

Letter #	Comment	pg	Commenter	Resource / Topic
<a href="#">1</a>	1	1	KTI	Support Project
<a href="#">2</a>	1	1	ALC	Support Project
<a href="#">3</a>	1	1	CCWA	Support Project
<a href="#">4</a>	1	1	KVRI	Support Project
<a href="#">5</a>	1	1	Vern Morton	Support Project
<a href="#">5</a>	2	1	Vern Morton	Aquatics
<a href="#">6</a>	1	1	IFG	Support Project
<a href="#">6</a>	2	2	IFG	Harvest Systems
<a href="#">6</a>	3	2	IFG	Harvest Timing
<a href="#">7</a>	1	1	KEA	NEPA
<a href="#">7</a>	2	1	KEA	Aquatics
<a href="#">7</a>	3	1	KEA	Fisheries
<a href="#">8</a>	1	2	ICL	Recreation
<a href="#">8</a>	2	2	ICL	Recreation
<a href="#">8</a>	3		ICL	Engineering
<a href="#">9</a>	1		BCC	Support Project
<a href="#">10</a>	1	1	AFRC	Support Project
<a href="#">10</a>	2	2	AFRC	Vegetation
<a href="#">10</a>	3	2	AFRC	Support Project

<a href="#">10</a>	4	2	AFRC	Harvest Systems
<a href="#">10</a>	5	3	AFRC	Harvest Systems
<a href="#">10</a>	6	3	AFRC	NEPA
<a href="#">10</a>	7	3	AFRC	Engineering
<a href="#">10</a>	8	3	AFRC	NEPA
<a href="#">11</a>	1	1	IDPR	Recreation
<a href="#">11</a>	2	1	IDPR	Road Storage
<a href="#">11</a>	3	1	IDPR	MVUM
<a href="#">12</a>	1	1	AWR_WLD	NEPA
<a href="#">12</a>	2	1	AWR_WLD	NEPA
<a href="#">12</a>	3	1	AWR_WLD	Vegetation
<a href="#">12</a>	4	2	AWR_WLD	Vegetation

<a href="#">12</a>	5	2	AWR_WLD	Roads
<a href="#">12</a>	6	2	AWR_WLD	Roads
<a href="#">12</a>	7	3	AWR_WLD	Roads
<a href="#">12</a>	8	3	AWR_WLD	Roads
<a href="#">12</a>	9	3	AWR_WLD	Fire
<a href="#">12</a>	10	3	AWR_WLD	Wildlife
<a href="#">12</a>	11	3	AWR_WLD	Vegetation
<a href="#">12</a>	12	4	AWR_WLD	Vegetation

<a href="#">12</a>	13	4	AWR_WLD	Roadless
<a href="#">12</a>	14	5	AWR_WLD	Models
<a href="#">12</a>	15	5	AWR_WLD	Hydrology
<a href="#">12</a>	16	5	AWR_WLD	Fisheries
<a href="#">12</a>	17	5	AWR_WLD	Soils
<a href="#">12</a>	18	5	AWR_WLD	Weeds
<a href="#">12</a>	19	6	AWR_WLD	Wildlife
<a href="#">12</a>	20	7	AWR_WLD	Vegetation

<a href="#">12</a>	21	7	AWR_WLD	Climate
<a href="#">12</a>	22	7	AWR_WLD	Roadless
<a href="#">12</a>	23	7	AWR_WLD	Economics
<a href="#">12</a>	24	7	AWR_WLD	Fire
<a href="#">12</a>	25	8	AWR_WLD	Fisheries
<a href="#">12</a>	26	8	AWR_WLD	Vegetation
<a href="#">12</a>	27	8	AWR_WLD	Wildlife
<a href="#">12</a>	28	8	AWR_WLD	Hydrology
<a href="#">12</a>	29	8	AWR_WLD	Roadless

