability to make a comfortable living without harassment; clearly it is out of bounds. (Individual, Thompson Falls, MT - Letter #B76360)*

*This analysis appears to be totally driven by wildlife and fisheries. It is a DEIS that is driven by ESA and NFMA requirements. The requirements of the Multiple Use-Sustained Act are ignored to meet the direction of the president to develop an ecosystem plan and to meet the viability requirements of the NFMA and the other requirements of ESA. (Professional Society, Moscow, ID - Letter #W546)*

## 2.9.8 - Effects on Specific Wildlife Species

### 2.9.8a Birds

This section focuses on individual species and their requirements for adequate management under the ICBEMP. Management standards and guidelines and their effects on these species are addressed. Many respondents feel that the Draft EISs lack clear standards for species management, and they question the scientific accuracy used by the project, as well as the incorporation of science into management decisions.

Many believe that the agencies need to fully evaluate the impacts of the project on bird populations and habitat. Many find it important to protect and restore bird foraging and nesting grounds; they advocate basin-wide standards to safeguard habitat for forest, range, marsh, waterfowl, and migratory species. Claiming the agencies fail to incorporate many of their own scientific findings in the standards and objectives, some are uncertain the project will help bird populations and their corresponding habitats in the interior Columbia River Basin.

Some insist that the best way to deal with preserving bird habitat is to include blanket standards for the entire interior Columbia Basin. Others conclude that site-specific analysis is a more proper way to address habitat management, because of changing and diverse land conditions in the project area.

Several add that the *Evaluation of EIS Alternatives by the Science Integration Team* fails to consider range management effects on bird habitat. They warn that the role of livestock grazing, in their opinion, results in adverse habitat conditions such as desertification, alteration of hydrologic processes, removal of nesting cover, and destruction of food-producing substrates. These people contend that trampling and the removal of residual ground cover by livestock is leading to declines in populations of range-related species, such as the Columbian sharp-tailed grouse and the sage grouse.

They view the proposed management plan as catering to livestock and ranching needs and they feel the standards and guidelines will endanger many of these habitats.

Many feel that the discussion (or lack of discussion) of certain species in the Draft EISs fails to address some key species which are noted to be in population decline. Some note that the upland sandpiper, Lewis' woodpecker, olive-sided flycatcher, and the veery fit this description and should be listed as sensitive species. Some suggest the further analysis of introduced or exotic species to the area. Neotropical migratory birds, others state, are not being adequately considered in the management provisions.

A number argue that certain species other than those listed by the Draft EISs need to be addressed, leading them to question whether the draft standards are based on accurate science. For example, they declare that Brewer's sparrow does not receive the attention it deserves, and its dependance on sagebrush habitat needs to be considered. One person notes recent scientific data indicating the northern goshawk prefers mature forests for foraging, while the scientific conclusions in the Draft EISs indicate mixed forests and openings as preferred habitat. This person states that forest openings are not favorable for the goshawk and may favor competitors of the bird, and the respondent feels that new effects analyses should be performed under the assumption that goshawks prefer mature and old-growth forests for foraging.

**Issue:** *The selected alternative should provide adequate protection for bird species.*

**Sample Comments:** *The ICBEMP will directly affect the fate of avian species on approximately 25% of the National Forest and 10% of shrub steppe grasslands managed by the BLM. The DEIS fails to follow many findings of the project's own biologists. This is particularly evident as it relates to its own team findings. The opportunity exists between now and the selection of a final alternative to complete some necessary riparian analysis at the appropriate scale to help determine specific standards and guidelines which are currently lacking. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*As an organization, TAS is concerned about protection and restoration of ecosystems, with particular emphasis on bird habitat. (Conservation/Environmental Group, Tacoma, WA - Letter #W1485)*

*Address avian stress. This needs basin-wide coordination to protect habitats for migrating breeding birds. (Conservation/Environmental Groups, Longview, Wa - Letter#W1014)*

*The DEIS appears to ignore the findings regarding avian species presented by the Large-Scale Conservation Assessment for Neotropical Migratory Land Birds in the Interior Columbia River Basin... This report indicated that many bird species are declining throughout the study area, and that there are many species of high concern, including Lewis Woodpecker, Olive-sided Flycatcher, Willow Flycatcher, Sage Thrasher, Loggerhead Shrike, Western Meadowlark, Brewer s Blackbird, and Pine Siskin. Many of these species appear to be declining in direct response to habitat loss in old-growth coniferous forests, and grasslands. Many of these neotropical migrants have the misfortune of being habitat specialists, including some that require large, contiguous areas of their required habitat type. The avian report called for a number of actions which would help to both assess and address the population trends for neotropical migratory birds... Unfortunately, these important recommendations were not incorporated into the DEIS. (Conservation/Environmental Groups, Seattle, WA - Letter #W1970)*

**Issue:** *The Final EIS should address the presence of non-native species and their effects on bird populations.*

**Sample Comments:** *Also consider the great increase in waterfowl in the last five years, where duck numbers are up by over 30% in areas and wild Canada geese have become plentiful enough to become urban pests in many cities, all because of active habitat management. (Individual, Cle Elum, WA - Letter #W2145)*

*There is little (if any) discussion of the presence or consequences of introduced birds i.e. partridges, quail, and pheasant. This fact is particularly noticeable especially since there was considerable discussion on of introduced plants such as crested wheatgrass and cheatgrass. The document states: 'There has been at least 60% decline in their population (sage grouse) in Oregon since 1940.' No reference is provided for this statement, although it is assumed that it came from Crawford's papers in the 1980s. Crawford's discussion of the history of sage grouse populations is very questionable since it is almost totally based on anecdotal observations by Oregon State Game Commission personnel - there were few actual studies. However, even if Crawford's conclusions are accepted, he says that the sage grouse population has been declining since a major die off in 1919. In Chapter 1 - Page 7, the Eastside DEIS says 'Rangeland conditions have steadily improved since the late 1800s and early 1900s.' Therefore, it could be concluded that sage grouse populations have been declining ever since rangeland conditions improved. (Individual, Clarkston, WA - Letter #W3111)*

**Issue:** *The Final EIS should address range management effects on bird populations and habitat.*

**Sample Comments:** *The GTR [PNW GTR - 406] fails to adequately address or assess the role of livestock grazing in desertification, alteration of hydrologic cycle, removal of nesting cover, trampling of nests, destruction of food producing substrates. Although the GTR and DEIS blather on excessively about fire, the importance of residual cover (which is removed in fire) in successful nesting is not considered. What is the 'proper functioning condition of wetlands for water birds?' The GTR states: 'restoration and management of fire were considered essential to the success of some alternatives in setting back succession to early stages, for example, to increase habitat for rails' What can this possibly mean? No reference is provided. Rails of the basin are secretive creatures, of dense marshy vegetation. How can actions that decrease density of marshy vegetation benefit rails? On page 593, the GTR lauds 'flexibility' in restoration activities and at the same time discounts Alt. 7 - 'flexibility' in grazing. But the reader is never informed what this 'flexibility' may be. Anything goes? During a presentation by [the] DEIS rangeland preparer..., our members were told that no specifics relevant to grazing were put in ICBEMP because each situation/scenario needed 'site-specific' recommendations. That is sheer nonsense. Stubble heights, bank trampling standards,...upland utilization standards of 30% or less - these should be across-the-board recommendations for improvements in nesting habitats for nearly all Basin bird species. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

*Passerines. See Ohmart 1996 for detailed discussion of impacts of livestock grazing on Western riparian areas and bird species that are dependant on them. The GTR fails to adequately address these impacts. See Saab 1995 for recommendations on changing livestock grazing in upland shrub-steppe habitats. The GTR fails to adequately consider these recommendations. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

**Issue:** *The Final EIS should use accurate science to address the correlation between bird populations and habitat needs.*

**Sample Comments:** *This DEIS identifies the northern goshawk as a species that would benefit from a mix of forest structures. This assumption apparently stems from the SIT statements regarding the foraging habitat for the goshawk. The SIT assessment for wildlife states: 'It uses old stands of multi-layered conifers for nesting and a mixture of habitats including young forests and small openings for foraging. This statement and the following conclusions that goshawks will benefit from the creation of a mosaic of habitat types is contrary to more recent radio-telemetry studies of habitat preference that show goshawks in the western United States prefer mature to old growth habitats for foraging (Fischer and Murphy 1986; Austin 1993; Hargis et al 1993; Titus et al 1994). While goshawks may use a variety of habitats, openings are not used greater than random in these studies. Thus perpetuating the idea that goshawk management includes expressly creating openings is mistaken and unsupported by scientific information. In addition, these openings favor competitors of the goshawk (great gray owl and the red-tailed hawk) who have been observed to take over goshawk nests near openings (see Patla 1991). They also favor nest predators like squirrels and coevrds. Openings may be tolerated to some extent by goshawks, but establishing openings under the assumption that they benefit goshawks is incorrect based on the available science. Thus, the effects analysis for the goshawk is incorrect and needs to be redone with the assumption that they favor mature to old growth forests for foraging. The DEIS and its standards and guidelines fail to meet the requirement of NFMA and FLPMA with regard to the protection of biodiversity. These openings will adversely affect goshawk nesting habitat and foraging capacity. These new openings also need to be considered in the context of the preexisting openings on public lands and considered in a cumulative way to protect viability of the northern goshawk. (Individual, Missoula, MT - Letter #W3801)*

*The list of sensitive species in Appendix E fails to list several species in Montana and parts of the Northern Region that appear to be in a significant decline and should receive sensitive status. These include the Upland Sandpiper, Lewis' Woodpecker, Olive-sided Flycatcher, and the Veery. (Conservation/Environmental Group, Missoula, MT - Letter #B3902)*

*The analysis also seems to ignore the issue of tradeoffs between species. The DEIS and the SIT analysis both lump flammulated owls and goshawks. Flammulated owls require a grass understory community to support their main food, grasshoppers, yet goshawks may sue the same forest in a closed canopy condition. The tradeoff between the habitat needs of these species in restoration has been recognized by the Lolo National Forest, where it acknowledged that conversion of the stand to the open character required by flammulated owls would render it useless for goshawk nesting. These tradeoffs need to be acknowledged in the analysis and the management standards. (Conservation/Environmental Group, Missoula, MT - Letter #B78643)*

**Issue:** *The Final EIS should provide clear definitions and standards for bird management.*

**Sample Comments:** *Although none of the four woodpecker species [white-headed, pileated, three-toed, and pygmy woodpeckers] predicted to be at risk of extirpation, are projected by any analysis of how the snag and other habitat requirements of the species will be met. The default snag requirements in the DEIS are inadequate to support woodpecker populations on the Eastside. The DEIS does not adequately provide for snag recruitment trees and down logs, to ensure that the snag requirements of cavity dwellers are met as time passes after harvest. (Conservation/Environmental Groups, Eugene, OR - Letter #B78798)*

*Red-wing blackbirds are associated with riparian/wetland habitat - even more so than flycatchers. The DEIS states western meadowlark, Brewer's blackbird showed consistent long term declines. Then on page 284, it states 'population increases of birds that use riparian areas - such as MacGillivray's warbler, western meadowlark, Brewer's blackbird have increased, indicating some recovery in riparian systems. What does this last sentence mean? Western meadowlarks are very rarely associated with riparian areas in the basin. They are an upland species. MacGillivray's warbler populations have declined. Are Brewer's blackbirds increasing or declining? We are left totally befuddled. (Conservation/Environmental Groups, Boise, ID - Letter #W3689)*

## 2.9.8b Domestic/ Bighorn Sheep Habitat Conflicts

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Some individuals note a habitat conflict between domestic sheep and wild bighorns, and they are concerned about which species will win the right-of-way in management decisions. They believe the Draft EISs do not go far enough in describing management criteria for these interactions.

Those who advocate the removal of domestic stock from areas where bighorns are present say that wild populations will benefit genetically by lowering the exposure and risk of transferable diseases from domestic species. Others suggest that site-specific analysis should be implemented to better address potential consequences of these situations. They are weary of plans that offer more protection to wild species than they believe is needed for adequate viability standards.

For additional comments about other wildlife/domestic livestock conflicts, see Section 2.9.5, Wildlife and Human Interactions.

**Issue:** *The Final EIS should clarify management prescriptions for domestic and wild sheep interactions.*

**Sample Comments:** *In situations where livestock competes with native species, especially bighorn sheep, which are susceptible to domestic sheep diseases, the livestock should be eliminated from the range. There is absolutely no excuse for continuing this exposure of a rare native species to known fatal diseases at the expense of the public. (Individual, Moyie Springs, ID, - Letter #B4692)*

*HA-S21: Will it be interpreted as removing or reducing the wildlife population or the reduction or removal of livestock? Redundant to HA-07. Site-specific analysis should be done. (Natural Resource-based Business or Business Group, Joseph, OR - Letter #W1360)*

*Standard HA-S21 was intended to reduce disease transmission from domestic to bighorn sheep. However, these standards do not provide clear direction to managers and offer little differentiation between alternatives. For example, it is not clear whether 'reducing potential for disease transmission' (alternative 5) is intended to provide more protection. The BLM has draft guidelines for minimizing the risk of contact between domestic and wild sheep. It seems consistent with the concepts of Alternatives 1, 2, and 3 (and possibly 5) to adopt minimum standards that reflect the BLM memo No. 92-239 dated June 5, 1992. The BLM guidelines should provide interim direction until local, site-specific standards are developed. The other restoration alternatives should propose more stringent standards. Conversion of all domestic sheep grazing permits that overlap or are adjacent to bighorn sheep ranges to other livestock classes that do not represent a threat to wild sheep would be consistent with a goal to restore ecosystems (Alternatives 4,6)*

and 7). With ecosystem restoration as your overriding goal, more emphasis should be placed on management of bighorn sheep to improve habitat conditions for these species. This is particularly true for California Bighorn sheep, given their current status and the EIS estimate of a continued risk of extirpation for this species. (State Agency or Elected Official, Helena, MT - Letter #B78887)

HA-S20 and HA-S21: These standards are written as objectives. Provide measurable standards, implementation methods, standard practices that would assist in implementation of these standards. (Federal Agency, Seattle, WA - Letter #B78714)

## 2.9.8c Big Game

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Big game population health and security are priorities for many individuals living in the project area. Respondents feel that these species not only represent wildness and spiritual values, but they also are vital to the social and economic considerations of people. They urge that consequences of management effects should be investigated more thoroughly and that a more adequate discussion should be included in the Final EIS.

Many individuals have views about the limiting factors which affect the viability of big game species. Some feel that winter habitat and winter weather, not management activities, are responsible for controlling big game viability. Others suggest that the agencies need to address the issue of large numbers of deer and elk populations moving to private land. Some add that road policies dictate habitat conditions for these populations.

Declaring that safe migration routes are essential for effective management of these species, some people contend that proper management practices, such as relocating grazing allotments out of prime corridor habitat, are necessary to reduce elk and deer casualties when they travel through these areas.

**Issue:** *The Final EIS should adequately discuss standards and management direction for large ungulate health and viability.*

**Sample Comments:** *All research this reader has examined indicates elk do not require thermal cover, in addition anyone who is familiar with the characteristics of mammals coats as they relate to habitat recognizes hollow hair is one of nature's best insulating mechanisms. This is utilized in manufacturing hollow fill outerwear and has been known for at least thirty year. The latest study from the Startky experiment once again confirms thermal cover is of little benefit to elk. (Individual, Joseph, OR - Letter #W4538)*

*Our reviews of the proposed alternatives in the DEIS has not found any evaluation of the consequences to surplus elk and deer populations.... Some elements of such an analysis...should include...the role of road management or other management actions to minimize negative impacts to elk and deer habitat...[and] consequences from elk and deer movement onto private lands. (State Agency or Elected Official, Portland, OR, - Letter #4869)*

*The discussion of mammals is woefully inadequate in the Dry and Cool Shrub Potential Vegetation Groups. There is no mention of deer or elk, although several other species are specifically mentioned such as woodrats, marmots, gophers, mice and porcupines. At the very least, deer and elk species which have much more greater potential to have major effects on social-economic or ecological processes than the species which are highlighted. (Individual, Clarkston, WA - Letter #W3111)*

*Ninety percent of your game animals are on private lands these days. They have left your mismanaged lands. Does that give you any clue that you are not doing what you should be doing on the land? It will only get worse under your grand scale. (Individual, Dayton, WA - Letter #W3677)*

*The DEIS indicates that the management focus for fish and wildlife will be to maintain viable populations and to restore, where appropriate, species below these levels. What our biologists have not been able to determine is the management direction for large ungulates. (State Agency or Elected Official, Portland, OR - Letter #B4869)*

**Issue: *The Final EIS should analyze management effects on migration routes for big game species.***

**Sample Comments:** *Moreover, this [Hells Canyon Rim] roadless section is critical summer habitat for all wildlife and the only unsevered migration route connecting the low elevation, big game winter range of Hells Canyon to the high summer range in the Wallowa Mountains. Thus, the road would be a detriment to the very purposes for which the wilderness area was created. (Individual, Salem, OR - Letter #w427)*

*Bear Valley is an important part of a natural wildlife migration route, being the upper part (summer) range of elk and deer that winter in the middle fork of the Salmon River area. I would like to see consideration for moving these allotments to outer fringe areas instead of right square in the middle of an area that needs to be kept intact for wildlife to live without the disturbance of private livestock grazing and all the fencing done at taxpayer expense to control private livestock. Many of those fences have taken a serious toll of elk and deer in them. The \$30,000 fence cuts right across this valley. (Individual, Mountain Home, ID - Letter #B56)*

## 2.9.8d Grizzly Bears and Wolves

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While more comments pertain to grizzly bears than to wolves, comments on both species are included here together because bears and wolves would be subject to similar management measures from Federal agencies. In addition, some of the public interpret both species in a similar way.

Many feel that the analysis in the Draft EISs is too general for grizzly bear management. They demand that the agencies take a closer look at proper measures to promote health of this listed species. A few individuals suggest that planning strategies should reflect those of the Interagency Grizzly Bear Committee. Many question how the agencies could implement the alternatives yet still maintain a management plan where bears might experience levels of extirpation, which they feel is contrary to the provisions of the Endangered Species Act. They dispute the agencies' agenda for effective ecosystem management and claim the Draft EISs are not sufficient for grizzly bear viability and will not meet the desired range of future conditions. Advocates of grizzly preservation assert that management activities such as road building and logging are detrimental to proper habitat conditions and will lead to reduced numbers if habitat and management decisions are not improved.

Countering this belief of the need for special grizzly management, others feel that bears and wolves are getting better treatment than humans. They believe this management strategy needs to stop or humans will continue to be pushed out of the planning picture. Some question whether the agency should even bother with the proposed management standards, since, in their opinion, there will not be enough bears to account for a viable breeding population in the area.

Some comments reflect a distaste for people living outside the project area who, some believe, are dictating the lives of those residing and working in the interior Columbia River Basin. Many of these individuals are weary of reintroduction efforts for both wolves and grizzly bears. Many feel that the agencies should not promote these measures of reintroduction because they believe that the lands would be unsafe for recreationists, workers, and livestock. Others argue that reintroduction is necessary for species survival. They believe that these areas are natural grizzly bear ecosystems. These respondents want more protection than they think the agencies are offering, and they request more restrictions of management to ensure species recovery.

**Issue:** *The selected alternative should provide adequate management direction for grizzly bears.*

**Sample Comments:** **PROMOTE GRIZZLY BEAR HEALTH-**

*The DEIS fails to provide mandated protection for threatened and endangered species such as the grizzly bear in its last remaining wild ecosystems. The UCRB Purpose and Need Summary Working Draft states 'the strategy is intended to assist the cooperating species to recover and sustain populations of threatened, endangered, or sensitive species.' The UCRB strategy will, in fact, cause confusion and chaos with efforts to recover the grizzly bear by dividing its wilderness ecosystem in half. This condition will not be a 'more ecologically sustainable desirable future condition.' The UCRB strategy is not 'an ecosystem approach' for the grizzly bear of the Northern Continental Divide. The CCP considers this to be a very serious matter adversely affecting future grizzly bear recovery in the northern Continental Divide grizzly bear ecosystem. Any new federal attempt to rename the NCD GBE a 'zone' is also unacceptable. The NCD GBE is a natural wilderness grizzly bear ecosystem, please identify it completely and correctly in the Final EIS. (Conservation/Environmental Group, Hungry Horse, MT - Letter #B81)*

*Doubling the amount of logging over current levels will increase road building. This will inevitably cause less habitat and allow hunters and poachers easy access to wildlife, including endangered species such as grizzly bears. (Individual, Cleveland, OH - Letter #W722)*

*While the extractive industries are concerned about being able to continue their destructive status quo, I am concerned about what will happen to the area's large carnivore population. The DEIS states that both wolves and grizzly bears have a likelihood of extirpation when cumulative effects are considered. That is totally unacceptable and goes against the ESA and the purpose of the species recovery plans which are covered by the EIS. (Individual, Vancouver, WA - Letter #B4708)*

**Sample Comments:** **TOO MUCH EMPHASIS ON GRIZZLY BEAR HEALTH -**

*Supposedly our road closures density is figured on a square mile basis to allow for the attaining of suitable populations of grizzly bears. Why is this important if during the study it is found that not enough area is in the study area to ever arrive at a breeding population anyway? (Individual, Troy, MT - Letter #W710)*

*We recently had meetings on proposed recommendations to change road management standards in grizzly bear recovery areas that comprise around forty percent of our Kootenai National Forest. Public support and confidence in the recovery program is essential to its success. Strong showings of local people in three communities yielded over 10 hours of presentation and discussion with a clear message: Local people are adamantly opposed to further access restrictions. They want a more reasonable approach to access management that provides flexibility for seasonal access to be restored to many areas currently closed that were for decades*

traditionally accessed for a variety of uses. Supplemental information suggest that those species requiring large home ranges should receive special consideration. What consideration will our people get? The director of the grizzly bear recovery program, Chris Servheen, told us that grizzlies and people were compatible. He also told us that proper timber harvests enhance bear habitat and that people and bears could co-exist without significant impact to our lifestyle. This has simply proven to be untrue. Over the past ten years, human activities have been almost totally eliminated from bear habitat. Local people back here are threatened by the grizzly bear manager's intrusive impact on our social custom and culture and our traditional lifestyle. The grizzly bear recovery experts are creating a social jeopardy for this animal that far overshadows the biology and habitat benefits they may be achieving. In fact, it has been suggested to many that the most substantial thing one could do to attain the status of a local hero would be to go out and kill a grizzly bear. The grizzly bear is fast becoming public enemy number one because of the severe social engineering being imposed on our constituents. Wherever potential conflicts occur with people, the management decisions are dictated to favor the bear. People are an afterthought or totally ignored in the recovery program. (County Agency or Elected Official, Libby, MT - Letter #B78920)

**Issue:** *The Final EIS standards regarding grizzly bear health and management should align with management objectives of the Interagency Grizzly Bear Committee.*

**Sample Comments:** *The rationale statement accompanying HA-S17 needs to be expanded to include all management objectives of the 1994 IGBC access management guidelines: Minimize human interaction and potential for grizzly bear mortality; minimize displacement from important habitats; minimize habituation to humans; provide relatively secure habitat where energy requirements can be met. The rationale needs to be modified to acknowledge that access provided by roads not only increases grizzly bear vulnerability to mortality, but also increases bear displacement from key habitats. Further, regarding the rationale presented here, once species are listed, it may be appropriate and biologically necessary that standards that promoted recovery of the species continue to apply...*

*...HA-S18: This standard calls for the use of habitat mapping and cumulative effects analysis for projects in recovery areas where road densities exceed access thresholds. The use of these two procedures should not be tied to road density thresholds. Both NEPA and ESA already require cumulative effects analysis. Additionally, the IGBC Access Task Force Report calls for habitat mapping via the Unified Cumulative Effects Model (UCEM) for all project planning, not just in those areas where access thresholds are exceeded. THE UCEM addresses habitat mapping of each recovery area - this is a key component of the model. Therefore, habitat mapping and cumulative effects analysis are essential tools in evaluating a project's compatibility with and/or contribution to grizzly bear recovery and need to be fully described in the Final EIS...*

*...HA-S19: Rewrite this standard to ensure the evaluation of the IGBC strategy for reducing grizzly bear mortalities apply to all grizzly bear recovery zones, not just the Selkirk and Cabinet/Yaak. Activities must be consistent with the particular ecosystem in which the activity is located. The rationale for this standard indicates that departure from the strategy are approved by the IGBC. This is accurate, but the rationale should indicate that these departures are also subject to section 7 consultation with the U.S. Fish and Wildlife Service. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should consider effects of possible species reintroductions on other wildlife and on human communities.*

**Sample Comments:** *Recently, the USF&WS were told to revisit their grizzly bear recovery plan because it managed the bears into extinction. Please don't go down the same path, (Individual, Vancouver, WA - Letter #B4708)*

*The draft EIS states that all alternatives except Alternative 7 will likely lead to the extirpation of wolves and grizzly bears from the UCB. This seems to be an extremely cavalier way to treat threatened and endangered species, especially when efforts are being made to reintroduce both species in the CRB... Part of the reintroduction effort is to reestablish habitat corridors between the remnant populations and the new populations. This should be supported in the UCRB management plan. (Individual, Moyie Springs, ID - Letter #B4692)*

*The wolves and grizzly bears seem now to be more important than the public. I would be afraid to go into the mountains if grizzlies were reintroduced. I am also opposed to the wolf recovery. Cattlemen and sheep men have a hard enough time already. (Individual, Rupert, ID - Letter #B104)*

*Wolf and grizzly reintroduction sounds nice and fuzzy until you encounter one on your visit to their territory. There were probably bears and wolves where Central Park is located but I don't see someone from the West pushing for their reintroduction in the middle of New York City. (Individual, Rupert, ID - Letter #W4610)*

*I would like an end to ADC which kills animals. (Individual, Portland, OR - Letter #W233)*

## **2.9.8e Other Mammals and Predators**

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There is an overwhelming concern over the accuracy of scientific information in standards regarding smaller mammal species in the project area, which some think may be harmful to certain animal species. For example, some believe there is a lack of data on pygmy rabbit habitat type, distribution, and numbers in the area. Claiming that pygmy rabbits require dense sagebrush cover to live, they note that Alternatives 4 and 6 would control or eradicate sagebrush; they interpret this procedure as being opposite to what the science tells them. These respondents feel that without proper evaluation of these and other species types, management decisions cannot be appropriate and have no scientific merit.

Some dispute the Draft EIS statement that some ground squirrel species have benefitted from loss of ground cover. They claim that loss of shrub cover such as big sagebrush negatively affects ground squirrel populations, and they state that declines in populations have occurred within the region.

Many feel that predators and small animals are important links in properly functioning ecosystem processes. These respondents are concerned about management standards for these species. They believe that the lynx, marten, wolverine, and mountain lion all need proper management provisions to maintain viable populations and restore predator-prey balances.

**Issue:** *The Final EIS should incorporate accurate science in their management standards for small mammal species.*

**Sample Comments:** *Pygmy rabbits are declining throughout their range. They select sites with 28-46% sagebrush cover. Pygmy rabbits must have dense sagebrush cover to live. It has been established that control or eradication of dense sagebrush is detrimental. Sagebrush of this density is precisely the habitat type which vegetation manipulation projects espoused by Alts. 4 and 6 of the DEIS would target. Without full and complete knowledge of distribution, occurrence, and population status of pygmy rabbits in the basin, GTR cannot analyze impacts of grazing levels, vegetation manipulation, range improvements, and 'mosaic-izing' habitat on pygmy rabbits. The preceding is true for all wildlife species. No evaluation of habitat condition for all endemic species is presented. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

*The American marten is among the species most likely to be jeopardized by the loss of LOS on the Eastside... Removing structural complexity, especially the large structures, on the Eastside forests will likely be detrimental to marten. The snag requirements set forth for Alternative 4 have smaller dbh requirements and fewer snags per acre than what the marten requires, and the needs of the marten are therefore likely to go unfulfilled. This impact is not disclosed in the DEIS. The Draft EIS also fails to account for the fact that the marten's foraging areas usually do not overlap. Nor does the DEIS address the need for marten ranges to be connected by corridors with relatively high canopy closure. The DEIS does not explain how the marten will improve with continued logging and roading of LOS forests, given its need for large undisturbed and unroaded LOS habitats. (Conservation/Environmental Groups, Eugene, OR - Letter #B78798)*

*Page 1571 [PNW GTR - 405] In the one paragraph, discussion of small mammals presented here, a significant portion of the paragraph contains incorrect information. 'Some species, for example, of ground squirrels have benefitted from changes in cover type like the loss of big sagebrush and the increase in agricultural crops. Habitat may have improved...' Ground squirrels throughout the Basin have suffered serious population declines because of the loss of shrub cover. For example, see information presented in Snake River Birds of Prey BLM Management Plan 1995. Page 1572: 'Mountain lion populations were likely reduced in many areas but have increased recently as a result of increased prey.' What is the evidence that prey has increased? This ignores changes in hunting, and persecution of predators. The structure of paragraphs here is incredibly hard to follow and unclear. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

**Issue:** *The Final EIS should provide standards to protect predator species.*

**Sample Comments:** *Your recent DEIS alternatives... provide little or no protection for area predators... Please devise or create an alternative, if there is not one already, that would help ensure for the long-term sustainability of forest predators in these areas... Since you... are keenly aware of the threat, take every action necessary to protect these forest predators, instead of the interest of the logging, livestock, recreation, or other exploiting industry. (Individual, San Antonio, TX - Letter #B75218)*

*We hope these comments on behalf of our 800 members will help to generate increased attention for all forest predators in supplemental analysis, particularly for the forest carnivores, and that the proposed alternatives will be modified to better address the needs of these imperiled species. (Conservation/Environmental Groups, Bozeman, MT - Letter #B75519)*

*According to what I've read about the ICBEMP, none of the Draft EIS alternatives meet the need of the forest predators in their last stronghold in the lower 48 states. (Individual, Laramie, WY - Letter #B4714)*

## 2.9.8f Amphibians and Reptiles

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Some people cite a lack of clarity in the management standards for both amphibians and reptiles in the Draft EISs. They request that the Final EIS to include accurate scientific data and more detailed standards and guidelines. Some question whether these species actually exist in the project area, since they perceive the maps and data as incomplete and vague.

Some feel the science is inaccurate in the assessments for amphibian species in the interior Columbia River Basin. Serious habitat decline is noted for the spotted frog, and some people express concern for the northern leopard frog, claiming that grazing and range practices have been a catalyst to the species decline. They assert that the introduction of livestock grazing has contributed to the removal of vegetation and alterations of pond hydrology, affecting species habitat.

These people also view the section covering reptile habitats as inaccurate, because they see sagebrush habitat shifting into crested wheatgrass or other exotic grasses and they feel these habitat changes are responsible for reptile declines. They assert that loss of shrub cover from grazing, salt placement, water developments, and fences will just add to reptile declines.

**Issue:** *The Final EIS should address range management effects on amphibian populations.*

**Sample Comments:** *The GTR [PNW GTR - 406] repeatedly mentions grazing 'intensity' yet never defines intensity. In its discussion of amphibians, the GTR begins to honestly recognize deep and continuing ecological harm caused by grazing. Spotted frog habitat decline is projected to continue; northern leopard frog 'requires tall, dense grass bordering aquatic habitats. Past grazing practices have reduced habitat through the removal of pond bank vegetation and altered pond hydrology.'*  
(Conservation/Environmental Group, Boise, ID - Letter #W3689)

**Issue:** *The Final EIS should address range management effects on reptile populations.*

**Sample Comments:** *In comparison, the GTR discussion of reptiles appears to be in denial of impacts on reptiles. GTR states 'current habitat has declined only slightly from the historic range of conditions.' This is simple not true. Serious habitat decline has occurred throughout the Basin as a result of habitat alteration and invasion of exotic species such as cheatgrass in wake of livestock grazing. Direct habitat loss for reptiles has resulted from agricultural conversion, and fire-caused cheatgrass monocultures. It is well known that shrub-steppe reptiles do not use grasslands (this includes the 5 species assessed for Outcomes here), and are absent from them (see Werschkul 1982, Reynolds and Trost 1982). Loss of shrub cover has drastic impacts on native reptiles. Reynolds (1979) found the greatest abundance of sagebrush lizards in native, ungrazed sagebrush habitat in southern Idaho, and noted that converting sagebrush range to crested wheatgrass reduced population levels of both sagebrush lizards and shorthorned lizards. Werschkul (1982), in a study of species-habitat relations in an eastern Oregon cold desert lizard community, examined abundance and diversity of 8 lizard species in 9 habitat types, and found that sagebrush areas were most productive in terms of number of species present. Lizards were not found in grasslands (defined by Werschkul as areas where native grass had largely disappeared due to livestock grazing or range restoration projects - crested wheatgrass). Shrub cover and habitat structural diversity is important in determining lizard distribution and abundance patterns (Germano and Hungerford 1981, Werschkul 1982). Invasion of introduced grasses impact the habitat of native reptiles (St. John 1985). Thus, the GTR ignores the profound changes in reptile habitats which have occurred and continue to occur in the Basin. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

*The GTR also incorrectly projects future declines based on past habitat conversion and ignores the ongoing effects of grazing in 'cheat grassification' of low elevation salt desert shrub and Wyoming big sagebrush reptile habitats. It fails to consider ramifications of grazing practices - as use is shifted from riparian to upland, and range improvements installed to facilitate/increase upland use. Salt placement, water developments, and fences all alter or increase livestock use in uplands and affect reptile habitats. The GTR does acknowledge the western pond turtle - 'disturbance of nest sites by cattle.' In discussion of Mojave collared lizard, leopard lizard - 'sparse vegetation' - is in reality shrubs, with native bunchgrasses and forbs, not cheatgrass. GTR concludes that Alternatives 2,3,4,6, and 7 would retain reptile populations similar to current. This is incorrect if manipulation (burning) of low elevation lizard habitats occurs under Alternatives 4 and 6. (Conservation/Environmental Group, Boise, ID - Letter #W3689)*

**Issue:** *The Final EIS should provide accurate scientific information regarding amphibian and reptile species.*

**Sample Comments:** *Chapter 2, Page 37. Map 2-8 --- The map title implies that the data is for the Columbia Gorge only, but the entire Eastside planing area is shown in the map. It cannot be determined whether amphibians are missing from most of the planning area because the input data set covered only a portion of the planning area, or the amphibians truly are only present near the Columbia Gorge. Indicate the source of the data and the geographic area for which they represent. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Important linkages or cross-references to aquatic dependent species (such as amphibians) are not made between the terrestrial and aquatic sections. (Resource Advisory Council, Bend, OR - Letter #W3080)*

## 2.9.8g Invertebrates

Some people criticize the agencies for using invertebrate viability as a tool for limiting management activities on certain lands. They feel the project's proposed management for these species has no scientific backing and is speculative at best. These individuals disagree with the Draft EIS evaluation of effects on species from management activities, and they request the agencies to re-write the text regarding invertebrates for the Final EIS.

**Issue:** *The Final EIS should correct the Draft EIS text to clearly show invertebrate relationships to ecosystem health.*

**Sample Comments:** *The text states that habitat effectiveness for some soil invertebrates is reduced from increased compaction and soil displacement, but no indication of the relationship's importance to ecosystem function is provided. It is unlikely that increased soil compaction and soil displacement affect habitat effectiveness for soil invertebrates because only a fraction of the total landscape is ever affected by these conditions. This is another example of the misuse of the broad-scale assessment to selectively address certain fine-scale ecosystem relationships. Statements like this which describe relationships without any indication of significance or importance should be deleted. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The text describing effects of vegetation changes on invertebrates is pathetic. It is broadly overstated and replete with speculation (for example, dense stocking reduces soil productivity.) Correct deficiencies of the assessment and eliminate speculation. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## Section 2.10 ~ Fish

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Many think the success of fisheries is the primary indicator of overall aquatic and riparian ecosystem health and is a driving issue that will influence future management decisions within the project area. According to many respondents, the composition, distribution, and status of fisheries within the interior Columbia River Basin has changed over the past century or so, and some fish species have been eliminated from large portions of their historical ranges. Public comments show concern for fish, habitats to maintain viable populations, and impacts of management activities. There also is worry over extrinsic factors such as oceanic conditions, predation, overharvesting, and non-native species introduction.

### 2.10.1 Fish Health and Management

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One person says that the project and the agencies involved in its conception have “missed the boat” on their fish management strategy. This comment reflects a dismal mood shared by several respondents regarding the effectiveness of the Draft EISs to protect fish populations and habitat. Many are critical of the standards and guidelines for being vague, unclear, and contradictory to other proposals and the project’s own objectives. Questioning whether science was involved in the Draft EIS alternatives, some feel the agencies’ decisions are replete with political motivations and rhetoric.

Some note an absence of information regarding historical ranges and baseline values, making it difficult to interpret the effectiveness and ensuing consequences of the alternatives. Many of these respondents fear that native fish populations will be vulnerable to adverse habitat conditions; they caution the agencies to take the utmost care of threatened populations. While some propose that listed species should receive management priority, others promote standards and guidelines that would benefit habitat and population health for all fish species.

Some say that most of the data for the scientific analyses are inaccurate or misrepresented. Others feel that a few statements are simply untrue. They feel the agencies are exaggerating issues such as the severity of fish declines as a tactic to employ stricter planning management regulations. Most agree that unbiased and accurate scientific information is needed before any decisions or proposals can be made.

Because watersheds fall under numerous zoning and management jurisdictions, some remind the agencies to comply with other management plans and laws that pertain to fish health and rights.

**Issue:** *Historical and scientific information on fish species should be verified in the Final EIS.*

**Sample Comments:** *In Chapter 4, page 152, you address the issue of the Wood River Sculpin and Bridgelip Sucker. You state that their habitat will continue to decline due to the excessive logging going on there. This is an out and out fabricated lie. It is one more bit of proof that this EIS is a political process and not a scientific one. The truth is that there has not been any commercial timber sales in the Wood River Drainage for the past eight years. The drainage is 99% old growth forest and most of the altered 1% is due to one state highway and housing subdivisions. Less than one half of one percent has ever been logged in all of history. This lie about logging must be corrected. This information was obtained from USDA Forest Service ‘veg maps.’ (Natural Resource-based Business or Business Group, Bliss, ID - Letter #B78002)*

*The Historical Distribution map of key salmonoids is misleading. The area southwest of Burns, Oregon is a desert with few perennial streams historically or currently. To show this vast area as historic distribution is misleading and exaggerates the decline of the key salmonoids. I suspect this exaggerations also true for other areas such as the Snake River Plain and Central Washington. Exaggerations such as this points more to politics than science. Your maps of historical and current fish distribution do not show habitat currently occupied which never had historical fish populations. (Individual, McCall, ID - Letter #B99)*

*The third paragraph discusses the broad distribution of redband trout and cutthroat trout but fails to mention that few pure genetic populations exist due to hybridization with introduced fish. The DEIS (Chapter 4-136) discusses the impacts of introduced fish species for all key salmonoids except Yellowstone cutthroat trout. The range of Yellowstone cutthroat trout may be severely restricted if the introduction and spread of rainbow trout is not controlled. Historically, rainbow trout out-competed Yellowstone cutthroat trout in all areas where their range overlapped and Yellowstone cutthroat trout existed only above barriers that rainbow trout could not negotiate. Increasing numbers, or expanding the range will be problematic, regardless of the amount of habitat improvement that occurs. (State Agency or Elected Official, Boise, ID - Letter #B77849)*

*The Westslope cutthroat in the Upper John Day basin are a genetically isolated and unique ESU of fish. This fact warrants protection of a large portion of the John Day basin and protection of these fish so that their populations may expand and become less vulnerable to stochastic events. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*Map 2-26. The map gives the impression that historical presence of salmonoids is known with authority, but little historical information has been verified, which makes the map misleading. Add a footnote to the map that indicates the assumptions behind the data presented. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Bulltrout utilize Pipe Creek in the Yaak (historic range map is incorrect). (Individual, Troy, MT - Letter #B1145)*

**Issue:** ***The Final EIS should address its relation to other planning processes with regard to fish.***

**Sample Comments:** *To protect anadromous fish habitat and meet the federal government's trust and treaty obligations, ICBEMP should set objective, measurable standards that cannot be weakened through EAWS. These standards would include adequate buffer widths, and bank stability, substrate, temperature, and shade requirements such as those set forth in Wy-Kan-Ush-Mi Wa-Kish-Wit (Spirit of the Salmon), and The Columbia River Anadromous Fish Restoration Plan of the Nez Perce, Umatilla, Warm Springs and Yakama Tribes (CRITFC, 1995). Activities that further degrade habitat or retard recovery should be suspended and restorative measures (e.g., reductions in road density; reduction, elimination or other effective management of grazing) required until these parameters are met. Compliance with these standards should be assessed prior to implementation of disturbance activities, and monitored during and after implementation. Contrary to the current ICBEMP approach, which sacrifices degraded habitat or weak populations of anadromous fish, these standards should be applied uniformly to all anadromous fish habitat in the Basin. It goes without saying that every alternative must comply with applicable laws, including the Clean Water Act, the Endangered Species Act, the National Environmental Policy Act, the National Forest Management Act and all laws relating to cultural resources and properties. (Tribal Government, Warm Springs, OR - Letter #W4672)*

## 2.10.2 Effects on Fish Habitat and Management Practices

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A widely held belief is that the Columbia River is beyond conversion back to historical standards. Nevertheless, many respondents advocate fish protection measures and insist the agencies offer adequate standards and guidelines to ensure long-term viability and habitat conditions. These people believe that standards and guidelines proposed in the Draft EISs will not help restore fish habitat, noting that “salmon can’t live where they don’t have a home.” Many contend that detrimental effects on fish populations stem from management activities as well as natural disturbances.

Some insist that ocean conditions must be considered as a factor that limits or contributes to the strength of anadromous fish populations. They believe that harvest levels and marine predation continue at rates that exceed fisheries capacity and need to be addressed. Some suggest that ocean habitats should be studied along with river conditions. They feel the Draft EISs ignore the impacts of oceanic events, such as heavy fishing and current changes on river fish populations. Many individuals declare that overharvesting, both historically and currently, is one cause of the decline in fish populations. They add that the situation is not helped by sport fishing, commercial practices, chemical pollution, and netting salmon to be processed as dog food.

Claiming that other fish and wildlife populations can impose negative effects on certain fish species associated with the Columbia River, some say the agencies need to look at introduced fish species (such as northern pike), and consider their consequences on native bull trout populations.

Some assert that hatcheries were at one time common on the Columbia River, boosting fish populations in the drainage. They feel the Draft EISs do not address the issue of declines in salmon and steelhead due to hatcheries closing throughout the interior Columbia Basin. Others believe that the genetic inferiority of hatchery fish is reason enough to close hatcheries and not incorporate them into management provisions. Some respondents note that dams along the river also pose a challenge to migrating species, and some people insist that removing these impoundments is the key to salmon recovery. In contrast, others believe the dams will never come down and the economic disaster of such removals would be too great, so they advocate that fish routes be developed that would allow fish access to spawning grounds.

Many respondents claim that without addressing other management activities such as grazing, timber harvesting, and mining on lands administered by the BLM and Forest Service, fisheries will not be effectively restored. They state that improper grazing practices lead to a reduction of redds and water quality, especially in smaller channels. Countering this view, some others say that livestock introduce nutrients into watersheds and that fish populations are highest when cattle are present.

Several people are concerned about logging in the vicinity of fisheries. Many request that a discussion of the positive and negative contributions from silviculture practices be written in the Final EIS. Some respondents believe that spawning habitat is ruined from sediment resulting from logging practices. Effects from forest fires also are of concern to many who feel that proper standards and guidelines need to be used to minimize negative effects on water quality and fish habitat. Others feel there is no connection between logging and degraded habitats, citing personal experience on the Kootenai National Forest with what they consider some of the best fisheries in the country. They suggest that proper logging practices can enhance fish habitat by supplying nutrients and structure into fisheries.

A number of respondents claim that by limiting road construction and use, streambanks and riversides will be better protected for healthy fish habitat. Others add that roads will promote harmful activities and will further contribute to the decline of these fisheries.

**Issue:** *The Final EIS needs to address contributing factors to fish population and habitat health.*

**Sample Comments:** **OCEAN RELATED -**

*The analysis of the 4 Hs (hydropower, hatcheries, harvest, habitat) on pages 157-159 should be expanded to discuss the effects of ocean conditions (physical, chemical, biological aspects) when considering all factors limiting or contributing to the strength of anadromous populations. An additional factor potentially affecting strength of chinook salmon populations is ocean conditions and should be addressed in a discussion of limiting factors. Include a discussion of the importance of ocean conditions. (Natural Resource-based Business or Business Group, La Grande, - Letter #W686)*

*I want to list a few reasons for not going through with this ICBEMP plan. It fails to recognize the salmon decline as ocean oriented, from high tech fish boats, Korean drift netters, Indian fill netters on river inlets, ocean currents changing and natural salmon predators now protected and increasing in number. (Individual, Leavenworth, WA - Letter #W863)*

*Efforts are being made to improve inland habitat while the ocean-wide and marine habitat is largely ignored. Harvest levels are continued at rates far above the fisheries capacity and marine mammal predation is at an all time high. (Individual, Joseph, OR - Letter #W4538)*

**Sample Comments:** **OTHER FISH AND WILDLIFE SPECIES -**

*I learned of Oregon State University's federally funded analysis of fish-eating birds in the Columbia River. One nesting flock (Caspian terns) has been identified as being accountable for the smelt depredation of between 5 and 20 million Columbia River salmon in 1997 alone...with millions more eaten by cormorants. I am forced to conclude that the primary management concern concerning ESA anadromous fish species on the Columbia has been overlooked for purely political reasons. (Individual, Hamilton, MT - Letter #B77957)*

*The non-native Northern Pike has been unlawfully introduced into our native streams and lakes. Could they be eating our native bull trout? (Individual, Seeley Lake, MT - Letter #B103)*

*Chapter 2, page 136. Include Northern Pike as a non-native species. This species is devastating the bull trout population. (Individual, Missoula, MT - Letter #B3798)*

*When salmon thrive the bull trout will increase since they are dependent on the salmon. The expectation to this is where small remnant populations of stunted bull trout live in small headwater streams that are no longer accessible to salmon, as fish biologists know. (Individual, Baker City, OR - Letter #W810)*

*The third paragraph discusses the broad distribution of redband trout and cut-throat trout but fails to mention that few pure genetic populations exist due to hybridization with introduced fish. (State Agency, Boise, ID - Letter #B77849)*

*I think they should stop taking our water from us and making fisheries at home but I understand the seals are eating the salmon down river in Columbia - Is this true? (Individual, Kalispell, MT - Letter #B66)*

**Sample Comments: FISHING AND HARVESTING -**

*In my opinion, over the years bull trout have had too much pressure from fisherman, too many fisherman for the number of fish these streams can support. In this regard I do not believe that our Fish and Game personnel have been responsible. The number of fisherman should be limited that fish on these streams so that they are not overfished. In the planning process I hope you will address this concern and work out a solution. (Individual, Eureka, MT - Letter #B4792)*

*A large portion of the problem is with ocean fishing, or I should say, overfishing, with so many retirees buying boats. They, along with the trawlers and factory ships just offshore, endanger all fish, not just the anadromous species. (Individual, Klamath Falls, OR - Letter #W1293)*

*That I should even have lived through the sight of the great salmon runs earlier in this century, only to learn at last that they are virtually a thing of the past due to such practices as netting them by the million to make dog food with, while a state and federal government looked on without protest, is enough to stagger the imagination. (Individual, Seattle, WA - Letter #W895)*

*Our fisheries of salmon and steelhead will never return until foreign cannery ships are pushed 200 miles offshore and we quit allowing Indian treaties to literally sterilize our rivers with overlapping nets. (Individual, Corbett, OR - Letter #B79157)*

**Sample Comments: RANGE MANAGEMENT -**

*Both wetlands and healthy redd habitat are critical to fish survival during early life stages. While the preferred alternative will try to 'minimize' risks to wetlands and salmonoid redds, cattle will still be permitted to trod in these areas. While 'minimizing' risks sounds like a prudent policy direction on paper, the preferred alternative fails to ensure that risks will be truly minimized to the extent required for species recovery. Without constant supervision of cattle, risks to this critical fish rearing habitat will remain unchecked. Given the declining condition of key salmonoid populations within the Basin, the preferred alternative proposes an unsound management approach. (Conservation/Environmental Group, Portland, OR - Letter #W4830)*

*Livestock access and human activities managed to minimize adverse impacts on redds and sensitive species. Either make a decision to manage entire ecosystems or to manage single species. This standard is contrary to the basic idea of ecosystem management. Allow discretion for incidental disturbances and leave the decisions and enforcement tactics to local land and fisheries managers. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*We are starving the fish by fencing streams. We had lots of fish when livestock roamed free. Also, they are being eaten, all up and down the Columbia and at the entrance from seals, whales, otters, eagles, etc. How do you expect there to be salmon in Eastern Oregon rivers? A few years ago, Fish and Wildlife made people clear streams or roads of debris. Now they are stuffing the streams with it. (Individual, Enterprise, OR - Letter #W3027)*

**Sample Comments: ROAD RELATED -**

*One of the essential needs for protecting and restoring anadromous fish habitat is to significantly reduce the adverse effects of the road network on a broad scale. Critical steps to reducing road effects are to suspend road construction and require reductions in road density. Unfortunately, none of the alternatives ensure that road effects are consistently reduced on a broad scale in watersheds with anadromous fish. Instead, all of the alternatives allow the effects of roads to persist or increase in areas with anadromous fish. (Tribal Commission, Portland, OR - Letter #W4733)*

*Despite evidence that areas with low-density road system to be most vital habitat for salmonoids, the Preferred Alternative allows for increase in total miles in road. Salmonoids Are Facing Extinction! The worst thing we can do is build more roads in these areas. (Individual, Kaysville, UT - Letter #B77878)*

*Roads will certainly promote mining and logging which would threaten the fisheries of the area. This is especially true in the Upper Columbia Basin of Montana and Idaho. (Individual, Afton, MN - Letter #B996)*

*Both the Aquatic Assessment and the EDEIS (Eastside Draft EIS) acknowledge the relationship between road densities and strong fish populations. However, the EDEIS is notably lacking in directing to protect roadless areas and areas with low road density from the direct and indirect adverse effects associated with increased logging. (Professional Society, Corvallis, OR - Letter #W4635)*

*Despite evidence that area with low-density road systems are most vital habitat for salmonids, the Preferred Alternative allows for an increase in total miles of roads on these lands. (Individual, Marcola, OR - Letter #E46)*

*Studies show that erosion caused by road building (and overgrazing) is an indirect cause of fish mortality and decrease productivity. It s simple - dirt in streams causes fish eggs to suffocate, kills insects that trout and salmon feed on and cloudy water inhibits primary production. (Individual, Green River, WY - Letter #B75459)*

**Sample Comments: FOREST MANAGEMENT -**

*The risk of fire is preferable to forest management. There is a myth that the risk of fire compels the Forest Service and the Bureau of Land Management to build roads and allow timber harvest. From an aquatic perspective, this myth has no basis. A supplemental paper prepared by the Aquatic Science Integration Team concluded that the risk of the integrity of aquatic ecosystems from fire is considerably less than the risk inherent in silvicultural 'forest health' treatments. Simply put, we would rather have a fire than roads for fish. (Individual, Superior, MT - Letter #B75255)*

*The text suggests that 'silvicultural practices...degrade habitat,' but neglects to describe the positive and beneficial contributions of active management through silviculture to maintain and improve aquatic habitat. Add a discussion of the positive and beneficial contributions of active management through silviculture to maintain and improve habitat. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*In chapter 4, page 152 you address the issue of the Wood River Sculpin and Bridgelip Sucker. You state that their habitat will continue to decline due to the excessive logging going on there. This is an out and out fabricated lie. It is one more bit of proof that this EIS is a political process and not a scientific one. The truth is that there has not been ANY commercial timber sale in the Wood River Drainage for the past eight years. The drainage is 99% old growth forest and most of the altered 1% is due to one state highway and housing subdivisions. Less than one half of one percent has ever been logged in all of history. This lie about logging must be corrected. (Natural Resource-based Business or Business Group, Bliss, ID - Letter #B78002)*

*The aquatic and fisheries section place the responsibility for the lack of woody material on logging and timber harvesting when history clearly reversals that fish and wildlife agencies mandated the removal of woody materials from streams by loggers as part of the (timber) harvesting process. (Individual, Joseph, OR - Letter #W4538)*

*Plainly, logging can reduce, rather than promote forest health and restoration of stand structure. However, the DEISs and EASIT [Evaluation of the EIS Alternatives by the Science Integration Team] fail to adequately analyze the effects of logging and thinning on soils, resultant changes in soil productivity, site level hydrology and resultant effects on forest dynamics. They also ignore the findings of the Sierra Nevada Ecosystem Project regarding the effect of logging in increasing fire risks. Similarly, the DEISs and the EASIT completely fail to credibly analyze the differences under the alternatives regarding the logging of species and sizes of trees critical to restoring forest health. For instance, Alternatives 4 and 6 allow continued logging of large larch and ponderosa pine, while Alternative 7 requires retention of such trees. Although this has clear implications of stand and forest integrity, the DEISs and the EASIT fail to provide and credible analyses of these differences. ( Tribal Commission, Portland, OR - Letter #W4733)*

*This misconception has been perpetrated for a number of years throughout our region and the entire United States. Again, what is being reported does not conform with what I have seen and experienced through many years of fishing. No one debated the fact that the Kootenai National Forest has been logged extensively during the last 40 years. Yet this ecological system still contains some of the best fisheries in the nation particularly for cutthroat trout and bull trout. (Individual, Kalispell, MT - Letter #B76036)*

**Sample Comments: HATCHERIES -**

*The fact that there were so many fish hatcheries throughout eastern Oregon has been ignored. These hatcheries, many associated with and using natural hot springs as part of their rearing process, increased the numbers of salmon and steelhead dramatically prior to the introduction of dams in the Columbia River. Many of these hatcheries closed in the later thirties and forties, consequently the numbers of fish going to the ocean declined almost immediately. This was not caused by the advent of the dams, but by war. These and other similar facts have been conveniently left out of this document. These fish, by the way, were considered native. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*We need irrigation and electric power. The Columbia was undoubtedly a great fishery, but due to overfishing and permanent loss of habitat, the runs will never come back to pre-Columbian volumes. The Columbia serves more good as it is than reverting to a fish hatchery only. (Individual, Klamath Falls, OR - Letter #W686)*

*Close down hatcheries - they produce weak fish that can't stand changes in water temperature and have no genetic strength. (Individual, Milwaukee, OR - Letter #W653)*

**Sample Comments: DAMS AND HYDROELECTRIC POWER -**

*The federal agencies comprising ICBEMP are some of the many entities involved in the complex interactions that have caused the diminution of anadromous fish runs to their present state. The DEIS and supporting documents make it abundantly clear that Columbia River hydroelectric development and other problems have done grievous harm to the basin's fish runs. This has significant ramifications for the future existence of salmon, not to mention their harvestability. None of the alternatives would address the needs and opportunities for restoring habitat conditions outside federal lands, nor do they address the need for a comprehensive approach to restoring stream-type chinook salmon habitat and alleviating causes of mortality in freshwater spawning and rearing areas, migration corridors, estuaries, and the ocean. Without a comprehensive approach, even those alternatives that most benefit stream-type chinook salmon could not be expected to ensure persistence. (Tribal Commission, Portland, OR - Letter #W4733)*

*There isn't much use talking about them [dams] as Congress would never allow any of them to be breached. So I guess figure out how to get the fish up and down the rivers past them. (Individual, Corvallis, OR - Letter #B7)*

*Consistently amend the DEIS to clearly recognize that declines are due to a combination of the factors (dams, hydropower, exotic species, sport fishing and in some cases fisheries management practices designed to cause these changes). (Natural Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*The plan does nothing to guarantee the identification or modifications of existing fish passage barriers. (Conservation/Environmental Group, Portland, OR - Letter #W3816)*

*Removal of all the dams on the Snake and Columbia rivers may or may not benefit salmon but it would surely create an economic disaster for those depending on that electricity and the stored water for all its beneficial uses. (Individual, Rupert, ID - Letter #W4610)*

*The BLM and Forest Service do not have authority over dam construction or the NWPPC (Northwest Peoples Power Council), but since dams are the main deterrent to continued successful salmon reproduction their value should be reassessed in light of recently accumulated knowledge about their effects on fisheries. (Individual, Moyie Springs, ID - Letter #B4692)*

*Creating a new river channel that bypasses the dams is an option that would cost 800 million (dollars), about the equivalent of two years spending on salmon recovery. This solution should be taken seriously. So should the removal of the dams on both the Snake and Columbia. (Individual, Corvallis, OR - Letter #B75949)*

*Power generated throughout the Columbia Basin keeps the lights on for the Pacific Coast - where do they think power will come from if they mess this up? (Individual, Malta, MT - Letter #B78278)*

*The Snake and Columbia rivers have been converted by technology to run amok into a hydroelectric factory and a 350 mile navigation canal. What technology created, it can help mitigate and reverse, in theory, anyway. Dam removal can be matched with serious attempts to implement alternative sources of energy... The one method of getting salmon around the eight dams on the Snake -barging- does not work. It is the method preferred by power and barging companies because it allowed business as usual. Spilling fish over the dam has been called an art. The agencies are not committed to controlling spill for the fish and power companies oppose spilling. (Individual, Corvallis, MT - Letter #B75949)*

**Sample Comments: CHEMICAL RELATED -**

*The 'Plan' totally ignores the fact over-grazing and heavy use of chemicals are two of the primary reasons for degradation of the fish-sustaining capacity of literally thousands of streams in the basin, which, of course, run into the Columbia, degrading that stream too. So called non-point chemical pollution, (not the fault of various mills along the stream) is getting more and more blame for killing fish-eggs and smelt from various game biologists and fish-protection folk. (Individual, Gresham, OR - Letter #W739)*

*The decline in bull trout population is attributed to loss of habitat when the decision by fish biologists and the public to control bull trout populations by the use of Rotenone, unlimited harvest and paying bounties on bull trout caught in rivers and streams played a much larger role in their decline. (Individual, Joseph, OR - Letter #W4538)*

## 2.10.3 Special Status and Anadromous Fish Species

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Some individuals question how the agencies can be managing for long-term viability and health when the Draft EISs call for management practices that are, in their views, responsible for population declines in the first place. They feel that no scientific data are available demonstrating that biological requirements of fish can vary in different rivers. Some say the agencies are adjusting fish habitat standards in order to not interfere with “extractive industry aspirations.”

Many people are concerned about the number of native fish species that have declined to the point of requiring special status. They believe there is a correlation between fish decline and the loss of key habitat that has forced many species to the brink of extinction.

Numerous individuals feel cheated over the alternatives in the Draft EISs. They contend there are contradictions and deficiencies in the standards, and they feel new provisions and alternatives should be written to better address fishery health. Many of these people recommend the agencies take a closer look at how management actions in each of the alternatives affect fish habitat. Some state that none of the proposed alternatives will meet the project goals or the Desired Range of Future Conditions. Questioning the accuracy and inclusion of science in the standards, some recommend these inappropriate provisions should be removed.

Some say that one reason they feel the Forest Service and BLM will not succeed with any type of management plan, is that most recovery efforts involve a species-by-species approach. They feel the Final EIS must extend its management philosophy to look at whole systems, similar to the ecosystem management principles being promoted. Others say there is a need for flexible management practices that can match specific habitat and species requirements throughout the project area.

**Issue:** *The Final EIS needs to clearly evaluate the alternatives’ effects on fish populations.*

**Sample Comments:** *Alternative 5 appears to be the worst for anadromous fish, assuming the DRFCs are reasonably predictive. Essentially, this alternative writes off large area of habitat to an unproductive state, ensuring extirpation of numerous sub-populations of wide-ranging anadromous salmonoids, such as spring/summer chinook salmon. This alternative, as it is currently written, will likely not meet ESA section 7 consultation requirements or comply with the CWA or species viability requirement of NFMA. The theme for Alternative 4 appears to rely largely on achieving ‘properly functioning’ conditions. This is defined as ‘the minimum acceptable condition’, and, if applied to aquatic systems, will not meet section 7 requirement’s for anadromous fish. Under this alternative, significant additional impacts on aquatic systems (above and beyond the currently degraded environmental baselines of many watersheds), would be commonplace. Even if long-term terrestrial goals are met, the short- and intermediate-term consequences for anadromous fish and other aquatic resources would likely be severe. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*The statement that ‘Alternatives 1,2, and 5 would result in the continued decline in the overall status of steelhead and stream-type chinook salmon stocks because of a minimal emphasis on restoration and continued land disturbance in portions of the current range over the long term’ is not supported by discussion in the DEIS. The DEIS must provide an evaluation of how continued land disturbance and management under each alternative’s standards and guidelines would affect fish or state that the evaluations are inconclusive. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The last sentence states 'persistence and viability of bull trout throughout the core distribution area is expected in Alternatives 2, 3, 4, 6, and 7', implies that bull trout populations would suffer under Alternative 5, but this is not substantiated. The DEIS must provide an analysis and discussion of how activities per Alternative 5 would effect the persistence and viability of bull trout in the core distribution areas and identify where these areas are. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*I am concerned that none of the alternatives protect [enough] fish habitat. We spend millions to help save salmon without doing things at the source. Excess logging seriously damages fish habitat. I examined all the alternatives and none do nearly enough to protect the fish. Lets be brave and restrict activities that damage fish habitat. [Alternatives] 3 and 4 don't do enough even though they are an improvement. (Individual, Yakima, WA - Letter #W685)*

*The text of this section (pg. 3-91) is contradictory in terms of its predicted effect on conservation of anadromous stocks under the various proposed alternatives. While Alternatives 3,4, 6, and 7 provide for greater levels of conservation of aquatic habitats for these stock that would other alternatives, the predicted continues declines in POPULATIONS of anadromous stocks identified under Alternatives 1,2, and 5 would also be expected (for Snake River spring/summer Chinook salmon, Snake River sockeye salmon and Snake River steelhead stock within the upper Salmon River Basin) under the other alternatives as well. While the effects of mortality factors other than habitat is acknowledged and discussed in the DEIS, the predicted effects of the various alternatives on status of anadromous fish stocks appears to have been on levels of habitat protection provided, without full consideration of these other identified factors. (County Agency, Challis, ID - Letter #B77161)*

*The DEIS conclusion that Alternative 5 would not conserve strong populations of bull trout is not a defensible conclusion. Remove the erroneous conclusions from the DEIS. The statement that Alternative 5, outside of aquatic emphasis areas will result in broad scale fragmentation of aquatic and riparian environments is not scientifically supported in the DEIS. The justification for statement must be provided or such statements should be removed from the DEIS. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*All of the alternatives are also inadequate to contribute to maintaining and restoring anadromous fish because they specifically focus the highest risk forest treatments in some of the more degraded drainages, where existing depressed populations are most at risk. This flaw is exacerbated because ICBEMP documents specifically recommend concentrating high-risk activities in degraded streams with hatchery-influenced anadromous fish, contrary to the federal governments responsibility to manage lands consistent with salmon rebuilding and the tribes' rights to take salmon. The strongholds identifies for lower levels of activities that degrade habitat and reduce salmon survival do not include areas where hatchery influenced anadromous fish spawn and rear. Concentrating activities that degrade habitat in areas that are already degraded, have weak populations, or are hatchery-influenced, is not consistent with protecting and rebuilding anadromous fish populations. It is also not a low risk approach. (Tribal Commission, Portland, OR - Letter #W4733)*

*The Preferred Alternative fails to correctly identify aquatic habitat strongholds that are essential to the protection and restoration of healthy ecosystems... It also fails to provide management standards that will adequately protect these stronghold. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

**Issue:** *The Final EIS should consider the effects of a regional approach with basin-wide standards.*

**Sample Comments:** *Rehabilitation of depressed populations of our fisheries cannot rely on habitat improvement alone but requires a concerted effort to address causes of mortality in all life stages... These include fresh water spawning and rearing, juvenile migration, ocean survival, and adult migration ... This is exactly the conclusion that my husband and I had reached, for it is our firm opinion that we cannot continue to fix bits and pieces of a system that is producing fish that are continuing to be listed on the endangered species lists species by species; if we expect to restore our endangered fisheries in Idaho. (Individual, Boise, ID - Letter #B75653)*

*The documents assert that none of the alternatives address the need for a comprehensive approach to alleviate mortality outside BLM and USFS administered lands to ensure persistence and viability of endangered and threatened anadromous fish stocks. It is evident that ESA and fish and wildlife viability issues cannot be resolved to any substantial degree in the ICBEMP. So there is no need to perpetuate or impose near-restrictive standards on management activities at the regional level, premised on fish and wildlife habitat issues. Such standards should be deleted from the ICBEMP in favor of flexible regional guidelines from addressing habitat issues at the forest and district plan and site-specific project levels. (Natural Resource-based Business or Business Group, Boise, ID - Letter #B75569)*

*The best available science indicates that there are certain minimum baseline conditions that fish need to survive and flourish. Non-prescriptive standards have failed to achieve these conditions. We have been unable to meaningfully exercise our treaty rights to fish for several decades now, due in large part of the failure of federal agencies to protect and restore fish habitat and water quality. We cannot live with the status quo of leaving it to local watershed analysis and on-the-ground decision makers. Near extinction for many of our salmon runs clearly requires establishment at the regional plan level. (Tribal Government, Pendleton, OR - Letter #W625)*

*Within the DEIS, the treatment of species under the Endangered Species Act follow the old one-species at a time approach that has been recognized as the wrong approach to species management. At one time it was stated that individual species management is not workable in the long run. Why continue this in this DEIS? (Natural Resource-based Business or Business Group, Prineville, OR - Letter #W746)*

## 2.10.4 Habitat for Viable Fish Populations

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Many assert that proper habitat is vital for viable fish populations. They believe that none of the alternatives address habitat improvements in a manner conducive to positive change. Some suggest establishing reserves and refuges throughout the basin to preserve habitat and spawning areas. They note that there must be a connection between these reserves or fish populations will stagnate. Even if no further habitat is lost, some believe the isolated pockets the fish are surviving in now will put these populations at risk.

Others fear that aggressive management will have a negative impact on fisheries. Some contend the agencies are not preventing basic practices, such as logging, which they perceive to be instrumental in the decay of original habitat conditions. Many respondents suggest that management decisions are not worth making unless basic information is known, such as the assessment of breeding numbers and distribution ranges of fish populations. Expressing frustration due to their perception of a lack of scientific merit represented in project information, many insist scientific backing for these statements is necessary for the proper analysis and understanding of the Draft EISs. Some state that a lack of guidance in these management provisions will only hinder the future progress of restoring species.

Many respondents feel the agencies need to conduct viability analyses for the fish species in the Columbia River Basin. Some add that monitoring and adaptive management can be effective tools for the restoration of fisheries and species viability. Those who promote baseline standards say implementation of these standards can provide conditions where fish can flourish and survive.

**Issue:** *The Final EIS needs to revise management strategies for fish habitat and viability.*

**Sample Comments:** *As someone who has worked professionally for the last 4 years in the field of salmon habitat restoration on the Olympic Peninsula, how well I know the importance of protecting habitat. We must protect certain key elements in the watershed if we want to protect the entire watershed. It is much cheaper in the long run to protect riparian environments than to try to rebuild them or to wait the many years for it to heal naturally. (Individual, Port Townsend, WA - Letter #W349)*

*Connectivity among populations, especially with fringe populations, was identified by the aquatic SIT as one of the most important needs for the continued existence of most species. Based on this finding, emphasis should be made in Chapter 3 to direct managers toward restoration of connective corridors among populations and high quality habitat. (Federal Agency, Portland, OR - Letter #W4641)*

*If current distributions of the key salmonids are good indicators of aquatic ecosystem health, many systems remain only as remnants of what were larger, more complex, diverse, and connected systems. Even with no further habitat loss the fragmentation and isolation may place remaining populations at risk. Most of the important areas for key salmonids exist as patches of scattered subwatersheds. The patchwork of important watersheds also suggests that remaining populations of salmonids are not well distributed within the subbasins. If connectivity of populations is limited by matrix of poor quality habitats interspersed among remaining high quality areas, gene flow and the potential for refounding or demographic support among populations will also be limited. (Conservation/Environmental Group, Swan Lake, MT - Letter #B78929)*

*The DEISs mirror the deficiencies of the EASIT [Evaluation of EIS Alternatives by the Science Integration Team] and AEC [Assessment of Ecosystem Components]. The EASIT and DEISs also premise the analysis on invalid assumptions that thoroughly warp the analysis. For instance, it is assumed that requiring EAWS improves the probability that management will be consistent with improving/protecting anadromous fish habitat. However, there is no data or case histories to support this highly unscientific statement of faith, nor is any cited in the EASIT or DEISs. There are case histories which thoroughly undermine the contention that EAWS lead to land management that is more consistent with protecting and restoring anadromous fish habitats. (Tribal Commission, Portland, OR - Letter #W4733)*

*We are not advocating that ICBEMP address all the ills afflicting salmon in this document. However, the ICBEMP cannot adhere to its current position of pointing its finger at other entities, some of whom are agencies within the same Department, and complain that salmon management is an uncoordinated and impossible mess and that the fate of salmon is out of its hands. The federal government has the capability and the responsibility to comprehensively implement salmon restoration. Accordingly, the federal government's assessment of salmon protection needs, must be informed by the federal government's assessments, activities, and decisions in other forums. (Tribal Commission, Portland, OR - Letter #W4733)*

*Provide more specific direction for monitoring, reporting results, and adjusting management. The [Fish and Wildlife] Service has concerns about the plan's emphasis on species viability. Assessments of the alternatives on species viability do not necessarily contribute to recovery or avoiding new listings. Because viability analyses are generally inadequate predictors for the perpetuation and recovery for many species, monitoring strategies in the ICBEMP need to assure that species do not decline during implementation of ICBEMP. Existing monitoring strategies in the plan need to be made more specific and provide for clear accountability for doing monitoring, reporting results, and adjusting management accordingly. The plan should provide specific provisions for the interagency implementation team to develop monitoring protocols that require incorporating adaptive management through feedback loops. When monitoring shows that goals, objectives, or assumptions for listed and sensitive species are not being met, the ICBEMP should specify a consistent process to address the problems. (Federal Agency, Portland, OR - Letter #W4641)*

**Issue:** *The Final EIS should consider prescription standards to re-establish fish habitats for long-term protection.*

**Sample Comments:** *There are core salmonid habitat parameters, to which fish respond. Therefore the selected alternative must include: Fish habitat standards, including substrate (cobble embeddedness and/or sediment), bank stability, and temperature; Indication of land management changes triggered by violations of habitat standards [e.g. disallow actions regarding recovery in substandard areas, required pre-project restoration activities (such as road obliteration)]; Protect all roadless areas from entry; require reduction in road densities. (Tribal Government, Toppenish, WA - Letter #B81209)*

*Essential to us in the Pacific Northwest, we need an alternative that protects remaining high-quality watersheds and restore those watersheds already in trouble, so that we can reverse the deterioration of the salmon and trout populations here in Washington and Oregon. (Individual, Everson, WA - Letter #W383)*

*It is much cheaper in the long run to protect riparian environments than to try to rebuild them or to wait the many years for it to heal 'naturally.' (Individual, Port Townsend, WA - Letter #W349)*

*In their landmark study, Return To The River, the Independent Science Group concluded that it was very important to protect the remaining core salmonoid population in the Columbia River Basin. The report highlighted the existence of 'de facto' reserves for Westslope cutthroat trout in the Clearwater (Kelly Creek) and Salmon (middle Fork) Rivers in Idaho and chinook salmon in the Hanford Reach of the mainstream Columbia River as example of where aquatic reserve systems could be established in order to preserve spawning and rearing habitats so that such areas can serve as a foundation from which natural population and metapopulation structure can be re-established. (Conservation/Environmental Group, Portland, OR - Letter #W3816)*

*Why can't the states and the U.S. Fish and Wildlife implement a plan to transfer fertile eggs directly to streams with low or non-existent fish runs? We hear how the Indian Tribes are doing this. Hatchery reared fish have survival problems once released. Why not try to duplicate natural spawning and get these little ones started out where they belong? This instream planting of eggs in large quantities done for a few years could jump start these runs in streams, that are ready for them. (Individual, Baker City, OR - Letter #W810)*

*The plan contains several deep flaws that threaten to undermine its ability to protect salmon, steelhead, bull trout, and other aquatic species. The plan fails to give federal land managers a set of bottom-line requirements which ensure protection and restoration of water quality and fish habitat. This lack of measurable, enforceable standards almost guarantees that time and money will continue to be spent on the design of projects which will fail to pass minimal legal and biological standards. (Natural Resource-based Business or Business Group, Eugene, OR - Letter #W4658)*

*We already have the technology to improve fish habitat and other resources. In fact we have seen much improvement in recent years. We also see some streams with prime fish rearing habitat that are almost devoid of fish. I am confident that it is possible to revive salmon and other fish if we don't tie our hands, but we have a maze of self-imposed restrictions to overcome before that will happen. (Individual, Baker City, OR - Letter #W810)*

*AQ-O1. This objective should refer specifically to recovery of listed aquatic species. The goal of maintenance and restoration falls short of the mandate of Section 7(a)(1) of the Endangered Species Act. Rather than slowing the speed of decline or maintaining the status quo, the [Fish and Wildlife] Service suggests that the primary objective of the ICBEMP be recovery of listed species and the preclusion of future listings. AQ-O7. The Final EIS should include an alternative which states clear goals for recovering native aquatic communities through specific management actions. Although the objective as stated has been a general goal of land management agencies for years, the lack of specific guidelines and criteria for achieving this objective has precluded progress toward species recovery or protecting species from being imperiled to the point of meriting listing. (Federal Agency, Portland, OR - Letter #W4641)*

*Include in the FEIS selected alternative and ROD, measures to direct land management decisions so as to ensure successful ecological near-term and long-term outcomes for anadromous species. This is especially important for those areas needed to protect existing high quality habitats and populations in anchor watersheds. Prior to the FEIS and ROD, develop an interagency cumulative effects analysis methodology(ies) that will be incorporated into step-down analyses (SBR, EAWS, and NEPA planing documents) and the overall adaptive management process. Use NMFS' 'Making Endangered Species Act Determinations of Effects for Individual or Grouped Actions at the Watershed Scale' as a basis for the evaluation of cumulative effects. (Federal Agency, Portland, OR - Letter #B78714)*

**Issue:** *The Final EIS needs to assess the number of fish populations and their geographical distribution to effectively manage for fish habitat and viable populations.*

**Sample Comments:** *The idea of population centers or strongholds is firmly rooted in the literature, but the concept expressed the ICBEMP DEISs seems to misinterpret the concepts of habitat refugia and population source areas. ICBEMP DEISs analyses used a criteria of 5,000 fish as the number required to define a population stronghold. It is not clear what relevance this number of fish has to species viability, survival, or production. The ecological basis for the concept of strongholds described in the DEIS is questionable, and it does not include the life history patterns of species, genetic diversity and viability of fish populations. These factors include the life history patterns of species, genetic factors specific to each population, demographic patterns, patch dynamics, and dispersal patterns. Without analysis or consideration of life history and demographic factors, absolute numbers of fish do*

*not indicate the status of the species of the importance of a particular location in the conservation or recovery of the population. The strongholds identified in the DEISs represent locations where habitat is relatively undeveloped in some instances, but do not necessarily have any relationship with fish demographics. (Federal Agency, Seattle, WA - Letter #B78714)*

*To suggest aquatic improvements will occur under any of the alternatives fails to describe the target levels which will define improvement and increases in fish populations. Will 100 fish or 1000 fish provide information that an improvement is sufficient over time? Some quantifiable amount of population measurement must be set in order to determine if the planning decisions are working. (Individual, La Grande, OR - Letter #W3806)*

*The discussion relative to 'genetic integrity' (DEIS 2-162) is extremely general and ignores one of the most important factors relative to genetic diversity, namely the number of breeding populations. It is well established that the critical question relative to genetic stability and resilience is the distributions of the population. If the distribution is narrow, a local catastrophic event could lead to extinction, however, if the population is well distributed, any area or areas where the loss occurred could be recolonized from other areas once the catastrophic event subsides. Furthermore, a well-distributed population can serve as a buffer against gene loss resulting from random mating with small populations. In other words, to assess the genetic risk, both the total abundance of the population and the geographical and habitat distribution need to be assessed. In this case, the starting point for genetic integrity would be at the broad scale with a review of the geographical distribution. We are unable to ascertain a functional difference between Objective AQ-O9 and AQ-O3. We suggest that the objectives be closely reviewed to avoid duplication and confusion. (County Agency or Elected Official, Canyon City, OR - Letter #W4580)*

## 2.10.5 Watersheds

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Some individuals discount the agencies' processes for classifying watersheds into categories. People are unclear about what constitutes a priority watershed and question how many actually exist in the project area. Respondents say that the Final EIS needs to include specific numbers of watersheds in each of the proposed alternatives. Some say the classification is biased toward salmonid distribution, which, in their opinion, leaves out priority for other aquatic species. They contend that failure to address these other species could lead to management issues in the future.

Other people consider the management standards an adequate base, but they still are unclear of the language in the standards, which they believe may stall the project's effectiveness. Seeing little difference between Category 1 and 2 watersheds, some suggest the combination of the two, where both can benefit from Ecosystem Analysis at the Watershed Scale. Others say that Category 1 subbasins are ineffective strategies because they do not cover all salmonid species. Some individuals promote the principles of conservation biology and request the agencies to incorporate those principles into management practices.

**Issue:** *The Final EIS should clarify its rationale for classifying watersheds into categories 1, 2, and 3.*

**Sample Comments:** *The Eastside DEIS does not reveal how many acres of timber are engulfed in these Category 1 watersheds, what is the foreseeable impact on timber and range resource outputs, what is the projected cost on/ or length of time needed to prepare one of the analyses, and what is the timeframe for completion? (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

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*The process used to rank subbasins did not examine watershed integrity but inferred its condition based on the number of salmonoid species known or assumed to be in strong numbers. This was presumably due to the paucity of monitoring data collected per the current forest plans yet there is no monitoring commitment made through the DEISs. As a result there is no network of watersheds across the landscape to provide for migratory fish species. Category 1 subbasins are supposed to receive the most protective management standards, however there is no tangible management difference between Category 1, 2, or 3 subbasins except that Category 1 subbasins require watershed analysis prior to any activities that also require an EA or EIS. In Category 2 and 3 watersheds, watershed analysis is only required prior to activities which 'may affect' species that are listed or proposed for listing under the ESA. Under preferred Alternative 4, no direction is provided to meaningfully constrain the type of management activities which can be allowed once a watershed analysis has been completed. (Conservation/Environmental Groups, Swan Lake, MT - Letter #B78929)*

*It is unclear how much of federal land consists of Category 1, 2, or 3 Watersheds. This is a crucial piece of information for the reader to understand perceived aquatic ecosystem conditions on federal lands and the relative abundance of the three types of watersheds that will be affected by federal land management policy decisions. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The project is currently skewed toward key salmonoids. The ranking of watersheds into categories of high, medium, and low aquatic integrity is overly dependent upon information pertaining to the distribution of key salmonoids. While salmonoid distribution provides a reasonable starting point for the identification of important watersheds, it is inherently biased against identification of watersheds critical for other aquatic species. Although it is clearly necessary to ensure species already in danger of extinction are considered, the Project must ensure that its selection process does not set the agencies up to face management problems from future declines in now-ignored species. (Conservation/Environmental Group, Seattle, WA - Letter #B75255)*

*To ensure that appropriately conservative management can be targeted towards those species most at risk, all 45 of the Basin's 'special status fish' species must be considered when identifying 'special status subbasins or watersheds.' This is the only to improve the status of these species and increase the likelihood that increased ESA protections will not be needed. The preferred alternative fails to provide direction for proper management of 'special status fish' watersheds and essential aquatic strongholds. The preferred alternative should include specific guidance regarding these and other land management activities that requires a more conservative approach in 'special status fish' watersheds. Furthermore, a targeted restoration program is needed in many of these watersheds so that the status of all 45 special status fishes can be improved. (Conservation/Environmental Groups, Eugene, OR - Letter #W3786)*

*The EASIT [Evaluation of Alternatives by the Science Integration Team] and the DEISs fail to disclose the number of watersheds with anadromous fish and the status of those populations included within the reserves under Alternative 7. This is a significant defect, since such populations would be protected from increased road density and construction under Alternative 7. This must be rectified and the DEISs and EASIT corrected to include a reasonable and adequate analysis of the provisions of Alternative 7 regarding road construction and the spatial distribution of anadromous fish. (Tribal Commission, Portland, OR - Letter #W4733)*

**Issue:** *There is a need for proper watershed management in the Final EIS.*

**Sample Comments:** *The watershed objectives (AQ-O4, O7 and O9) seem to be headed in the right direction. Watersheds most crucial to aquatic resources should be protected from human-induced impacts. Important watersheds that are readily restorable should be protected from new impacts and have the lingering effects of past management restored. The remaining watersheds (those that have been impacted and are not readily restorable) should be managed with non-degradation if the watershed in mind, and with the special effort to protect, and where possible, restore the remaining isolated refuges or 'biological hot spots' (AQ-O9). Unfortunately, the objectives are not supported by clear management standards which prevent activities already known to be incompatible with the attainment of the objectives for priority watersheds and other watershed classes. Despite the voluminous list of activities that have been recognized as incompatible with the purposes for which priority watersheds are identified, none of these activities have been constrained through management standards applicable to priority watersheds. Providing maximum management discretion for Forest Service and BLM decisionmakers dooms line managers to re-creating the wheel with every project's design. (Conservation/Environmental Group, Eugene, OR - Letter #W3786)*

*Class 1 and Class 2 watersheds should be lumped together, because both are healthy and can thus contribute to survival and recovery of all aquatic species. The requirements to do EAWS should pertain to both of these watersheds. ...The importance of Class 2 watersheds for salmonoid populations is too great to allow wholesale experimentation. They are not places to experiment with on a large-scale, but they could selectively accommodate smaller 'experiments' with the appropriate monitoring. Class 2 watersheds are the most in need of analysis because many are somewhat degraded and require active management (restoration) to attain proper function. (Conservation/Environmental Group, Baker City, OR - Letter #W4608)*

*In establishing a network of key or priority watersheds, the principles of conservation biology must be applied. The watershed network must facilitate efforts to protect, expand, and reconnect the remaining healthier aquatic habitats and it must ensure that all the genetic pieces of each native aquatic taxon are retained. The first step in establishing a system of key watersheds is to identify the last best places. Second, this initial network must be evaluated to ensure it encompasses the important breeding and rearing areas as well as take into consideration migration corridors. If the initial network is especially skewed in its geographic or taxonomic coverage, additional areas must be added to include additional watersheds that can serve as recovery anchor points. It is crucial that the identification process consider both the geographic and the taxonomic contexts; that is, the network must be well distributed across the land and it must include areas of importance to all aquatic species, regardless of whether or not the species is of interest to a large segment of society. (Conservation/Environmental Group, Boise, ID - Letter #B78654)*

*The Category 1 subbasins do not provide a foundation of aquatic species conservation. They should not be used as the foundation to vary management activities. To conserve genetic diversity, there should be conservation of populations and habitats across the full range of their distribution. The Category 1 subbasins have a clumped distribution and do not encompass the full range of key and ESA listed salmonoid species. (Federal Agency, Seattle, WA - Letter #B78714)*

## 2.10.6 PACFISH and INFISH

Many individuals feel that the agencies are hiding behind interim policy safeguards, and they say they are getting the same PACFISH and INFISH guidelines, just wrapped in a new package. They state that the default standards should be replaced with a new level of management which contains more flexible guidelines and management principles.

Others claim the policies affecting fish in the basin have been lowered, believing that fish populations could be jeopardized if the preferred alternative is implemented. Many feel that the new guidelines are unclear and confusing, leaving them uncertain of the effects of the alternatives. Those who favor the removal of guidelines that are similar to PACFISH and INFISH strategies, say that such measures will lead to economic hardship for those communities reliant on activities in areas where the standards are in effect. They say that research has shown that the interim measures are overly prescriptive for proper riparian conditions.

Some assert that the widths in Riparian Conservation Areas of PACFISH do not provide for safe fish habitat. They feel that the widths do not include provisions to protect fisheries from active management activities such as roadbuilding and logging, which, they believe, are responsible for the initial degradation of these areas.