<a href="#">12</a>	30	9	AWR_WLD	Wildlife
<a href="#">13</a>	1	1	Bennett	Support Project
<a href="#">14</a>	1	1	IDFG	Wildlife
<a href="#">14</a>	2	1	IDFG	Botany
<a href="#">14</a>	3	2	IDFG	Weeds
<a href="#">14</a>	4	2	IDFG	Roads

<a href="#">14</a>	5	2	IDFG	Fisheries
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Comment Text	Alt. Issue	
The Kootenai Tribe of Idaho is writing to express our support for the Proposed Boulder Creek Restoration Project.		
The ALC-Idaho supports active use management of our National Forests.		
The Cow Creek Water Assoc. supports the fuels reduction because our water system is adjacent this project. We also support the recreation and wildlife habitat improvements with this project.		
The KVRI board supports the project and wishes to continue the collaborative effort as <u>potential issues and concerns are analyzed.</u>		
Support the harvesting of the lodgepole pine.		
You should let miners use the lower end of Boulder Creek, it would not hurt it one bit.		
IFG fully supports the purpose and need for the project.		
There is a lack of availability for helicopters Please do not require mandatory winter harvest because winter conditions (deep snow) are often lacking in this area and we currently have numerous projects that drag on due to the lack of winter conditions.		
40 CFR 1508.27(b)(3)(7), (9), and (b)(IO) each contain language that apply to the BCRP. 40 CFR 1508.27(b)(7) includes the following statement. "Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts. Since the KNF is preparing an EIS for the Starry Goat project and the BCRP is directly adjacent to <u>Starry Goat project area, NEPA indicates an EIS is required for the BCRP.</u>		
There is no information in the 19 page BCRP information document regarding the temperature TMDL that is in effect for a number of waterbodies in the Kootenai River and Moyie River Subbasins. Boulder Creek is included in the list of creeks that are included in the temperature TMDL. The NEPA document also needs to provide high quality information <u>regarding roads and sediment issues.</u>		
The fisheries discussion on page seven states that all streams in the project area are properly functioning. Is it correct then that no sediment from FSR 314 entered any waterbodies as a result of the flooding events? As of today's date, the most recent IPNF M&E Report is for the years 2010-2011. The NEPA document needs to provide high quality information indicating the year of the most recent aquatics/fisheries monitoring activities that were completed in the project area and cumulative effects analysis area. How many acres in the project area are located in a rain-on-snow zone? Have there been any r-o-s events <u>within the project area or CEA area after December 2015?</u>		
It came to my attention that a number of the proposed units would affect recreational trails within the project area. The Forest Service might consider using a lighter touch within the immediate vicinity of trails. To the extent practical, I would also recommend against skidding trees across existing trail tread. To the degree that the trail network can be preserved, I think <u>we will not run into opposition from the recreationists that use this area.</u>		
As for temporary road construction, I encourage the Forest Service to fully obliterate and recontour these road segments after harvest activities have concluded. I believe that this is necessary to restore natural drainage patterns, prevent illegal motorized access, and limit <u>the spread of noxious weeds.</u>		
Finally, it is not clear what would happen with the unauthorized roads in Boulder Meadows. Because this is an important area for recreation and wildlife, I would hope that the unauthorized roads in Boulder Meadows would remain closed and removed from the <u>transportation system.</u>		
Boundary County wishes to support the BCRP. Commisioners would also support analysis of the helicopter units and to review the transportain analysis plan (TAPS).		
AFRC supports the main purposes of this project.		
AFRC would like to offer the following recommendations to help with framing the final implementation of the project. Recommendations 1-3, 5, 7 include treating more than the 5510 acres that are currently proposed.		
AFRC believes that one of the purposes of the project should be to support the forest products industry and local communities, since one Idaho study shows that for every one million board feet of timber harvested 18 direct and indirect jobs are created or maintained.		