**Issue:** *The Final EIS needs to address the removal of interim management strategies.*

**Sample Comments:** *The Eastside DEIS fails to remove interim guidance; it continues to utilize default standards in the absence of local knowledge. Timely replacement of the continued interim guidance with site-specific management objectives and standards through ecosystem analysis relies on unproven technologies and is probably unrealistic. A successful management strategy, as envisioned in the project Charter, would be expected to replace interim protection strategies not only in form, but also in management, philosophy, and approach. Current interim strategies are quick fixes for threatened legal challenges to federal forest policies; that is, they are overly conservative, address fairly narrow purposes and objectives, have questionable scientific validity, and have never been fully evaluated in terms of ecosystem effects. However, the Eastside DEIS fails to remove interim guidance, and also lacks a performance-driven, functionally based approach to resource management and firm grounding in ecosystem principles. (Natural Resource-based Businesses or Business Groups, Usk, WA - Letter #W4547)*

*All alternatives remain simply refinements to PACFISH and INFISH interim strategies. Replace these strategies with performance and functionally based approaches. (Natural Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*PACFISH was developed and designed to add to the land management plans an adequate aquatic management framework. By not including the goals of PACFISH in the ICBEMP DEISs, and by replacing the PACFISH amendment to Forest and Area management plan with ICBEMP DEISs, the FS and BLM planning documents will continue to lack an appropriate aquatic ecosystem management framework. Therefore, goals similar to those outlined in PACFISH should be included in the ICBEMP FEIS. (Federal Agency, Seattle, WA - Letter #B78714)*

*DEISs fail to remove interim strategies. They are replaced with new standards that are even more restrictive. The interim strategies are rigidly restrictive, have questionable scientific validity and have resulted in unintended effects on the ecosystems by increasing the fire risk in streamside areas. (Natural Resource-based Business or Business Group, Lyons, OR - Letter #W732)*

*It appears that there is a shift from the PACFISH and INFISH interim directions toward management standards which are less protective. There does not appear to be an obligation in the standards that management activities do not impede rates of recovery. Because the standards and guidelines are vague or extremely discretionary, they are of little use to land managers when designing proposed actions. The standards and guidelines are even less useful in deciding whether or not aquatic ecosystems will flourish or decline. ICBEMP should use standards and guidelines to set measurable and enforceable criteria by which to judge management. (Conservation/Environmental Group, Boise, ID - Letter #B78654)*

*The proposed departures from existing Interim direction, such as protective provisions in PACFISH, require defensible biological rationales. There is critical discussion presently lacking in the evaluation of effects of the proposed action, and is required to account for the fact that '...thousands of hours of deliberation by biological experts were used in developing PACFISH. Lessening those standards would necessitate a full and detailed justification which has not yet been provided.' (Conservation/Environmental Group, Baker City, OR - Letter #4608)*

**Issue:** *The Riparian Conservation Area widths of PACFISH are not adequate to provide riparian functions.*

**Sample Comments:** *The EASIT incorrectly asserts that the RCA widths of PACFISH are adequate to provide riparian functions and include a margin of error. This is obviously incorrect when activities allowed within the width include grazing, clearcut logging, strip mining, and road construction of channel banks, as is allowed within the RCA widths under Alternatives 4 and 6. This again points to the erroneous nature of the assessments that neglect to fully evaluate what is allowed within RCAs. Therefore, even though it is known that riparian protections should incorporate factors of safety, as noted in Rhodes et al., none of the alternatives include RCAs that incorporate such safety factors across the range of anadromous fish. (Tribal Commission, Portland, OR - Letter #W4733)*

*Riparian areas should be delineated on the basis of recent entities such as PACFISH and INFISH. Riparian reserves should have wider buffers than prescribed by PACFISH where these do not exceed the depth-of-edge influence. Buffers exceeding the depth-of-edge influence are warranted to minimize the permeation of edge effects that are deleterious to salamanders and other biota dependent on riparian microsite conditions. (Conservation/Environmental Groups, Seattle, WA - Letter #W4611)*

*Screens and infish do not work, ecosystem are too complex for 300 buffers or 1 snag per acre. (Individual, Boise, ID - Letter #B75281)*

**Issue:** *The Final EIS needs to re-evaluate the aquatic and riparian standards in the Draft EIs in relationship to PACFISH guidance for buffer widths*

**Sample Comments:** *A major justification for the ICBEMP has been to replace interim PACFISH and INFISH guidelines for maintaining fish habitat with more flexible, science-based direction. Yet the standards and objectives for riparian areas and aquatic habitat incorporated in the DEIS action alternatives perpetuate one size fits all, top-down, default buffers and other mandatory requirements of questionable scientific validity. (Professional Society, Boise, ID - Letter #B75495)*

*We cannot find the science which adequately supports the proposed standards. We especially tried to find the scientific support for the riparian buffer zones and the degree of road density reduction. In neither case could we find adequate scientific support, in fact we found scientific evidence which supports the adequacy of PACFISH/INFISH buffer widths which are substantially less than those proposed in the DEIS. There is also new information coming out of the Washington State Timber, Fish, and Wildlife process that shows that even PACFISH/INFISH standards are excessive for appropriate riparian functioning conditions. We find this unacceptable and that the DEISs are not scientifically sound. (Natural Resource-based Business or Business Group, Colville, WA - Letter #W698)*

*Although PACFISH and INFISH were interim strategies subject to change following watershed analysis, they were adopted as minimum standards by most federal managers. This is true despite the fact that the science supporting them is weak, or nonexistent. (State Agency, Boise, ID - Letter #B77849)*

**Issue:** *The Final EIS should address the social-economic effects from the proposed standards replacing INFISH and PACFISH.*

**Sample Comments:** *With the inclusion of the UCRB, the added 'interim measures' of PACFISH and INFISH, the prolonged preparation time of the ICBEMP DEIS, and the resulting massive reduction in the quality and quantity of federal timber, our members throughout the seven affected states have been subjected to severe distress, dislocation, and uncertainty beyond anyone's wildest imagination. Their surrounding communities have experienced corresponding socio-economic distress. (Natural Resource-based Business or Business Group, Beaverton, OR - Letter #W4535)*

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# Chapter 3

## Social and Economic Consequences

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### Introduction

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Chapter 3 discusses public comments related to the social and economic consequences of the Interior Columbia Basin Ecosystem Management Project, such as recreation uses, commodity outputs from public lands, and the effects of management actions on the people, communities, and economies in the project area. This discussion includes such issues as traditional ways of life, cultural and heritage resources, community dependence and resiliency, jobs, taxes, roadless areas and wilderness, and social and cultural issues specific to America Indian Tribes.

Comments on the environmental consequences of the alternatives are discussed and analyzed in Chapter 2 of this document. Comments about the project's purpose and need, planning processes, and relationship to other plans and laws are discussed in Chapter 1, along with general comments about the proposed action, terminology, science and data.

### Section 3.1 ~ Economics

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Some people believe that their communities are not resilient enough to withstand the potentially negative economic impacts resulting from implementation of the project, based on the Draft EISs definition of community resiliency as the ability of a community to successfully deal with the inevitable social changes that will affect them. These respondents question whether their particular communities have the population size, economic strength and diversity, aesthetic appeal, surrounding amenities, and strong leadership to be considered resilient. They note that several rural areas already suffer economically from new management plans, and they question the feasibility of transforming a resource extractive economy into an economy relying more on tourism and less active management of the land. Many people, while appreciating the environment, feel the land is meant to produce goods and should do so even if it is at some cost to the environment.

Conversely, some people feel that the “subsidizing” (of) timber-dependent communities is an increasingly poor management decision by government to support an “isolated and unsupportable” lifestyle. They acknowledge an obligation to help these communities, but not in ways that they perceive as degrading the natural environment.

Overall, many people believe the conclusions the project's economic analysis comes to are too broad and are based on insufficient information and inaccurate and unscientific material.

### 3.1.1 Community Resilience

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The project concerns many people because they think that it expects all rural communities to switch their economic base from natural resource extraction to tourism. Pointing to Hell’s Canyon National Recreation Area as an example of where unrealistic expectations were not met for communities involved in the transition from extractive to tourism industries, some people question how this can work. They believe their communities don’t have the same amenities to attract tourists as Glacier or Yellowstone National Parks. Others wonder how proposed road closures would affect recreational opportunities that underpin any future tourism. Many people say that if a more diversified economy is called for, then the government should provide sufficient financial assistance to ensure successful transition.

Many respondents worry that implementation of the project will result in lost jobs and a lost tax base for funding schools. They believe that the Draft EISs do not adequately consider these economic impacts on resource-dependent communities. Some add that planning strategies should be developed to place resource-dependent communities at a high priority for continued management when funding is limited.

Some feel that public lands were set aside with the intent of providing for multiple use. They contend that society needs resources and that resource-dependent communities want to continue providing these resources. The project offends some who view management specialists as people who “produce piles of paper and regulations,” and remove opportunities for them to be productive members of society.

Others oppose continued community dependence on natural resources and government subsidies, suggesting that communities can supply timber without being timber-dependent. These respondents feel logging must be done responsibly, with care for the environment, to create a more selective and sustainable harvest. Some people point out that according to the Draft EISs, an overabundance of timber grows in the wrong places. They feel such pockets of timber can be harvested, effectively removing the excess without harming the ecosystem.

Several believe that government should financially aid communities through economic transitions but should no longer subsidize resource extractive economies. However, they also state that the economic needs of communities should not receive precedence over the needs of the greater ecosystem. Some people suggest that resource-dependent communities need to “wean themselves” from an isolated lifestyle that is increasingly less viable. Some note that the agencies need to follow legislative direction that permits and encourages consideration of community economic stability when planning or implementing management plans.

**Issue:** *The Final EIS should consider the potential economic damage to resource-dependent communities incapable of withstanding an economic change.*

**Sample Comments:** *The suggestion in the DEIS that areas now dependent on renewable resources could withstand the economic impact by promoting tourism and recreation is an unproven generalization. The Hell’s Canyon National Recreation Area has been in place for several years and few if any (including the US Forest Service) are making any profit on tourism and recreation in that area. (Individual, Imnaha, OR - Letter #W786)*

*I am concerned about the validity of the social-economic portion of this plan. I do not believe in that the areas specified in the plan COULD or WOULD survive as tourism and recreation areas. This is not a realistic possibility. This is not Glacier or Yellowstone Park and never will be. Many people in the area would be forced to move and businesses to close. (Individual, Thompson Falls, MT - Letter #B75414)*

*I do not want to be forced to leave Tobacco Valley to find work but I can't see a future for Eureka the way ICBEMP is set up now. If I do have to leave Eureka to find work, uprooting my family of six, who will buy my house I have worked so hard for when there is no industry or economic base? (Individual, Eureka, MT - Letter #W802)*

*I also find it patently offensive that ICE BLIMP suggests that rural areas that rely on renewable resources, such as grazing and timber, should promote tourism and recreation. It seems to me that more and more management specialists' want to stifle the productive people that actually produce food or fiber, and turn them into people like themselves that produce piles of paper and regulations for all of us to live by. (Individual, Plush, OR - Letter #W789)*

*DEIS discounts the issue of community stability. This has been a long standing policy of the Forest Service and BLM and has been reinforced through laws such as the Small Business Administration Act and the National Forest Management Act. This issue must be adequately addressed. (Natural-Resource- Based Business or Business Group, Colville, WA - Letter # W708)*

*I am opposed to the ICBEMP because of its: negative impacts on local economies. (Individual, Fort Bragg, CA - Letter # W4105)*

*I have a very real fear that the plan may be devastating to the economics of the local communities. I think Congress and the Eastside Ecosystem Coalition of Counties had the same fear when they directed the project team to do the analysis of the economic and social implications of the plan. In talking last night to Dr. Fred Obermiller, professor of agricultural and resource economics to Oregon State University, I expressed my concerns. Dr. Obermiller said (direct quote), 'this report and the EIS is an attempt to obscure the negative impacts on local communities based on data that does not exist and assumptions that can not be validated. I expect that implementation of this plan will lead to annihilation of rural communities within the scope of the Interior Columbia Basin Ecosystem Management Planning area.' (Individual, Jordan Valley, OR - Letter #3814)*

*The plan also fails to provide any meaningful assistance to local communities undergoing economic and social transition to more diversified economies. (Individual, Portland, OR - Letter #W510)*

*The public lands here have historically been available for multiple use, while continuing to generate renewable resources. It is estimated here that every timber dollar is moving throughout our local community as many as nine times! What would a small place like Eureka, Montana do without those timber dollars and the exchange of those dollars? (Individual, Eureka, MT - Letter #B4647)*

*Although these lands are 'national' forests, and rangelands, they are also our backyards and we, as regional residents of these lands have become dependent upon the harvesting and responsible use of these resources. We also treasure their spectacular beautiful landscapes, but also realize that we, as occupants of this planet, need to use (but not abuse), these resources with diligent use to provide sustained supply for our future generations of co-habitants. (Individual, Pendleton, OR - Letter #W1498)*

*While ecological restoration of forests can pay its own way and continue to provide goods and services, rangeland restoration is a different subject. There would be displacements, and the hard-working, little guy would apparently be the loser. (Professional Society, Libby, MT - Letter #W967)*

**Issue:** *The selected alternative should provide for assistance, both financial and other to resource-dependent communities while they undergo transition to less extractive economies.*

**Sample Comments:** *The social and economic changes inherent in such a plan are already occurring. As the Social/Economics Report demonstrates, the effect across the Basin will be quite small, but some isolated communities will feel a proportionately large economic impact. Even so, many of these communities have a small portion of their economies based on commercial extraction on the federal lands. While the federal government should expand or institute programs to help them through the transition, we cannot continue to sacrifice the public's natural resources to maintain a local economy built upon conditions that have now changed. Also, the restoration program will require substantial work and funding, providing employment to these same communities and workers. (Individual, Seattle, WA - Letter #W4674)*

*Alternative 5, which would provide some ecosystem management efforts, would resolve conflicts in favor of positive socio-economic effects rather than positive ecological effects. This approach is unacceptable. First, it does not restore the ecosystem, which can be viewed as a complex of resources owned by American citizens (or the public or the taxpayer, choose your favorite noun). This means, in effect, that we are using public ecosystem resources to subsidize pockets of isolated ways of life with little or no capacity for change. While we have no objection, and in fact, encourage the use of public monies to help people out of social misery, there are other ways of helping people which do not further destroy ecosystems! (Individual, Portland, OR - Letter #W1755)*

**Issue:** *The “subsidizing” of resource-dependent communities and industries should be addressed in the Final EIS.*

**Sample Comments:** *The DEISs exaggerate the importance of federal timber and range to local communities, and the preferred alternative directs agencies to ‘emphasize customary economic uses in rural communities...’ disregarding the economic changes that have occurred over the last thirty years. These communities do NOT depend on federal logging and grazing as much as the FS and BLM would have us believe. (Individual, Hamilton, MT - Letter #B3939)*

*Public citizens in Okanogan County and across the nation value their National Forests and public lands. These public forests and lands are not seen to be simply further industrial assets for commercial logging. Okanogan County's economy is not dependent on timber, although commercial logging has and continues to provide useful products and jobs. Responsible logging will remain a part of the economy, but there are places to log and places not to log. (Individual, Twisp, WA - Letter #B4775)*

*These are ‘national’ areas being considered here - for public benefit. The whole public and the greater ecosystem/biosystem good does not include commercial logging, road building, grazing, etc. to expand, continue or run rampant (those are private commercial interests that for the most part have been subsidized for too long). (Individual, Seattle, WA - Letter #W867)*

*You've spent the last 100 years helping the ranchers and loggers ruin our public lands. I don't see any point in continuing to subsidize timber dependent communities. We need to move on to the next century. (Individual, Eugene, OR - Letter #W884)*

*I believe strongly that needs of 'area economies and communities' must not take priority over or conflict with the basic direction of needs of 'aggressively restoring ecosystem health.' Indeed, this would seem to be implied by the emphasis on SUSTAINABILITY, i.e., local humans must accommodate to the natural setting, live within its limits. (Individual, Portland, OR - Letter #W43)*

*I know there are communities that are heavily dependent on national grazing and timber harvest and I'm not about to say I had to readjust so, so should they, but I think a slow weaning process is essential. First of all, we don't need more red meat, we need less. Secondly, when timber tycoons find they can't raid the federal lands, they will tend their own private stands much more assiduously. Federal money, which these towns receive, should not be dependent on desecrating our public lands. (Individual, Oakland, CA - Letter #W31)*

*Since economic analysis within the Basin has shown that new industries have more than offset any possible future reduction in mining, logging and grazing activity, why is it that these industries must be protected at all costs when so many of us have had to adapt in recent decades? (Individual, Anacortes, WA - Letter #W466)*

**Issue:** ***The Final EIS should address how resource extraction can be done effectively to maintain local economies and sustain the ecosystem's health.***

**Sample Comments:** *The 'LOCKING UP' of land to eliminate, reduce or prevent, people from making a living is outrageous! The American people MUST be able to live, and make a living. This CAN be done and protect the ecosystem health at the same time. Simply, eliminating human activity in and on federal lands is idiotic. (Individual, Morenci, AZ - Letter #W3087)*

*It would devastate my community and eliminate my job. Private timber cannot long continue to provide for the needs of our country in housing, paper and other forest products. Federal lands are growing far more timber than is being harvested. The EIS says that there is too much timber in the wrong places. Why not harvest it to provide the raw materials needed by our society? It can provide for the needs of our society forever. (Individual, Seeley Lake, MT - Letter #B4712)*

*Historically the economy of the land encompassed in ICBEMP has always been based on natural resource industries - mining, grazing, and timber. In recent years, each of these industries have made enormous strides in protecting the environment. Grass and timber are renewable resources and under proper management by those who KNOW each permit or timber sale they can be a valuable source of income for years to come. (Individual, Unity, OR, #W774)*

**Issue:** ***The Final EIS should address the responsibility to provide economic stability to rural communities.***

**Sample Comments:** *Although the documents are quick to point out (and attempt to support) that the Forest Service (never mentions the BLM) has no specific mandate to provide economic stability to rural communities, there are numerous references to indicate that there is a requirement. For example: 'Use of the National Forests for national and regional growth and development was the federal policy when the Organic Act was passed in 1897, and has remained so'; and 'The Forest Service was an early promoter of using a sustained yield, even-flow timber policy to promote the stability of forest communities'; and 'Congress, in the White Pine Blister Rust Protection Act of 1940, mentioned for the first time maintaining community stability as the purpose of an act of the federal government'; and 'The idea of community stability was firmly*

*connected to timber supply in terms of sustained yield, in the Sustained Yield Forest Management Act of 1944, which gave authority to establish Cooperative Sustained Yield Units to promote the stability of forest industries, employment, communities, and taxable forest wealth intending to support the stability of communities primarily dependent on federal timber; and 'In order to protect domestic wood processing jobs and promote small businesses, the Congress restricted log exports from federal lands and set aside timber for sale to companies with 500 or fewer employees'; and The NFMA of 1976 added substantially to Forest Service community stability policy. It solidified a traditional but contentious even-flow timber supply strategy for National Forests through the sustained yield and non-declining even-flow provisions in section 11(36 CFR 219.16) of that law. Community stability also surfaced in section 14 (e)(1) of NFMA, requiring bidding methods for timber sales to consider 'the economic stability of communities whose economies are dependent on such National Forest materials', with regulations requiring dependent communities to be one of several factors considered'; and 'The National Forest-Dependent Rural Communities Economic Diversification Act in the 1990 Farm Bill which sought to provide assistance to rural communities located near National Forests that fit a special definition of 'economically disadvantaged' due to the loss of jobs or income derived from forestry, the wood products industry, or related commercial enterprises such as recreation and tourism in the National Forests.' (Natural Resource-based Businesses or Business Groups, Colville, WA - Letter #W698)*

### 3.1.2

## Economic Analysis

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Most people find different aspects of the the project's economic analysis to be inadequate or incomplete. They feel the analysis is not scientifically grounded and the project is an unproven management theory potentially devastating to many communities. Some fear that an anti-resource use ethic is evident in the lack of analysis addressing the effects of development, recreational or otherwise, on lands previously used for timber and agriculture.

Many people feel the economic analysis does not distinguish between rural and urban areas. They contend that lumping communities into one category inaccurately offers the appearance that small, rural communities have the same economic background as larger cities.

Several people believe the economic analysis does not comply with the Department of Interior and Related Agencies Appropriation Act of 1998 (Act). They feel the project did not provide information required by the Act, including subbasin reviews and analysis of the impacts of each alternative on local economies. One tribal government feels the project dismisses the analyses of economic impacts on tribes, focusing instead on non-Native American communities. This respondent alleges the project claimed it could not complete an economic analysis of the Tribe and could only analyze non-Indian communities.

Some people suggest that conducting a county or community-level economic analysis, not a regional-level analysis, is necessary to address the impacts of reduced resource extraction on local economies. They feel regional-level analyses are too broad and do not provide sufficient information for local governments to assess impacts to their communities. Some people believe that location-specific alternatives would be most effective, along with an economic analysis of each alternative. Some feel that the *Economic and Social Conditions of Communities* report is incomplete and does not adequately consider different methods of assessing recreation employment in the project area.

One individual suggests that the project should develop effective community out-reach programs, to help gain cooperation from communities in formulating strategies for extracting resources in a responsible manner. Some people feel the project holds the importance of ecosystems over the importance of humans, even though humans are part of the ecosystem. Many feel the public should have a chance to comment on and help guide their economic destiny.

Some people feel the Draft EISs remain incomplete without an estimation of Allowable Sale Quantity (ASQ) or Probable Sale Quantity (PSQ) of timber. They believe communities have a right to predictable levels of harvest year to year, so banks have the criteria to make loan decisions and governments and schools can draft their annual budgets.

Some respondents believe that economics and ecosystem management are mutually exclusive. They feel that capitalism based on scarcity, competition, and maximum use of resources for the maximum economic good cannot accommodate a healthy environment and reduce resource extraction.

**Issue:** *The Final EIS should include an economic analysis containing complete, accurate, and adequate information.*

**Sample Comments:** *The social and economic analysis of the effects of ecosystem management is unscientific and wholly inadequate. No management system can succeed that fails to disclose real social and economic effects to communities, landowners and citizens. This project is an experiment with no track record, yet, it will irrevocably commit human and financial resources, curtail production of valuable commodities and cause serious economic dislocations in many of the 104 counties in the planning area. This is too great a risk to put on an unproven management theory. (Individual, Baker City, OR - Letter #W492)*

*The socio-economic analysis needs to be revised. It is representative of an anti-resource development ethic that is not based in 'science.' The emphasis on timber issues and lack of discussion of grazing and particularly mining resources needs to be corrected. (Individual, Missoula, MT - Letter #B76187)*

*The economic analysis fails to consider the effects of increased development of lands previously used for agriculture. With their development comes more demand on the local government for goods and services. Recreation, the expected replacement to the resource-based economic losses, will not provide the funds necessary for the counties to provide the infrastructure and deal with increased problems such development brings with it. (Natural-Resource-based Business or Business Group, Salem, OR - Letter #W4831)*

*The cost analysis avoids discussion of economic losses due to catastrophic events under each alternative. The cost analysis needs to be revised to incorporate measures of potential losses because of catastrophic events. Cost assumptions varied by alternative. The justification for varying cost assumptions by alternative needs to be provided, or the cost assumptions need to be treated equally among alternatives. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The analysis of economic effects in the Eastside DEIS inappropriately relies on broad regional analysis, which diluted the significance of effects on local communities. The Eastside DEIS fails to adequately recognize the distinction between urban areas and rural areas. Many of the underlying assumptions of the economic assessment are incorrect or fail to recognize opposing views. The Eastside DEIS provides only two quantitative estimates of how the alternatives will affect the economy. A complete economic analysis should also include estimates of the following: Total regional and sub-regional employment; Regional income (payrolls and business net income); Federal net timber revenues; Payments to counties and schools of 25 percent of revenues; Federal personal and corporate income tax collections; State income and business tax collections; Sales taxes; State timber tax receipts; Unemployment compensation for displaced workers; and Losses to U.S. consumers due to higher wood products prices. (Natural-Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*At the forefront, this analysis has been identified as being flawed in the past. Most of the analysis is taken from the 1996 report ECONOMIC ASSESSMENT OF THE BASIN, by Haynes and Horne. William McKillop, Professor of Forest Economics at the University of California, Berkeley commented that Haynes and Horne (1996) was defective pointing out that the report has an 'outmoded and narrow view of community stability' and that it 'presented a false picture of the basis of economic growth.' Yet, this economic information has been included in the DEIS. (County Agency or Elected Official, Cascade, ID - Letter #W1861)*

*The criterion that only 4% of the economy within the Basin depends directly on commodity extraction does not tell the story adequately. First, 4% is an average of the entire Columbia Basin, which is very diverse in its economies. The Economy of Northwest Montana is more directly impacted by the logging industry and commodity extraction than the economy of the area of Spokane, Washington. It is inappropriate to apply this criterion throughout the Columbia Basin. Sub-areas within the Basin need to be created for application of this criterion. Secondly, it is inappropriate to look only at the impact of its commodity extraction directly on the economies. There are substantial indirect and induced aspects of the commodity extraction, particularly in the Northwest Montana Region. Income in Northwest Montana from commodity extraction is substantial, and restrictions, particularly on small businesses, would force significant portions of the populations out of work and would hurt the local economies. (Individual, Lakeside, MT - Letter #B4724)*

*The recently released economic study (dated February 1998), which is intended to be the response to Congressional direction in the Department of Interior and Related Agencies Appropriation Act of 1998, is only 121 pages long. It covers 543 communities in 98 counties. This is a poor attempt, at best, to comply with the Act. The Act required the ICBEMP Team to 'analyze the economic and social conditions and culture and customs, of the communities at the subbasin level within the Project area and the impacts the alternatives in the draft EIS will have on those communities.' In our opinion, you did not comply with this mandate. Those of us who live in or near the ICBEMP region believe that the ICBEMP Project will harm our economies, tax base and communities. Our small businesses and families deserve to have a proper analysis done and we therefore insist that the congressional mandate and intent be complied with. (Wise-Use Group, Whitehall, MT - Letter #W4665)*

*It is unfortunate that when the ICBEMP planning was first initiated, the CTUIR [Confederated Tribes of the Umatilla Indian Reservation] requested the assistance of the U.S. Forest Service and the BLM in assessing the economic issues related to Tribal people of past federal lands management and of management under the future FEIS. After CTUIR obtained funding assistance from the Ford Foundation and contracted with the economists to assist with this work, the ICBEMP managers reported back to us that such a study could not be conducted. The CTUIR was advised that the information needed could not be compiled. The end result was that the contractual commitments made by the CTUIR could not be fulfilled. Further, the ICBEMP did not benefit from the analysis of economic effects of federal lands management on Indian people. Now, unfortunately, the economic analysis has come full circle. A report has been completed that focuses on non-Indian communities and attempts to address Tribal communities by inference. Consistent with our view of much of the DEIS, the economic assessment has provided information to and about the non-Indian economies but has sacrificed the Tribal economies and Tribal needs. The Economic and Social Conditions of Communities falls far short of the federal government's obligation to assess the impacts of past management and predict the impact of proposed management on the CTUIR. This conclusion is supported by the document itself on page 26. (Tribal Government, Pendleton, OR - Letter #W4656)*

*The implementation of this project will have a major impact on our business, our employees and frankly our whole Valley, as the forest products industry is the primary local industry. The DEIS section on Human Uses and Values (DEIS Chapter 4, pages 164-190) is ambiguous and totally inaccurate. Local economies in Western Montana are directly linked to timber production from USFS and BLM lands. From all I have seen and heard recently, I believe you need to review your research on the local communities' economics. Our county was reported to have no agriculture, high mining, and medium logging. When in fact there is no longer any mining, medium logging and agriculture has always been a large part of our local community. (Natural-Resource-based Business or Business Group, Deer Lodge, MT - Letter #B77070)*

*I understand the ICBEMP wrongly reports Twisp, Winthrop, and Pateros as highly dependent on wood product manufacturing, and Winthrop as being highly dependent on federal employment. These areas are recreational, and highly dependent on tourist or out of town employment. The mill that exported logs has been closed for years now and local people who log commute to work largely. The Forest Service is in the middle of another downsize. (Individual, Twisp, WA - Letter #W1772)*

**Issue:** *The project's economic analysis should not lump small individual communities into broad economic categories.*

**Sample Comments:** *Of special concern is lumping the community of Eureka, MT in which my family has a history of 80+ years with Missoula, MT. I have a son who lives in Missoula and I can assure you there is no economic benefit of jobs lost in Eureka being replaced in Missoula. Because of these kinds of faulty assumptions I believe the economic analysis should be redone. (Individual, Eureka, MT - Letter #B4617)*

*Throughout the document there is a resounding disrespect for existing cultural and socio-economic lifestyles. There exists within the DEIS a clear and distinct positive emphasis upon large urban communities with apparent non-resource-based economies versus a negative or inconsequential regard for small rural communities with natural resource-based economies (timber harvesting, ranching, farming, or mining). Of the 500+ rural communities within the study area the ICBEMP team has eliminated all but 29 from any consideration by placing them within an amorphous sphere of influence of larger towns. (Individual, Sparks, NV - Letter #B77093)*

*I am referencing the position taken in the EIS that ties Lincoln County to the Missoula population study and concludes the Timber Industry represents only 5%. If you don't live in Lincoln county - you might read through the lines and figure there's little economic impact. But for those who live here - we are not fooled! Somebody needs to get their facts straight! Lincoln County is 85% timber related not 5% - and the economic impact will devastate Eureka and all other communities in Lincoln County if ICBEMP is acted on by our Federal government! (Individual, Eureka, MT - Letter #B4662)*

**Issue:** *The project should conduct county and community level economic analyses in addition to regional level analyses.*

**Sample Comments:** *Despite different management approaches, the same population projections are provided for all alternatives. The Eastside DEIS needs to contain a thorough analysis of social and economic impacts at the community level where impacts are meaningful. (Natural-Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*Page 743, col. 1, paragraph 2, Counties. Problem Statement: One would have expected that the section entitled 'Counties' would include an analysis of the fiscal impacts on each county resulting from the 7 alternatives, yet one was not provided. Supporting Evidence: It is important to provide information on the potential county-level fiscal impacts resulting from each alternative so that decision makers have a clear understanding of all impacts of plan implementation. Recommendation: The analysis needs to be revised to include county-level fiscal impacts from each of the alternatives. (Natural-Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

*The communities whose economic viability is solely based on the extraction of resources will support management strategies which sustain future supplies of resources. Within these communities knowledge of resource sustainability is the only way to have continued economic benefit with minimal environmental degradation. Sustaining future supplies of resources in the Columbia River Basin may only be possible with cooperation from every individual which stands to impact the resources. Public outreach programs are critical to each of these communities as well as the communities within the project area. In order for the ICBEMP to gain widespread acceptance within the project area, analysis of all the affected communities must occur. Analyzing community ideals will enable ICBEMP implementation to match restoration activities with specific community needs. Development of public outreach programs which are tailored to meet the needs of the various communities. The adaptive management approach institutes changes in management with each evaluation of progress. Community analysis must be included in every progress evaluation. (Individual, Unknown - Letter #B77290)*

*The economic and social impacts are not adequately addressed. Specific social/economic impacts to individual communities is critical to local governments. Local governments need information on the number of jobs affected, losses in projected revenue as well as other specific impacts to individual communities. The ICBEMP should contain location-specific alternatives and a specific economic analysis of each alternative. (County Agency or Elected Official, Eureka, NV - Letter #B78918)*

*The DEISs fail to consider the multiplier effect of economics or study the impacts on the rural communities and how those impacts affect the rest of the state and thereby the region. These documents contain the ability to severely impact three states (Idaho, Oregon, and Washington), and to have severe impacts on portions of Nevada and Montana. Yet these potential economic impacts are barely addressed. It is apparent to us that the DEIS has placed the values of people, their economy, and their culture into a lower class role than ecosystems. It fails to acknowledge that these people and their communities and states are actually very integral parts of the different ecosystems that the BLM and USFS want to manage for ecosystem health. (Natural-Resource-based Business or Business Group, Elko, NV - Letter #B78739)*

*Your entire economic analysis is a travesty based on economic assumptions that are not accepted by the economic community. The people who are affected should have some say in their economic destiny. Those who have no vested interest should not be allowed a voice. If you had used accepted economic theory and practices you might have had a harder time assuming that everyone wants to be involved in making a living from tourism. (State Agency or Elected Official, Weiser, ID - Letter #B75761)*

**Issue:** *The Economic and Social Conditions of Communities report should have more accurately analyzed community-level impacts of the project and this should be reflected in the Final EIS.*

**Sample Comments:** *We note that while there was agreement that a socio-economic supplement be prepared, this supplement [economic and social conditions of communities] does not include two tasks agreed to be completed. First, the supplement was to explore other methods of measurement to give a realistic picture of recreation employment in the Basin. The second task is presentation of tables that display income associated with various jobs in the region, in particular between recreation jobs and traditional employment opportunities. (County Organization, Salem, OR - Letter #W4555)*

*After spending tens of thousands of dollars developing a report, this non-responsive answer to the request for the potential impacts and effects of decisions is unacceptable. It is but another example of the Project failing to be responsive to the public, even at the Congressional and County level. The Eastside Ecosystem Coalition of Counties had concerns that the potential impacts on communities be accurately described, yet the effects that each alternative could have at the community level are only described in terms of trends. Current impacts and effects from the existing interim direction, that has been 'rolled over' into the DEISs, are not generally disclosed. Consequently, the potential economic and social impacts and effects are grossly misrepresented and understated. It is obvious that the Economic and Social Conditions of Communities is designed to support the direction to implement the existing perceived concept of ecosystem management. This is supported by the statement that 'community-level results expressed in this report do not change the effects that were described for the county and regional levels discussed in the Draft EISs. (Natural Resource-based Business or Business Group, John Day, OR - Letter #W4729)*

*The lack of interest in pursuing rigorous approaches to impact analysis is disturbing. Recommendation: Revise the discussion to include a balanced discussion of economic impacts that can occur at the community level that can, subsequently, be evaluated in the impacts section of Chapter 4. Also discuss the importance of timber outputs to local economies. Absence of this information is a significant oversight that calls for discussion and analysis in a supplement to the DEIS. (Natural Resource-based Business or Business Group, LaGrande, OR - Letter #W686)*

**Issue:** *The Final EIS should provide predictable Allowable Sale Quantities (ASQs) or Probable Sale Quantities (PSQs) to timber-dependent communities.*

**Sample Comments:** *We would ask the ICBEMP team how it will be possible for area mills to remain in business without some measure of certainty that predictable levels of harvest will continue from one year to the next? What criteria will area banks use to base their lending decisions to local contractors and businesses on? How will city and county governments be able to draft annual budgets, and continue with the level of services we currently enjoy? Area schools, which already face shortfalls in annual budgets, will have no choice but to float ever higher school bonds, which will have little chance of voter approval, due to the unstable and unpredictable level of employment. (Individual, Rexford, MT - Letter #B75564)*

*The new report only provides information on which alternatives would generally result in positive or negative Socio-Economic effects (page 94). However, the inclusion of perceived uncertainty renders this information useless (Tables 2-3, 2-4, 2-5, and 2-6). The change in allowable sale quantity (ASQ) and or probable sale*

quantity (PSQ) resulting from ICBEMP's standards can be accurately estimated. A more accurate estimation of ASQ and /or PSQ will provide the information needed to estimate the number of mills likely to close and related social and economic impacts. Information on the ability of the 423 listed communities to obtain resources from other than Forest Service and BLM lands would allow a listing of specific impacted communities and the severity of the impact upon those communities. This information would be much more useful for the public and the decision makers than the information provided in the DEIS and the new report (Pages 94-99). (Natural-Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B77298)

The definition of 'timber dependent communities' was arbitrarily changed to exclude communities within a fifty mile radius without the consideration of geographic barriers that limit accessibility. There are no figures for ASQ in the DEISs. How can an economics analysis be completed without knowing how much of a particular product will be offered for sale? How can the agency determine how much work it can perform without knowing what funds will be added to the trust funds from the sale of timber products? There is no analysis showing how any changes to the timber sale program will impact the 25% fees that are paid to the counties. (Natural-Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B77304)

**Issue:** *The Final EIS should recognize that ecosystem management and economic management often run counter to each other.*

**Sample Comments:** *Economic goals are completely myopic and short-sighted. Overwhelming emphasis is placed on commercial/extractive activity at the whim of input from local communities; even the old 'sustained yield' concept seems to have been abandoned in favor of 'commercial activity'... Economic goals do not function at the ecosystem level. Goals do not consider the economic aspects of export of local, low wage jobs from extractive uses overlaid with export of raw commodities to areas outside 'rural' communities. (Conservation/ Environmental Group, Boise, ID - Letter #W3690)*

*Ecosystem management flies in the face of the current economic model under which our society operates. Our capitalist economy makes it virtually impossible to make sound environment management decisions based on an ecosystem approach (Kahn 1995, 125). Our traditional laissez-faire economy is based on scarcity and driven by competition without government interference. Many in society who rely on the economic benefits associated with the lands managed under ICBEMP are fully entrenched in this principal. ICBEMP does little to address this paradox. (Individual, Ellensburg, WA - Letter #B77292)*

## Section 3.2 ~ Employment and Industries

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Most jobs, less money for school and road funds, and community economic stability are vital concerns for respondents, particularly those who reside in the interior Columbia River Basin. Opinions are split on how, and to what extent implementation of the project will affect regional and local economies. Some feel the project has little or no potential for negative effects on communities, citing evidence that employment sources are shifting from extractive to recreational activities. Others, mostly residents of small towns and cities within the project boundaries, strongly assert that any plan that further limits their access to extractive commodities from Federal lands will sound the death knell for their communities.

### 3.2.1 Commodity- based Employment

The statement “I will lose my job and community” made by one respondent captures the sentiments of many to the perceived impacts of the preferred alternative. These people want the project to realize they depend on extracting natural resources from Federal lands to make a living, whether in timber, mining, or ranching. They feel they are misrepresented by the Draft EISs, in particular by the claim that only four percent of regional employment is in extractive industries. In their estimation, this statement is a gross under-valuation for their towns and counties, failing to consider indirect employment and addressing the relative importance of resource extraction in their particular community. Many residents from smaller towns, particularly in northwest Montana and northern Idaho, are upset they were included in larger economic analysis areas which they feel mask their isolation and dependency on timber.

Some assert that all alternatives in the Draft EISs fundamentally disregard the needs of people in the project area. They argue that the Draft EISs consider mining, timber, and grazing only as by-products of maintaining ecosystem health, which increases the uncertainty of future production.

Several feel that employment in new job sectors created by restoration activities is a step in the right direction but will not be enough to replace jobs lost in traditional extractive industries.

In contrast, others feel that a decrease in opportunities for extractive industries will not adversely affect the communities. They believe that communities will and must adapt to survive. They perceive that the trend is toward less extractive industry representation in local economies is inevitable. Asserting that economic strength can be maintained by sustainable extractive practices that consider ecological integrity, they content that without healthy and stable ecosystems no community can survive in the long-run.

A number of these respondents argue that resource extraction is a vital use for the land. They believe that without timber harvesting, supply and demand levels will become unbalanced not only in the United States, but world-wide. They feel that the nation already relies heavily on foreign sources for paper, other wood fiber products, and beef cattle, and that the country will suffer when it no longer supplies its own needs and must rely on imports.

**Issue:** *The Final EIS should limit impacts on local resource-based economies.*

**Sample Comments:** *I feel this plan if implemented will create immediate economic disaster for thousands of people in the Northwest. It would not single out any one industry or group but will include all activity within those areas... The RCAs, if implemented would virtually eliminate the logging, mining and grazing and cause an economic disaster for those living and working in those areas. The trickle down effect would be disastrous for communities (sic), businesses, families and unemployment would rise to new heights. (Individual, Emmett, ID - Letter #W9686)*

*The people of the Flathead Valley can barely pay the bills. Timber related jobs used to be plentiful. Not any more. If more timber was released people would be making 10 to 15 dollars an hour. Instead they are being forced to take 1 or 2 minimum wage jobs or they go on welfare. As a timber grader I see what the old growth looks like you are trying to save - most of it's rotten and split up trees do not last forever. (Individual, Kalispell, MT - Letter #B75430)*

*The small percent of a workforce is the least important or the smallest ingredient in a finished product...The authors assume this small percentage is of no consequences...However if one only looks at a box of cereal costing \$2.75 and knowing it contains only \$.04 worth of cereal one recognizes the fallacy of this assumption. (Individual, Joseph, OR - Letter #W4538)*

*Kittitas County takes offense to Figure 1, page 5, as we believe the figure does not accurately represent the benefits timber, mining, and ranching activities produce to the specific communities within the study area. We believe that this figure trivializes the impacts to these industries in many counties, where timber, ranching, and mining provide the economic backbone of its citizens. We believe that the benefits that these industries produce are immeasurable. How many communities will have to sacrifice what is precious to their customs, culture, and economic well being for the sake of some poorly defined ecosystem value? (County Agency or Official, Ellensburg, WA - Letter #W4571)*

*It is not clear how timber jobs resulting from forest restoration activities were calculated. Jobs generated as a result of restoration need to be incorporated into the economic analysis. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*The socio-economic aspects have been ignored. Over 200 new standards have been developed for restoration, but no real standards or objectives have been developed to 'support economic and/or social needs of people, cultures, and communities, and provide sustainable and predictable levels of products and services from lands...' (Civic Group, Eureka, MT - Letter #B75619)*

*I do not believe that 'Remediation and reclamation' constitutes 'mineral economic activity'. Second, it takes considerable less people to do this type of work than it does to operate a mine, so your 'local and regional economic imports' that you refer to will be virtually non-existent. (Individual, Elko, NV - Letter #W892)*

*We also need numbers on how much timber will be harvested with ICBEMP; will there be enough to keep area mills running or will they just shut down and look for other jobs or go on welfare, where do we raise our families and how do we keep schools going? (Individual, Eureka, MT - Letter #B75567)*

*I have worked for the pulp & paper industry for 19 years. I have a wife and three kids that depend on my income. I can't afford to loose (sic) my job; and have to start all over with a job in a different field...I understand why people want to preserve the environment and the endangered creatures. I feel the same way. But at the same time you need to look at the needs of the people and not the wants of a few uneducated people who don't understand how big of an effect this will have on millions of timber employees. (Individual, Spokane, WA - Letter #B80053)*

*The business and government in Plains as well as all of Sanders County depend heavily upon the income from the timber in the surrounding mountains and the Forest Service. Sales and service of chain saws used by professional loggers is a major part of our shop's income. The Forest Service department located here is also a customer as are many of the employees. I want to express our concern that timber harvest will continue in this area and that the Forest Service department will continue to operate here. (Non-Natural Resource Based Business, Plains, MT - Letter #B4875)*

*The people factor has been left from this study. What happened to communities, businesses, people while this 5 to 10 year transition takes place. How can \$5 or \$6 hour jobs replace \$10 or \$14 hour timber jobs? A financial crisis to communities and people would be created and a disruption of any source of livelihood would take place in this transition period. How do people survive and keep their homes? While aid to communities are low, and welfare almost non-existent, how can you know if some if any of these communities have a natural resource other than timber to sustain them? (Individual, Boise, ID - Letter #B76985)*

*The Timber, Ranching and Mining Industries will all be dramatically affected by new policy changes being pursued by the Interior Department. The ability of a person to make a good living in areas like northwest Montana is becoming increasingly more difficult. Good high paying jobs in the natural resources industries are being eliminated. With this trend comes an increasing burden on local tax bases which depend on the resource industries. (Individual, Bozeman, MT - Letter #B77275)*

**Issue: *The Final EIS should balance ecological health and extractive industries to preserve community integrity.***

**Sample Comments:** *Allow harvest without clearcut in forests, allow mining without contamination and scarring, allow limited game harvest without the devastation of the past - After all nature by nature is destructive by flood, fire, earthquake, etc. - Use common sense! Be reasonable - Not all one way. (Individual, Libby, MT - Letter #W1687)*

*Citizens have no wish to destroy our environment. Extraction of renewable resources can and must be done while maintaining ecological integrity. (Individual, Pleasant Hill, OR - Letter #W2558)*

*Outputs, such as timber, water, minerals and grazing are essential products that Mother Nature has given us to manage correctly. We should use these gifts to endow our children with a sustainable future. Mismanagement (which includes no management) is not an acceptable option. I am concerned that a decision to implement this project would further embargo our ability to manage natural resources correctly on public lands and jeopardize diversity. (Natural Resource Group, Missoula, MT - Letter #W2934)*

*Nature and man can provide for the needs of both by working together. Things can be much more friendly and also more economical. We should live with nature and not apart from nature...More people earn their living constructing the necessary roads. Farming, mining, hunting, camping, sightseeing, etc. are all bonuses...If we claim that we are saving things for the future generations, then why are we locking out the children of this generation? The entire project seems very carefully thought out but from a single point of view. (Individual, Redlands, CA - Letter #W754)*

*A food chain has a balance the same as land use should be balanced. Shut it down and the imbalance will create economic problems felt all through this country. (Individual, Kevin, MT - Letter #W4215)*

*Concern by humans over environmental sustainability only occurs after the basic needs of the human population have been met. These are the basics of survival, which include adequate food and shelter for themselves and their children. In addition, before concern for the environment, some of the creature comforts will have been attained. It had been said that environmental sustainability and economic wealth are two sides of the same coin. I concur. The use of our natural resources has made this nation what it is. Continued national strength requires environmental sustainability and economic strength. (Individual, St Anthony, ID - Letter #B76216)*

*Economics should not play a role in resource management of environmental planning. If the environment is valued and preserved the economy will take care of itself. This had been shown to be true in many localities that have made the transition from extractive based economies to environmentally based ones where the transitions were begun while the environment was still perceived to be desirable. (Individual, Moyie Springs, ID - Letter #B4692)*

**Issue:** *Impacts on resource-dependent communities should be disclosed in all alternatives.*

**Sample Comments:** *The economics and social analysis is weak and not helpful in determining which alternatives best serve our communities in the Basin...The DEIS says very little about potential social and economic outcomes of ecosystem management. There is no way to assess the social and economic impacts of the different alternatives. Normally some economic indicator, like present net value, is presented to give the reader some sense of the overall economic value of the alternatives. We do not have that with this DEIS. (Individual, St. Anthony, ID - Letter #B75365)*

*The effects analysis does not appear to be of much use as it is unable to predict consequences of the alternatives... (Resource Advisory Council or Provisional Advisory Council, Prineville, OR - Letter #W1830)*

*Evaluate and fully disclose the economic impacts relating to the production of goods and services and jobs for each of the proposed action alternatives. (Natural Resource-based Businesses or Business Groups, La Grande, OR - Letter #W686)*

*Definitely the economics of the rural regions has not been addressed realistically. Communities such as Libby, MT or Moyie Springs, Idaho are timber dependent communities. Many of these areas are hundred of miles away from your reference point and too far to travel and that would totally destroy custom, culture and all lifestyles of the areas in between. (Individual, Bonners Ferry, ID - Letter #W2142)*

*In agreeing with Arthur Ayre, Economist for the State of Oregon Economic Development Department, we would suggest using the nation rather than the Bureau of Economic Analysis regions as the basis for analyzing community industrial specialization. (County Agency or Elected Official, Prosser, WA - Letter #W3079)*

*The DEIS admits that so much uncertainty would arise from the various alternatives that the consequences for the livestock and timber industries cannot be predicted. (Natural Resource Group, Bozeman, MT - Letter #B77929)*

*The concept of geographic isolation is no longer a critical one for understanding community development. As our 1996 report on the ICBEMP rural community assessment suggested, a town may be isolated and yet more resilient than other less isolated towns. (Academia, Moscow, ID - Letter #W3804)*

## **3.2.2 Timber**

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A number of respondents state that many local communities depend on timber sales for their economies. They assert the Draft EISs, and in particular the preferred alternative, are flawed because they do not predict a specific volume of timber to be cut in the future. They ask how businesses can plan with such unpredictability, and they feel small tree and thinning harvests described in some alternatives will not be sufficient to sustain local mills. Some note that the timber projection averages of the Draft EISs were figured together and do not accurately portray future supplies for local areas.

A sustainable supply of timber is a major concern to many people. Some respondents note that Montana's standing timber volume per-acre is now greater than in the 1950s, which leads them to conclude that current harvest levels will sustain the resource for the future. Others suggest that the BLM and Forest Service should follow what they consider to be good, sustainable harvest methods found on industry-owned forestlands in the region.

Importing wood fiber is another concern of many respondents who believe that Federal lands should be managed at a sustainable level to prevent the need for imports. They also feel that logs should not be sent abroad to provide milling jobs and then returned at a value-added rate.

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Others fear a displacement of environmental impacts if the source of regional wood fiber shifts overseas. They note that the United States has strict environmental regulations but other countries do not, including Mexico and those in Central and South America.

**Issue:** *The Final EIS should quantify future timber output to allow communities to predict short- and long-term effects to local employment.*

**Sample Comments:** *The project claims that resource production outputs are not targets, a claim that is in direct conflict with the stated goal of the action alternatives. Timber production must be fully analyzed to provide the reviewer with an acceptable perspective of the certainty and predictability of future production levels, and the economic impacts to local communities. Impacts to restoration goals of not achieving anticipated production levels on time must also be evaluated and disclosed in the DEIS. (Natural Resource- Based Business or Business Group, La Grande, OR - Letter #W686)*

*As I understand it, the Preferred Alternative in the UCRB EIS, doesn't even predict what the future supplies of timber from the national forests will be. Considering that the Forest Service has 100 years of experience harvesting, growing, culturing, and managing timber, it should be able to make substantially accurate timber output predictions...Now the FS maintains that it can't even make a prediction as to what it may sell! That doesn't appear to be a very professional approach to, or result of, land management planning, considering all of the outstanding technology and science that is available. In the last five to eight years, the Forest Service has become an undependable, dysfunctional, and unstable agency. (Individual, Libby, MT - Letter #W973)*

*I am worried. The USFS will not be specific about the volume of timber to be cut. It is clear they want to leave real merchantable timber, clearing away the small understory trees. I know as a millworker how hard it is to make a profit and decent lumber out of this small wood. It is clear the Forest Service would do away with many acres, roads, and volumes of timber. (Individual, Unknown - Letter #B75486)*

*I had the opportunity to attend a meeting hosted by the Kootenai National Forest where they displayed their model of Alternative Four from the DEIS for the UCRB. I am thankful these people took the time and effort to put the model together because they reached one of the same conclusions I did. And that is, there is no way to predict the amount of timber to be offered, there is no way to measure how well this will support the economic and/or social needs of the people, cultures, and communities, which is part of your stated needs, page 2 of the summary. (Individual, Eureka, MT - Letter #B75391)*

*Timber Projection Average, p. 93. In determining the overall effect on timber activities by alternative, 'Timber projection levels in the Eastside and UCRB DEISs were combined into a basin-wide average to use in this report.' Why was this done? It seems odd to average westside and eastside timber projection levels, given the differences in climate, altitude, soils, etc. (County Agency or Official, Yakima, WA - Letter #W3112)*

*Timber volume figures should be given for the current amount harvested and the projected amount harvested under the different alternatives, using the same measure. Your tables for this are inadequate and that makes it impossible to compare the timber volume of the various alternatives. EIS should say that timber harvest will be reduced until sustainable levels are reached, and should define 'sustainable' in specific terms. (Individual, Weiser, ID - Letter #B2743)*

**Issue:** *The Final EIS should emphasize sustainable timber harvest techniques.*

**Sample Comments:** *I love to listen to Bob Jackson and Leo Goebel telling how they continually harvest their timber land. If we were to let them and theirs harvest our public forests the society would get a steady supply of timber for some mills. It would create long term steady jobs in the forest and mills. I had taken enough math to understand..how much more lumber you could get as you let a tree grow five more years. (Individual, Joseph, OR - Letter #W912)*

*Constant, reliable sustained yields of timber need to be available - not only for economic security of Woods Products dependent areas, but also for the health management of National Forests; timber can be harvested in environmentally sound ways - I have seen it accomplished! (Individual, Philipsburg, MT - Letter #B76856)*

*According to an interagency task force study in which the FS participated, Montana now has more timber volume and timber volume per acre than in the early 1950's So the timber industry has been operated 'sustainably'. Central historical trends like these need to be a stronger focus of your economic analysis. (Individual, Missoula, MT - Letter #E53)*

**Issue:** *Import and export impacts on the economy and environment should be evaluated in the Final EIS.*

**Sample Comments:** *Look at the effects of changing the demand for forest products to off shore markets. (Individual, Ridgeway, PA - Letter #B77596)*

*The U.S. harvest of raw logs results in 50% export of these logs. Why destroy our forests for export? ( Individual, Bedford Park, IL - Letter #B2078)*

*Following two large local wildfires on USFS land, salvage was denied or delayed until the timber lost its value while the DEIS points out logs are being hauled from greater distances; but not by choice. The beef industry is the same story. While relatively uninspected meat pours in from Canada, Mexico, Central and South America the local stock yard closed first then no meat inspectors short of Seattle and cattle numbers have dropped by 1/2 since the mid 1980's. Knowing we have been and are a net importer of food and resource material we oppose any further encroachment on our ability to be self sufficient and invulnerable, both as a nation and individually. (Individual, Kettle Falls, WA - Letter #B77206)*

*Where will our nation get its wood products after your plan is implemented, Canada or third world countries where environmental regulations are not as strict as our current regulations? (Individual, Eureka, MT - Letter #B4595)*

*Pg 30 'Our land use policies have evolved-- More people want more things from a finite world' You do not address the world's problem of over-population nor do you even consider what the level of contribution of goods should be from the UCB areas. Under ecosystem management concept, the production of fiber for useful products is only a by-product that dribbles out of the process and is not a planned objective. What effect does this have on other parts of the world that have less advanced practices for resource protection- this is not addressed anywhere in the DEIS. Will the UCB area of study be a net importer of fiber or other products of the forest? This is not addressed anywhere. (Individual, Ryegate, UT - Letter #B77184)*

*People around the world rely on the resources produced in this area for food and shelter; a supply that will be greatly diminished if natural resource use is eliminated.*

*These industries have the privilege of working with renewable resources that, if managed properly can be in perfect condition and still be used by different sectors of the economy. (Individual, Laramie, WY - Letter #B78934)*

*The need for these products is not going to disappear. How will it be fulfilled? By importing wood products from third-world nations that have little or no environmental regulations? (Individual, Eureka, MT - Letter #B4676)*

*The UCRB and EDEIS still allows continued logging to subsidized timber companies so they can ship their logs to Japan. (Individual, Bellevue, WA - Letter #W790)*

### **3.2.3 Grazing**

In the opinion of some respondents, sheep and cattle grazing cause irreparable damage to the land. Many of these people believe that the Draft EISs, especially under the preferred alternative, do not support what they feel is a necessary cut in grazing levels. They want to see each alternative address potential reductions in grazing.

In contrast, others feel that the Final EIS will drastically limit existing grazing rights, with a negative effect on local economies. They often cite personal experiences with reduction in grazing and large negative impacts both personally and to their communities.

**Issue:** *Grazing levels should be better addressed in the Final EIS.*

**Sample Comments:** *Each alternative should state that grazing AUM's will be reduced if needed to make the range use sustainable. (Individual, Weiser, ID - Letter #B2743)*

*I'm very thankful that we're moving in a direction of ecological restoration, but was concerned by the fact that grazing will go on at the same level as is presently the case. I think for the sake of land, water, and human health we need to be moving away from this resource --intensive form of agriculture. As our clean water supplies diminish and our population grows exponentially, I don't think we can keep up this level of cattle industry. Please consider initiating a serious decrease in grazing intensity in the ICBEMP. (Individual, Bend, OR - Letter #W22)*

*I realize that some people do make a living from extracting resources from our public lands. I also know that the economic contribution of the Forest Service and BLM grazing is minimal. Only 7% of livestock feed and 1% of jobs in the Columbia Basin come from grazing these federal lands. (Individual, Portland, OR, Letter #W3787)*

*Perhaps the most egregious omission of all, the plan would do nothing to reduce the number of cattle and sheep grazing on public lands, despite the long-term damage to watersheds often caused by livestock. (Individual, San Rafael, CA - Letter #W688)*

*Something is dreadfully wrong with the management of public lands in the Pacific Northwest. If the DEIS want the rural areas to withstand economic losses from decrease grazing, then let them provide income for agricultural people to maintain their livelihood. (Individual, Myrtle Point, OR - Letter #W811)*

*I cannot agree with some of Alternative #4's management strategies - there seems to be no call for reduced livestock grazing. (Individual, Salt Lake City, UT - Letter #B61)*

*Approval of the DEIS in any form will sound the death bell for livestock production in the Columbia River Basin. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter #B77929)*

### **3.2.4 Mining**

In the opinion of some people, the Draft EISs contained inadequate or missing information on, and analysis of, the role of mining in ecosystem management and the economic consequences of a decrease in mining. They want the Final EIS to discuss how mining will be affected by the selected alternative and to present a comparison among the alternatives with regard to mining.

These respondents contend that mining is an important aspect of our nation's economy, providing direct and indirect employment and raw materials for industry. They note that minerals are needed in everyday life and that the Pacific Northwest offers the only domestic source for some strategic minerals. They are concerned that any cut in U.S. mineral production will negatively affect world supply and demand.

In contrast, many others want no more mining in the interior Columbia River Basin. A few specifically request that the Final EIS specify only underground mining, with no mining allowed in riparian areas. They point to the legacy of environmental damage throughout the region, especially on water quality, and the need for reclamation on a vast scale.

Others however, contend that current technologies and reclamation requirements make mining environmentally agreeable. They want the BLM and Forest Service to encourage prospecting and mineral development.

Respondents are concerned about the legal aspects of mining, in particular the 1872 Hardrock Mining Act and its implications for the future role of mining in the region. Echoing an ongoing national debate of the past decade, some consider this law to be antiquated, while others assert its continued viability and importance.

**Issue:** *The Final EIS should include more extensive analysis of mining impacts.*

**Sample Comments:** *A great deal is said about mine waste waters yet no evaluation of the water in the effected drainage prior to mining is available. Does your analysis show this pre-mining or other activity water condition and is this survey conducted by a competent authority? (Individual, Riverton, WY - Letter #B76918)*

*What's going to happen to mineral resource management on the BLM and FS administered lands? I could find no reference to mining, exploration activities, the filing and locating of claims and any references to leasing for coal, oil and gas, and geothermal. Are additional portions of the public lands proposed to be off limits to mining? (Individual, Beowawe, NV - Letter #W32)*

*Both the BLM and the FS have statutory requirements to promote mining as part of the multiple-use scheme within the lands administered by them. Mining activities such as exploration, development, production, and closure are already adequately governed by the State and Federal regulations. Inclusion of items in the DEIS such as eliminating existing roads and limiting new roads could adversely effect exploration and operations of future mines. Watershed analysis is a proper requirement for large mine development, but may place undue burdens on exploration activities and small and recreational mining operations which are already regulated. (Individual, Seahurst, WA - Letter #B76161)*

*Page 35: Alternative 5 appears to be the most efficient and business-like approach. This recognizes the fact that mineral resources can be produced only from where they occur; their production cannot be moved for convenience to some non-mineral area (Individual, Fort Collins, CO - Letter #W649)*

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*In Alternative 4 you also plan to cover old mine tunnels and remove or in some other way obliterate mine tailing piles. Do you realize thousands of us consider those things treasures? Where else can we find that kind of history and many mineral specimens? Our excitement and enjoyment from discovering an old mine is the same as a bird spotter when they spot a rare bird. (Individual, Hamilton, MT - Letter #W4626)*

*Not reporting an estimate of minerals outputs based on implementation of alternatives is not acceptable. There must be a comparison between alternatives. (Individual, Libby, MT - Letter #B75386)*

*A revision or supplement to the EIS must be prepared which would include the following: Change the mining standards to allow underground mining only. All mining must be kept out of riparian areas. Leaching and run-off from mining activities severely impacts stream resources, kills fish and pollutes water. (Individual, Seattle, WA - Letter #W3010)*

*I support a plan which includes absolutely zero new mining. (Individual, College Station, TX - Letter #E15)*

*Surely the terrible toxic flows of heavy metals and pollution through the Coeur d'Alene is an example of the uncontrollable disasters which accompany mining. (Individual, Portola Valley, CA - Letter #B3852)*

*The Eastside DEIS discussion of past, present, and future mining impacts is woefully inadequate. Acid mine drainage, heavy metals contamination, and sediment loading are not discussed in terms of specific mining impacts. This is a serious oversight. Already 14,000 sites exist in the Interior Columbia Basin which need cleanup. This will cost hundreds of millions of dollars. (Conservation/Environmental Group, Tonasket, WA - Letter #W495)*

*The northwest contains many strategic minerals needed by our nation for defense and industry that can only be otherwise found outside the United States. Stopping mining will worsen the international trade deficit and limit our capabilities for national defense. (Individual, Seely Lake, MT - Letter #B4712)*

*Mining in our forests is very valuable in that it provides metal and materials necessary to supply products for the people of the world. (Individual, Omak, WA - Letter #W1168)*

*Minerals are a key component of the economic base of the State of Wyoming. We support responsible development of those resources that provide revenue for many services including education, in a manner sensitive to the needs of all parties and to good environmental practices. (State Agency or Official, Cheyenne, WY - Letter #B3803)*

*The document states that '...it is difficult for the FS or the BLM to prohibit mining of locatable minerals on the public lands if the deposit can be profitably produced. Thus, the focus of agency efforts...is to prevent unnecessary and undue degradation...' This statement is misleading and could be interpreted as indication that the FS and BLM would, if the authority existed, prohibit Mining on public lands. For clarity and to keep a proper perspective on possible intentions of the DEIS, not to mention the intentions of the FS and BLM, it would be helpful to state that prohibiting Mining would be, at least in the general sense, a violation of the 1970 Mineral and Mining Policy Act. (Individual, Libby, MT - Letter #B75386)*

**Issue:** *The selected alternative needs to address the 1872 Mining Law in relation to mining rights.*

**Sample Comments:** *The draft also fails to analyze impacts to valid existing rights under the 1872 mining law. The draft should be withdrawn and these issues addressed. (Individual, Helena, MT - Letter #B76784)*

*'In Volume 1, Chapter 4, Environmental Consequence, page 175, Effects on Permitted Mineral and Energy Operations. The title and first paragraph portrays a change of emphasis, by the agencies, away from mining and existing law. Mining and exploration is a codified right enacted by Acts of Congress and recognized in policy by the agencies. The agencies are attempting to implement a new policy outside the review of Congress. This new policy could have undesirable consequences for rural, resource dependent communities and our national security. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*Why is that mining law, so damaging to the public, that came out of the 19th century still on the books? (Individual, Klamath Falls, OR - Letter #W374)*

*Those who make the laws for areas like Eastern Oregon and Washington are usually either actually engaged in one of the source-based industries, or in their pocket. This is probably the main reason why the 1872 Mining Law and other ruinous and anachronistic legislation is preventing and logical progress on environmental issues. (Individual, Prineville, OR - Letter #W237)*

### 3.2.5 Fossil Fuels

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A majority of respondents addressing oil and gas exploration oppose it in specific locations. Asking for protection for Yellowstone and Glacier National Parks, the Bob Marshall Wilderness Complex, and the Rocky Mountain Front in Montana, these people argue that some areas are more important ecologically than as sources of fuel.

Some think that alternatives to fossil fuels are numerous and should be considered prior to oil and gas development, including wind and solar power. Some suggest that the Final EIS should include an analysis of alternative sources of energy.

Powerline and pipeline corridors are mentioned by a few people, who believe that continued reliance on fossil fuels and electric energy requires corridor maintenance. They feel corridor maintenance should be conducted in a manner that balances utility needs with the protection of the environment and maintenance of ecological integrity.

**Issue:** *The Final EIS needs to address the levels of oil and gas drilling in specific sensitive areas.*

**Sample Comments:** *Drilling or exploring for oil near Yellowstone, Glacier Park, Bob Marshall Wilderness Area, say NO! (Individual, Great Falls, MT - Letter #B4374)*

*As a Wyoming resident please help to preserve our National Forest lands from oil and gas drilling. (Individual, Jackson, WY - Letter #B58661)*

*[Protect] the Rocky Mountain Front from oil and gas exploration. (Individual, Glasgow, MT - Letter #B62870)*

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**Issue:** *The Final EIS should consider alternative energy resources.*

**Sample Comments:** *We can get along without coal and other fossil fuels because it is quite doable to develop clean sustainable and renewable energy sources --namely, wind and solar power. (Individual, Kaysville, UT - Letter #B76357)*

*Because all resource consumption is directly the result of and proportionate to energy expenditure, some means whereby to cut back gradually, reasonably and drastically on fossil fuel use is critical to the plan and beyond it to our survival. Our history shows that it is possible to lead simpler and less stressful lives and still be happy and healthy; indeed, that may well be where the answers to the quests for health and happiness lie. The number within our population who are willing to voluntarily cut back while facing the tide of consumerism is minuscule. Therefore, a significant carbon or BTU tax on fossil fuels is imperative in order to drive us into efficiencies of scale and function and the saner values which derive from them. (Individual, Anacortes, WA - Letter #W466)*

**Issue:** *The Final EIS should balance utility needs and the environment.*

**Sample Comments:** *Utility corridors must be subservient to species needs and other multiple resources. 'Buildable' and 'reliable' are going to come back and bite us. The needs of the utility industry must be balanced with concerns about fragmentation of habitat, road density, and non-native weeds. (Environmental/Conservation Group, Eugene, OR - Letter #W4622)*

*The importance and location of regionally significant utility corridors should be emphasized. This can easily be done by including maps of the corridors included in the Western Utility Group's Western Regional Corridor study which we strongly recommend as a planning and implementation tool. (Non-Natural Resource-based Group, Portland, OR - Letter #W868)*

### 3.2.6 Amenity- based Employment

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Many respondents assert that more jobs are found in recreation than in extractive industries. They believe the Final EIS should focus on this information and stop emphasizing future employment opportunities in extractive industries. They believe that recreation will offer more economic stability in the long run.

A number of individuals suggest re-training as a possible answer to extractive industry unemployment. They feel that by ending "subsidized" timber sales, displaced loggers and miners could be part of the restoration teams. Others ask why the government should guarantee jobs for the timber industry if jobs are not guaranteed for the rest of the country.

Others feel that re-training is not the answer. They believe that displaced workers cannot live on low-paying recreation and service jobs, which they feel will replace current employment. They want to know how they can be expected to support a family on such wages. Many of these respondents work in the timber industry and chose to live in the Pacific Northwest, and they feel that without timber jobs they would be forced to relocate to larger towns.

Some believe that more emphasis should be placed on non-commodity economic values, such as clean water, clean air, flood control, natural insect predation, and climate regulation. A few think the Draft EISs did not do a sufficient job of assigning values to non-commodities and are therefore in violation of NFMA. Others believe that wilderness and roadless areas are valuable spiritually and historically, and that a dollar value cannot be placed on them. Some assert that this beauty draws other businesses into the Northwest. They believe the government is putting a higher value on the dollar than on the resources, and letting profit destroy the ecosystem.

**Issue:** *The Final EIS should emphasize amenity-based economic assets.*

**Sample Comments:**

**RECREATION AND TOURISM BASED ECONOMIES -**

*Our Columbia River basin forests and waters would be much better served by observing the following measures: It should note that only 4% of the jobs in the region are provided by timber and wood products and 15% are provided by recreation. It is time to change our priorities to better represent the area and not let the loud voices of a few people interested in short term gain allow our forests to become lost to further generations. (Individual, Tonasket, WA - Letter #W211)*

*The money the government saves by not subsidizing timber sales can be used to retrain the workers, who may be laid off, to preserve and nurture the land rather than extracting its ever diminishing resources. This will diversify the economy and give these towns a shot for the future. (Individual, Helena, MT - Letter #B201)*

*Montana's economic health depends substantially on recreation on our public lands and that can only increase in the future. Montana does not need more industrial rape of our public land. If the present Preferred Alternative (#4) is implemented only logging, mining, and grazing will receive priority treatment. This is not what I want for Montana. (Individual, Big Timber, MT - Letter #B3890)*

*While I understand that jobs are in part at stake, I feel that a comprehensive management plan for the region will permit those working in the forest products industry to make the transition to other industries, such as recreation. There exist many precedents for such a transition. (Individual, Seattle, WA - Letter #W742)*

*The political and local self interest shown by the push to maintain all communities and occupations is unrealistic. The job information was correct. The loss of timber or ranching jobs would not be significant. The spotted owl was going to cause 40,000 lay-offs in Oregon, it didn't happen. Protecting all loggers and ranchers is not part of a free-market economy. All business should be allowed to succeed or fail, government agencies should not protect or eliminate business. Overutilization of public resources to protect or maintain local industries or benefit a few individuals is wrong, against free-market economic theory and is short-sighted. (Individual, Boise, ID - Letter #B75281)*

*Their industries (timber, mining, roadbuilding) can be replaced with work in creative fields, passive recreation, restoration projects and other ecological compatible work. (Individual, Staten Island, NY - Letter #W709)*

*The discussion regarding recreation jobs and roads contain contradictions. The relationship between roads and recreation needs to be carefully reviewed, since the information presented here and in the DEIS is contradictory. It is noted that Alward's recreation response coefficients probably overstate recreation jobs. The impact analysis needs to be redone using a methodological approach that is more accurate and reliable. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

**EXTRACTIVE ECONOMIES -**

*Evaluation of EIS Alternatives by SIT, Vol. 2. The authors downplay the fact that jobs in the forest products industry pay significantly better than jobs in recreation and have higher income multipliers. Provide an objective presentation of the data that accurately reflects economic conditions. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Will any of the projects create jobs within the communities impacted by it? (Individual, Troy, MT - Letter #W849)*

*Recreation importance is greatly overstated. Timber growing lands do not attract many out of state people willing to spend vacation dollars to view silvicultural activities and good forest management. (Natural Resource-based Business or Business Group, Eureka, MT - Letter #B77868)*

*Speaking as one who now makes a one way commute of 26 miles, the assumption that commuting distances of up to 50 miles are reasonable is flawed as such commutes are almost always undertaken only on a temporary basis when closer employment is lost. If the change in employment becomes permanent then a relocation to the area of employment is necessitated by the high cost in money and time of commuting versus the normal wages available in the area. Some people may commute from say Joseph to La Grande, OR but it is not a situation that most could afford to maintain indefinitely. It would be much more likely that such commutes would be instigated by people with highly flexible and high paying occupations seeking to remove themselves from the more urban areas than by normal wage earning individuals. (Individual, Hermiston, OR - Letter #W4551)*

*The managers of our National Forests and Grasslands have a responsibility to honor their commitments to the public. This includes providing resources to the local industries. People in the private sector make many personal investment decisions on the basis of announced management plans and encouragement by the public agencies. (Individual, Seeley, MT, Letter #W668)*

*It is difficult to understand why government officials want to prevent use of public lands for goods of the people. There are already too many unemployed people in the US. President Clinton brags about how many new jobs have been made but he doesn't tell us what fields those jobs fill. There is a difference between useful employment and a position. (Individual, Lusk, WY - Letter #B77653)*

*I am deeply concerned with how ICBEMP will affect my income. If you are willing to find me a job that pays the same wage, same hours, same days and I don't have to re-locate then there is no problem. But I've always wanted to raise my kids the same way I was raised and if ICBEMP closes off roadless areas; that will affect the timber; which will then affect my job; which will then cause me to lose my job; which I will then either have to give up everything or re-locate to a larger town which I think is no right of yours and anyone else involved with ICBEMP to make me do! (Individual, Eureka, MT - Letter #B76014)*

*Since I work as a millwright in a papermill, I feel my job is at risk because of this ICBEMP project. I can't support my family by working at Burger King and I don't think any of you from the Forest Service and Bureau of Land Management could either. (Individual, Pasco, WA - Letter #W3751)*

**Issue: *The Final EIS should emphasize non-commodity values.***

**Sample Comments:** *No value is placed upon essential natural ecosystem services such as clean, abundant water supplies, natural pest control, insect pollination, flood control, climate regulation, etc. If ICBEMP assigned those services dollar values, wood fiber and forage values would be so minuscule in comparison that they would have been embarrassed even to have mentioned them. (Environmental/Conservation Group, Bates, OR - Letter #W222)*

*The 1900's are coming to a close and we are long overdue to realize that America's wilderness is far more valuable to us spiritually, historically, recreationally than it can ever be economically. (Individual, San Anselmo, CA - Letter #B986)*

*The ICBEMP is in violation of NFMA economic analysis requirements by failing to adequately discuss or assign value to a wide range of ecosystem services performed by intact forests in the ICBEMP. This is especially troubling in light of the fact that the SIT economic analysis did a complete estimate of some of these values. To meet the letter and intent of NFMA, the Forest Service must analyze the market and non-market benefits of unlogged forests on lands scheduled for logging. (Environmental/Conservation Group, Santa Fe, NM - Letter #B78905)*

*A healthy environment is a valuable commodity to Northwest residents and businesses. Tourism and recreation are only one (large) part of the economic benefits that result from a pristine, healthy ecosystem; companies like Microsoft, who provide high-paying jobs and sizable tax contributions, choose to stay in the Northwest because of the quality of life here. If we destroy the ecosystem of the Interior Columbia Basin, we would be throwing away the opportunity for valuable, long term business investment. (Individual, Seattle, WA - Letter #E1)*

*The Upper Columbia Basin is at ecological risk with the government's public land management plan of road building to facilitate the logging and mining of the area. In other words, corporate welfare at the expense of the environment! It is quite obvious, old growth forests and the natural habitat within them are less important than corporate greed. (Individual, Bradford, VT - Letter #B1108)*

*Our undeveloped wildlands and their associated large herds of elk and other wildlife and fisheries in the Northern Rockies provide quality outdoor recreation, camping, fishing, hunting, and wildlife viewing. They are the source of a multi-million-dollar industry. Further, they are attracting other industry, jobs and a multi-billion-dollar economy. The protection of natural landscapes should be viewed as an economic act benefiting our thriving economy. (Environmental/Conservation Group, Hamilton, MT - Letter #B4566)*

### **3.2.7 Costs to Federal, State, and Local Governments**

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Several respondents expressed concern over the costs to date of the project. They believe too much money has been spent with too few tangible results. Some believe the data collected is not sufficient to make any decision that would benefit the environment, while others question the validity of the project since it is not mandated by Congress. All who responded on the issue of cost for the project want to see the project stopped.

Many want to know where the money will come from to implement the plan. Some believe restoration costs should be charged to those who caused the damage, and that is, in their perspective, logging companies. It is their opinion, that the money must not come out of the taxpayer's pocket which, they argue, is a subsidy. They state that requiring the expenditure of tax dollars to correct these issues is an unfair burden to the public.

Others question user fees to offset implementation costs. They do not feel these fees can raise sufficient funds to cover all the costs of assisting local communities and restoring Federal lands. Specifically, a few want to know how local logging operations can afford the equipment required for new harvesting and milling methods, complaining that they have put money into other equipment that was required and now must buy more.

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**Issue:** *Planning and implementation costs outweigh potential benefits, so the project should stop.*

**Sample Comments:** *This entire study should be banned now and save all of us tax paying citizens a lot of money and agony. (Individual, Clinton, MS - Letter #W1889)*

*Millions of dollars were misappropriated, at least in part, by the Forest Service, to complete the study. (Individual, Hagerman, ID - Letter #W1904)*

*I think 40 million taxpayer dollars is more than enough spent on social engineering. The plan would alter the lifestyle of thousands of people in the Northwest. I think the whole project should be abandoned and let each county manage their own resources. (Individual, Libby, MT - Letter #B76105)*

*I can't believe \$40 million has been spent on just a study and nothing has been accomplished. It sounds a lot like the Pentagon's \$76 screws. (Individual, Cataldo, ID - Letter #B76847)*

*My fear was that a lot of energy and resources would be wasted with another bureaucratic boondoggle. After 5 years and nearly \$40 million, I'm not convinced that the effort has been worth the resources. Instead, it appears that you may have created another impediment to implementation of ecosystem management on the ground. (Individual, Sagle, ID - Letter #W4639)*

**Issue:** *The Final EIS should account for all costs.*

**PUBLIC COSTS -**

**Sample Comments:** *A balance between benefits and net costs is critical in assessing which alternative is best for taxpayers. Where more than one strategy provided the same level of benefits and services, the one with the least drain on taxpayers is best. However, there is no way to determine which proposed strategy is most fiscally responsible from the Eastside DEIS evaluation of alternatives. True costs of alternatives including net costs, risk factors, ecosystem values, and opportunity costs are not accounted for. (Individual, LaGrande, OR - Letter #W686)*

*Without the production of goods and services, agencies will not be able to produce the revenues to sustain management for their objectives and goals. Increasing spending of taxpayer's money (subsidies) without an economically sound and self-sustaining strategy is irresponsible. (Individual, Bellevue, CO - Letter #B3938)*

*Funding for this restoration needs to come from the citizens of this country not from logging or grazing! This is the destructive method used now with funds like the Knutson Vanderburg fund the FS uses to do 'restoration' projects on national forests. We no longer are accepting of the 'destroy to restore' idea of funding restoration projects. (Individual, Portland, OR - Letter #E27)*

*How will the communities survive through this transition? The local contractors in this community are not equipped with the type of machinery that will be needed to accomplish the new type of timber harvest or restoration. Will the local bankers trust the new types enough to loan contractors the money for the changes required especially when the plan says timber output will be even less certain? And what will they do with the old types? Will there be a market for that equipment that they bought to do mechanized logging to be environmentally sound? Or will they just be strapped with hundreds of thousands of dollars in equipment? (Individual, Libby, MT - Letter #B3831)*

**SUBSIDIES -**

*I am tired of seeing my tax dollars spent on below cost sales that ruin my environment and subsidize the extraction industries. (Individual, Hamilton, MT - Letter #W475)*

*Subsidies for road-building in wilderness areas, timber and grazing subsidies should be severely curtailed, if not completely eliminated. I am from a farm in North Dakota, where recently the federal government sharply curtailed grain subsidies to farmers. If farmers, the backbone of not only the American, but the world food economy has subsidies slashed, it is high time for federal subsidies to multinational logging companies and rancher grazing subsidies to be eliminated. (Individual, Grand Junction, CO - Letter #W695)*

*I cannot understand the logic of subsidizing roads and other assistance to logging projects which are obviously not profitable (because they must be subsidized) and which decrease the capital on which we all depend, namely, the natural resources of the planet. Any economic benefit is illusory because it comes at a greater cost to our resources, and any jobs created can equally be created through a lesser subsidy to more environmentally sound activity. (Individual, New York, NY - Letter #B1132)*

**USER FEES -**

*Just don't mess with my god-given right to go, without fee, in the mountains whenever I want. (Individual, Pendleton, OR - Letter #W718)*

*On page 85 of volume 1 of the component assessment it states 'that recreation fees (if charged) could be used to finance road maintenance, offsetting other potential decreases in road funds.' This is unrealistic, foremost, in the support for county revenues with respect to recreation 'benefits' is not set forth in FS policy as is forest and mining revenues. This notion fails to take in account if it is politically feasible to impose increases in fees for recreation on public lands. Recently, Congress established the Recreation Fee Test Project to see how the public reacts to user fees in certain areas and how much money could be raised. Upon being asked what the money should be for, recreationists indicated that the funds should go back to the site for maintenance, improvements, etc. -how then would fees go back to counties as revenues? (County Agency or Official, Cascade, ID - Letter #W1861)*

*Some people have the idea that service fees such as a \$2.00 permit to have a picnic in the woods will cover the expense of managing the woods. There is no way they can collect enough to cover that expense. They need some logging, if even only salvage logging. This will come a lot closer to meeting that expense of blading roads, upkeep on improvements (bridges, etc.) Our counties need more than service fee(s) to cover our needs. Our needs can be partially met even if it is only a salvage program. (Individual, Pendleton, OR - Letter #W3828)*

*Costs may be offset with high user fees. Higher user fees should be implemented on a flat basis. Change programs so federal government is not losing money on grazing, minerals, and timber. A \$1.35/month for grazing fees is way too low compared to fair market value. Recreation users cannot be expected to pay much when industry gets essentially free use of federal lands. If a timber sale is not profitable, increase the required minimum bid. (Individual, Butte, MT - Letter #E40)*

*I want to list a few reasons for not going through with this ICBEMP plan...It expands on the need to charge user fees for parking, hiking, foraging, wildcrafting, road use and group recreation due to the lack of the funding on all phase. (Individual, Leavenworth, WA - Letter #W863)*

*The federal government receives \$20-22 million annually in fees from ski areas for the use of that land. This represents between \$222 and \$244 per acre annually for*

use of undeveloped federal land. Compared to revenues paid for other uses of unimproved federal land, like grazing, the government is getting an unusually high return. (Recreational Group, Seattle, WA - Letter #W2463)

**Issue:** *The Final EIS should fully disclose all additional costs and externalities associated with management decisions.*

**Sample Comments:** *It is important to realize that grazing and timber and mining also impose costs on others that are distinct from the costs to the Treasury. These additional costs - called negative environmental externalities by economists - occur, for example, whenever activities related to logging and grazing pollute streams, degrade soil productivity, and alter the watershed characteristics so that water runs off more quickly and increases the risk of flood damage downstream. Past logging and road building in the Salmon River watershed in Idaho, for example, caused the capitalized value of the fishery to decline by more than \$186 million (Haynes and Horne 1997). Negative externalities also occur when these activities degrade the characteristics of an ecosystem, for example, eliminating habitat for at-risk species that require the expenditure of tax dollars and other resources to correct. The presence of negative externalities increases the subsidies associated with grazing and timber above those identified above. (Conservation/Environmental Group, Eugene, OR - Letter #W3786)*

### 3.2.8 Receipts to Local Governments

Some people note that many small communities in the interior Columbia River Basin rely in part on payment in lieu of taxes (PILT funds) and/or the 25 percent fund to help finance school budgets and road projects. PILT payments, some observe, have been historically tied to timber output. If extractive activities should decline as a result of the project, many people believe that communities will lose this vital funding. Some cite examples of local budget declines associated with a decrease in timber harvest over the past few years, as evidence of things to come.

Others ask that the Final EIS identify alternative funding resources for the PILT and/or the 25% fund if commodity extraction and use on Federal lands decreases. One person believes this funding should, at a minimum, be separated from forest and rangeland management.

Some do not believe that user fees for recreational use on National Forests and BLM lands can offer a viable alternative to timber receipts unless very high fees are charged. Others fear that higher taxes will be needed to cover the decrease in funds and cause economic hardships.

**Issue:** *The Final EIS should address changes in the Payment In Lieu of Taxes (PILT) and the 25% fund resulting from the project.*

**Sample Comments:** *Due to decrease of timber sales in our region and all regions, this has taken away much needed revenue. This reduces services to our school and has a great impact on the conditions of our rural roads. Following are the amounts that the Missoula County Road Department in Montana, alone, has received during the past five years from the sale of timber: 1993 -\$365,952; 1994 -\$558,852; 1995 -\$730,776; 1996 -\$300,189; 1997 -\$251,028. To you this amount may be small compared to the size of budget you deal with, but to us it means whether we produce good education for our children or have the roughest roads in the county. How is the revenue that funds these services going to be replaced? (Individual, Seeley Lake, MT - Letter #B103)*

*Who will make up the loss of funds to local government county and school districts! And don't say local taxes! (Individual, Columbia Falls, MT - Letter #B76220)*

*I very much think funding of counties and schools needs to be separated from forest management and would be glad to work on this issue in some capacity. (Individual, The Dalles, OR - Letter #W664)*

*The implementation of this project will have a major impact on our way of life. As a retired person on limited income, with no income from forest receipts, taxes will be a decided burden on all retired persons. (Individual, Eureka, MT - Letter #B76328)*

*We must not forget that our environment is one of the most important resources that we have in our state for it provides revenues, through tourism, to our general fund. This revenue funds our schools, our social programs for the elderly, our prison populations, and on and on. We must take better care of it, for it is important to our well being and happiness as well. (Individual, Boise, ID - Letter #B75653)*

*Changing from timber based economy to a recreation based one is loaded with pitfalls for communities and their economies. Timber harvesting and mineral extraction are the only national forest activities that lead to significant payments to the states and local governments in lieu of taxes (PILT). The RPA admits that even if the projected increases in recreation fees are realized, recreation fees cannot replace PILT payments to states and local governments resulting from timber sales receipts. (County Agency or official, Cascade, ID - Letter #W1861)*

*My county operates its schools and roads partly on timber receipts which are one-third of what they were several years ago. I in no way can see how increased tourism and recreation has made up for this loss. (Individual, Burns, OR - Letter #W897)*

*A primary goal of the DEIS is to contribute to economic stability and potential growth of the natural resource industries and local economies. Yet when we look to see what UCRB is contributing to community stability, we find no mention of 25% funds, PILT funds, total wages, or any other indicator of economic health. How are we to judge whether UCRB contributes to economic stability if there are no indicators? If UCRB is completed provide an assessment of the effects each alternative will have on the economic health of local communities. This should be done in terms of total wages, 25% funds, PILT funds, and present net value for each alternative. (County Agency or official, Dubois, ID - Letter #B75494)*

*I am concerned about the impact ICBEMP could have on county and local taxing bodies. If ICBEMP reduces the local tax base in any way, how will this be mitigated? Please provide me with all information developed by ICBEMP for all county and local taxing districts - -such as fire protection districts and sewer and water districts -- in Walla Walla County. (Natural Resource- Based Business or Business Group, Walla Walla, WA - Letter #W516)*

## Section 3.3 ~ Social Systems

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Comments about social systems reveal a variety of issues concerning quality of life, recreation, and human population. Some individuals feel that the project threatens the cultural integrity of their resource-dependent communities because they believe it has the potential to negatively affect cultures and traditional family values developed over several generations. Other individuals want natural areas preserved for their spiritual integrity.

Some respondents feel that road closures will affect their recreational opportunities and that motorized recreation and its impacts did not receive adequate coverage in the Draft EISs. Some people took this opportunity to respond to other management activities that they feel contribute to a decline in recreational enjoyment, including: timber harvesting, mining, livestock management, and private land recreational subdivisions.

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### **3.3.1 Quality of Life**

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Several people believe the Draft EISs do not adequately cover social and recreational issues. Some contend that human values and desires change over time, and that the human element needs to be considered in ecosystem management. They feel that the problem of an increasing, uncontrolled human population is woven through these issues. Others believe that the project cannot effectively plan for the future because no one can accurately predict what future populations will require or what resources will be available to them.

A number of respondents feel that the Federal government and other people, particularly citizens on the East Coast, are infringing on their rights. Their sentiment is that the agencies are catering to environmental groups. They believe that these entities do not care about their livelihood or ability to make management decisions at a local level, but instead want the land for their own “selfish reserves.” Other individuals believe the government too often acts in the interest of resource-based industries and not often enough in the interest of the environment.

Many people fear that the project will negatively affect the quality of life in resource-based communities, resulting in economic tragedy and job loss. Many respondents believe the project will lock up the timber supply and close timber mills, which will negatively effect their quality of life and that of future generations. Others feel that their needs should come before those of wildlife, but that the Draft EISs consider animals more important than people.