<p>AFRC does not support helicopter logging 1,887 acres in this project including 1,950 acres of timber harvest. We believe it will make the project uneconomical and go with no bidders. Not only is helicopter logging expensive, but the availability of ships to do the work is also problematic. There are only a few helicopter logging companies available, and during summer months when logging can be the most productive, most of the companies have fire fighting contracts and their ships are not available.</p>		
<p>AFRC suggests using mechanized ground skidding equipment on slopes over 35% to help reduce logging costs. Today's new light touch equipment operates efficiently on steep slopes with minimal damage. A Forest Plan Amendment may be necessary to allow this equipment but we believe it will be the most efficient and economical approach.</p>		
<p>AFRC supports the prescribed fire aspect of the project, however, we believe that a salvage clause should be included in the planning document that would allow for rapid removal of commercial trees killed by prescribed fires that got out of the control guidelines and burned more acres or hotter than planned.</p>		
<p>AFRC has concern about the expensive roads package and the reconstruction of some roads that may not be necessary to the completion of this project.</p>		
<p>AFRC believes that analyzing this project using and Environmental Analysis (EA) is adequate since no significant negative impacts were found to occur on the landscape during operations, rather the actions will improve forest health and benefit other resources as well as reducing the threat of catastrophic wildfire to the Forest and to adjacent land owners.</p>		
<p>We support the creation of new trailheads in the project area. We also support the seasonal designation of Road 2209 because many visitors do not want to walk a road bed to reach trailheads.</p>		
<p>Support the removal of culverts for road storage because culverts tend to get blocked over time and can wash out the road bed, causing environmental impacts.</p>		
<p>The changes to the road system will require updates to the MVUM. Please send me the changes to my address below so I can update the Idaho Trails Application at <a href="http://arcg.is/2hpOnmc">http://arcg.is/2hpOnmc</a></p>		
<p>As part of the NEPA process, please analyze and disclose the results of previous project implementation in this watershed, such as BolderOver and others, including the results of monitoring specified by those NEPA documents. Also, what were project objectives, and how has the FS measured achievement of those objectives?</p>		
<p>The PA would implement the 2015 Revised Forest Plan (RFP). In carrying out its mission, AWR has participated in the public processes concerning management of the Idaho Panhandle National Forests (IPNF) since the early days of original 1987 Forest Plan implementation, and has taken legal action a few times to force the Forest Service (FS) to manage the IPNF in conformance with environmental laws such as the Endangered Species Act (ESA), the National Forest Management Act (NFMA), and the National Environmental Policy Act (NEPA). AWR also participated fully in the public process as the FS developed its RFP, including commenting at every stage and submitting a formal objection. And because the FS provided essentially no relief in response to the formal objection, AWR incorporates the documentation of its participation in the RFP public process within the comments on the Boulder Creek PA. By implementing the RFP with this Boulder Creek project, we believe the FS would be in violation of laws and regulations.</p>		
<p>It makes no sense, ecologically speaking to "increase resilience" to the identified natural processes. An ecosystem that is fully functioning is naturally resilient. When an ecosystem is disturbed, succession according to natural processes occurs. If previous management has led to restoration needs, then the course of action should be to work with natural processes, removing human-caused impediments as necessary.</p>		
<p>What is the scientific basis for the statement that the historic range of old growth is 15 to 35 percent? What is the scientific basis for the inference that forest stands can be actively managed "so they can develop into old growth"?</p>		