A number worry that implementation of the project could damage cultural integrity in resource-based communities and they believe that planners have not taken this concern into consideration. These individuals feel they will lose not only jobs, but also the heritage and culture that defines their sense of identity and community. Some respondents explain that the culture of their communities developed around resources, such as timber and mining, more than a century ago. They claim that locking away these resources will destroy their way of life and that the project fails to consider these consequences. Some say they have worked in their industry for several generations and would like to see their children have the same opportunities to partake in this heritage.

Others perceive cultural integrity to be the ability of community members to make land management decisions at a local level. They feel it is unfair for anyone outside their community to make decisions that could affect the integrity of their culture and lifestyle. In their perspective, they know and appreciate the land and believe they should have the power to make decisions of the project on a local level. A few citizens suggest that the project needs to integrate the lifestyles of resource-based communities into the Final EIS to adequately consider the outcomes of future decisions. One person acknowledges that lifestyles have changed often throughout history because of a variety of outside forces; however, this respondent states that policies must work to reduce the stress resulting from these changes.

Several respondents suggest that spiritual needs are an aspect of each individual’s quality of life and they rely on the environment to fulfill these needs. They want the government to preserve natural areas so that these areas can continue to offer people an irreplaceable sense of peace and the ability to achieve full potential. Some express the necessity of natural areas for physical and spiritual healing which they believe occurs not only on an individual level, but also at family and national levels. Natural areas offer others a sense of identity in relation to the world and a connection with other species. One person believes that natural areas influence even those who cannot physically appreciate their beauty, but who have a dream of one day visiting these areas. Most respondents to this issue state that monetary values cannot measure or compare to spiritual values.

Some respondents disagree with the Draft EISs' reliance on social desires and values to manage the area, citing ambiguous and confusing passages. They assert that values and desires are not scientific and therefore subject to change, and that management practices also change with new understanding and knowledge. These individuals further believe that a project of this size will require many individuals to change their values to accept this plan.

Several people feel the Draft EISs do not provide enough information regarding the social effects of implementing the project, including specific questions on how the project will be implemented, what economic impacts will result, and what the economic and financial feasibility of the project might be. Some respondents say that without this information they are unable to effectively comment on the Draft EISs.

One group suggests that since, in their view, no groups support the Draft EISs the project does not successfully incorporate the social element of the project. They suggest that the Final EIS should establish social characteristic guidelines that will be monitored; if the project does not meet these guidelines in a particular area, adaptive management actions should be engaged.

**Issue:** *The Final EIS should not adversely affect the economies and quality of life of resource-dependent communities.*

**Sample Comments:** *The true effect both socially and economically on the area covered by this document will be devastating both to our generation and those to come! (Individual, Midvale, ID - Letter #W1850)*

*I love my town and my state and I appreciate the quality of life I enjoy here, and I ask you to thoughtfully consider the impact this whole proposal would have on those of us who are totally timber dependent. We don't want Eureka and dozens of other towns in Montana to become ghost towns. Thank you. (Individual, Eureka, MT - Letter #B4596)*

*I am 100% opposed to ICBEMP. The quality of life has deteriorated significantly for many of my friends in this area, mainly due to the curtailment of logging. (Individual, Columbia Falls, MT - Letter #B76952)*

*The critical question is: are the DEISs' concessions to human well-being sufficient? The new management direction makes it evident that a new day has dawned which subordinates meeting human needs to the protection of ecosystems. The project's underlying assumption strongly suggests that any action benefiting people that could be interpreted as deflecting the landscape away from a natural condition could be deemed outside the capability of the ecosystem. (Natural Resource-based Business or Business Group, Bozeman, MT - Letter #B77931)*

**Issue:** *The Final EIS should consider the potential impacts on the cultural integrity of resource-based communities.*

**Sample Comments:** *In 1976 the U.S. Congress passed the American Folklife Preservation Act (P.L. 94-201). In writing the legislation, Congress had to define folklife. Basically the law says: 'American Folklife' means the traditional expressive culture shared within the various groups in the United States: familial, ethnic, occupational, religious and regional. Expressive culture includes a wide range of creative and symbolic forms such as custom, belief, technical skill, etc. These expressions are mainly learned orally, by imitation, or in performance, and are generally maintained without benefit*

*of formal instruction or institutional direction...ICBEMP seeks to ignore a culture that has been defined over two centuries and it is no more or less significant than any other culture present in America. Sociologists agree that the above noted items are consistent and unique to a rural culture. (Natural Resource-based Business or Business Group, Olympia, WA - Letter #W3747)*

*The values and culture of the rural communities near federal lands in the region were largely discounted or ignored by the Eastside DEIS. (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4732)*

*Twenty-five years ago was the beginning that started taking livelihoods away from our communities. Communities were told, 'timber is not going to be here, so you better start looking for other alternatives of work,' which we did. We sold the studmill, did other jobs for a time without much satisfaction for a day's work. Life of the forest is in the blood of the man. The majority of these working folk do not believe in welfare or unemployment. They are a working class of people. My family and many families in our forest communities, within the State of Montana, have a vested interest in what the U.S. Forest Service is proposing to make their 'ends meet.' Unfortunately this is at the expense of family income, family unity, lands that are rightfully our heritage, community development, and well-being. Have people opposed to this ever thought that someone else is taking care of their land for them, without them having to work the land? (Individual, Seeley Lake, MT - Letter #B103)*

*I have lived and worked in Pend Oreille County for over 20 years. My children were raised here and I hope they will have the opportunity to raise their children here. The Forest Products Industry has always been a big part of our lives. Now, ICBEMP not only threatens our lives, but the lives of thousands. It threatens our heritage. It threatens the freedom of all who live here. ICBEMP is not, in any way, shape or form, something I can or will support! (Individual, Newport, WA - Letter #W4550)*

*I have been a minerals exploration geologist for 17 years, and I am the third generation in mining in my family. I have seen towns flourish and fade depending on the status of the local resource industry. World economics and natural variations in the environment make it difficult enough for resource-based businesses to succeed without being attacked by over-zealous preservationists often living far away from the people and towns their policies are affecting. Most people love the land around their home. For many in the West that is precisely why they live where they do. Management policies for the public lands should be formulated as much as possible at the local level, while incorporating sound science...Let the local people decide what is best for the public lands. They love them and will take good care of them. (Individual, Spokane, WA - Letter #B77875)*

*Citizens in the region have traditional ways of life that are part of our heritage like many other groups throughout the world. It is up to your team to integrate all aspects of our way of life into your document. Our lifestyles and ability to make a living off of the land must be paramount in the UCRB documents. Please give the working people of this region your fullest attention. (Individual, Missoula, MT - Letter #B75855)*

*Over the long history of humankind, old ways of life have given way to new ways of life as socio-political conditions and technology have changed. The fundamental policy issue is how to ease the change in a humane way to minimize social misery and psychological distress, rather than to shore up a way of life that cannot survive on its own, or without high costs to other values. (Individual, Portland, OR - Letter #W1755)*

**Issue:** *The selected alternative should consider protecting natural areas to meet spiritual value needs.*

**Sample Comments:** *I feel that the environment is so very important to our survival not only physically but spiritually as well. As such, I feel very strongly about protecting the environment as a means to achieve full human potential for all persons. I have experienced first hand the healing power of nature on those previously denied exposure. (Individual, Pomona, CA - Letter #B3826)*

*People come to these areas for harmless, non-land disturbing, quiet types of recreation that are so severely needed in today's society. Such types of non-motorized recreation help to heal the human spirit, keep marriages and families together and stimulate the human imagination, which promotes reverence and awe and wonder that makes us less selfish and self-centered. Such recreation also ensures the long-term health of the Nation as a safe and sane place to live and work and raise our families. (Individual, Kaysville, UT - Letter #B76357)*

*The experience of wild places fills us in a manner in which nothing else can compare. There is a transcendence about the wilds, a beauty and rhythm which reminds man of his place in this world; which reminds man he is but a guest, one of many species of importance on this earth. In the wilds one can experience the vibrancy of other species, the vulnerability of man in a world ultimately out of his control. It is the experience of the wild places which enlightens man as to his place and the futility of attempts to control and divert each and every resource for his use. (Individual, Pocatello, ID - Letter #B3927)*

*Pristine areas cannot be replaced or rebuilt in a physical sense and especially not in any spiritual sense. Physical values can be priced in present and future dollars, but spiritual values can only be priced in the loss of mystery and awe that brings and holds us to this part of America. (Individual, Bozeman, MT - Letter #B3885)*

*We are so lucky because all of this beauty is all around us but there are millions of people who live in big east/west coast cities who dream of enjoying just a piece of this someday. Even for maybe just one week. And this dream maybe all that is keeping them sane. Please don't let that dream be destroyed! (Individual, Idaho Falls, ID - Letter #B77115)*

**Issue:** *The Final EIS should provide adequate information regarding the nature of social-related decisions.*

**Sample Comments:** *The DEIS mentions several times that these lands will be managed with social desires and values. The problem with this is that science is not involved in values and desires. Values and desires change with politics and administrations with no scientific basis for the changes. The health and integrity of federal lands cannot afford to be managed on the whims of the general population who are largely ignorant of land management. The general population would be better served through education of sustainable land management practices. (County Agency or Elected Official, Salmon, ID - Letter #B77161)*

*In reference to the UCRB DEIS, chapter 4, p. 166, this broad scale plan could not provide the understanding that panelists of the social staff evaluation felt they needed to evaluate social effects, except in the broadest terms. Also, inadequate information about how plans would be implemented, what the economic impacts might be and questions of the financial and operational feasibility of the alternatives impeded attempts by the panel to estimate social effects. (Individual, Libby, MT - Letter #B3895)*

*ICBEMP does not adequately consider the social and cultural impacts of the proposed management alternatives outlined in the DEIS. Humans must be considered as an essential component of any ecosystem management plan (Mannion 1991, 331). The few paragraphs that are dedicated to this subject are ambiguous and confusing. Additionally, with the exception of the projected cost to the federal government, little discussion takes place on the economic impacts from ICBEMP to society in general. Ecosystem management, as discussed in ICBEMP, is based on the premise of safeguarding ecological integrity while maintaining sustainable benefits to human populations. All members of society and the diverse cultures they represent tend to view and to exploit ecosystems in different ways (Noss 1994, 13). Societal attitudes and values also tend to change over time. ICBEMP does not go far enough to quantify or qualify the impacts to society associated with restructuring historical decision making processes and land use planning practices. It is unrealistic to expect that the majority of affected individuals will be willing to change their value systems to embrace the sacrifices necessary to implement ICBEMP. (Individual, Ellensburg, WA - Letter #B77292)*

*The social element of ecosystem management also seems to have badly missed the mark as currently there is no group outside the Agencies that supports the DEIS's. Whereas the EIS team focused on community resiliency, there are many more aspects to the social element of ecosystem management. The vast lack of support for the project indicates its level of success within the social element. Attached is a copy of an opinion poll conducted in 1997 by the Idaho Forest Products Commission that gives a strong indication of what the public will support. As an example, 83% of those polled favored active forest management of federal lands, and 72% responded that the State of Idaho or the counties would do the best job of managing those lands. The same concern as expressed above regarding disproportionate resources about the economics element is also a concern for the social element. Guidelines should be established for social characteristics of the plan, they should be monitored to determine if they are being met, and if not, then adaptive management actions should be engaged to correct the situation. (Natural Resource-based Business or Business Group, Coeur d'Alene, ID - Letter #B77304)*

### 3.3.2 Recreation

A number of people think that implementation of the project will lead to road closures. They express concern that road closures will affect their ability to access public lands for recreation and traditional activities, such as collecting berries or firewood, hunting, fishing, hiking, mountain biking, and motorized vehicle use. Some respondents feel that federally-imposed restrictions violate their "ownership" of and right to use public lands. Many feel the closures are discriminatory, because they will particularly hinder the elderly, the very young, and the disabled from participating in recreational activities that require road access.

A few people believe the project will limit access to roadless tracts of land to the government, the rich and physically fit. Others indicate that as access becomes limited, user concentrations will increase in areas that permit motorized recreation, thereby diminishing their enjoyment of outdoor recreation. Some individuals question how the project expects communities to rely on income from tourism and recreation when it limits access by closing roads. They allege that the Draft EISs do not fairly analyze the benefits that motorized use offers to both users and local economies. Some respondents want more road closures.

Several people suggest that the Draft EISs did not effectively analyze the benefits and impacts of motorized recreation use in the project area. Some people feel the Draft EISs unfairly stress wilderness recreation over motorized recreation, which they feel leads to road closures and limited access. These respondents assert that motorized recreation occurs more frequently than non-motorized recreation, allows greater opportunities for access, and boosts local economies. They hope the Final EIS will consider the number of users who rely on motorized vehicles for recreation before imposing further restrictions.

Other people, however, contend that the project did not adequately study the detrimental impacts of motorized recreation on the land. Most comments on this issue focus on off-road motorized use impacts and motorized recreation in reserves, but one person wants the Final EIS to analyze the impacts of all motorized use on public lands. This person argues that motorized use harasses wildlife and contributes to pollution, erosion, and the spread of noxious weeds. Another individual suggests that wilderness should be considered to be more important than recreation, and that wilderness and roadless areas consequently should be managed for non-motorized recreation.

Some people took this opportunity to voice their opinions about how management decisions on other issues may affect recreation. Some note that decisions made regarding other land management activities, such as timber harvest and noxious weeds, will affect recreation. They feel that managing recreation within the context of impacts related to other activities will result in a challenge for policy makers. Another person wants the project to consider the long-term effects of subdividing private forested lands and the consequent disruption of habitat. Some request a more credible analysis on the relation of roads and recreation access, contending that the agencies should account for their proposed contradictory measures of increasing recreational opportunities and associated receipts while promoting road closure.

Several respondents are concerned about the effects of livestock grazing on recreation. One person believes that livestock management intrudes on the natural beauty of public lands with such activities as building roads and erecting metal water troughs. Some people further suggest that health hazards result from the presence of livestock wastes in their campsites and water supply, and from livestock waste and carcasses in the interior Columbia River Basin water systems where they wade or swim.

Mining, timber harvest, and urbanization are other management activities that some people perceive as intruding on their recreational experiences. One person, however, suggests that tourism and timber harvest do not adversely affect each other in the Flathead Valley in Montana. This person states that both activities are valuable and can co-exist. They feel that forest management provides the necessary recreational resources for tourists to enjoy.

Some respondents feel that the Draft EISs do not provide enough details regarding the recreational impacts of each alternative. Believing they may lose recreational opportunities, some people want the Final EIS to state what recreation will be available and where. Other individuals assert that the recreational effects are too broad and the alternatives need more and clearer analysis. They feel the Final EIS should conduct the recreational analysis at a regional, not a site-specific level. Some people assert the Draft EISs do not accurately portray the various economic values of recreation. Furthermore, they feel the Draft EISs do not effectively address multiple recreational use. Expressing this concern, one person noted that the Draft EISs do not distinguish between winter and summer recreational activities, which have different environmental impacts.

A number of people question the use of the “willingness to pay” methodology to determine the value of recreation. Several believe this is not an effective method; they believe that asking people how much they are willing to pay is not representative of how much they will actually pay. Some cite a perceived decline of visitation at national parks as an example of people not being willing to pay increased fees.

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**Issue:** *The Final EIS should address the effects of closing roads on recreational opportunities.*

**Sample Comments:** *Recreationists are significant users of the roads on public lands in the project area. The Preferred Alternative hits hunters, fishermen, campers, sightseers, and other outdoor users particularly hard because it calls for closing 800 miles of roadway every year in order to supposedly protect aquatic resources which will deny people access to the land. All the other alternatives also hurt recreationists. (Individual, Whitefish, MT - Letter #B75992)*

*Recreational users would be hard hit by this proposal because it would cause numerous road closures, thus denying access to many areas used by these people. Speaking on behalf of hunters and others who love the wilderness, I am very upset to know that this plan could drastically alter our enjoyment of the great outdoors. As a taxpayer, I'm angry that the federal government might deny us the chance to enjoy land supposedly owned by the public. (State Agency or Elected Official, Olympia, WA - Letter #W360)*

*Private landowners should not be allowed to deny access to government owned property. It becomes their own private hunting and fishing domains. Places I have had access to for forty years are now blocked to the little guy. Roads that once gave us access are now blocked or off limits. No trespassing, road closed, no hunting, no fishing, keep off, no vehicles, and other signs greet us nearly every place we go. Multiple-use sounds great but it is losing favor and soon only the rich will be able to enjoy what should be accessible to all of us. (Individual, Rupert, ID - Letter #B104)*

*Only a minimum number of people will ever see these areas unless you work for the government in charge of monitoring these areas or for the rich who will be able to afford access to these areas by using the limited number of outfitters and guides who can take people back into these natural preserves. Certainly the common working person will not be able to see or enjoy the areas with the exception of a small number of young people who live in the area. Older people and disabled citizens will be barred from enjoying these areas because the preservationist groups are continually striving to cut back on the roads that would give these people access to these areas. (Individual, Kalispell, MT - Letter #B76036)*

*There is a demand for developed recreational facilities and increased access to resources but you seem to consider only primitive recreation. If the only way in and out of the forests is to be by back-pack, this option will be unavailable to many, including the handicapped. (Individual, Elgin, OR - Letter #W1819)*

*The assessment of recreation demand emphasizes wilderness recreation at the expense of more popular activities such as weekend drives in the woods, picnicking, hiking, camping, and skiing. (Natural Resource-based Business or Business Group, Lyons, OR - Letter #W732)*

*Those of us who actually use the mountains for our recreation use 4WD vehicles by the tens of thousands, pickup campers, camp trailers, motorcycles, snowmobiles, motor homes, and horse trailers. Our mountains are big and steep. An old logging road or trail for motorcycles is the only way most of us can get away from the crowd. Every time you close a road or trail, you squeeze more people into a smaller area. Our outdoor experience is thus decreased as we trip over each other. The best way to give all of us a satisfying outdoor experience is to disperse us over a large area. Closing roads and trails will thus damage the outdoor experience for the 97% of us who use our mountains to recreate in. (Individual, Caldwell, ID - Letter #B3805)*

*You propose to utilize outdoor recreation to replace natural resource based jobs. Then you indicate there should be road closures, access limited and areas returned to their 'natural state,' a state that apparently you bureaucrats will designate. You ignore the value of motorized recreation, which is a major factor in employment in recreation-based communities. (Individual, Caldwell, ID - Letter #W1310)*

*I am an avid 64 year old hunter - I hunt on foot and do not appreciate road hunters, including those on ATV's in the back country - so I don't care if they close roads to motorized vehicles. When I'm too old to hunt on foot it's time to hang it up and stay home! I'm also very much against the use of snowmobiles in game habitat. (Individual, Hailey, ID - Letter #W4491)*

**Issue:** *The Final EIS should better examine both the negative and the positive aspects of motorized use in the project area.*

**Sample Comments:** *I wish to comment on the ICBEMP EIS for Idaho. I am very upset at the bias the EIS has for wilderness recreation and against motorized recreation in our national forests. It is all out of balance. Research has shown that less than 2% of Idaho people recreate in wilderness areas. Nearly all of us recreate where there are roads and trails we can use. These 2 percenters make a lot of noise, but they spend little time in our mountains. The use of recreational vehicles has been shown to be the most popular way to recreate in Idaho in research after research. Wilderness backpacking has been shown to be less than 1% of total recreation time spent in our forests. Due to the size and height of our mountains, we must use our 4WD vehicles, trail bikes, ATVs and now mountain bicycles to hunt, fish, or just about anything we wish to do. There is no other way. Closing roads and trails will just push all of us into a smaller area -- ruining the outdoor experience for all of us. A 1990 study found that Idaho recreationists cover 58.2 million miles with their 4WD rigs in off-road use. Trail bike riders and snowmobilers racked up many millions also. This is the way we want to go in Idaho. (Individual, Caldwell, ID - Letter #B75461)*

*The DEISs ignore motorized recreation and say nothing about the increased popularity of snowmobiling, trail motorcycling, ATVing, 4WDing. These legitimate forms of recreation are a very important part of my life and should not be ignored. Any new land management plan must include increased availability of public lands for motorized use, open to motorized use. Any attempts to take away any type of motorized use on our public lands is totally unacceptable. This plan is an attempt to lock the people out of their own public lands and it must be stopped immediately. I am demanding that the ICBEMP and its DEISs be completely abandoned. As an American, I have the right to use and enjoy public lands, whether it be on a snowmobile, a motorcycle or a 4x4, and I refuse to have that right taken away. (Individual, Fall City, WA - Letter #W532)*

*Motorized off-road recreation should be prohibited in reserves. There is currently no standard dealing with this important problem in the basin. Direction should be taken to modify travel plans accordingly. (Individual, Missoula, MT - Letter #W3801)*

*We requested that a Supplemental EIS be prepared to address profound and destructive issues raised by motorized recreational effects on ecosystems and to establish standards to deal with those effects. Motorized recreation is one of the most contentious uses which affects huge areas of our public lands virtually unregulated in terms of machine type, air pollution, water pollution, noise pollution, wildlife harassment, soil erosion and the spread of noxious weeds. To ignore the motorization of public lands is unconscionable. (Conservation/ Environmental Group, Helena, MT - Letter #B78902)*

*We support an alternative that would protect the Basin's remaining roadless areas. Recreation opportunities are secondary benefit. Wilderness areas and adjacent roadless areas should be managed for non-motorized recreation, hunting, and fishing. (Individual, Condon, MT - Letter #B3920)*

*The DEIS ignores motorized recreation, its contribution to recreation choices, and how it benefits local economies. (Individual, Redding, CT - Letter #B76939)*

**Issue: *The Final EIS should analyze the potential impacts of other management activities on recreation.***

**Sample Comments:** *The challenge for recreation in this document is in those other areas that affect recreation through various land management activities. The decisions that will be made concerning timber harvest, grazing, noxious weeds, roads, etc. will have an impact on recreation throughout the project area. (Resource Advisory Council, Prineville, OR - Letter #W1830)*

*Current trends for increased development in recreation counties cannot always be viewed as positive. Increasing amounts of private forest lands are being subdivided for recreation properties. This has more potential long term effects than timber harvest. Trees grow back, but subdivisions stay. This increases the loss of wild lands and effects the adjacent Federal Lands. This in effect is permanent loss of habitat. Increasing recreation on Federal Lands increases recreational subdivisions. (Individual, McCall, ID - Letter #B99)*

*ICBEMP particularly ignores analysis of the aesthetic impacts of livestock grazing on recreational areas of public lands. These include existing and resultant large-scale visual impacts and intrusions which detract from a sense of wildness and naturalness: metal cow water tanks surrounding wastelands in otherwise primitive areas, roads and two tracks for maintenance of range facilities and salt licks, ever increasing numbers of fences which impair free movement of humans and wildlife (actually maim and kill birds and mammals which run into or get hung up on them), new roads, trails, and erosional surfaces resulting from vegetation manipulation projects (fire lines and the like) and the unnatural appearance of virtually every vegetation manipulation project ever done in the Basin. Our members have often passed through or inhaled dense clouds of dust and pulverized livestock waste while encountering cattle concentrating by roads or streams; camped in 'official' BLM or FS campgrounds and elsewhere on public lands where livestock waste was ubiquitous; swatted flies and biting insects directly associated with the presence of livestock and their wastes; encountered the feedlot stench of livestock feces and urine permeating otherwise wild settings; and tried to swim, wade and enjoy waters of the Basin, only to find them polluted with livestock waste - and in many instances, livestock carcasses. What are the economic costs of livestock degradation of the recreational and aesthetic environment? What are the costs in terms of human illness? (Conservation/ Environmental Group, Boise, ID - Letter #W3690)*

*I make numerous trips to the Northern Rockies hunting and fishing and I am increasingly concerned about the effects of urbanization, timber harvesting and mining on this beautiful place. Please take action to conserve the Northern Rockies for tomorrow. (Individual, Port Matilda, PA - Letter #B76501)*

*Over the past ten years, the Flathead Valley has seen a significant increase in non-resident tourism and population growth. However, we have found no evidence suggesting that in-migration and non-resident tourism would suffer from a continuation and perhaps even an increase of timber production from U.S. Forest Service and Bureau of Land Management lands. We believe that it is possible for*

these two uses and values to co-exist in a county such as ours with 72,000 people spread over 5,100 square miles. Indeed, forest management is needed to provide the kind of recreational resource that will preserve our high quality natural amenities. (Civic Group, Kalispell, MT - Letter #B76234)

**Issue: *The Final EIS should provide a more comprehensive analysis of potential impacts from recreation.***

**Sample Comments:** *I notice there was no Recreation Specialist on your panel. I wonder how thoroughly this subject was covered - especially in the realm of snowmobiling. (Individual, Bend, OR - Letter #W285)*

*What types of opportunities will be available for cultural, recreational, and aesthetic experiences? Recreation use is important on ICBEMP lands. 'Population growth would be the dominant factor affecting recreation uses during the next ten years, both in type and amount. In the longer term, demographic changes (especially an aging population) will become increasingly important' (DEIS, page 4-170). However it does not appear that the action alternatives reflect this increasing and changing demand. Recreation use becomes a residual output with no consideration for balancing with ecosystem integrity. Aquatic Standards are especially restrictive. This conflicts with the desire to recreate near water: 'The presence of water has been and will continue to be the most important draw for recreation visitors.' Recreation use should be receiving a more balanced treatment with Goal #3 of the action alternatives being: 'Provide diverse recreational and educational opportunities within the capability of the ecosystem.' (Professional Society, Eatonville, WA - Letter #W573)*

*Chapter 3, page 63, Human Uses and Values. Problem Statement: Most of the recreation-oriented objectives and standards found here are inappropriate to the scale of this project. Supporting Evidence: For example, (A1/Human Uses, Standard Three) 'Dispersed recreation sites and special places' are impossible to identify at a regional level. Rather than focusing on site-specific issues, broader, more regional policies and approaches should be referenced. Recommendation: Revise the text to include a discussion of regional level recreation issues in need of management policies and programs. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

*Information gathered and depicted in the ICBEMP does not agree with prior studies made in other states. The minimal treatment of recreation in the DEIS is apparently due to a lack of input. The use of 'ORV' instead of the more acceptable term of OHV, or off-highway vehicle, is indicative of that lack of input. Since treatment of recreation will be dependent on priorities established by this project, the proposed increases in growth and related economic values would have to be fairly and accurately portrayed. Since the various recreation uses are not separated or accounted for, economic multipliers that indicate economic values cannot be accurately portrayed. The effort to address multiple use recreation in the DEIS is a muted one. Very similar to the Oregon effort in 'Assessing the Economic Impacts of Outdoor Recreation in Oregon - 1995. The tendency to treat recreation lightly because it is sometimes controversial is folly and the negative result will return to haunt us all. We should look it square in the eye and intelligently plan for its application with education, partnership, and viable, environmentally sound trails. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*The entire subject of winter recreation needs to be separated from summer use in this report. Winter motorized and non-motorized use causes no impact on soil and snowmobiles need to be designated as OSVs -- oversnow vehicles, not ORVs. (Individual, Cle Elum, WA - Letter #W212)*

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**Issue:** *The Final EIS should re-evaluate the ‘willingness to pay’ concept to determine the value of recreation.*

**Sample Comments:** *The report uses the willingness-to-pay concept to assess the recreation value of all public lands. It attempts to attach dollar amounts to nonmarket values, such as existence values and option values, and advocates the use of such values obtained by contingent valuation. It should have noted that a number of leading economists have a low regard for the use of contingent valuation. The report uses estimates of existence values for unroaded areas that are unrealistically high and of dubious validity. Asking people what they would be willing to pay when they are not fully informed about the complex issues and who know full well that they are not going to have to pay is not a scientific approach to resource valuation. (Natural Resource-based Business or Business Group, Portland, OR - Letter #W3751)*

*‘The willingness to pay’ calculations are also dubious. What people say they will pay and their actual dollars spent are usually very different. (Civic Group, Eureka, MT - Letter #B75619)*

*Willingness to pay methodology can be demonstrated to have little meaning in actual real world applications. Asking individuals if they would be willing to pay for something, knowing that they would never actually have to pay, always overstates payments. Recent downturns in national park attendance where user fees have been applied is a good example of people ‘speaking with their pocketbooks.’ The willingness to pay approach should be dropped, or, at the least, discussed in the context of the failings of the methodology. Furthermore, other values such as food, shelter, and other components of a budget should be measured as well. (Natural Resource-based Group, La Grande, OR - Letter #W686)*

*There is no credible analysis of future receipts from recreation, yet recreation is projected to make up economic losses from timber reductions. The plan speculates that there is a lot of potential for primitive recreation activity, which has led to the proposal to remove old roads and not create new ones. The economic analysis indicates that in the next fifty years, the three most highly valued uses will be motor viewing, day use and trail use, all of which require roads. This plan will decrease road density, which would seem to be in direct contradiction to the projections for developed recreational needs. As written, it would seem that the goal of this plan is for less recreation, not more. For instance, Standards like AQ-S26, address existing recreation facilities inside RCAs and directs that, ‘where RMOs cannot be met or adverse effects on aquatic resources cannot be avoided, recreation facilities shall be relocated.’ Most forest facilities are next to water because those are the places people prefer. This standard is so restrictive that nearly every existing facility on the national forests theoretically could be closed or relocated to a less desirable site. Under current budget limitation, it is unlikely that these facilities would be replaced. Even if they were, if moved away from water, would people use them? The full effect of the closure of many or all forest facilities located next to water would bring an unfavorable public reaction. The affect of these closures should be fully disclosed. Many forests have already imposed recreation user fees. This new fee system is yet to be analyzed and the effects it may have on the numbers or recreationalists is therefore unknown. How can the DEISs even attempt to project the demand for recreation when the effect of this new fee system is unknown. A thorough and credible analysis of the future recreation demand must be done, using a wider range of information sources including those prepared by the private sector. More credible analysis needs to be done on roads and access and how they affect all aspects of the DEISs. (Natural Resource-based Businesses or Business Group, Horseshoe Bend, ID - Letter #B78644)*

### 3.3.3 Human Population

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The perceived impact of population growth on future resources prompted some people to comment on human population and environmental stability. A few respondents suggest that the Draft EISs do not adequately cover the population problem or the amount of resources future populations will require. Others point out that the project cannot control the rise in populations and consequent environmental impacts, yet they believe that management plans cannot effectively sustain resources until population growth is controlled. While some allege the project's job is impossible because of unpredictable population trends, others request that planners develop methods to protect future resources. However, responses vary on the reasons for and methods of protection.

Others feel the government should not lock away these resource-laden areas but rather should allow communities to continue to develop resources for future generations. They think that the current levels of resources are not sustainable and that the government should make the land available for future resource extractions. They believe that historical standards for forest management will not apply in the future after current populations have doubled.

**Issue:** *The Final EIS should consider impacts on resources from rising human population.*

**Sample Comments:** *Some of the causes of the decline in the health of natural areas, such as climate change and population growth, are beyond the control of the FS or BLM management. (Individual, Prineville, OR - Letter #440)*

*I suggest that your job is impossible, given a continuing growth in the numbers of humans competing for use of Columbia Basin 'resources,' and I urge you to include an introductory statement in the final decision document which puts on notice your superiors in your position and public officials in general, that no management plan can protect the resource achieve sustainability, etc. without setting in motion a plan which will halt and reverse human population growth. (Individual, Coos Bay, OR - Letter #B75779)*

*Overpopulation is the biggest problem for wilderness areas and this causes the natural resources to become destroyed or threatened. I would like to see as much wilderness saved as possible and a BIG campaign to lower population rates. It might help solve some social problems if babies were precious - not just had. Print the expedient/ geometrical rates in newspapers - inform the public - go to the source of the problem. (Individual, Billings, MT - Letter #B4381)*

*As the US grows in population, there will be a greater need for people to have access to wilderness areas. Logging old growth areas simply is not appropriate and will not be until more such areas become available. (Individual, Salinas, CA - Letter #B1135)*

*Our country's population is predicted to double by the year 2050. If we stop logging on our public forest lands, where will the people get the lumber to build their houses? Where will the paper come from for computers, writing, boxes, paper towels, toilet paper, etc? Canada? Europe? Russia? (Individual, Eureka, MT - Letter #B4638)*

*1850 forest management will not work in the year 2050 when population is doubled. Demand for resources will more than double. Forest Plans should be designed to meet predicted demand. (Individual, Eureka, MT - Letter #B4645)*

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## Section 3.4 ~ Wilderness Areas, Roadless Areas, and Wild & Scenic Rivers

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The subject of wilderness and roadless area management received voluminous public input, although most respondents do not distinguish among congressionally designated wilderness areas, wilderness study areas, inventoried roadless areas, or areas that currently are unroaded. Some respondents express strongly held beliefs about wilderness and wilderness values. Many people advocate using roadless areas to buffer wilderness or call for ultimate assimilation of roadless areas into the wilderness system. Many respondents feel that the Draft EISs do not go far enough in protecting roadless and wilderness areas. Others take the opportunity to request protection of numerous specific areas.

In contrast, some people believe that enough congressionally designated wilderness areas already exist and there is no need for further designation. Some of these people feel roadless areas should be opened up to allow logging and other management activities.

### 3.4.1 Wilderness Management

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Many respondents want to make sure that existing wilderness areas are adequately protected. These people perceive wilderness to be a finite resource, and they are uncertain whether the alternatives presented in the Draft EISs would provide enough protection from management and other activities, extractive industries, and pollution. Some believe strongly that all wilderness study areas should be put off-limits to logging and mining activities until a final decision on their status is determined. They feel this will provide short-term protection to these areas since once wilderness areas are developed they can never be fully restored.

Several people wrote of the importance of living in a region with extensive wilderness opportunities and unbroken landscapes, outings in the back country, the intrinsic value of wild areas, and the importance of maintaining these places for future generations. Some people feel that the Draft EISs do not go far enough in protecting such places. Others wonder why the BLM's wilderness study areas are not mentioned in the Draft EISs.

A number of respondents would like to see a wilderness rangeland created. Another proposes creating a fish, wildlife, plant, and habitat Sanctuary from Forest Service- and BLM-administered lands. Some believe that severe wildfires in wilderness areas could create ecosystems that are at odds with the intent to keep wilderness areas ecologically intact.

In contrast, some respondents feel the project is an attempt to create one huge wilderness from taxpayer dollars. Several people assert that there is little or no land left in the West that qualifies for roadless or wilderness designation. They feel there might be an over-abundance of wilderness and that some of these areas could be healthier if they were given a Restore or Produce emphasis in Land and Resource Management Plans. One individual recommends a task force to be assigned to evaluate data relating to wilderness resources and how they contribute to overall ecological integrity and social and economic resiliency. Others believe putting any more lands into the wilderness system would simply be a waste of resources.

Some concern is expressed that the project could limit access to wilderness areas, particularly to in-holdings in the Frank Church River of No Return Wilderness.

**Issue:** *The Final EIS should contain alternatives that provide adequate protection for roadless areas.*

**Sample Comments:** *Not a single alternative offered in the DEISs offers roadless areas the protection that the scientific findings indicate they must have if we are to protect healthy ecosystems and native species...The Integrated Scientific Assessment shows a clear correlation between heavily managed (especially roaded) landscapes and low terrestrial and aquatic ecological integrity, as well as the inverse: a clear correlation between lightly roaded or non-roaded landscapes and high ecological integrity...We continue to recommend that these areas be protected and not put at risk because these areas form the cornerstones of habitat recovery. (Conservation/Environmental Group, Missoula, MT - Letter #B78935)*

**Issue:** *The selected alternative should protect remaining wilderness and roadless areas by keeping these lands off-limits to natural resource development.*

**Sample Comments:** *The jury is out on what 'ecosystem management' will amount to. I would like to see comprehensive recommendation of wilderness designations as part of any broad management plan aimed at restoring a degree of healthy land and biotic communities. (Individual, Butte, MT - Letter #B3)*

*I was disheartened when reading about the proposal. Especially disconcerting was the fact that areas surrounding several great wilderness locations would not be protected and potentially open to logging and other interests. Obviously the surrounding areas are crucial to maintaining healthy ecosystems within the entire areas. All isolated wilderness is a futile and ultimately doomed wilderness. (Individual, Missoula, MT - Letter #B4417)*

*Please leave the wilderness areas alone to Nature, where it belongs without man's interference! Let Mother Nature decide what should happen to the wilderness ecosystem. (Individual, Moyie Springs, ID - Letter #B4042)*

*I moved to Idaho largely because of the Selway-Bitterroot Ecosystem... Many others in the area value the wilderness and all of the associated recreational opportunities. The conserved areas provide essential habitat for many species that are doomed in the suburban landscape of the majority of the continental United States. The lynx, grizzly and many other species require the open spaces that the interior basin has to offer. Furthermore, the Interior Columbia Basin provides essential areas for scientific research. These areas can provide background information for air and water quality (since these are probably some of the most pristine continental regions of North America). Also research concerning bio-diversity and ecosystem management need to be conducted in intact ecosystems (of which very few remain). (Individual, Eugene, OR - Letter #W481)*

*I am a local Idahoan and I am concerned about what amazing wilderness we have left be preserved as intact as possible for many generations to come. I value the wild nature of these Western States and the abundant Wildlife that they support. Please stop unnecessary logging and minimize bad impacts and keep the ecosystems pristine!! (Individual, Ketchum, ID - Letter #B76650)*

*Please protect our semi-wilderness lands and waters from mining & logging. We need to have some undisturbed public land for future generations. (Individual, Helena, MT - Letter #B4467)*

*The BLM's Wilderness Study Areas (WSA) are not even mentioned in the draft EIS. Over 90 WSA's exist in Oregon alone. (Individual, Portland, OR - Letter #E25)*

*I value the natural beauty, richness and heritage of our National Forests and public lands. The proposed federal plan. ICBEMP must do much more to protect natural values: Protect backcountry areas that have never been logged. These undisturbed natural areas are the highest quality fish and wildlife habitat in Washington and Oregon! (Form Letter #208).*

*I hope and pray that you treat these lands like the national treasures they really are so that some day our children, grandchildren, and subsequent generations will experience the site of a grizzly sow with cubs or maybe even a pack of wolves -- in the wild-- and realize that we were indeed wise stewards of the land. (Individual, Ridgeland, MS - Letter #B3893)*

*For both economic and emotional reasons please consider not logging the wilderness areas at hand. Make the right decision to save some beauty for future generations. Clearcuts and logging roads have no place in the Northern Rockies wildlands. (Individual, Missoula, MT - Letter #B4530)*

*The Wilderness areas we have in the Northwest is a finite resource. Once it is violated, it can no longer be retrieved. I ask that you please maintain as wilderness areas in all fashions. Of course, it has mineral and resource value, but its value as a resource of wilderness cannot be obtained from any other piece of land. Please maintain it. (Individual, Butte, MT - Letter #B4139)*

*As this region contains outstanding scenic wilderness, and biological attributes of National significance...To manage this region as a Fish Wildlife Plant Habitat Sanctuary. With Forest Service and Bureau of Land Management areas established as a National Preserves and wilderness areas... (Individual, Minneapolis, MN - Letter #B4251)*

*The 1964 Wilderness Act was enacted to assure that 'an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition.' Two million acres of Oregon's public forest land are protected, 14 million acres remain unprotected. The U.S. Forest Service predicts a 35% erosion of our forests by 2010 with complete elimination in 50 years. (Individual, Ashland, OR - Letter #W1674)*

**Issue:** *The selected alternative should not place any more roadless areas under wilderness protection.*

**Sample Comments:** *There is little or no land in the 13 western states that qualifies as roadless or wilderness. (Individual, Cedar City, UT - Letter #W922)*

*We have enough wilderness in the United States. The wilderness study areas are a way of slowly taking the land, so we need to get that stopped... (Individual, St. Maries, ID - Letter #W1833)*

*This whole plan the Interior Columbia Basin Ecosystem Management Plan is to create one huge Wilderness Area for the U.S. taxpayer to support. We in Sublette Co. are dealing with the 'Buffer Zone Creep.' It all ties together. (Individual, Big Piney, WY - Letter #B77779)*

*We have more wildlands than Congress has chosen to adequately maintain. I know; I use them frequently. We are wasting our wood fiber resources and need to add to our domestic supply of wood. (Individual, Stevensville, MT - Letter #B4052).*

**Issue: The Final EIS should not limit access to wilderness areas.**

**Sample Comments:** *I belong to an organization called the Flying Resort Ranches, Inc. It consists of 150 members who own, maintain and enjoy two properties; one being The Flying B Ranch on the Middle Fork of the Salmon River and the other being The Root Ranch in Chamberlain Basin. Both of these properties are within the Frank Church River of No Return Wilderness Area. I feel that all of our members enjoy these areas and want to keep them available to us. Therefore, I am firmly opposing any actions taken as a result of your project which would result in any loss of our ability to continue to use and enjoy these wilderness areas. I believe that all of our members, including myself, take pride in these areas and make all attempts to preserve these wild lands. I firmly oppose any radical changes in the management of these properties which would take away our right to enjoy them. (Individual, Rupert, ID - Letter #B75301)*

**3.4.2**

**Protection of Specific Areas**

Respondents requested protection for many specific areas, as summarized in the following table:

AREA NAME	NATIONAL FOREST/BLM DISTRICTS	STATE	LETTER#
Great Burn WSA	Lolo, Clearwater, St. Joe	Montana, Idaho	B4410
Boulder-White Clouds	Sawtooth	Idaho	B4291
Cube Iron-Silcox	Kootenai	Montana	B62875
Badger Two Medicine	Lewis & Clark	Montana	B76555
Yaak Valley	Kootenai	Montana	B2839, B76060, B75348, & others
Boise River	Boise	Idaho	B75653
Columbia River Hanford Reach	D.O.E.	Oregon, Washington	B4745 W3816
Chopaka		Washington	W227
Glacier National Park, Great Bear, Scapegoat, Wilderness Complex		Montana	B4089, B4197, B4455 B76799, & others
Greater Yellowstone Ecosystem		Montana, Wyoming, Idaho	B4089, B4197, B4455, & others
Greater Salmon Ecosystem		Idaho	B4455, B76799, numerous others
Saddle Mountain		Washington	W227
Grande Ronde Canyon	Vale,Umatilla, Wallowa-Whitman	Oregon	W227
Hells Canyon NRA	Wallowa-Whitman (Oregon Canyon rim)	Oregon	W427
Copper Salmon Wilderness Area	Siskiyou	Oregon	W1674
Upper Hemlock Creek	Clearwater	Idaho	B3825
Kelly Creek	Clearwater	Idaho	W3816
Salmon River	Payette (Middle Fork)	Idaho	W3816
John Day Basin	Umatilla	Oregon	W4622

### 3.4.3

## Roadless Area Management

The subject of roadless areas is of acute interest to a large number of respondents. Many people assert that there are already enough forest roads. These individuals would like to see roadless areas of 1,000 acres or larger be put off-limits to all road building and resource extraction activity. Many of these people cite the protection of biologically diverse regions, old-growth forests, riparian areas, and wildlife habitat, including fisheries, as reasons to put these places off-limits to management practices.

Several people point to the project's own findings that roaded and harvested forests show the most change from their historical condition as reasons to close existing roadless areas to road building. Some respondents further point to information in the Draft EISs that the existence value of unroaded areas exceeds the combined perceived public importance of timber harvesting, fishing, hunting, and day use. They contend that by conserving these areas we are protecting our national heritage. Others believe that roadless areas are much less susceptible to devastating wildfires than are roaded areas.

However, some believe that putting roadless areas off-limits would not be conducive to effective ecosystem management. A number of individuals assert that decisions about these lands need to be made on a site-by-site basis. Others argue that there are enough roadless areas and that roads should be built into these areas to give greater access to all including handicapped and elderly people.

**Issue:** *The selected alternative should put roadless areas off-limits to road building and resource extraction.*

**Sample Comments:** *Protect all unroaded areas over 1,000 acres in size from logging, road building, and mining. (Individual, Bozeman, MT - Letter #B3924)*

*Fires in unroaded areas are not as severe as in roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in unroaded areas produce a forest structure that is consistent with the fires regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are commonly more intense, due to dry conditions, wind zones on the foothill/valley interface, high surface fuel loading, and dense stand.' ...Historical and Current Landscapes in Eastern Oregon and Washington. USDA Forest Service Pacific Northwest Research Station Gen. Tech. Rep. PNW-GTR-355. (Conservation/Environmental Group, Eugene, OR - Letter #W4622)*

*Alternative 4...has an increase in road building in current roadless areas. These areas are exceedingly rare in the lower 48. Additionally exhaustive scientific studies have found road building detrimental to wildlife, fish and water quality, and increase noxious weed problems. So based on the findings of your own studies building more roads in the roadless areas does not make sense at all if the goal is to improve ecosystem quality. Unless the entire plan is used to justify increasing timber, mining and grazing/agriculture activities, I believe it would make more sense to preserve the roadless areas as roadless. (Individual, Seattle, WA - Letter #W845)*

*We already have over 440,000 miles with at least 60 percent in disrepair - and a maintenance backlog of \$10 billion - does this sound like a ship that is sinking? All roadless areas are critical for the survival of our native species; the Columbia Basin contains some of the last fragments of roadless wilderness areas capable of sustaining many larger wildlife species. The Forest Service has intentionally cut roads and logged entire areas to keep them out of a roadless designation. Unfortunately this agency cannot be trusted to accurately identify, or protect any wilderness areas, since their only commitment is to meeting logging quotas. (Conservation Group, Santa Cruz, CA - Letter #W4619)*

*Since 70% of the healthy ecosystems left in the continental U.S. are found in the ICBEMP study area, I urge you to include the following actions in the preferred alternative in order to protect these few remaining healthy ecosystems: Protect all roadless areas larger than 1,000 acres from any logging, road building, or mining. (Form Letter #256).*

*It is my understanding that the federal government intends to manage 45 million acres of public land in Montana and Idaho by increasing logging, road building and mining. I am concerned that this increase will cause destruction to old-growth trees, as well as to world class fisheries and wilderness recreational areas in the area. Please oppose any additional roads, old-growth logging or mining in the undeveloped areas of the northern Rockies. (Individual, Biloxi, MS - Letter #B87)*

*... 'Managing' our forests does not only include building access roads for mineral and resource extraction. It also means to 'manage' scarce and precious resources for the future. All logging of old growth timber and mining in these areas must simply stop and stop now. (Individual, Salinas, CA - Letter #B1135)*

*Unroaded areas are recognized by biologists as de facto refuges for numerous sensitive plant and animal species, reservoirs of genetic material, and benchmarks for experimental restoration efforts in intensely managed landscapes. Roads fragment wildlife habitat, alter the hydrological processes of watershed, discharge excessive sediment to streams, and are the cause of environmentally destructive landslides. Yet more roads would be permitted in roadless areas. (Environmental/Conservation Group, Tacoma, WA - Letter #W1485)*

*This is a national treasure...It is already badly compromised by logging, road building and mining on public land...Please count this unequivocally as a strong statement in opposition to any proposals to put in more roads, to approve any old-growth logging, and to approve any mining in these undeveloped public lands. Leave this land untouched, as part of our heritage to the future. (Individual, Waikoloa, HI - Letter #B1091)*

*Page 40 of the 'Status of the Interior Columbia Basin Summary of Scientific Findings' and page 1824 of the 'Assessment of Ecosystem Components in the Interior Columbia Basin...' both contain tables showing current and project future importance of selected benefits that could be measured. One wonders why this table was not presented in the complete text of the 'Integrated Science Assessment.'...the tables show that the percentages associated with the existence value of unroaded areas is over 4 times as popular as the second rated value and exceeds the combined perceived public importance of timber harvest, fishing, hunting and day use...I find it inconceivable that the ESC [Executive Steering Committee] chose to ignore this data in their selection of Alternative 4 in the DEIS. Perhaps the ESC chose to enter the roadless areas with roads and timber harvest to protect it from large fires which will inevitably occur. Many members of the public are astute enough to know that things will change... natural disturbances will occur and vegetative succession will continue. However, many members of the public (including myself) when faced with a choice, would rather take the risks and live with the impacts of such disturbances (such as wildfires which produce pulse aquatic impacts, as opposed to treating the fuels in the roadless areas with projects that require new roads (which produce long-term, press disturbances). (Individual, Grangeville, ID - Letter #B4705)*

**Issue:** *The selected alternative should allow roadless areas to be opened to road building.*

**Sample Comments:** *Let's build some roads in unroaded areas - not wilderness. We have enough lands of no use. Handicapped people can see new scenery from these roads that otherwise only a choice few can view. (Individual, Florence, MT - Letter #W1982)*

*There is already 110 million acres of roadless, unusable land in the Western States. What in the world do we need more for? Let's put an end to the demands of these selfish special interest groups. (Individual, Rexford, MT - Letter #B76094)*  
*It has been brought to my attention that your department is in the process of developing a policy directive that would prohibit any active ecosystem management opportunities in roadless areas of the National Forest. If indeed this is true, I am greatly concerned that your agency is moving forward with an idea that has not been well thought out as it relates to enhancing and maintaining areas of the upper watersheds that are roadless. (Elected Official, La Grande, OR - Letter #B4878)*

*I question the need to complete the ICBEMP if the Administration moves forward in banning any active management opportunities to improve the ecosystem in roadless areas of the U.S. Forest Service. This would definitely be a slap in the face of county commissioners and the National Association of Counties, who have given support to the process of the ICBEMP and would cause county commissioners, including myself, to withdraw from the ICBEMP process. I strongly recommend that your agency not move forward with this initiative. County commissioners desire that public land managers have all the tools and the entire land base available for effective ecosystem management. (Elected Official, La Grande, OR - Letter #B4878)*

*Management opportunities in roadless areas should not be restricted arbitrarily. RM-S16 which would prevent road construction in roadless areas greater than 1,000 acres in size, is completely inappropriate for any alternative because it rejects ecosystem principles and ignores scientific assessment. Rather, location-specific decisions need to be made, considering risks and tradeoffs, and the landscape context. It was expected that the plan would designate active ecosystem management across the entire non-wilderness forest land base and recognize the need for a dynamic approach. Instead, it takes a politically motivated and simplistic approach, resulting in establishment of additional set-asides and static land allocations. (Natural Resource-based Business or Business Group, La Grande, OR - Letter #W686)*

## Section 3.5 ~ Road Management

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Roads are a concern for many people, whether they are for or against road closures and obliteration. Many of the comments with regard to this topic are general in nature, although loss of income for communities and management access are major concerns. Some respondents question definitions and scientific evidence they feel are not clear in the Draft EISs. Input summarized in this section includes comments related to the adverse effects of roads, effects and costs of road construction and maintenance, clarification of road density and definitions, and the need for road access for management.

### 3.5.1 Road-related Effects

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A number of respondents who addressed road management advocated a “close and stop building roads,” sentiment. These people argue that roads negatively affect the environment by causing erosion and providing access for timber harvest. Contrary to this belief, others contend that roads do not cause adverse effects and should not be closed.

Some feel that roads are necessary for active forest management; others feel roads are vital for recreation access, which some consider important to the maintenance of local economies through a transition from extractive to recreation-based employment. They hold that a decrease in the number of roads can serve only to limit recreational opportunities and development of a recreation-based economy. They want a more complete analysis of the effects of road closures on local economies.

A few believe that scientific data used by the project concerning adverse affects of roads is flawed. These respondents assert that the information does not support the policies in the Draft EISs aimed at limiting construction or mitigating the impact of roads.

**Issue:** *The Final EIS should contain guidelines for managing roads that emphasize protection of the environment.*

**Sample Comments:** *One thing we don't need is more roads. Roads don't create oxygen. (Individual, Leesburg, VA - Letter #B4265)*

*I am even more concerned about the fact that you are still allowing roads to be built in forests at all. The plan to stop the building in riparian zones and old growth stands is smart but it doesn't go far enough. There are already more miles of logging roads on our public lands than there are national highways, we don't need any more since logging is not a sustainable practice anyway. The emphasis should instead be placed on maintaining the roads that do exist so that they do not cause unnecessary damage. (Individual, Bellingham, WA - Letter #W1357)*

*And please, no new road construction. Road construction has an adverse effect on wildlife habitats and affects adversely the integrity of aquatic habitat. (Individual, Boise, ID - Letter #B3882)*

*Please don't build anymore roads on public lands in the Columbia Basin. It's a waste of money and it's environmentally destructive. (Individual, Seattle, WA - Letter #B3809)*

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**Issue:** *The Final EIS should not adopt road closure as an all-purpose policy.*

**Sample Comments:** *The health of the forests and rangelands in the Interior Columbia River Basin, the last best place is critical to the survival of the last best people. The ICBEMP is bad for the land and bad for the people. The ICBEMP DEISs cater to the 'lock-it-up, hands-off' approach advocated by a very vocal few. The idea that the only way to protect the forests is to deny public access and use is flawed. We want the opportunity to use - not abuse - our forest and range land. (Form Letter #220)*

*The DEIS proposes detailed standards and guides that could close up to 50% of the roads and an unspecified number of trails in some areas. I oppose these closures. (Individual, Redding, CT - Letter #B76939)*

*I strongly object to your 'expected outcomes' which will create vast areas where they are inaccessible to me and most of the public. And these so-called 'ghost roads' do exist because they fulfill a public need to access public lands. (Individual, Cle Elem, WA - Letter #W1696)*

*When the above conflicting attitudes arise, all should be reminded that one of the major items of public recreation is that of following dim trails, mine roads, and old logging roads. These should remain permanently open without any improvement except for occasional drainage changes. (Individual, Fort Collins, CO - Letter #W649)*

*Concerning road closures - to limit access to our forests is to cut out the very reason most people live in our area. Almost all of our recreation and livelihood comes from our forests. (Individual, Eureka, MT - Letter #B4639)*

*The project plan does not state how roads will be chosen for closure and/or removal. It would be easy for a government agency in control of this land, to arbitrarily close only a few key roads, effectively closing access to vast areas. We in California have seen this happen on a regular basis in Southern California. And because of the random and unpredictable nature of road closures, one can never know if he is in violation by being in a recently closed area. (Individual, San Jose, CA - Letter #W4736)*

**Issue:** *Economic effects of road closures on local communities should be re-analyzed in the Final EIS.*

**Sample Comments:** *We are opposed to the road management objectives. There is another bias in the DEIS against roads. The team assumes that roads and ecological integrity are opposed. This is not necessarily true. Roads shall be required for restoration implementation, fuel reduction, fire protection, and recreation. Eighty percent of national forest recreation is road-based. Roads equal recreation. How is recreation going to replace resource economies without roads? Please show us. (Civic Group, Eureka, MT - Letter #B75619)*

*We own a motel and gas station in Eureka. We have many tourists who support our business in the summer. They come here to 'see' the area by car or camper. Many of the roads these tourist use would be adversely affected by the current proposal. (Individual, Eureka, MT - Letter #B4655)*

*The DEIS does not take into account what the impact would be on the economy of people who live around the proposed road closures. (Individual, Oak Harbor, WA - Letter #B75954)*

*The reduction of road densities as called for in the DEIS will affect the efficiency of timber harvest. A road density of 1.7 miles per section will result in about half the harvest being helicopter yarded. Thinning small diameter species from below larger trees with a helicopter will likely prove uneconomical. So the projected harvest will be less than what is shown. (Individual, McCall, ID - Letter #B99)*

*The city of Salmon has some real concerns with the Preferred Alternative of the CRB DEIS. The DEIS proposes closing 50% of the roads in this area which will result in a negative impact on economy of Salmon. Closing roads will impact hunters, fisherman, tourist, wood gathers and others. There had been no road inventory done. No inventory showing age of roads, custom and cultural use of roads, of any other uses. (City Agency, Salmon, ID - Letter #B4666)*

**Issue:** *The Final EIS should re-examine scientific evidence related to road management.*

**Sample Comments:** *Nowhere in the impact statement is the effects of roads scientifically quantified. Yet throughout the impact statement, it directly or indirectly implies that roads harm the environment and must be eliminated along with the noxious weeds. Not once were roads shown to have any benefit, which they obviously do. (Individual, San Jose, Ca - Letter #W4736)*

*The connection between roads and erosion cannot be proven with actual sediment sampling techniques typical of a full field study. The conclusion the 'roads contribute to the disruption of hydrologic function and increase sediment delivery to stream' cannot be supported because, to be blunt, the researchers really do not know what the correlation is. The conclusions were arrived at by review of literature and through the use of an easily manipulated statistical model called MUSLE. Statements within the referenced document illustrate this lack of solid, empirical data. (Individual, Santa Clara, CA - Letter #W4713)*

## 3.5.2 Road Construction and Maintenance

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Individual comments on road construction and maintenance frequently call for decommissioning, obliterating, and revegetating unneeded or environmentally damaging roads. Some people, citing environmental concerns and what they see as the already enormous road system on Federal lands, specifically ask that non-system roads be targeted for obliteration before any others. Others requested that no more roads be built at all. These sentiments contrast with the requests of many other people that no roads at all be closed or obliterated, because closures would limit access for recreation, restrict BLM and Forest Service management options, or cause more environmental damage than leaving the roads to revert naturally to a wild state.

The cost of closing, maintaining, and obliterating roads is a concern to some people. They suggest that logging companies should be made responsible for road reclamation after the completion of projects. Others suggest imposing user fees and letting people using the roads pay for their upkeep. Because of a perceived shift from extractive industries to recreation, some people want the Final EIS to clearly state who will be responsible for road costs.

**Issue:** *The Final EIS should assess the need for roads.*

**Sample Comments:** *New roads need to be built, but should be built according to good engineering standards. (Individual, Spokane, WA - Letter #W3667)*

*The DEIS was developed around the premise that roads are bad and eliminating them is good. Eliminating roads and reducing road densities, without considering their purposes and needs, is simplistic thinking, lacking intellectual honesty and emotional integrity. (Individual, Roy, UT - Letter #B94)*

*It is an over-generalization for a project of this magnitude and breadth to equate road restoration with only road closure. Provide a more balanced discussion of road restoration that includes improvements to existing roads to reduce runoff, erosion, and sediment transport, improve slope hydrology, and provide other environmental benefits while maintaining access for other uses such as adaptive management, prescribed fire management and wildfire control, recreation, site monitoring, and research. (Natural Resource Based Business or Business Group, La Grande, OR - Letter #W686)*

*I am concerned about road closure. Here there are too many such gated roads. Closing more roads compacts the open ones and mechanical obliteration of roads trying to make them back to original slope, etc. makes a big mess. If the roads must be closed let them grow over. (Individual, Bonners Ferry, ID - Letter #B4678)*

*Reclaim, recontour, and revegetate as many miles of old roads as possible. (Individual, Helena, MT - Letter #B4785)*

*I have the experience in road construction and reclamation, and I know the great cost of constructing roads, and reclaiming them. Since reclamation of road causes roughly the same amount of disturbance in a watershed as the original construction, this does not seem like the logical way to best protect the environment. (Individual, Spokane, WA - Letter #W3667)*

**Issue:** *The Final EIS should state clearly where funding for maintenance, obliteration, and road closures will come from.*

**Sample Comments:** *'Recreationists' especially those who drive, should be charged significant fees for the use of roads and access to the Columbia Basin. Those found littering or committing other acts of vandalism should be fined 'exemplary' amounts, i.e. \$500 - 1,000 per occurrence. (Individual, Penllyn, PA - Letter #W1433)*

*How roads are to be paid for and who is to pay needs elaboration, particularly with the shift from resource extraction to recreation, preservation, and tourism. The EIS points out that of NF lands, traditionally 90% of the construction cost and 70% of the maintenance cost of roads has been paid for by commercial timber harvesting. Now however, 60% of the use of the roads is for recreation. But there is no discussion of techniques that will be employed to ensure that the historical 'user pays' process is shifted to the new paradigm. If the recreational user is to be subsidized, then it should be stated explicitly, along with relevant assumptions, costs, and reasons. (State Agency, Boise, ID - Letter #B77879)*

*Since timber harvesting is undoubtedly, the single most destructive activity people can subject land to, and building roads to facilitate logging is the single most destructive aspect of the activity, you should have stopped cold, any and all new road building, and provided for the obliteration, carefully, of however many logging roads are not being used any longer...at the expense of whomever was the major user in the area. (Individual, Gresham, OR - Letter #W739)*

*The preferred alternative recommends decreasing road densities in both the forest and range clusters. The decreases range anywhere from 25 to 50 plus percent of*

*the road miles reduced. Costs and benefits, and levels of road usage must be quantified for each proposed closure prior to initiating any road closure actions. From a utility management perspective, elimination of roads is akin to elimination of a financial asset, and this carries a significant cost (loss). (Individual, Portland, OR - Letter #W840)*

*Roads are especially important to the social fabric of our country. Roads are the focal point for many different kinds of social patterns, like OHV summer use, snowmobile use, RV outings and hunting. Many of these are family-oriented activities where people get together just to enjoy each other and the outdoors. We note, however, the management emphasis of the preferred alternative is to close existing roads, and there is a built-in bias against new road construction. The net result will be restricted public use of all kinds by denying access to the land. (County Agency, Rexburg, ID - Letter #B76125)*

### 3.5.3 Road Density and Definitions

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A number of people assert that road density standards are misguided. These respondents express disbelief that that roads do not have to be counted if they are blocked from entrance by a gate or water-bar. According to them, the science used to determine road density standards is lacking in credibility. Others see density standards as another example of top-down control of local interests—“just another big brother policy,” in the words of one, with no consideration for local wants or needs.

Some people doubt that any policy regarding density standards or road management in general can be completed without a clear and unambiguous definition of ‘road’. In the absence of such a definition, they say, a road can refer to anything from a deer trail to an interstate highway. Several respondents cite the official definitions in the Forest Service Manual and say the Draft EISs do not even mention these definitions.

Relatively few comments were received on the topic of road inventory and analysis. However, some do make a specific point of requesting a new inventory of all roads, not just BLM and Forest Service roads, in the region.

**Issue:** *The Final EIS should better clarify the road density criterion.*

**Sample Comments:** *The DEIS continues the existing misconception that road density is the measure of the effects that roads have on the environment...It is not the miles of roads in the vicinity of the stream that affect water quality, it is the amount of sedimentation and other pollution that get into the stream. Miles of roads do not affect wildlife habitat, but wildlife could be affected by the use of these roads. It needs to be recognized and documented that the existence of roads is not the same thing as using roads. It is unacceptable to continue to use the unsupported and undefined concept that controlling the miles of roads per square mile is the answer to road management. (Natural Resource-based Business or Business Group, John Day, OR - Letter #W4729)*

*I can live with medium road reduction in forest cluster 2,3,& 4. We should have a sea of forests with a few roads, not a sea of roads with islands of trees! This is an issue of water quality and wildlife protection as well as appropriate recreation and aesthetics. (Individual, Moscow, ID - Letter #W436)*

*I disagree with medium road density reduction in forest clusters 2,3,&4 because decreasing road density does not mean that negative effects of a road will be decreased. Let local conditions dictate how many and which ones. (Individual, Bonners Ferry, ID - Letter #W434)*

*Under the proposed alternative, roads do not need to be counted as long as they are closed by gate or earthen barrier. Such roads are easily accessible to off road vehicles and still have an impact on wildlife, water quality and fisheries. All roads, whether gated or open, negate wilderness values. These roads must be counted. (Environmental/Conservation Group, Sandpoint, ID - Letter #W202)*

*Standards for road density are too extreme. Your team needs to recognize that roads are necessary for management and we do have road standards today that will meet other resource needs. The road problems are generally tied to old construction and location problems. The emphasis should be on sediment reduction of roads which includes not only location, but construction and maintenance. (Individual, McCall, ID - Letter #B75382)*

*If there are Project wide percentage road reductions in the plan and they are required, how can you say that road density reduction is a local option? What if nobody on the local level wants to reduce road density? (Individual, Unknown - Letter #B4565)*

*Confidence and scientific rationale to justify road density standards is lacking. Road density standards subjectively mandate reducing road lengths and effects to unrealistically low levels. Most prudent management of federal lands would be precluded by only three standards (RM-03, RM-S8, RM-S9). (Natural Resource-based Business or Business Group, Salem, OR - Letter #W4732)*

**Issue:** *The Final EIS should clearly define what a road is and should re-inventory the area.*

**Sample Comments:** *It is also not clear in the standards what constitutes a 'road' (only open roads {see BLM definition in Glossary, p.19}, closed roads, and/or temporary roads). It could be possible to meet standards for increasing and decreasing road densities by just closing roads and not counting closed or temporary roads that still have impacts on aquatic habitat. (Professional Society, Corvallis, OR - Letter #W4635)*

*A forest road is 'a road wholly or partly within, or adjacent to, and serving the National Forest System, and which is necessary for the protection, administration and utilization of the National Forest System and the use and development of its resources.' A Forest Development Road is a forest road under the jurisdiction of the Forest Service.' Neither forest roads or forest development roads are mentioned in the UCRB DEIS. (Individual, Roy, UT - Letter #B3806)*

*I also think that there are important smaller 'unroaded areas' that were not addressed in RARE II that need to be evaluated. Unlike RARE II inventoried roadless areas, these areas would not be evaluated for possible wilderness inclusion. Instead, they would be analyzed for their ecological importance and the effects of roading would be clearly displayed. Some should be roaded and some should not. To continue to analyze these areas piecemeal (project by project), does not provide a clear view of their importance and context at the broadscale. I would like to see the FEIS/ROD include a standard that would direct the USFS and BLM to inventory all such areas that are 1,000 acres and larger. In addition, this standard would require an analysis of the ecological importance in their current unroaded state at the 4th code HUC scale prior to any new road construction. (Individual, Granville, ID - Letter #B4705)*

*I am not aware that any creatures other than humans recognize the difference between federal roads and other roads. Road quantity must include all roads, not just federal roads. (Individual, Portland, OR - Letter #W2931)*

### 3.5.4 Management Access

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Many assert that roads are vital for the management of the forests, and they do not want road closures. They feel that without roads the forest is at risk from fire, insects, and disease. Some suggest keeping roads but limiting access, especially during the muddy season. Others feel that management activities should be limited to areas with existing roads.

**Issue:** *The Final EIS should address management access by additional means including road closures.*

**Sample Comments:** *Keep all roads that are needed to manage the watershed but control traffic on all roads during the muddy and dusty season to decrease maintenance costs and keep the dust from the vegetation. (Individual, Klamath Falls, OR - Letter #W3798)*

*Limiting active management to areas that already have roads will protect those areas that can easiest be restored or redesigned for habitat. The incredible impact roads have on hydrology, wildlife, and erosion make it essential that those areas that have not been roaded remain so. (Individual, Seattle, WA - Letter #W635)*

*I realize some road building may be necessary to manage some of the 45 million acres of public land in Montana & Idaho. But let this road building be done in a way that least affects the land. (Individual, Colfax, WA - Letter #B2756)*

*Decreasing road densities can complicate the ability to treat overstocked stands and hinder the suppression of wildfires. (Individual, St Maries, ID - Letter #W3792)*

*A minimum number of permanent roads is necessary to manage the resources. Additional temporary roads may be necessary to accomplish management objectives. They would be closed after planned use. Criteria in dealing with existing roads causing environmental concerns should call for obliteration as a last resort. Corrective measures to reduce or correct adverse affects should be the first option or action. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*I think the closure of roads is not in our best interest. Do you intend to let the forest burn up with no way to get to the fire? (Individual, Lolo, MT - Letter #B75879)*

*If roads are destroyed what will happen when there is a need to move in fire fighters. Will the roads be rebuilt at more expense to the taxpayer. Why not put in tank traps to stop traffic where needed and leave the road grade to grow back up with brush then it is easy to reopen in times of fire. (Individual, Missoula, MT - Letter #B75830)*

*There are very few main drainages left open (in Lincoln County) and as proved by the 1994 fires in our county, the Forest Service spent more time and money opening up roads than fighting fire. What would it be like to protect our forests if there were no road at all. The only factor that did not allow our county and maybe our cities to be destroyed was the complete absence of low level winds over the burn area. (Individual, Troy, MT - Letter #W710)*

## Section 3.6 ~ Cultural Resources

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Chapter 2 of the Draft EISs define cultural resources as “the nonrenewable evidence of human occupation or activity as seen in any area, site, building, structure, artifact, ruin, object, work of art, architecture, or natural feature, which was important in human history at the national, state, or local level”. The Draft EISs point out, however, that American Indians, in contrast with Federal definitions, characterize all

aspects of their heritage as cultural resources. While both Draft EISs acknowledge the discrepancy between legal and cultural definitions, these differing perspectives carry through public and tribal comments on the Draft EISs. This section includes a summary analysis of comments with regard to survey, analysis, and protection of cultural resources.

### 3.6.1 Inventory and Protection

Continued preservation of known cultural sites, and actions to locate and preserve new sites, are all of interest to those who responded to the cultural resource sections of the Draft EISs. Citing what some perceive as a lack of information on cultural resource management, these people ask for more analysis and information regarding appropriate management of the remnants of our past. Many people make suggestions for new research and guidelines.

Some people suggest that better cooperation between Federal and Tribal governments will play an increasingly vital role in preserving the history of humans in the interior Columbia River Basin. They say that they hope the project will provide more opportunities for tribal management of Native American cultures and artifacts, asserting that cultural resources includes traditional cultural properties and areas currently in use, not just the relics of past activities.

Several believe that more guidance is needed in the Final EIS on the importance of cultural resources. They ask that the Final EIS not restrict analysis of these resources to traditional resource extraction projects as required under the National Environmental Policy Act, but also study the impacts of activities such as recreational use and livestock grazing. They feel that although many of these activities currently require analysis under cultural resource laws, agency response has inadequately accounted for negative impacts. One person asserts that livestock grazing on prehistoric sites has destroyed cultural resources directly by trampling or indirectly through soil disruption and resulting erosion. This person argues that management for range health can further harm artifacts and archaeological sites. Water developments, altering fencing patterns, discing, and seeding are a few of the activities they feel result in ground disturbance and destruction of cultural resources.

A few respondents believe that since human activity in the past encompassed landscapes across the entire region, the assumption underlying the cultural resources sections of the Draft EISs is too antiquated and narrow in scope. In their opinion the Final EIS must not only include protection of traditional cultural sites and historical trails and travel routes, but it must also address the importance of these sites at a regional scale. They argue that the current emphasis on protecting sites, although in compliance with relevant laws, insufficiently captures the scientific value of the sites. They hold that a quality assessment of the past interactions of humans and the environment will emerge only from a regional perspective.

**Issue:** *The Final EIS should reanalyze the impacts on cultural resources.*

**Sample Comments:** *The DEIS fails to consider and assess the impacts of livestock grazing on prehistoric and historic cultural resources in the Basin. For example, in the Challis Draft Resource Management Plan and Environmental Impact Statement, BLM states that there is currently a probable downward trend. Livestock in the CRA, ORA, and throughout the public lands of the Basin destroy and alter site stratigraphy, induce erosion processes which expose artifacts and cultural remains to the view of looters, directly break or damage and displace artifacts, drool on pictographs and petroglyphs, etc. Trampling and erosion cause irreparable and irretrievable harm to cultural resources. If sites are disturbed before being studied and chronological sequences or artifacts destroyed, scientific information is permanently lost. Construction and placement of rangeland facilities/improvements, particularly water*

developments and pipelines, destroy the setting of archaeological sites. Fences alter patterns of livestock and often result in the development of eroding livestock trails and concentrated use areas which disturb sites. Vegetation manipulation projects such as burns, discings and seedings, result in ground disturbance and destruction of archaeological sites. A typical public lands cow water development in arid land receives archaeological clearances, despite the fact that the spring source is ringed with cultural resources. Tanks are placed in areas with lithic surface scatter. As livestock degrade the area, artifacts are exposed. Placement of salt licks, for which no clearances are ever done, degrades archaeological sites. Reducing areas used for commodity resource use (livestock grazing, forest harvest) will reduce damage to cultural resources. (Conservation/Environmental Group, Boise, ID - Letter #W369)

**Issue:** *The selected alternative should provide better guidelines for survey and analysis of cultural resources, including improved coordination with the region's Tribal governments.*

**Sample Comments:** *Cultural resources - the agencies need a stronger statement on them. The local federal offices need more guidance on the importance of preservation and protection of cultural resources so that every person understands the importance of cultural resources. (Tribal Government, Burns, OR - Letter #W513)*

*We support the inclusion of the rationale under Human Uses and Values Standard Four (HU-S4, p 153) as part of the standard, i.e., cultural resource surveys and assessments should be accomplished prior to signing decisions on activities, so a more complete recognition of integrated cultural resource patterns can be considered. Cultural resources are an integral part of federal lands and require appropriate management. Cultural resources need to be determined in cooperation with tribes and be considered in terms of prehistoric, historic, and current use. (Resource Advisory Council, Ontario, OR - Letter #W2956)*

*Management of cultural resources on management projects is conducted in accordance with Section 106 of the National Historic Preservation Act and Advisory Council regulations 36 CFR Part 800. These regulations call for survey, evaluation and protection of significant historic and archeological sites prior to any disturbance. Provided the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) follows the procedures established in the regulations, we have no objections to the project. (State Agency or Elected Official, Cheyenne, WY - Letter #B3803)*

**Issue:** *The selected alternative should include regional or landscape scale management of cultural resources.*

**Sample Comments:** *Under the description of cultural resources, travel routes should be included. There are numerous historic trails within the EIS area, several of which have been designated as National Historic Trails and included within the National Trails System. National Historic Trails (NHT) within the area are: 1. Oregon NHT 2. California NHT 3. Lewis and Clark NHT 4. Nez Perce NHT. Remnants of historic routes must be considered as cultural resources as should the sites and possibly some of the landmarks associated with them. (Individual, Eagle, ID - Letter #B75259)*

*The greatest problem that I have with the two terribly brief and dismissing paragraphs on cultural resources is the statement that the 12,000 years of human activity in the Columbia Basin with its attendant evidence is 'by its nature' site-specific. This suggests that all of the human behavior on the landscapes of the study area throughout this 12,000 year period can be reduced to some specific locations in the landscape that are to be avoided or dealt with through Cultural Resource Management (CRM). Aside from using a view of the archaeological record that is today openly criticized, the Draft EIS is employing a type of archeology that has not been practiced since the nineteen thirties, forties, and fifties, Culture History (Dancey 1973, Dunnell and Dancey, 1983, Ebert 1992). For nearly thirty years, archaeology has been concerned with the investigations of human/land interactions that only emerge through a regional perspective. The inaccurately stated site-specific focus of both archaeology and CRM (as it should be practiced) are used to dismiss the applicability of cultural resources from the scope and broad scale nature of the Draft EIS. This is simply not the case, and furthermore, marks a travesty, given the goal of the EIS at understanding 'how ecological processes and functions operated with human uses.' (Individual, Ellensburg, WA - Letter #B77279)*

*The minute section addressing cultural resources was disappointing (DEIS, 2-172). A variety of commercial and recreational uses of public lands may have serious impacts at both the site and landscape level on cultural resources. For a document which purports to take a holistic view of an entire ecosystem, the three paragraphs pertaining to cultural resources are a measly contribution. Simply stating that 'the inventory detailed descriptions and protection mitigation of site-specific cultural resources are better discussed on a local basis' (DEIS, 2-172), seems more excuse than explanation and damages the document's comprehensive character. In the same chapter of the DEIS, the linkages between environmental preservation and quality of life are clearly stated (DEIS, 1-199). Retaining desirable cultural landscapes, particularly those which possess scenic amenity values, could have important economic benefits for rural communities. If it is going to address the issue of intangible values at all, and I believe it must, the DEIS should expand the cultural resources section to examine the issues and threats to landscapes, and resources of historical or archaeological nature. (Individual, Yakima, WA - Letter #B77295)*

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## Section 3.7 ~ Tribal Rights and Interests

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**M**any people—especially those representing tribal governments—want to ensure that the Final EIS mitigates potential conflicts and adequately addresses environmental concerns that relate to hunting, gathering, religious, or cultural rights guaranteed under treaties with American Indian sovereign nations. These respondents feel the Draft EISs fail in this regard, citing what they view as a lack of consideration for the importance of maintaining tribal rights and interests. They want clear, accessible evidence of collaboration and consideration of their concerns. Some question why alternatives have different levels of consultations with Tribal governments. They assert that tribes are not always informed of projects in a timely manner.

Some people believe that because of past injustices, Federal agencies need to take a hands-off approach to tribal lands.

Some people want the Final EIS to address continued access to Federal land to harvest fish from the rivers of the interior Columbia River Basin, to gather pine nuts from the high mountain regions of Utah and Nevada, or for cultural and religious practices.

This section includes summaries of comments with regard to treaty rights, protection of cultural and spiritual resources, and concerns over maintenance of habitat vital to support traditional gathering and hunting.

### 3.7.1 Treaty Rights and Federal Trust Responsibilities

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Some people feel the project has made considerable progress in explaining the extent to which the trust responsibilities of the U.S. Government are carried out by Federal natural resource agencies. They believe that successful implementation of ecosystem based management must protect the values and needs of American Indians. Perceiving their concerns to be the most critical ones in the EIS, these respondents believe that Federal agencies must make a commitment at the highest level to resolving tribal issues. One respondent says, "The Indian Nations can identify their cultural values and needs. These can be considered in the collaborative planning process for implementing ecosystem management." He notes that the project has made an effort to reach out to tribes and improve government-to-government consultations.

Many of these respondents remind Federal agencies of their trust obligations to tribes, citing concerns with the emphasis on standards and guidelines such as those for livestock grazing. Some people fear the project will fail to meet these trust and treaty obligations, and they suggest that care must be taken to ensure that management direction is sufficient to protect various resources, such as those dependent on rangeland habitat. A tribal government agency asks that the project account for Federal obligations to protect off-reservation treaty rights, such as traditional access to hunting and fishing.

One representative of the affected tribes wants the Final EIS to clarify the effect of land exchanges and other land transfers on fulfillment of treaty obligations, in particular whether treaty rights on Federal lands transfer with an exchange to private or State ownership. If not, they ask that the tribes retain or obtain ingress and egress rights or a right-of-way to access traditional use areas for hunting, gathering, and fishing.

In contrast, a few respondents feel that tribes have been given too many rights. They assert that the impacts of tribal rights on the environment have not been fully studied. Another believes that tribes should be held accountable to the same standards as non-Indians regarding resource availability and usage levels, arguing that if Tribes are to be given equal weight in considerations, then their lands and resource practices must come under the jurisdiction of the project as well.

**Issue:** *The Final EIS should recognize and ensure protection of tribal treaty rights for traditional practices of hunting, gathering, and fishing.*

**Sample Comments:** *The tribes should be furious. Everything said about their problems, while voluminous, was condescending bureaucratise--idiotic, meaningless, and unhelpful. (Environmental/Conservation Group, Bates, OR - Letter #W222)*

*All levels of government have an obligation to comply with treaty obligations. Treaty rights cannot be balanced with competing uses. Fulfillment of treaty rights and trust responsibility obligations includes setting enforceable measures to ensure protection and restoration of resources on which the treaty rights depend. (Tribal Government, Pendleton, OR - Letter #W625)*

*Where in the Draft EIS is cultural sustenance practices recognized? The Native American tribes of the United States retain rights to hunt and gather on USA lands. I failed to recognize any consideration of the importance of maintaining cultural sustenance practices; especially in critical rural dryland, floodplain, and wetland areas. These areas in my opinion have all been severally degraded by cattle grazing on public lands of the PNW. Cattle grazing practices developed by the Forest Service have and currently are a direct threat to the biointegrity of herbaceous plant species which are utilized as cultural sustenance gathering by the general and tribal people of the PNW Interior and East side Columbia River Basin. (Individual, Coeur d'Alene, ID - Letter #W44)*

*If tribal treaty rights do not transfer with the transfer of federal land for private, state, or other land, then can we as a tribe retain or obtain a right to access traditional use areas for hunting, gathering, and fishing, that is a right of ingress and egress or a right-of-way for these purposes. (Tribal Government, Blackfoot, ID - Letter #W612)*

*As an agency of the federal government, the BLM must comply with the federal trust responsibility, which arises from commitments made by the United States to Indian Tribes in treaties, executive orders and statutes, and from court case decisions. The federal trust responsibility obliges federal agencies to protect the Tribes' treaty rights and the resources on which those rights depend. The focus of the standards and guidelines on livestock grazing (re. Oregon State BLM 'Standards for Rangeland Health' & 'Guidelines for Livestock Grazing Management' - March 1997) is insufficient to protect the various resources dependent on rangeland habitat, and thus will not meet BLM's trust responsibility or other statutory obligations, including the Clean Water Act and the Endangered Species Act. (Tribal Government, Pendleton, OR - Letter #B2)*

*Why are there differences in levels of consultation with Tribal governments by alternative? Isn't consultation with Indian tribes a part of the NFMA? Is the Federal Trust responsibility, and Constitutional obligations, something to be adjusted at various levels by alternatives in a land management plan? (Tribal Government, Nespalem, WA - Letter #W82)*

*Trust Obligation. Paragraph 2: Beginning with 'Resources located outside reservation boundaries...' It sounds like 'Trust resources' apply only to lands within the Reservation boundary. If this is the case, then it sounds like the US Forest Service/BLM does not have a trust responsibility. 'Treaty resources' (off reservation rights, such as hunting and fishing) were granted by Congress and/or Executive Order by the President of the United States as negotiated on government to government basis. As such, agents of the United States government have a legal obligation to protect and preserve 'Treaty Resources' and the Tribal lands and interests should not be superseded by other compelling circumstances without a negotiated government to government settlement. (Tribal Government, Nespalem, WA - Letter #W82)*

*We believe both the values and needs of the American Indians and local communities should be addressed with ecosystem management. Both are important when recognizing socio-economic resiliency. The Indian Nations can identify their cultural values and needs. These can be considered in the collaborative planning processes for implementing ecosystem management. (Professional Society, Eatonville, WA - Letter #W573)*

**Issue:** ***The Final EIS should include extensive collaboration and consultation with America Indian Tribes and clearly state how Federal trust responsibilities will be met.***

**Sample Comments:** *Collaborative intergovernmental processes are unlikely to fulfill the government's federal trust responsibilities to Indian tribes. Tribes have an extensive history, dating back to 1987, of trying to work with the federal government to make land management consistent with basin-wide salmon rebuilding goals. In 1990/1991 the CTUIR [Confederated Tribes of the Umatilla Indian Reservation] appealed the Umatilla, Wallowa-Whitman, and Malheur National Forest LRMPs. Five years later these appeals were officially denied, under the assumption that PACFISH answered most of our concerns and the ICBEMP's would provide further protections.*

*However, PACFISH has been described by NMFS as not much more than a place holder for current degraded habitat conditions, and our review of the DEIS indicates that the ICBEMP's proposed strategies are likely to perpetuate and even exacerbate existing flaws of current forest plans. So once again we are back at square one. (Tribal Government, Pendleton, OR - Letter #W625)*

*At a recent meeting of tribal representatives and regional executives from the ICBEMP project, moderated by Secretary Babbitt, the Nez Perce Tribe offered a framework proposal for meaningfully beginning to negotiate treaty rights and trust responsibility issues in this plan for managing nearly 75 million acres of land in the Interior Columbia Basin. Professor Charles Wilkinson, who has devoted his career to Forest Service and Native American issues, recently stated that these issues were the most critical ones in the development of the entire Plan. We believe it is important for there to be commitment from the highest levels of the agencies if this effort is to be successful. (Tribal Government, Lapwai, ID - Letter #B75419)*

*The CTUIR (Confederated Tribes of the Umatilla Indian Reservation) has consistently asked to see the following in this process, at a minimum, and hereby requests to see this reflected in the Final EIS: effective consultation. Consultation is more than a procedural requirement consisting of information sharing, notice and comment. It is an attempt by decision makers representing sovereign governments to reach mutually agreeable solutions as to how best to protect and restore trust resources. It is the actual protection and restoration of resources which form the basis of the treaty reserved rights which is the measure of effective consultation. (Tribal Government, Pendleton, OR - Letter #W625)*

### 3.7.2 Cultural Resources and Religious Freedom

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Some people believe the project failed to communicate and collaborate with tribes concerning certain land management practices in the alternatives, such as: routine surveys of cultural plants during all projects, restoration of riparian areas, notification of tribes for prescribed burns, and plan guidelines prohibiting pesticide use in traditional gathering areas.

These respondents are concerned about protecting the tribes cultural resources, which include certain sacred animal species, vision quest sites, burial and food production sites, and other sacred sites. According to some people, it is difficult to protect and manage these resources in some regions, because of extensive population growth and checkerboard land ownership. Others feel that the Draft EISs offer an inadequate plan to preserve American Indian values and non-renewable resources, and that all cultural resources and sacred sites need permanent protection, not just "buffer zones."

**Issue:** *The Final EIS should ensure protection of tribal cultural resources and religious freedom.*

**Sample Comments:** *The DEIS fails to adequately consider planning for and preservation of Native American values and nonrenewable cultural resources. ...All cultural resources and sacred sites need permanent protection and not just 'buffer zones' that have proven all over the nation to be inadequate protection for these irreplaceable, nonrenewable resources. (Individual, Marcola, OR - Letter #E46)*

*Mining-this is a subject of great concern to the Tribe. Mining seems to take precedence over all other resource uses on federal lands. The Tribe is concerned that cultural areas will be lost during mining projects. (Tribal Government, Burns, OR - Letter #W513)*

*The Kalispell Tribe has the following concern: Loss of remaining cultural resources. This heading covers most of the items of interest to the tribe, including protection of traditionally used plant and animal species, vision quest sites, and burial and food-production sites, among others. In this region, occupation and development (hydroelectric, commodity production, and residential) of the landscape have pushed these resources far past their ability to withstand perturbation and, for most biological systems, to reproduce. In the vicinity of the Kalispell Reservation, the checkerboard railroad-grant lands and the ANILCA [Alaska National Interest Land Conservation Act of 1980] access requirements have made resource management particularly onerous...Examples...lookouts constructed on vision quest sites, food and fiber-gathering areas and resources destroyed, terrestrial and aquatic wildlife species pushed into extinction...We hope the ICBEMP process can assist the tribe in managing remaining cultural resources. (Tribal Government, Usk, WA - Letter #W611)*

*There is a significant lack of attention paid to cultural resources in the ICBEMP. Certainly it can be said that there is a substantial presence of cultural resources in the Columbia Basin; so many, in fact, that the number is undefinable. This lack of interest in these resources is not surprising, considering that this level of ignorance has been continuing on since European settlement in this area. For centuries there has been desecration and decimation of Native sites within the Columbia Basin and also throughout the Americas. (Individual, Ellensburg, WA - Letter #B77283)*

*Consult with all federally recognized tribes and spiritual practitioners within the planning area and develop an alternative that adequately represents the interests of the indigenous community. Failure to do so will result in failure to comply with federal laws and executive orders. Engage in effective consultation with all Federally recognized Native American tribes and spiritual practitioners to ensure inclusion of all critical information relative to Native American use and access to public lands. (Individual, Marcola, OR - Letter #E46)*

*Your DEIS fails to recognize the cultural significance of this area know as the sacred backbone of the world for the indigenous native American Indians since 10,000 years B.C. The resources in this area are further protected by the Hellgate and Judith River Treaties. Your DEIS has completely ignored substantive NEPA 'scoping' comments in this regard. The NCD GBE is considered 'sacred ground' in Native American Indian religion. EISs are required to consult with Indian Tribes on cultural matters of significance (cultural amendments to the National Historic Preservation Act). No such adequate required consultation has occurred with preparation of this DEIS...these particular federal lands are predated by the Treaties of Hellgate (west side) and Lame Bull's Treaty (east side), both of which contain preservation clauses for protection of the land, its resources and areas of continuing use rights. Please note Medicine Grizzly was of special religious significance. (Environmental/ Conservation Group, Hungry Horse, MT - Letter #B81)*

### 3.7.3 Restoration of Tribal Interests

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Several respondents hold the belief that inadequate attention has been given by the Federal agencies concerning their responsibilities for habitat restoration in support of treaty guaranteed rights. These people find reasonable the tribes' request to have grazing and logging suspended in riparian areas until those areas can recover from damage. Pointing out that tribes have expended considerable amounts of time, money, and labor to restore salmon populations, they also feel their efforts will have only limited success until there is extensive collaboration with Federal agencies. They assert that current collaboration for habitat restoration is inadequate.

In contrast, other respondents feel current government actions implementing Endangered Species Act conservation measures on tribal lands are inconsistent with Federal laws. Even though many tribes have scaled back their resource extraction activities, such as salmon fishing, over the years because of resource depletion and habitat destruction, some people feel tribes bear an under-proportionate burden for the conservation of listed species.

**Issue:** *The Final EIS should restore habitats necessary to ensure availability and access to resources guaranteed in treaty obligations.*

**Sample Comments:** *Indian tribes' claims that the federal government has a legal obligation to restore habitat to a condition that will ensure harvestable populations of fish and game should be recognized. This should be done for the integrity of the environment and the enjoyment of all whether or not it is a legal obligation. (Individual, Moyie Springs, ID - Letter #B4692)*

*The ICBEMP DEIS recognizes that the federal trust responsibility to Indian tribes requires the BLM and the Forest Service to provide fish and wildlife habitat conditions capable of supporting harvestable resources...However, the DEIS falls far short of providing the means to achieve such habitat conditions - without such assurances the ICBEMP becomes another empty promise to Indian tribes. ( Tribal Government, Pendleton, OR - Letter #W625)*

*The Umatilla Tribes have expended huge amounts of time, money and manpower over the past two decades to bring salmon back to the Umatilla River (in 1995, more spring chinook returned to the Umatilla River than to the entire Snake River). We have also participated in projects to restore anadromous fish to the Upper Grande Ronde and John Day River systems, among others. Our efforts need to be met with federal government actions that will ensure protection and restoration of habitat that can produce healthy, harvestable populations of both anadromous and resident fish. (Tribal Government, Pendleton, OR - Letter #W625)*

*When Columbia basin Indian tribes signed treaties with Governor Stevens in 1855 they were adamant about reserving their traditional practices of fishing, hunting, grazing and gathering plants. These practices were central to their culture and economy, and remain so to this day. Salmon is still the 'first food' at all ceremonies, and Tribes still practice a limited subsistence fishery in the mainstream and tributaries. However, the Tribes have voluntarily curtailed their commercial salmon fisheries since the 1960s, which represents a great loss to Tribal fishermen and Tribal economies. While dams are a major factor in the spiraling decline in salmon runs, degraded habitat conditions also play a very big role. (Tribal Government, Pendleton, OR - Letter #W625)*

*The people of the Northwestern Band of Shoshoni Nation have treaty rights in the area we identified in general as existing between the Portneuf Mountains (in Idaho) on the east and along the Raft River (in Idaho) on the west and the southern end by the Great Salt Lake (copy of Treaty of 1863 with the Northwestern Band of Shoshoni). The NWBSN's aboriginal lands are in Utah, Idaho, and Nevada (Map/ Exhibit 2: The Land Claimed by the people of the various Shoshoni Indian Bands) where cultural and natural resource gathering of plants for medicinal, food, and other purposes are harvested by tribal members. One of the important tribal gathering food items is pine nuts which grows in the high mountain areas/regions of Utah in the Sawtooth National Forest and Grouse Creek Mountains and into Idaho near the Raft River, in northeast Nevada in the Humbolt National Forest to central Nevada in the Toiyabe National Forests (including Shoshone Mountains). (Tribal Government, Blackfoot, ID - Letter #W612)*

*I think the request of the Indian tribes to have grazing and logging suspended in riparian areas until they can recover from damage is reasonable. (Individual, Moyie Springs, ID - Letter #B4692)*

*ESA and trust responsibility require federal agencies to take affirmative steps to conserve species in peril. NFMA and ESA require preservation and restoration of species viability - trust responsibility calls for at least that and something more. There must be specific aggressive critical habitat restoration requirements for all critical habitat. The CTUIR and other Columbia River Treaty tribes have provided a blueprint in the Upper Grande Ronde Plan and the Spirit of the Salmon. Measures must be in place immediately to assure habitat conditions capable of supporting harvestable populations of trust resources, including fish, wildlife and plants - within as short a time frame as possible. (Tribal Government, Umatilla Reservation, Pendleton, OR - Letter #W625)*

**Issue:** *The selected alternative should ensure that Tribal rights are consistent with other Federal laws.*

**Sample Comments:** *Presently, our government allows Indians the right to net fish in lakes that are almost depleted of fish. They can hunt all year around and aren't required by law to have a license. I hear people say we owe this to them. We have paid them more money for our right of citizenship than what the country was worth when we came here... (Individual, Aitkin, MN - Letter #W847)*

*While we cannot effect Indian game management on reservations, we need their cooperation to improve our national resource base. Did you adequately address the unlimited use doctrine? The tribes insist upon, and successfully leverage, their independent-nation status with regard to compliance with federal regulations, yet insist upon exerting great influence upon all aspects of American life outside their national boundaries when it serves their immediate purpose. I would like to see a statement from the tribes included wherein they commit to the high standards with which they hold the rest of us regarding resource availability and usage levels. Their participation is not only welcome, it is essential, if your objectives are to be fully realized...If Native American nations are to be given equal weight in these considerations, then their own sovereign lands and resource practices must come under the jurisdiction of the plan you propose. Their resource practices have long effected the quality of resources off the reservations (Watershed, Air Quality, Species mix), just as our practices impact their life-quality. They must be included in implementation or left out of the regulatory process. (Individual, Kennewick, WA - Letter #W1844)*

*I think you will find tribes enjoy dependent sovereignty. In such theory they are subject to the Federal threatened and Endangered Species Act the same as non-Indian persons. (Elected Official, Canyon City, OR - Letter #W626)*

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# Appendix A

## Issues Index

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### Section 1.1 ~ Purpose of Proposed Action

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#### 1.1.1 Purpose and Need

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*Issues:*

- The Final EIS should provide certain and predictable supplies of resources and restore ecosystem health.
- The Final EIS should not defer decisions to the National Forest, BLM District, or other subregional level which could contradict the original purpose and need.
- The Purpose and Need should explain and expand upon the concept of adaptive management.

### Section 1.2 ~ Proposed Action

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#### 1.2.1 Ecosystem Management

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*Issues:*

- The Final EIS should contain a clear, scientific definition of ecosystem management.
- Ecosystem management should be legally supported before it is implemented.
- The Final EIS should address the needs of all of the social, economic, and biophysical elements in the interior Columbia River Basin through Ecosystem Management.

#### 1.2.2 Health and Integrity

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*Issues:*

- The Final EIS should emphasize ecological health as a primary goal.
- The Final EIS should have quantifiable definitions for ecosystem health and ecosystem integrity.
- The Final EIS should promote management activities that increase ecosystem health.

#### 1.2.3 Restoration

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*Issue:*

- The Final EIS should re-examine restoration prescriptions.

## **1.2.4 Ecosystem Analysis at the Watershed Scale**

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**Issues:**

- The Final EIS should allow for watershed analysis to provide clear management direction.
- Watershed analysis should take place before the Final EIS is issued.
- The Final EIS should allow resource management should continue without delays related to watershed analysis.
- Watershed analysis should clearly identify environmental impacts.
- The Final EIS should ensure that watershed analysis consider effects of land management activities on whole ecosystems.

## **1.2.5 Reserves**

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**Issues:**

- The Final EIS should use reserves to restore ecological health.
- More reserves than those identified in Alternative 7 should be included in the Final EIS.

## **Section 1.3 ~ Scale/Decisions**

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### **1.3.1 Scale**

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**Issues:**

- The Final EIS should offer guidelines and allow for standards to be developed through analysis at a finer scale.
- The Final EIS should allow ecosystem management to be adaptable to local circumstances and conditions.
- The Final EIS should use data in its ecosystem analysis that is internally consistent across varying scales.

### **1.3.2 Decisions**

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**Issues:**

- The Final EIS should allow local people and ground-level administrators to make resource decisions.
- The Forest Service and BLM should not issue a Final EIS or Record of Decision.
- The Final EIS should contain consistent and clear direction.
- The Final EIS should clarify the legality of including standards in a programmatic EIS.

### **1.3.3 Subbasin Review**

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**Issues:**

- The Final EIS should ensure that lengthy subbasin reviews will be avoided.
- The Final EIS should address if management activities can continue during subbasin reviews or must be completed before management activities can take place.
- The Final EIS needs to address how funding levels will effect subbasin review time lines.

---

### **1.3.4 Trust and Authority**

***Issues:***

- The project appears to be an abuse of power which will take away individual rights.
- The Final EIS should consider divestiture and give Federal lands back to the States.
- The project is an instrument of higher levels of control who wish to take away the United States' sovereignty over its lands.
- The Final EIS should continue its public collaboration process established by the project.
- In identifying the selected alternative, the project should resist the influence of powerful lobbies.

### **1.3.5 Global Climate**

***Issue:***

- The Final EIS should consider effects on global climate change.

### **1.3.6 Use of Science**

***Issues:***

- The selected alternative should be based on good science, not political or personal biases.
- The Final EIS should verify the validity and credibility of science used in the Draft EIS.

---

## **Section 1.4 ~ EIS Alternatives**

### **1.4.1 Range of Alternatives**

***Issues:***

- All alternatives in the Final EIS should adequately address the purpose and need.
- The Final EIS should consider a wider range of alternatives.
- Several alternative features should be combined into new alternatives to be analyzed in the Final EIS.
- Alternatives submitted by other entities should be considered in the Final EIS.

### **1.4.2 Specific Alternatives**

***Issues:***

- Alternative 1 - various comments, no issue statements.
- Alternative 2 - various comments, no issue statements.
- Alternative 3 - various comments, no issue statements.
- Alternative 4 - various comments, no issue statements.
- Alternative 5 - various comments, no issue statements.
- Alternative 6 - various comments, no issue statements.
- Alternative 7 - various comments, no issue statements.

### **1.4.3 Desired Range of Future Conditions**

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**Issue:**

- The Final EIS should allow for the Desired Range of Future Conditions to be as accurate as possible, yet flexible enough to address site-specific issues.

### **1.4.4 Historical Range of Variability**

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**Issues:**

- The Final EIS should not establish standards for past ecological conditions based on the Historical Range of Variability.
- The Final EIS should not determine how well alternatives achieve their goals in relation to the Historical Range of Variability.

## **Section 1.5 ~ Collaboration/Involvement**

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### **1.5.1 Public Involvement/Adequacy of Process**

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**Issues:**

- The process for public involvement in the project should be more clear and accessible.
- Input from the public residing within the project boundaries should be more influential than input from outside the basin.
- The project should continue and improve its methods for public participation.
- In addition to providing information, the project staff should be more interactive with the audience at their public meetings.

### **1.5.2 Intergovernmental Collaboration**

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**Issues:**

- In developing the Final EIS, the project should collaborate with State, Tribal, and local governments as well as Federal agencies in the planning process, as mandated by NEPA.
- The project should reach its record of decision free from disproportionate local influences.
- The Final EIS should have a mechanism to resolve conflicts that may arise with local plans.

## **Section 1.6 ~ Relationship to Other Planning Processes**

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### **1.6.1 Relationship to Existing Forest Service and BLM Plans**

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**Issues:**

- The Record of Decision should amend or revise existing Federal plans only as permitted under Federal law.
- Before a Final EIS is completed and a Record of Decision is signed, administrative planning rules should be modified to regulate and direct broad-scale analyses and decisions.

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## 1.6.2 Relationship to Interim Strategies: PACFISH, INFISH, and the Eastside Screens

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### *Issues:*

- The selected alternative should rescind the interim strategies: PACFISH, INFISH, and the Eastside Screens.
- The selected alternative should incorporate PACFISH, INFISH, and the Eastside Screens.

## 1.6.3 Relationship to Other Planning Processes

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### *Issues:*

- The Final EIS should clarify its relationship with local, Federal, State, Tribal, and other plans.
- The Final EIS should incorporate existing plans that work.
- The Final EIS should better explain coordination efforts and planning considerations when analyzing cumulative effects of tribal plans.
- The Final EIS needs to be clear that the objectives and standards of the Northwest Forest Plan apply to all alternatives in areas of overlapping jurisdiction.
- The Final EIS should address and incorporate the Rangeland Reform regional standards and guidelines into the selected alternative.

## 1.6.4 Effects on Other Public Lands and Private Lands

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### *Issues:*

- The Final EIS needs to include additional analysis as mandated by Executive Order and Congressional direction for effects on private property rights.
- The selected alternative should clearly protect the rights of private property owners.
- The Final EIS should consider its consequences on other public lands.

## Section 1.7 ~ Implementation

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### 1.7.1 Priorities

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#### *Issues:*

- The Final EIS should set clear guidelines on how the project will be implemented.
- The Final EIS should set clear priorities for implementation.

### 1.7.2 Funding

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#### *Issues:*

- Funding sources to implement the Final EIS should be clearly identified.
- Funding should consider the role that funds from timber sales will play in implementing the project.

## 1.7.3 Collaboration, Accountability, and Monitoring

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**Issues:**

- ▶ The selected alternative must decide who will be responsible and accountable for the implementation of the project.
- ▶ Collaboration among agencies should be thoroughly addressed in the Final EIS.

## Section 1.8 ~ Relationship to Laws

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### 1.8.1 Specific Laws, Regulations and Executive Orders

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**Issues:**

- ▶ The Final EIS needs to better discuss the relationship of the project to Federal, State, and local laws and regulations
- ▶ The selected alternative should comply with Revised Statute 2477.
- ▶ The selected alternative should comply with the Clean Water Act.
- ▶ The selected alternative should comply with the Organic Act.
- ▶ The selected alternative should comply with the National Forest Management Act and the Federal Land Policy and Management Act.
- ▶ The selected alternative should comply with the Forest and Rangeland Resources Planning Act (RPA).
- ▶ The selected alternative should comply with the Endangered Species Act.
- ▶ The selected alternative should comply with the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act.
- ▶ The selected alternative should comply with the American Folklife Preservation Act.
- ▶ The selected alternative should comply with the Presidential Executive Order 12866, Regulatory Planning and Review.
- ▶ The selected alternative should comply with the 10th Amendment of the Constitution, associated with State jurisdictions.
- ▶ The selected alternative should comply with the Multiple-Use/Sustained Yield Act of 1960.
- ▶ The selected alternative should comply with the Americans with Disabilities Act.
- ▶ The Final EIS should comply with the spirit and intent of the National Environmental Policy Act (NEPA).
- ▶ The project needs to prepare a Supplemental EIS.
- ▶ Preparing one decision for the lands administered by the BLM and Forest Service will result in legal “gridlock.”
- ▶ The selected alternative should comply with the Wilderness Act.
- ▶ The selected alternative should comply with the 1872 Mining Law.
- ▶ The selected alternative should comply with Presidential Executive Order 12898, Environmental Justice.

## Section 2.1 ~ Soil Quality and Productivity

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### 2.1.1 Soil Health, Quality, Productivity

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**Issues:**

- ▶ The Final EIS should reanalyze the information on the state and history of soil productivity.
- ▶ The Final EIS should contain a new inventory and analysis of soil productivity to address the existing analysis of soil conditions and trends which is inadequate for determination of effects of the alternatives.
- ▶ The Final EIS should validate the statement that soil productivity is generally stable or declining.
- ▶ The Final EIS should clarify terms such as soil quality and soil productivity.

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## **2.1.2 Management Activity Effects on Soil Productivity**

### ***Issues:***

- The Final EIS should address the effectiveness of Best Management Practices.
- The selected alternative should contain management direction for soil productivity that emphasizes prevention of negative impacts before mitigation or restoration.

## **2.1.3 The Effects of Management Objectives and Fire on Soil Quality**

### ***Issues:***

- The Final EIS should address Coarse Woody Debris Requirements which may create a fire risk that is detrimental to soil quality.
- The Final EIS should offer a comparison of fire and logging effects on soils.
- The Final EIS should address how vegetation loss effects oil quality.

## **Section 2.2 ~ Air Quality**

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### **2.2.1 Air Quality Data**

#### ***Issues:***

- The Final EIS should better analyze air quality in the Interior Columbia River Basin.
- The Final EIS needs to re-address the discussion of air quality in pre-settlement conditions.
- The Final EIS should include improved methods and methodology in air quality modeling of the effects of prescribed fire.

### **2.2.2 Legal Issues Related to Air Quality**

#### ***Issues:***

- The selected alternative should ensure that smoke resulting from prescribed burning complies with Federal and State air quality requirements.
- The Final EIS should consider existing state and regional air quality plans and Memorandams of Understanding.

### **2.2.3 Management Activity Effects on Air Quality**

#### ***Issues:***

- The Final EIS should better analyze the effects of smoke from prescribed burning on human health.
- The Final EIS should address impacts of air pollution from non-burn sources on air quality and proposed management options.

## **2.2.4 Air Quality and Class I Areas**

**Issue:**

- The Final EIS should consider the air quality impacts of prescribed fire on Class I areas.

## **Section 2.3 ~ Wild and Prescribed Fire Effects**

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### **2.3.1 Restoring Fire as a Process**

**Issues:**

- The selected alternative should manage ecosystems flexibly to accommodate disturbances.
- The Draft EISs do not adequately consider the role of natural fire as a tool for restoring ecosystems on public land.
- The selected alternative should abandon fire suppression policies and practices and increase use of both prescribed and natural fire.

### **2.3.2 Fire Effects on Fish and Wildlife**

**Issues:**

- The Final EISs should adequately address the cumulative effects of prescribed fire on plants and animals.
- The Final EISs should adequately address the cumulative effects of prescribed and natural fire on aquatic and riparian habitats.

### **2.3.3 Silviculture and Fire**

**Issues:**

- Because of the potential of catastrophic wildfire, the Final EIS should analyze a proper balance between timber harvesting, commercial thinning, and prescribed fire.
- The Final EIS should consider additional methods other than timber harvest and thinning for management of fire-prone areas.

### **2.3.4 Fire Management Effects**

**Issues:**

- The Final EIS should address impacts of fire management on private property.
- The Final EIS should address fire's role in the spread of noxious weeds.

### **2.3.5 Fire Management**

**Issues:**

- The coordination of fire management programs should not be optional, but should be a requirement for the region to ensure successful implementation of Final EIS goals and objectives.
- The Final EIS should re-evaluate Objective TS-02 which fails to give resource managers the guidelines necessary to implement the stated fire strategy.
- The Final EIS needs to provide the methods and rationale for computing annual wildfire acreage.

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## **2.3.6 - Rehabilitating Burned Areas**

### ***Issues:***

- The Final EIS needs to completely display the effects of Standard TS-S4, including effects on economics and cooperative relationships.
- Standards TS-S2 and TS-S3 for rehabilitating disturbed areas with ecologically appropriate species are unclear.
- Native species should be used in revegetation and restocking programs and should be clearly defined and discussed in the Final EIS.
- The Final EIS should consider the use of non-native species in revegetation programs.
- The Final EIS should analyze the effects of grazing on burned areas.
- The Final EIS should consider post-fire management as part of the restoration process for rangeland health.

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## **Section 2.4 ~ Insects and Disease**

### **2.4.1 - Management of Forest Insects, Pests, and Disease**

#### ***Issues:***

- The Final EIS should fully address insect disturbance management responsibilities and effects on non-Federal lands.
- The Final EIS should incorporate management activities to treat insect disturbances.
- The Final EIS should address negative effects of insect disturbance treatments.
- The Final EIS should be clear in its prescription for insect disturbance treatments.
- The Final EIS should acknowledge the role many insects play in maintaining ecosystem health.

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## **Section 2.5 ~ Forest Health**

### **2.5.1 - Forest Health / Forest Clusters**

#### ***Issues:***

- The Final EIS should address and clearly spell out forest health definitions and guidelines.
- The Final EIS should use strict guidelines in identifying and classifying forest clusters.
- The Final EIS should address dry Douglas-fir ecosystems.
- The Final EIS management objectives for forest health needs to take into consideration impacts on private property owners and other Federal lands.

### **2.5.2 - Proposed Management Actions for Restoring Forest Health**

#### ***Issues:***

- The Final EIS should not consider commercial logging and road building for restoration.
- The Final EIS should consider the use of management activities in restoration.
- The Final EIS should further explain the use of potential vegetation groups (PVGs) in determining the need for restoration.
- The Final EIS should address the consequences of projecting activity levels in Table 3-6.
- The Final EIS should establish standards for forest composition and structure and the silvicultural practices should be used to achieve those standards.

### **2.5.3 - Mature and Old-Growth Forest**

***Issues:***

- ▶ The standards and alternatives in the Final EIS should include long-term management direction for mature and old-growth forests.
- ▶ The Final EIS should clarify Standard HA-S6.
- ▶ The Final EIS should include detailed mapping techniques for old-growth management.

## **Section 2.6 ~ Rangeland Health**

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### **2.6.1 - Impacts of Livestock on Rangeland Health**

***Issues:***

- ▶ The Final EIS should consider livestock grazing as part of rangeland health improvement.
- ▶ The Final EIS should analyze the effects of fire to maintain and restore the health of rangelands.
- ▶ Livestock grazing is destructive to rangeland health and should be curtailed on public rangelands.

### **2.6.2 - Use of Science**

***Issue:***

- ▶ The selected alternatives should address the use of accurate science in decisions in relation to rangeland health.

### **2.6.3 - Grazing and Rangeland Structure and Composition**

***Issues:***

- ▶ The Final EIS should more carefully examine the relationship between livestock and encroachment of western juniper on rangelands.
- ▶ The Final EIS should clarify statements regarding rangeland structure and composition.

### **2.6.4 - Grazing, Dry Rangelands, and Drought**

***Issue:***

- ▶ The Final EIS should accurately address the effects of livestock on dry rangeland and after droughts.

### **2.6.5 - Grazing Standards**

***Issue:***

- ▶ The Final EIS should set grazing standards for lands in the interior Columbia River Basin.

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## **2.6.6 - Range Management Objectives and Emphasis**

### ***Issues:***

- The Final EIS should clarify and justify the range management emphasis of restore, conserve, and produce.
- The Final EIS should incorporate site-specific measures for grazing management.
- The Final EIS should re-evaluate the system of range clusters. Management standards appear too broad in the Draft EIS.
- The Final EIS should explain criteria for the primary management emphasis of rangelands.
- The Final EIS should consider the advice of local Resource Advisory Councils.

## **2.6.7 - Grazing Fees**

### ***Issue:***

- The Final EIS should compare grazing fees to management costs.

## **2.6.8 - Grazing and Conflicts with Other Land Uses**

### ***Issue:***

- The Final EIS should address the conflicts between grazing and recreation.

## **2.6.9 Grazing and Wildlife**

### ***Issues:***

- The Final EIS should better address the effects of grazing on wildlife. This includes effects on predator/prey relations involving raptors, coyotes, grouse, turkeys, small rodents, and frogs.
- The Final EIS needs to address the interactions between domestic livestock and wildlife.

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## **Section 2.7 ~ Aquatic Health**

### **2.7.1 - Restoring Aquatic Health**

#### ***Issues:***

- The Final EIS should determine the state of aquatic and riparian health and, where necessary, identify areas to be restored.
- The Final EIS must provide for clean and safe drinking water.
- The Final EIS should prevent riparian damage from grazing, logging, mining, and agriculture.
- The Final EIS should acknowledge that management activities such as logging, grazing, road building, and mining are not entirely responsible for declines in aquatic health.

### **2.7.2 - Clean Water Act**

#### ***Issue:***

- The Final EIS must conform to clean water laws.

### **2.7.3 - Data and Definitions**

**Issues:**

- The selected alternative must identify and protect aquatic strongholds.
- The Final EIS should include detailed statements related to key aquatic ecosystem components.
- Streams have not been adequately surveyed to determine which ones might require buffers; this lack of surveys may lead to widespread use of default standards.
- The Final EIS should adequately explain what hydrologic integrity is.

### **2.7.4 - Management Actions to Maintain and Restore Aquatic Ecosystems**

**Issues:**

- Watershed management activities must be more clearly defined in the Final EIS.
- The Final EIS should not rely on upland treatments, but instead conduct subbasin and watershed analysis to identify areas for restoration.
- The Final EIS must better explain and justify the data and surveys required for implementation.
- The Final EIS should ensure local control over riparian management, and should not provide basin-wide standards and objectives.
- The Final EIS should better clarify the management emphasis (Conserve, Produce, Restore).
- The Final EIS should acknowledge the unpredictability of water supplies.
- The selected alternative should ensure funding of watershed management.
- The Final EIS should re-evaluate the use of Properly Functioning Condition (PFC) as a management goal to restore aquatic health.
- The Final EIS should adequately assess risks and tradeoffs in relation to aquatic systems.

### **2.7.5 - Relationship to Other plans for Restoring Riparian Health**

**Issues:**

- Riparian standards in the Final EIS should take into consideration existing plans including PACFISH, INFISH, Tribal plans, and Best Management Practices.
- The selected alternative should be compatible with the National Marine Fisheries Service Snake River Recovery Plan.
- The Final EIS objectives and standards should be compatible with the Wallowa County Nez Perce Tribe Salmon Habitat Recovery Plan.
- The Final EIS should consider how required watershed analyses must not hinder the implementation of on-the-ground projects.

### **2.7.6 - Standards Regarding Riparian Conservation Areas (RCAs) and Riparian Management Objectives (RMOs)**

**Issues:**

- The Final EIS should re-examine the standards for sediment levels.
- The Final EIS should consider the effects of sediment on aquatic habitat.
- The Final EIS should set more realistic standards for stream temperatures.
- The Final EIS must have Riparian Management Objectives that are realistic and attainable.
- The Final EIS should clarify standards regarding the retention of large, old trees in riparian areas.
- The Final EIS should clearly define “Restoring” and “Maintaining” in the context of RCA management.
- The Final EIS should re-evaluate the number of riparian standards necessary to address resource protection and implementation feasibility.
- The Final EIS should clarify and justify canopy closure standards.
- The Final EIS should allow for flexibility in Riparian Management Objectives to account for variations in local geology.

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## **2.7.7 - Size of Riparian Conservation Areas**

### ***Issues:***

- The selected alternative should include buffer zones to protect riparian health.
- The Final EIS should better address how buffer zones control only some sources of sediment.
- The Final EIS should reconsider RCA widths. The RCAs in the Draft EISs are too large and place too much timber off-limits.
- The Final EIS should better clarify the “Feathering” of RCAs.
- The RCA standards in the Final EIS should sufficiently protect riparian health.

## **2.7.8 - RCAs/RMOs and Forest Vegetation Management**

### ***Issues:***

- The Final EIS should not contain RCA standards that overly restrict forest management in riparian areas.
- The Final EIS should evaluate if mid-seral vegetation, rather than old growth, provides the best buffer against pollution in riparian areas.
- The Final EIS should consider the effects of logging in Riparian Conservation Areas.
- The Final EIS should better address the damage logging can cause to riparian health.
- The Final EIS should address how the risk to aquatic health from potential catastrophic wildlife does not exceed the danger from management activities such as logging.
- The Final EIS should address how increased vegetation density could reduce water yield.

## **2.7.9 - Fire and Fuels Management in Riparian Areas**

### ***Issues:***

- The Final EIS should fully analyze the potential effects of fire and fuels management on riparian areas.
- The Final EIS should address appropriate means of fighting fire in riparian areas.

## **2.7.10 - Roads in Riparian Areas**

### ***Issues:***

- The selected alternative should contain restrictions on road density to restore aquatic health.
- The Final EIS should analyze the effects of road densities on aquatic health.

## **2.7.11 - Grazing in Riparian Areas**

### ***Issues:***

- The selected alternative should ensure that grazing is severely restricted in riparian areas.
- The Final EIS should revisit the size of Riparian Conservation Areas.
- The selected alternative should ensure that grazing is allowed in riparian areas.
- The riparian standards regarding grazing in the Final EIS should be revisited to assure that they are not unreasonably strict.
- The Final EIS should better address the implementation and enforcement of grazing standards in riparian areas.
- The Final EIS should recognize that degradation of riparian rangeland has slowed or stopped.
- The Final EIS needs to be in compliance with Federal law regarding wild horses.
- The Final EIS should clarify restrictions on livestock handling facilities in riparian areas.
- Livestock restrictions should not exempt recreational livestock.

### **2.7.12 - Mining Effects**

***Issues:***

- The selected alternative should not allow for mining contamination in riparian areas.
- Aquatic standards for mining are too strict.

### **2.7.13 - Recreation Effects**

***Issues:***

- Impacts from recreation should be considered in the Final EIS
- Recreation standards and guidelines for aquatic areas should be clarified in the Final EIS.

### **2.7.14 - Toxic Chemicals, Fuels, and Herbicides in Riparian Areas**

***Issue:***

- The Final EIS should more clearly address present and potential effects of toxic chemicals, fuels, and herbicides on riparian areas.

### **2.7.15 - Lands, Permits, Facilities**

***Issues:***

- The selected alternative should allow for new and existing permits to be closely controlled, monitored, and considered for revocation if violations or non-compliance are found.
- The selected alternative should require that new development proposals include plans for recreation and restoration or maintenance of riparian resources.

### **2.7.16 - Water Rights**

***Issues:***

- The selected alternative should recognize private and state water rights.
- The selected alternative should not allow illegal use of water.

## **Section 2.8 ~ Plants**

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### **2.8.1 - Special Status and Native Plant Species**

***Issues:***

- The Final EIS should adequately protect native plant species.
- The Final EIS should adequately address sensitive, rare, or threatened and endangered plants.
- The Final EIS should adequately address microbiotic crusts and non-vascular plants.
- Analyzing various management options should be emphasized by the Final EIS.

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## **2.8.2 - Exotic Plants and Noxious Weeds**

### ***Issues:***

- The Final EIS should adequately address the problem of noxious weeds.
- The Final EIS should address whether additional scientific data are needed to address the problem of noxious weeds and non-native plants.

## **2.8.3 - Implementing Integrated Weed Management Strategy**

### ***Issues:***

- The Final EIS should establish clear guidelines for the implementation of the Integrated Weed Management Program.
- The Final EIS should include an Integrated Weed Management Program which considers the option of not using herbicides and/or pesticides.

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## **Section 2.9 ~ Wildlife**

### **2.9.1 - Management Effects on Wildlife**

#### ***Issues:***

- The Final EIS should address effects on wildlife from other management practices.
- The Final EIS should address road-related effects on wildlife habitat and viability.
- The Final EIS should address the impacts of off-road vehicle use in wildlife habitat.
- The Final EIS should address grazing effects on wildlife habitat and populations.
- The Final EIS should address the compatibility of mining and sufficient wildlife habitat needs.

### **2.9.2 - Habitat Management Approaches**

#### ***Issues:***

- The Final EIS should correct inaccurate or incomplete tables and data found in the Draft EISs.
- The Final EIS should reexamine the standards for habitat planning and effectiveness.
- The Final EIS should address the effects of past management activities on displaced species.
- The Final EIS should address concerns over the effects of habitat management on private property.
- The Final EIS standards should allow for site-specific analysis of habitat needs.
- The Final EIS should include basin-wide standards for habitat protection.
- The Final EIS should address management approaches for wide-ranging species.
- The Final EIS should address the parameters for selecting species for management.

### **2.9.3 - Specific Habitats**

#### ***Issues:***

- The Final EIS should include specific connectivity and linkage plans to maintain long-term viability for wildlife.
- The Final EIS should address patch size effects on wildlife habitat.
- The Final EIS should consider the importance of fringe habitats in viability analysis.

- The Final EIS should contain management strategies that address wildlife dependency on old-growth health and stand structure.
- Standards relating to old-growth and mature forests conflict with other management standards and objectives and should be clarified and rewritten in the Final EIS to better reflect their effects on forest management.
- The Final EIS should include scientifically accurate and consistent standards and objectives for snags and downed wood levels and their effects on wildlife.
- The Final EIS should include retention standards for snags and downed woody debris that are flexible and variable for different areas within the basin and should include biological considerations.
- The Final EIS should address the inclusion of Wildlife Conservation Areas and reserves in management plans to preserve wildlife habitat

## **2.9.4 - Management for Viable Populations**

### ***Issues:***

- The Final EIS should address how DRFCs and species viability will be achieved with current management strategies and alternatives presented.
- The Final EIS needs to define the term 'viability' and address its management consequences.
- The agencies should relate viability analysis and standards to other planning processes and laws.

## **2.9.5 - Wildlife and Human Interactions**

### ***Issues:***

- The Final EIS should be clearer in its provisions and management direction for wildlife/livestock conflicts.
- The selected alternative should allow for the opportunity to include ranchers and permittees in discussions over conflicts between wild and domestic animals.

## **2.9.6 - Species of Special Status**

### ***Issues:***

- The Final EIS should set clear standards for the management of threatened and endangered species habitat.
- The selected alternative should include objectives and standards that will provide protection for all listed plants and animals in the planning area.
- The Final EIS should contain an alternative that specifically calls for actions that contribute to species recovery and preclusion of future listing.
- The agencies should not require Ecosystem Analysis at the Watershed Scale for management activities in special species habitat.
- The selected alternative should include an effective strategy to prevent the further listing of species.
- Too much attention is being given to threatened, endangered, and sensitive species.

## **2.9.7 - Endangered Species Act**

### ***Issue:***

- The Final EIS standards for sensitive, threatened, and endangered species should comply with the Endangered Species Act.
- The selected alternative should manage to prevent detriments and abuses associated with the Endangered Species Act.

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## **Section 2.9.8 - Effects on Specific Wildlife Species**

### **2.9.8a Birds**

**Issues:**

- The selected alternative should provide adequate protection for bird species.
- The Final EIS should address the presence of non-native species and their effects on bird populations.
- The Final EIS should address range management effects on bird populations and habitat.
- The Final EIS should use accurate science to address the correlation between bird populations and habitat needs.
- The Final EIS should provide clear definitions and standards for bird management.

### **2.9.8b Domestic/Bighorn Sheep Habitat Conflicts**

**Issue:**

- The Final EIS should clarify management prescriptions for domestic and wild sheep interactions.

### **2.9.8c Big Game**

**Issues:**

- The Final EIS should adequately discuss standards and management direction for large ungulate health and viability.
- The Final EIS should analyze management effects on migration routes for big game species.

### **2.9.8d Grizzly Bears & Wolves**

**Issues:**

- The selected alternative should provide adequate management direction for grizzly bears.
- The Final EIS standards regarding grizzly bear health and management should align with management objectives of the Interagency Grizzly Bear Committee.
- The Final EIS should consider effects of possible species reintroductions on other wildlife and on human communities.

### **2.9.8e Other Mammals and Predators**

**Issues:**

- The Final EIS should incorporate accurate science in their management standards for small mammal species.
- The Final EIS should provide standards to protect predator species.

### **2.9.8f Amphibians and Reptiles**

**Issues:**

- The Final EIS should address range management effects on amphibian populations.
- The Final EIS should address range management effects on reptile populations.
- The Final EIS should provide accurate scientific information regarding amphibian and reptile species.

## **2.9.8g Invertebrates**

***Issue:***

- The Final EIS should correct the Draft EIS text to clearly show invertebrate relationships to ecosystem health.

## **Section 2.10 ~ Fish**

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### **2.10.1 - Fish Health and Management**

***Issues:***

- Historical and scientific information on fish species should be verified in the Final EIS.
- The Final EIS should address its relation to other planning processes with regard to fish.

### **2.10.2 - Effects on Fish Habitat and Management Practices**

***Issue:***

- The Final EIS needs to address contributing factors to fish population and habitat health.

### **2.10.3 - Special Status and Anadromous Fish Species**

***Issues:***

- The Final EIS needs to clearly evaluate the alternatives' effects on fish populations.
- The Final EIS should consider the effects of a regional approach with basin-wide standards.

### **2.10.4 - Habitat for Viable Fish Populations**

***Issues:***

- The Final EIS needs to revise management strategies for fish habitat and viability.
- The Final EIS should consider prescription standards to re-establish habitats for long-term protection.
- The Final EIS need to assess the number of fish populations and their geographical distribution to effectively manage for fish habitat and viable populations.

### **2.10.5 - Watersheds**

***Issues:***

- The Final EIS should clarify its rationale for classifying watersheds into categories 1,2, and 3.
- There is a need for proper watershed management in the Final EIS.

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## **2.10.6 - PACFISH and INFISH**

### ***Issues:***

- ▶ The Final EIS needs to address the removal of interim management strategies.
- ▶ The Riparian Conservation Area widths of PACFISH are not adequate to provide riparian functions.
- ▶ There is a lack of science in the planning strategies relating to PACFISH and INFISH.
- ▶ The Final EIS needs to re-evaluate the aquatic and riparian standards in the Drft EIS in relationship to PACFISH guidance for buffer widths.
- ▶ The Final EIS should address the social-economic effects from the proposed standards replacing INFISH and PACFISH.

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## **Section 3.1 ~ Economics**

### **3.1.1 - Community Resilience**

#### ***Issues:***

- ▶ The Final EIS should consider the potential economic damage to resource-dependent communities incapable of withstanding an economic change.
- ▶ The selected alternative should provide for assistance, both financial and other to resource-dependent communities while they undergo transition to less extractive economies.
- ▶ The “subsidizing” of resource-dependent communities and industries should be addressed in the Final EIS.
- ▶ The Final EIS should address how resource extraction can be done effectively to maintain local economies and sustain the ecosystem’s health.
- ▶ The Final EIS should address the responsibility to provide economic stability to rural communities.

### **3.1.2 - Economic Analysis**

#### ***Issues:***

- ▶ The Final EIS should include an economic analysis containing complete, accurate, and adequate information.
- ▶ The project’s economic analysis should not lump small individual communities into broad economic categories.
- ▶ The project should conduct county and community level economic analyses in addition to regional level analyses.
- ▶ The Economic and Social Conditions of Communities report should have more accurately analyzed community-level impacts of the project and this should be reflected in the Final EIS.
- ▶ The Final EIS should provide predictable Allowable Sale Quantities (ASQs) or Probable Sale Quantities (PSQs) to timber-dependent communities.
- ▶ The Final EIS should recognize that ecosystem management and economic management often run counter to each other.

## **Section 3.2 ~ Employment**

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### **3.2.1 - Commodity-based Employment**

***Issues:***

- ▶ The Final EIS should limit impacts on local resource-based economies.
- ▶ The Final EIS should balance ecological health and extractive industries to preserve community integrity.
- ▶ Impacts on resource-dependent communities should be disclosed in all alternatives.

### **3.2.2 - Timber**

***Issues:***

- ▶ The Final EIS should quantify future timber output to allow communities to predict short- and long-term effects to local employment.
- ▶ The Final EIS should emphasize sustainable timber harvest techniques.
- ▶ Import and export impacts on the economy and environment should be evaluated in the Final EIS.

### **3.2.3 - Grazing**

***Issue:***

- ▶ Grazing levels should be better addressed in the Final EIS.

### **3.2.4 - Mining**

***Issues:***

- ▶ The Final EIS should include more extensive analysis of mining impacts.
- ▶ The selected alternative needs to address the 1872 Mining Law in relation to mining rights.

### **3.2.5 - Fossil Fuels**

***Issues:***

- ▶ The Final EIS needs to address the levels of oil and gas drilling specific sensitive areas.
- ▶ The Final EIS should consider alternative energy resources.
- ▶ The Final EIS should balance utility needs and the environment.

### **3.2.6 - Amenity-based Employment**

***Issues:***

- ▶ The Final EIS should emphasize amenity-based economic assets.
- ▶ The Final EIS should emphasize non-commodity values.

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## **3.2.7 - Costs to Federal, State, and Local Governments**

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### ***Issues:***

- ▶ Planning and implementation costs outweigh potential benefits, so the project should stop.
- ▶ The Final EIS should account for all costs.
- ▶ The Final EIS should fully disclose all additional costs and externalities associated with management decisions.

## **3.2.8 - Receipts to Local Governments**

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### ***Issue:***

- ▶ The Final EIS should address changes in the Payment-In-Lieu-of-Taxes (PILT) and the 25% fund resulting from the project.

## **Section 3.3 ~ Social Systems**

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### **3.3.1 - Quality Of Life**

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#### ***Issues:***

- ▶ The Final EIS should not adversely affect the economies and quality of life of resource-dependent communities.
- ▶ The Final EIS should consider the potential impacts on the cultural integrity of resource-based communities.
- ▶ The selected alternative should consider protecting natural areas to meet spiritual value needs.
- ▶ The Final EIS should provide adequate information regarding the nature of social-related decisions.

### **3.3.2 - Recreation**

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#### ***Issues:***

- ▶ The Final EIS should consider the effects of closing roads on recreational opportunities.
- ▶ The Final EIS should better examine both the negative and the positive aspects of motorized use in the project area.
- ▶ The Final EIS should analyze the potential impacts of other management activities on recreation.
- ▶ The Final EIS should provide a more comprehensive analysis of potential impacts from recreation.
- ▶ The Final EIS should re-evaluate the “Willingness to Pay” concept to determine the value of recreation.

### **3.3.3 - Human Population**

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#### ***Issue:***

- ▶ The Final EIS should consider impacts on resources from rising human population.

## Section 3.4 ~ Wilderness, Roadless Areas, and Wild & Scenic Rivers

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### 3.4.1 - Wilderness Management

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*Issues:*

- The Final EIS should contain alternatives that provide adequate protection for roadless areas.
- The selected alternative should protect remaining wilderness and roadless areas by keeping these lands off-limits to natural resource development.
- The selected alternative should not place any more roadless areas under wilderness protection.
- The Final EIS should not limit access to wilderness areas.

### 3.4.2 - Protection of Specific Areas

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*Issues:*

- Various specific areas listed for protection; no issue statements.

### 3.4.3 - Roadless Area Management

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*Issues:*

- The selected alternative should put roadless areas off-limits to road building and resource extraction.
- The selected alternative should allow roadless areas to be opened to road building.

## Section 3.5 ~ Road Management

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### 3.5.1 - Road-related Effects

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*Issues:*

- The Final EIS should contain guidelines for managing roads that emphasize protection for the environment.
- The Final EIS should not adopt road closure as an all-purpose policy.
- Economic effects of road closures on local communities should be re-analyzed in the Final EIS.
- The Final EIS should re-examine scientific evidence in support of road management.

### 3.5.2 - Road Construction and Maintenance

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*Issues:*

- The Final EIS should assess the need for roads.
- The Final EIS should state clearly where funding for maintenance, obliteration, and road closures will come from.

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### **3.5.3 - Road Density and Definitions**

**Issues:**

- The Final EIS should better clarify the road density criterion.
- The Final EIS should clearly define what a road is and should re-inventory the area.

### **3.5.4 - Management Access**

**Issue:**

- The Final EIS should address management access by additional means including road closures.

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## **Section 3.6 - Cultural Resources**

### **3.6.1 - Inventory and Protection**

**Issues:**

- The Final EIS should reanalyze the impacts on cultural resources.
- The selected alternative should provide better guidelines for survey and analysis of cultural resources, including improved coordination with the region's Tribal governments.
- The selected alternative should include regional or landscape scale management of cultural resources.

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## **Section 3.7 ~ Tribal Rights and Interests**

### **3.7.1 - Treaty Rights and Federal Trust Responsibilities**

**Issue:**

- The Final EIS should recognize and ensure protection of tribal treaty rights for traditional practices of hunting, gathering, and fishing.
- The Final EIS should include extensive collaboration and coordination with American Indian Tribes and clearly state how Federal trust responsibilities will be met.

### **3.7.2 - Cultural Resources and Religious Freedom**

**Issue:**

- The Final EIS should ensure protection of tribal cultural resources and religious freedom.

### **3.7.3 - Restoration of Tribal Interests**

**Issues:**

- The Final EIS should restore habitats necessary to ensure availability and access to resources guaranteed in treaty obligations.
- The selected alternative should ensure Tribal rights are consistent with other Federal laws.

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# Appendix B

## Organized Response

### Campaigns

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#### *Form Letters*

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A total of 78,287 of the nearly 83,000 letters received throughout the public comment period reflect organized response campaigns, in the format of form letters. Types of form letters included: petitions, postcards, resolutions, comment forms, E-mail, and multiple letters.

As of May 6, 1998, 38 different form letters were identified. Fewer than four copies of some letters were received, while two forms exceeded 30,000 copies each—from the Northern Rockies Campaign (Form 252) and Working Assets group (Form 253).

Most of the form letters either (a) advocate protection of the Northern Rockies, including the Glacier Park–Bob Marshall Wilderness Complex, the greater Yellowstone ecosystem, and the greater Salmon ecosystem of central Idaho; or (b) request the project to protect roadless areas and old-growth forests and to restore damaged lands.

Other form letters question project’s scientific data, want land management to be more localized, ask for no Record of Decision, demand better social-economic analyses, or want a predictable sustained-yield of commodities from Federal lands.

All letters were processed similarly—each comment received a mail identification number, and each letter was entered into the database separately. Letters that include comments identical to a form letter plus additional individual comments were counted as individual letters for the purposes of data entry and the count below.

The following table summarizes the issues presented in the various organized response campaigns, and the number of times each type of correspondence was received. A summary of the Idaho Forest Congress Workshop follows the table. This roundtable discussion, held in September 1997, gathered additional comments to submit to the project.

**Form Letter/  
Number of  
Responses      Summary of Contents**

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**Form 41 - People for the USA**

- 23 Responses**      The Draft EISs are fatally flawed in their economic analysis and place undue burdens on the citizens of the Columbia River. None of the alternatives are acceptable and the project should be withdrawn from implementation because:
- DEISs were neither funded nor approved by Congress;
  - Under Multiple-Use Sustained-Yield Act (MUSYA), no single use should predominate over multiple use;
  - All alternatives obliterate roads which are needed to maintain forest health and ecosystem health;
  - Private property will be affected;
  - Ecosystem management and project regulations appear to be originate from the unratified Rio [de Janeiro] Treaty on Biodiversity;
  - County government has not been consulted on this plan; and
  - The Draft EISs place people and the economy into a less important status compared to the ecosystem.

**Form 201 - Postcard from the Spokane Area**

- 107 Responses**      The EIS team needs to correct the following problems for the Final EIS:
- Follow the agency scientists' recommendations;
  - Establish reserves with non-commercial restoration;
  - Protect old growth, unroaded wildlands, migration corridors, and key watersheds;
  - Get funding from Congress, not logging.

**Form 202 - Natural Resources Defense Council**

- 25 Responses**      Endorse a management plan that:
- Halts commercial logging and grazing in the region's old growth and roadless areas;
  - Undoes past damage with active restoration;
  - Restores the role of natural disturbances, especially fire.

**Form 203 - Basin Vision Group**

- 4 Responses**      ➤ The Draft EIS proposes to change the way Federal government manages public lands but omits critical information.
- The Draft EIS fails to adequately define the terms 'ecosystem integrity' and 'ecosystem management.'
  - Where are the ecosystems they propose to manage?
  - There are concerns about recreation access.
  - No legal authority exists for the change in land management policy.

**Form 205 - Washington Citizens**

- 13 Responses**      None of the Alternatives are acceptable. Look at another plan that includes:
- No commercial logging or road building in roadless wildlands larger than 1,000 acres, old growth forest, riparian areas, and aquatic strongholds;
  - Control of livestock grazing to allow rapid recovery of riparian areas and to prevent degradation of previously unglazed lands;
  - A scientifically based system of reserves which should allow road removal, prescribed fire, and control of non-native species to achieve the goals of the reserve system;
  - Much more explicit management standards, whether for resource extraction or ecological restoration.

**Form 206 - Request for Extension of Comment Period**

- 7 Responses**      Extension on public comments for another six to twelve months is requested.

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**Form 208 - Sierra Club**

- 33 Responses** It's wrong for Federal agencies to double current logging levels. Request the plan to:
- Protect water quality in rivers and streams and buffer zones;
  - Protect natural areas that have not been logged for wildlife;
  - Protect remaining old-growth forests from any logging.

**Form 210 - Form Letter from Riggins, Idaho**

- 5 Responses** The plan has serious shortcomings concerning its impact on:
- Communities in the area;
  - Scope of the project;
  - Cost and efficiency;
  - The prescriptive requirements included in the draft;
  - The lack of any sound scientific basis for the conclusions and recommendations.
- There is no congressional authority that exists for this plan and funding will not be appropriated. The Draft EISs open a Pandora's Box for litigation possibilities and should be abandoned.

**Form 212 - Forest Service Employees for Environmental Ethics**

- 15 Responses** The agency should fulfill its stewardship responsibility by giving full consideration to the science-based [Association of Forest Service Employees for Environmental Ethics] AFSEEE plan.

**Form 220 - Northwest Timber Workers Resource Council**

- 2477 Responses** What the project would really do for people and ecosystem health:
- Ignore the needs of peoples and communities;
  - Make timber harvest uncertain;
  - Restoration will take 70 years, putting forests and communities at risk;
  - Have negative social and economic impacts on people;
  - Leave 40–60 percent of public land unmanaged;
  - Require complicated and unnecessary study on almost every acre in the study area before any management activity takes place;
  - Offers no hope of ending current gridlock caused by lawsuits and appeals.
- The agency should:
- Avoid a Record of Decision;
  - Replace restrictive standards with more flexible guidelines;
  - Replace the inadequate social and economic information with a realistic description of impacts to local people;
  - Take action to improve forest and rangeland health.

**Form 221 - Inner Voice (Forest Service Employees for Environmental Ethics)**

- 236 Responses** It is imperative the agencies adopt a plan that takes into account the best scientific information available. Encourage the administration to carefully consider the AFSEEE-sponsored Ecosystem Management alternative. The legacy of the past requires a significant departure from current management principles.

**Form 223 - Western Ancient Forest Campaign**

- 304 Responses** The problem with the plan is the severed connection between the science and the proposed policies. The preferred alternative should be modified to include:
- Reserves;
  - Meaningful standards for protection of roadless areas, and native forests, and the restoration of riparian and rangeland ecosystems;
  - Grazing standards and guidelines that support rangeland restoration, monitoring, and native vegetation;
  - Funding for the restoration of salmon, trout, and steelhead habitat; and
  - Other funding provisions for the project.

Form Letter/ Number of Responses	Summary of Contents
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**Form 224 - “The last best place” Letter**

**32 Responses** The Draft EISs are one-size-fits-all plans which rely too heavily on standards. Guidelines:

- Do not allow local management flexibility or local involvement in decision making;
- Only take care of the needs of people as a consequence of “restoring” forest health;
- Cater to the “lock-it-up, hands-off” approach advocated by a very vocal few;
- Are so wrought with analysis that forest restoration work will take 70 years at best to complete;
- Should be more responsive to the local people who live on the land and know it best.

The project should not go to a Record of Decision. The good science in the document should provide general guidance to local agency managers.

**Form 225 - “Contribution of forest products industry” Letter**

**395 Responses** The plan should not go to a Record of Decision because:

- The project’s social science work is inadequate and does not realistically describe the economic impact on people and communities in the region;
- The plan ignores the contribution of the forest products industry;
- The inflexible one-size-fits-all standards simply will not work on the ground;
- Management decisions are best made by local agency makers;
- The plans short term goal of protecting the environment greatly increases the risk of catastrophic wildfires or severe insect and disease attacks; and
- The study is huge and too expensive and will have serious impacts on taxpayers.

**Form 226 - “Government governs best which governs least” Letter**

**184 Responses** The plan should not go to a Record of Decision because:

- The project’s social science work is inadequate and does not realistically describe the economic impact on people and communities in the region;
- The plan ignores the contribution of the forest products industry;
- The plan’s short term goal of protecting the environment greatly increases the risk of catastrophic wildfires or severe insect and disease attacks;
- The study is huge and too expensive and will have serious impacts on taxpayers; and
- The inflexible one-size-fits-all standards simply will not work on the ground.

**Form 227 - Tricon Timber Incorporated**

**48 Responses** The area is too large to be treated as one EIS. People rely on their culture to survive. Nowhere in the statement does it address timber-dependent communities.

- Weed control is left up to individual areas to be addressed, which will not be satisfactory.
- What of the rivers of life for plants, animals, and wildlife? We are past this stage to have virgin ownership surrounding rivers and lakes.
- Impact does not reflect damage done by Fish, Wildlife and Parks or damage done by individuals transplanting other species.
- Scientific data looks like it has been retrieved from past documents. The outline for the project seems to be coming from Spotted Owl studies in the Cascade Range.
- Strongly against wildfire burns, the study shows decreasing hunting by 50 percent in 50 years, and taxpayer loss.
- Road closures will put more people onto smaller acreage.
- Need various types of industry in the area—logging, ranching, recreation, and mining.

**Form 228 - “Agressively manage forests and rangelands” Letter**

**55 Responses** No Record of Decision should be issued. Forest Service and BLM districts should revise plans at the local level. This land scheme is unacceptable, probably illegal, and will toss the environment and rural society into chaos. The Draft EISs were orchestrated in Washington, D.C. and makes a mockery of science.

Because it fails to balance environment, business and society, the plan must:

- Replace all standards with flexible guidelines;
- Delete road limiting standards;
- Take emergency action to improve forest and range health.

#### **Form 229 - “Economic trade-off” Letter**

**10 Responses** No Record of Decision should be issued. The project represents a poor value for taxpayers’ dollars. Its short-term goals of protecting the environment sacrifices economic benefit. Implementation is ill advised for three reasons:

- Economic impact on people and communities is inadequately addressed. The project is quick to set aside the economic well being of the region and to dismiss the more problematic aspects of the plans consequences;
- Local agency managers are best equipped to make decisions about the regions’ resources. A one-size-fits-all plan may be convenient for those who seek to plan but its inflexibility causes problems for those charged with its implementation; and
- Active management is an ongoing process, and any postponement puts the environment at risk for catastrophic wildfires and insect infestations.

#### **Form 230 - “Effects on local economies” Letter**

**54 Responses** The implementation will have major impacts on business and way of life. No Record of Decision should be recorded because:

- The decision will only lead to further project appeals and procedural NEPA and Forest Plan litigation;
- The Purpose and Need statement lacks definition. The use of terms ‘Ecosystem Health’ and ‘Ecological Integrity’ are inappropriate and subjective;
- Basin-wide standards should be dropped, but provide foundation for local plans. Local Forest Service and BLM districts should adopt their own standards and guidelines;
- The Aquatic Conservation Strategy is flawed and does not consider fisheries management properly;
- The draft fails to demonstrate the scientific need for further restriction of timber management to achieve Riparian Management Objectives(RMOs); and
- The Human Uses and Values assessment is ambiguous and totally inaccurate. Local economies are directly linked to timber production from public lands.

#### **Form 231 - “Manage public lands for multiple use” Letter**

**45 Responses** The proposed changes are detrimental to nearly all multi-use activities in the project area. They are against this proposal because:

- Fifty percent of the roads are proposed to be closed to the general public;
- Much of the proposed thinning will be left in the form of deadfall that has potential for devastating fires;
- The logging will increase the yield for the short term, but decrease over the long term, forcing mill closures; and
- Reserves will allow no mechanical equipment within their borders.

#### **Form 232 - Letter from motorized recreation users**

**6 Responses** The Draft EISs promotes:

- A value system that believes man’s use of natural resources is negative;
- That people’s access to public lands should be limited; and
- Proposes guidelines that could close 50 percent of the roads and most trails.

This is wrong. I oppose the loss of access.

#### **Form 233 - Letter from Portland Area**

**10 Responses** No alternative meets the purpose and need of the project. A supplemental EIS is needed. Do not further degrade roadless forests and wildlands which provide critical habitat, clean water, and recreational opportunities. Any ecosystem-based plan should:

- Establish a reserve system to protect key areas of fish and wildlife habitat;
- Obliterate roads and protect roadless areas; and
- Restore the important ecological role of fire and other disturbances.

**Form Letter/  
Number of  
Responses      Summary of Contents**

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**Form 234 - Flagship Columbia Basin**

- 9 Responses**      It is imperative that revisions are made to the interior Columbia River Basin Plan. The current plan puts wildlife habitat at risk and caters to logging and grazing interests. The plan should address the following:
- Protect all roadless lands of 1,000 acres or more, as well as old-growth forest and riparian areas from road building and commercial logging;
  - Control livestock grazing to ensure rapid recovery of riparian areas and ungrazed grasslands; and
  - Establish a scientifically based system of reserves.

**Form 251 - Basin Vision Request**

- 7 Responses**      The public participation process occurs when farmers are the busiest with planting, growing, and harvesting. A six month extension for public comments is requested. The concept of ecosystem management is ill-defined. Representative George Nethercutt said the cost will far exceed the \$180 million the agencies estimate.

**Form 252 - Northern Rockies Campaign**

- 38,987  
Responses**      Bring science-based land management to the Northern Rockies. Protect the unprotected, unroaded, wildlife-rich, lands in the region, especially those of the:
- Glacier Park–Bob Marshall Ecosystem;
  - Greater Salmon Ecosystem of Central Idaho; and
  - Greater Yellowstone Ecosystem.
- Recognize these and other Northern Rockies wild places for their magnificence and value as natural and national treasures.

**Form 253 - Working Assets**

- 30,816  
Responses**      Increases in road construction, logging, and mining in undeveloped areas could destroy old growth forests, which harbor wildlife and foster nutrient cycling; clean water; world class fisheries; and recreational wilderness areas. Incorporate a more balanced alternative that stresses protection and restoration rather than destruction of this ‘Big Wild’ ecosystem. The Final EIS must:
- Include protection for all roadless areas from logging, road building, or mining;
  - Protect all remaining stands of old-growth trees from clearcutting and logging; and
  - Restore and rehabilitate lands damaged by such activities.

**Form 254 - Timber Companies**

- 2 Responses**      Forest Service and BLM are commended for their efforts in getting this project to stage. We recommend an extension on public comment until February 6, 1998. A 120-day comment period is not adequate for the following reasons:
- The Documents are voluminous and will take a lot of time to read;
  - The amount of detail and complexity is almost beyond belief for a project that could impact our quality of life for the next decade;
  - The timing of release could not be worse. This is our primary work and recreational season;
  - The agency training sessions are not starting until almost a month after the availability notice; and
  - Documents for the project were not ready for public review and were delayed in shipping.

**Form 255 - Montana Citizens Letter**

- 3 Responses**      They totally disagree with Preferred Alternative 4. Montana’s remaining roadless areas should be permanently protected as Wildlife Conservation Areas. The long-term economic health of Montana is tied more significantly to recreation and wildlife than to commodity uses of the land. The preferred alternative should:

- Control logging, grazing, and road building to protect streambanks and riparian zones;
- Protect clean water and fisheries habitat;
- Restore and rehabilitate land damaged by clearcutting, roads, and mining;
- Monitor and manage all commodity activities so clean water is fully protected; and
- Prioritize habitat health and security for big game species such as elk and deer.

**Form 256 - Support Alternative 6**

**10 Responses** Since 84 percent of our public land is in poor to moderate condition, it is imperative that the agencies do some very different and innovative management for the future. Alternative 4 has many good management directions, but still promotes too much timber harvest. Support Alternative 6 with Alternative 7's system of reserves where management activities are limited. Include the following actions in the preferred alternative:

- Protect all roadless areas larger than 1,000 acres from logging, road building, or mining;
- Protect streambanks and riversides to conserve clean water and fish;
- Protect all remaining stands of old growth - trees large than 20 inches in diameter and older than 150 years;
- Create a Wildlife Conservation Reserve system to protect wildlife in roadless areas. Manage reserves to protect healthy lands and fix damaged habitats.
- Identify and protect habitat for game and nongame species such as elk, carnivores, and rare species like bald eagles and grizzly bears. Acknowledge compliance with the Endangered Species Act; and
- Restore and rehabilitate lands damaged by mining, clearcutting, and too many roads.

**Form 258 - Postcard from Northwest Montana**

**559 Responses** None of the Alternatives in the Draft EISs meet the Need for Action for support of the economic and social levels of communities and predictable levels of goods and services. The situation should be remedied by:

- Stopping work on the project and restore local decision making;
- Developing alternatives that meet the Need for Action; and
- Providing the public with the opportunity to comment once sustainable yields of goods and services associated with the alternatives are predicted and disclosed.

**Form 259 - Yakima Valley Dust Dodgers Motorcycle Club**

**7 Responses** The Draft EISs promote a value system that believes man's use of our natural resources is negative, and people's access to public lands should be limited. There is objection because:

- The Draft EISs proposes detailed standards and guides that could close up to 50% of the roads and an unspecified number of trails in some areas;
  - The Draft EISs ignores motorized recreation, and its contribution and benefit to local economies; and
  - The Draft EISs is not authorized by existing federal law nor has it been mandated by Congress.
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**Form Letter/  
Number of  
Responses      Summary of Contents**

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*The following section consists of eight nearly identical form letters, all varying slightly in content, presentation, and form. Presented in a questionnaire form, each letter showcased a combination of statements to which respondents could agree, disagree, or show no opinion. A majority of the letters reflected accord with the statements listed. Additional comments that were written on many of the letters were incorporated into the main body of the public comment analysis report.*

**Form 209**

**576 Responses** *Upper Columbia Basin Draft EIS Comment Questionnaire*

1. The alternatives require extensive new analysis before decisions can be made that will result in lengthy postponements;
2. The social-economic impacts of reduced resource development in rural communities need to be addressed;
3. The impact on mineral and energy activities needs to be estimated by the agencies;
4. Land management is taken in the wrong direction by the agency introducing additional management uncertainty for livestock operators;
5. ICBEMP will significantly impact adjacent landowners, causing conflicts with private property rights;
6. The agencies' prediction for uncertainty for timber producers is directly contrary to the stated Need and Purpose of the project and multiple use laws.
7. Access will be denied to the public and recreationalists to supposedly protect aquatic resources, which will impact economic, recreational, and cultural resources of communities;
8. The DEIS does not establish coherent management strategies that would lead to healthy, productive, and sustainable ecosystems balancing the needs of people, wildlife, and habitat;
9. The DEISs are of questionable legal and scientific merit and do not meet the project's Purpose and Need. Congress does not mandate "ecosystem management" as a management method. Major problems exist in their compliance with NEPA and NFMA;
10. Management direction is light on guidelines and heavy on standards. The project should remove the standards and create a Regional Guide plan, with science from the project used to support local plan revisions;
11. The DEISs require, at the very least, a major rework because none of the alternatives adequately support an aggressive active management approach; and
12. The DEISs fail to adequately address key issues that plague the property management of our public lands, which will continue to deteriorate.

**Form 213**

**80 Responses** *Upper Columbia Basin Draft EIS Comment Questionnaire*

Similar statements as those found in Form 209, plus these additional statements:

13. The DEISs raise protection of ecosystem health and integrity above all other factors in land use decision making, which is inconsistent with multiple use law;
14. Many of the key concepts are vague, uncertain, or unidentified (e.g. ecosystem health, ecological integrity, sustainability, landscape health, and historic range of variation) and will expand opportunities for litigation;
15. In the preferred alternative, not one acre of federal land falls in to the "production" management category. There is no effort to achieve a balanced approach to management;
16. Jobs will be lost, and rural economies and human activity will decrease if the agencies manage to aggressively restore ecosystem health by de-emphasizing resource production;
17. Economies will be impacted if the preferred alternative emphasizes "conserving" and "restoring" in an attempt to "mimic" natural processes;
18. The level of science behind the DEIS is too vague to offer a firm foundation for public policy; and
19. There is no sound reason to seek management approaches which would mimic pre-European settling conditions.

**Form 214**

**366 Responses** *Upper Columbia Basin Draft EIS Comment Questionnaire*

Similar statements as those found in Form 213, with the addition of statements #4 and #7.

**Form 215**

**572 Responses** *Eastside Draft EIS Comment Questionnaire*

Similar statements as those found in Form 209, with the addition of statements #14, #17, and the following:

20. Logging, grazing , recreation and all other human uses will only be allowed under the alternatives if they are “within the capabilities of the ecosystem.” The agencies do not disclose the meaning and provisions of the term.

**Form 216**

**615 Responses** *Eastside Draft EIS Comment Questionnaire*

Similar statements as those found in Form 209, with the addition of statements #13 and #15.

**Form 217**

**5 Responses** *Eastside Draft EIS Comment Questionnaire*

Similar statements as those found in Form 213, with the addition of statement #20 and the following:

21. The DEISs are inconsistent and obscure. Stating many ecological conditions have improved over the last two decades, why is there reason to make changes in management philosophy?

**Form 219**

**605 Responses** *Upper Columbia River Basin Draft EIS Comment Questionnaire*

Similar statements as those found in Form 209, with the addition of statements #2, #18, #19, and the following:

22. The agencies exceed their authority to redefine the term “sustained yield” than as first defined in Congress.

**Form 222**

**131 Responses** *Eastside Draft EIS Comment Questionnaire*

Similar statements as those found in Form 217, with the addition of statement #22.

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## ***Idaho Forest Congress Workshop***

In September 1997, The Idaho Forest Congress held a roundtable discussion in Moscow, Idaho, to allow people of diverse backgrounds and perspectives to discuss the Interior Columbia Basin Ecosystem Management Project, and to gather comments to formally submit to the project.

Participants selected a category to describe themselves (for example, forester, environmentalist, educator, student, recreationalist) and formed five small, mixed groups. The groups discussed and rated his or her approval for each of several management activities in general and in reference to Forest Clusters 2, 3, and 4. They rated their agreement with the management activities as either 'green' (agree), 'yellow' ("I could live with it but it could be better"), or 'red' (disagree). They also had the opportunity to provide specific written comments.

Workshop participants used the same process to discuss whether the preferred alternative met the stated purpose and need, and to rate the workshop itself.

### ***1. Harvest (commercial)***

According to those who wrote in favor of increased harvest levels, commercial harvest is important for both forest health and the economic health of local communities. One person stated that if growth exceeds harvest, then forest health will deteriorate. Some felt commercial harvest, as opposed to pre-commercial thinning, is necessary to support local communities as well as to reduce the severity of wildfires.

One participant stated that private lands in Idaho cannot make up the lost economic activity if harvests on public lands are reduced. The person noted that Forest Clusters 2, 3, and 4 are not harvesting at their planned levels.

Several called for more local control over harvest levels.

An owner of a tree farm who treats more than 50 percent of the trees in a 10-year period and still finds the farm sustainable, questioned the usefulness of the labeling the harvest levels as low, medium or high, when even the high level is far less than 50 percent.

The predictability of harvest levels was a concern to some participants, who felt the levels fail to take into account what percentage of the forests might need treatment. One noted that the Draft EISs measure the harvest percentages by acreage rather than by board-feet, further reducing the predictability of the output.

Some mentioned the need for careful management to assure sustainability. One opposed new roads.

### ***Forest Cluster 2***

Fifteen participants voted 'green' for the harvest levels (low) in Forest Cluster 2; seven opposed the levels and four were in the middle.

Noting the abundance of wilderness in Forest Cluster 2, some participants wondered how this will affect the prescribed harvest levels. A few participants favored some level of commercial harvest or harvest to reduce fire danger, improve wildlife habitat, and otherwise restore forest health. One suggested pre-burning.

Some suggested high harvest levels on the non-wilderness areas in Forest Cluster 2, to make up for the presumably low or zero harvest levels in designated wilderness areas.

Others expressed concern for the integrity of the wilderness, recommending little or no harvest there and stressing that this area should not be viewed as a major source of timber.

One participant recommended harvest activity high enough to reduce the threat of catastrophic fire. Another suggested increasing harvest in the Powell area of Clearwater National Forest.

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### ***Forest Cluster 3***

Five participants approved of the recommended (medium) harvest levels in Forest Cluster 3; 13 opposed the levels and seven were in the middle.

Participants pointed out that much of this cluster has seen intensive harvest, silviculture, and road activity. A few said that the forest needs time to heal, and others stated that the areas are productive, roaded, and appropriate for high harvest levels.

### ***Forest Cluster 4***

Seventeen participants cast a 'red' vote to disapprove of the medium harvest levels in Forest Cluster 4; six approved the levels and four voted in the middle.

Noting the high productivity of this area, some advocated continued predictable harvest levels, access, and silvicultural techniques to assure forest health and sustainability. One person recommended increased logging in areas already roaded, and low activity in unroaded areas.

A few suggested lowering the harvest rate, allowing more time for the forest to grow back from previous harvest levels, and keeping roadless areas roadless.

## ***II. Thinning (pre-commercial)***

Among the three forest clusters under discussion, participants cast 44 'green' votes approving the levels of pre-commercial thinning, compared to 12 'red' opposing votes and 22 'yellow' votes in the middle.

Various statements from participants supported pre-commercial thinning and noted its benefits. Thinning, most participants stated, can improve forest health, increase the value of existing harvestable timber, protect forests from disease and catastrophic fire, improve wildlife habitat, and give desirable trees room to grow.

Several expressed concern over the costs of pre-commercial thinning, noting that this activity requires Federal expenditure. They wondered if funds spent on thinning will translate into economic benefit from more commercially harvestable timber. Some felt there should be more commercial harvesting and less pre-commercial thinning.

Some said the role of pre-commercial thinning was not clear regarding wilderness or roadless areas.

A few suggested that prisoners or people on welfare do the pre-commercial thinning.

### ***Forest Cluster 2***

Ten participants expressed approval of the medium level of pre-commercial thinning prescribed for Forest Cluster 2, with 3 people opposing the level and 13 voting 'yellow'.

Advocates of thinning noted that it helps restore forest health, but some questioned the appropriateness of this activity in wilderness areas.

One participant noted that the Idaho Forest Practices Act already addresses pre-commercial thinning.

### ***Forest Cluster 3***

Sixteen participants approved of the high level of pre-commercial thinning prescribed for Forest Cluster 3; four opposed the level and five voted in the middle.

Most comments pointed out the advantages of thinning, but one participant suggested reducing the thinning level to 'medium'. One participant recommended that the Civilian Conservation Corps or prisoners do the thinning.

### ***Forest Cluster 4***

Seventeen participants opposed the high level of pre-commercial thinning prescribed for Forest Cluster four, with six approving the levels and four in the middle.

Some of those opposed to the prescribed level favored more thinning; others favored less. One suggested high levels of thinning in roaded areas, and low levels in unroaded areas. A few participants recommended thinning to reduce fire danger.

Regarding thinning in wilderness areas, one participant mentioned the need to keep the symbolism of wilderness amid thinning.

## ***III. Decrease Road Density***

Among the three forest clusters under discussion, participants tallied 42 'red' votes opposing the recommendations to decrease road density, 18 votes of approval, and 19 in the middle.

Many of the comments opposing road closures or obliterations addressed the beneficial values of roads for fire control, emergencies, harvest, recreation, and other management needs. Some felt the guidelines were too vague and did not identify particular purposes for road closures. One participant noted that it would be better to close a stated percentage of roads that are causing problems, rather than simply closing a stated percentage of roads. One person stated it would be physically impossible to close 50 percent of the roads in 10 years.

The relative costs of obliterating roads, instead of merely closing them or continuing maintenance, was a source of concern for some participants.

Others noted the benefits to forest health of having fewer roads, such as leaving more ground for timber harvest and mitigating reductions in water quality. Some noted that roads currently in the forests are more than sufficient for recreation and management activities.

### ***Forest Cluster 2***

Fourteen participants disapproved of the prescription to reduce (at a medium rate) road density in Forest Cluster 2, with seven approving and five in the middle.

Some participants suggested that road density in Forest Cluster 2 is low already. One said there are enough roads, and another mentioned the benefits of fewer roads, such as a reduction in pressure on game.

### ***Forest Cluster 3***

Fourteen participants disapproved of the prescription to reduce (at a medium rate) road density in Forest Cluster 3, with five approving and seven in the middle.

Several people noted that roads support recreation. Some approved of road closures if the roads are not needed for timber harvest and firefighting access.

One participant recommended closing at least half the roads in Forest Cluster 3, to reduce hunting pressure, reduce erosion, and improve water quality.

One emphasized the importance of pre-road planning.

### **Forest Cluster 4**

Fourteen participants disapproved of the prescription to reduce (at a medium rate) road density in Forest Cluster 4, with six approving and seven voting 'yellow'.

Participants acknowledged the high road density in this cluster, including as high as 15 miles per square mile in the Coeur d'Alene River basin.

One participant recommended closing at least half the roads in Forest Cluster 4 to reduce hunting pressure, reduce erosion, and improve water quality. Another noted the value of roads to recreation.

One person recommended that the rate of road reduction be reduced to low on the Clearwater and Nez Perce national forests.

## **IV. Watershed Restoration**

Among the three forest clusters under discussion, participants tallied 24 'green' votes in approval of the prescription for watershed restoration, 20 'red' votes against, and 29 'yellow' votes in the middle.

A sense of urgency characterized the comments of those who favored active management to restore watersheds. Several linked watershed restoration to road maintenance and improvement. Some who voted 'yellow' felt that the prescriptions for watershed restoration do not go far enough. One suggested closing all but the main roads. Another suggested stewardship contracts in which the purchaser gets credit for restoration work.

In the view of some, the benefits of restoration may not be worth the costs. Some felt that the prescriptions were too severe, and a few wondered if funding would be adequate.

### **Forest Cluster 2**

Thirteen participants approved of the level of watershed restoration (high) prescribed for Forest Cluster 2, with eight opposed and four in the middle.

Watershed quality was important to most who commented on watershed restoration in Forest Cluster 2, but some felt that the aquatic health is good enough that no additional restoration is needed. One person said, "Mother Nature should continue working in this cluster."

One participant stated that watershed restoration was necessary in Forest Cluster 2 because so much of the area buffers wilderness areas.

### **Forest Cluster 3**

Thirteen participants voted 'yellow', indicating some approval for the level of watershed restoration (medium) in Forest Cluster 3, with five approving and five disapproving.

A few participants expressed support for a higher level of restoration activity. According to one participant, road management should be part of a restoration plan, but another warned against the negative effects obliterating roads might have on watershed quality. Another mentioned the Nez Perce Indian Reservation as in particular need of restoration. Another questioned the economics of restoration, stating that we should concentrate on harvesting these areas.

### **Forest Cluster 4**

Twelve participants voted 'yellow', indicating some approval for the level of watershed restoration (medium) in Forest Cluster 4, with six approving and seven disapproving.

Two commented in favor of higher restoration activity. One noted a link between restoration and road use, saying that highly used areas should be highly maintained.

## ***V. Prescribed Burning***

Among the three forest clusters under discussion, participants tallied 28 votes of approval for stated levels of prescribed burning. Twenty-one opposed the prescriptions, and 22 were in the middle.

Air quality, liability issues, and the danger of fires burning out of control caused concern among those who otherwise offered support for a prescribed burning regime. A few opposed burning of timber that could be harvested commercially.

While some noted the benefits of burning, such as improved wildlife habitat and healthy forests, some stated that prescribed fire activity should be low, at most. Some recommended burning in conjunction with other management activities such as thinning.

### ***Forest Cluster 2***

Seven participants approved of the level prescribed fire (high) called for in Forest Cluster 2, with six opposed and seven in the middle.

Comments related to fire in this cluster warned of uncontrollable consequences and diminished air quality, particularly since Forest Cluster 2 includes wilderness areas. A few comments recommended a lower level of prescribed fire.

### ***Forest Cluster 3***

Ten participants expressed approval of the prescribed fire regime (medium) in Forest Cluster 3; seven opposed the levels and eight voted in the middle.

Two participants recommended a lower level of burning; one recommended a higher level. One stated that this cluster is in poor condition.

### ***Forest Cluster 4***

Participants tallied 18 votes in favor of the level of prescribed burning (medium) in Forest Cluster 4. Five opposed that level, and four cast 'yellow' votes.

Two commented in favor of lower fire activity. One recommended fire for all uses, such as site preparation and nutrient recycling. One advised keeping fires under control.

## ***VI. Overall Rating (of Alternative 4's meeting the project Purpose and Need)***

Participants cast six 'green' votes of approval for the project's meeting of its stated Purpose and Need. Nine cast 'red' votes of disapproval, and five were in the middle.

Some participants found the broad-scale of the guidelines in Draft EISs inappropriate. They felt that local managers should make more of the decision that affect local projects. Noting that the funding for the project is not definitely established, some questioned how and if the project would ever become reality.

A few suggested more restoration activities, including increased harvest levels. One felt the economic needs of local communities were not addressed.

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# Appendix C

## Content Analysis Process

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### *Letter Coding and Database*

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Content Analysis is a process used to compile and correlate similar comments into a format usable by decision makers and the EIS Team. Content analysis helps the EIS Team clarify, adjust, and use technical information pursuant to National Environmental Policy Act (NEPA) regulations, which require response to comment before issuing a Final EIS and Record of Decision.

In the content analysis process for this project, each letter was given a number to help track its content back to the original letter stored in the administrative files. All respondents' names and addresses were entered into a specially designed computer program, enabling the project to have a complete mailing list of respondents. The database also will provide pertinent demographic information such as State representation and governmental and special interest response. This database can be used for fulfilling requests made through the Freedom of Information Act, for instance; if a county commissioner were to ask for all comments received from his/her county, a query can be made pulling up all letter numbers attached to that county's zipcode, enabling the project team to quickly identify which comments and letters need to be sent.

All letters were read for content. If a response was identified as a form letter, a code was attached linking it with others of its kind. Any additional comments enclosed with a form letter were read and identified through the individual response process.

Individual letters were read by a member of the Content Analysis Team, coding comments with the use of a tracking system designed for maximum clarity and organizational flow. The structure and codes were developed using the Draft EIS format. Once each letter had been read and coded, another analyst read it again to compare to the first reader's assessment to prevent subjectivity and ensure continuity. After a letter coding was confirmed, it was then entered into the database program, connecting the comments in the letter with the individual.

In many instances throughout this process, respondents sent in more than one letter. The database can track all letters accordingly for each person. This system of tracking also assists the Content Analysis Team to identify duplicate letters that may have slipped through.

After all the letters, including form letters, were entered into the database, a database report was produced. This report was used by the Content Analysis Team to analyze and summarize the batched information. A content analysis summary (*Final Analysis of Public Comment*) was written to provide the project staff and the Executive Steering Committee an in-depth summarization of all 82,895 letters.

### *Content Coding and Analysis*

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Two distinct ways of approaching content analysis are common. One is to scan in letters, programming the computer to identify key words and phrases that can automatically be binned into compartments of like comments. The other style, the one used for this project, is to manually read each letter and not only pick out the subject matter but to also include the perceived intent and emotion behind the comment.

Each approach is valid but can have different results if counting comments becomes an objective. If one desires an accurate count of how many people mention the words 'grizzly bear', then key wording may be the best and the resulting

statistics are fairly certain to be valid. But if the objective is to understand *why* people are concerned and if the comments have questions which are multi-layered in nature, simply searching for the words 'grizzly bear' will not give enough information. Consequently, the number of times each comment was received are not used in this type of content analysis summary, although they could be derived from the comment database if further information should be required.

Another reason not to emphasize the number of comments that are for or against a topic is because public comment is not a valid statistical process. Public comment in the NEPA process is not a random survey. When land managers ask the public for substantive comment on a specific project, they do not ask for a ballot of likes and dislikes; they ask for information that will help them make sound resource decisions. Human dynamics prevail when people are asked to write letters: respondents do not usually write about what makes them happy, but they write when they perceive a wrong is being done. Therefore, the majority of letters received on any project would never be a fair sampling of how everyone feels.

Some numbers, however, are useful in content analysis, such as where people are from, what special interest groups and sister agencies are responding. This information provides a clear picture of the tone and intensity of interest for any given project without lending the results to 'vote counting'. All comments are considered, whether they are derived from thousands of people saying the same thing or from one person bringing up a technical issue that could affect the decision on its merit alone. Such demographic information has been collected in this content analysis process and is reported in the full *Final Analysis of Public Comment* document.

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# Appendix D

## List of Preparers

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The following list includes the names of the individuals and area of contribution they made toward the completion of the Final Analysis of Public Comment for the ICBEMP Environmental Impact Statements.

### *Content Analysis Enterprise Team*

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#### **Program Coordinator**

Jody Sutton Content Analysis Enterprise Team

#### **Assistant Coordinator**

Ginger Hamilton Content Analysis Enterprise Team

#### **Program Assistant**

Linda Thompson Content Analysis Enterprise Team

#### **Team Leaders**

Myra Black Content Analysis Enterprise Team

Michael Schlafmann Content Analysis Enterprise Team

Michele Dragoo Flathead National Forest

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Jerry Scott Flathead National Forest

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Shelia Evans	Flathead National Forest
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#### **Database Programmer**

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#### **Computer Specialist**

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Leanne Filan	Ellen King	Cheryl Ringering
Pat Griffith	Dave Martinez	Cheryl Rutherford
Rayleen Hicks	Libby Martinez	Alisa Sampsel
Leslie Hubbard	Tara Osterhout	Karen Terrazas

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# Appendix E

## Acronyms

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<b>[A]FSEEE</b>	[Association of] Forest Service Employees for Environmental Ethics	<b>NEPA</b>	National Environmental Policy Act
<b>ARPA</b>	Archeological Resources Protection Act	<b>NFMA</b>	National Forest Management Act
<b>ASQ</b>	Allowable Sale Quantity	<b>NMFS</b>	National Marine Fisheries Service
<b>AUM</b>	Animal Unit Month	<b>NRCS</b>	National Resource Conservation Service (formerly Soil Conservation Service)
<b>BBF</b>	Billion Board Feet		
<b>BEA</b>	Bureau of Economic Analysis	<b>NOI</b>	Notice of Intent
<b>BIA</b>	Bureau of Indian Affairs	<b>PAC</b>	Provincial Advisory Committee
<b>BLM</b>	Bureau of Land Management	<b>PACFISH</b>	Environmental Assessment for the Implimentation of Interim Strategies for Managing Anadromous Fish-producing Watersheds in Eastern Oregon and Washington, Idaho, and Portions of California
<b>BMP</b>	Best Management Practice		
<b>CA</b>	Content Analysis		
<b>CEQ</b>	Council on Environmental Quality		
<b>CFR</b>	Code of Federal Regulations		
<b>CWD</b>	Coarse Woody Debris		
<b>DBH</b>	Diameter at Breast Height	<b>PFC</b>	Proper Functioning Condition
<b>DEIS</b>	Draft Environmental Impact Statement	<b>PILT</b>	Payment in Lieu of Taxes
		<b>PVG</b>	Potential Vegetation Group
<b>DRFC</b>	Desired Range of Future Conditions	<b>PVT</b>	Potential Vegetation Type
<b>EIS</b>	Environmental Impact Statement	<b>RAC</b>	Resource Advisory Council
<b>EPA</b>	Environmental Protection Agency	<b>RCA</b>	Riparian Conservation Area
<b>ERU</b>	Ecological Reporting Unit	<b>RMO</b>	Riparian Management Objective
<b>ESA</b>	Endangered Species Act	<b>ROD</b>	Record of Decision
<b>EAWS</b>	Ecosystem Analysis at the Watershed Scale	<b>RHCA</b>	Riparian Habitat Conservation Area (PACFISH)
<b>FACA</b>	Federal Advisory Committee Act	<b>SIT</b>	Science Integration Team
<b>FEIS</b>	Final Environmental Impact Statement	<b>UCRB</b>	Upper Columbia River Basin
		<b>USDA</b>	United States Department of Agriculture
<b>FEMAT</b>	Forest Ecosystem Management Assessment Team		
<b>FERC</b>	Federal Energy Regulatory Commission	<b>USDI</b>	United States Department of Interior
<b>FLPMA</b>	Federal Land Policy and Management Act	<b>USFWS</b>	United States Fish and Wildlife Service
<b>FOIA</b>	Freedom of Information Act	<b>USGS</b>	United States Geological Survey
<b>GIS</b>	Geographic Information System		
<b>HRV</b>	Historic Range of Variability		
<b>HUC</b>	Hydrologic Unit Code		
<b>ICBEMP</b>	Interior Columbia Basin Ecosystem Management Project		
<b>INFISH</b>	Interim Inland Native Fish Strategy for the Forest Service's Intermountain, Northern and Pacific Northwest Regions		
<b>IWM</b>	Integrated Weed Management		
<b>MMBF</b>	Million Board Feet		
<b>MOU</b>	Memorandum of Understanding		
<b>NAAQS</b>	National Ambient Air Quality Standards		