<p>The FS believes logging is justified to fund road maintenance across the IPNF. However there exists no forestwide NEPA analysis on that management model—no analysis or disclosures of how efficient timber projects are at providing additional funding, no analysis of the environmental damage because of roads left unmaintained or otherwise in poor condition, and no comparison of alternative road management schemes such as ones that would decommission roads the agency cannot afford to adequately maintain. How does the FS propose to afford maintaining the road system in this project area when the funding doesn't exist, and as a result watershed conditions will continue to deteriorate from naturally increasing erosion?</p>		
<p>The main ecological (as well as budgetary) problem facing the IPNF is the existing excessive network of roads. Although the main focus of the Travel Management Rule Subpart A was to be this excessive road network, the FS sidesteps the issue at every juncture—in the design of the RFP, in the design of projects implementing the RFP, and in the systematic avoidance of fully performing its duties under Subpart A, which requires the agency to minimize the ecological and economic liabilities of the excessive road network by significantly downsizing it.</p>		
<p>The Boulder Creek project analysis must disclose the project area road system's long-term financial liabilities, and the associated ecological impacts due to inadequate maintenance funding.</p>		
<p>The environmental and economic liabilities of all project area roads must be analyzed and disclosed in the FS's upcoming EIS. Please include an alternative that reduces road densities to the maximum extent possible.</p>		
<p>The PA alleges a need to reduce forest fuels in the wildland-urban interface (WUI). Aside from urging landowners to adopt firewise measures on their own land, there's little that "management" can accomplish in the way of reducing risk. When weather conditions arise that are favorable to high intensity fires, which happens more and more these days due to the effects of climate change, those fires will burn regardless of suppression efforts. Please disclose the relative contribution of weather factors to fire spread, intensity, and severity. Please analyze and disclose the forestwide cumulative effects of fire suppression.</p>		
<p>How does the FS intend to maintain viability of species such as northern goshawk, fisher and pine marten, whose populations are diminished by logging as proposed? Is the project area historically Canada lynx habitat?</p>		
<p>The scoping letter alleges that taking management action is responding to RFP DCs by increasing the resilience of the ecosystem. However, to date we've seen absolutely no operational definition of resilience that would allow anybody to actually measure the resilience of the ecosystem as it stands now, or measure the change in resilience following project activities. An essential component of an operational definition is measurement. A simple and accurate definition of measurement is the assignment of numbers to a variable in which we are interested. In this case, the variable in which we are interested is resilience, and how the FS measures it in these ecosystems.</p>		
<p>The RFP's strategy of "moving toward" DCs (e.g., resilience) basically focuses upon static conditions, instead of the natural dynamics of the ecosystem. An abundance of scientific evidence suggests that DCs be conceptually replaced with desired future dynamics, to align with best available science. Kauffman, 2004 states: Restoration entails much more than simple structural modifications achieved through mechanical means. Restoration should be undertaken at landscape scales and must allow for the occurrence of dominant ecosystem processes, such as the natural fire regimes achieved through natural and/or prescribed fires at appropriate temporal and spatial scales. Likewise, Sallabanks et al., 2001 state: Given the dynamic nature of ecological communities in Eastside (interior) forests and woodlands, particularly regarding potential effects of fire, perhaps the very concept of defining "desired future conditions" for planning could be replaced with a concept of describing "desired future dynamics." An accurate ecological analysis of the IPNF reveals too much forest and habitat fragmentation. In describing any landscape departures from the historical range of variability (HRV), please provide a spatial analysis, both for the true reference conditions and of current project area conditions.</p>		

<p>We strongly oppose the proposal to log around 2000 acres in roadless areas and conduct prescribed burning in another 6000 acres to “restore”. The best available science indicates the highest ecological integrity is where there have been no management manipulations such as logging, road building, etc.</p>	<p>????</p>	
<p>Many FS’s analyses rely upon the use of models. The reliability of all the data used as input for these models must be disclosed. Also, the validity of the models needs to be established for how the FS utilizes them. Please cite the best available scientific information which establishes their validity.</p>		
<p>The project would generate sediment impacts with extensive logging, temporary road construction, reconstruction of existing roads, and other actions. Please perform thorough surveys of sediment sources in the project area—that is, comprehensive surveys of all roads and other sites where management activities have caused soil erosion or damage, with quantitative estimates of tons of sediment yield.</p>		
<p>Please address the case law requirement that the FS insure that there exists the quantity and quality of habitat necessary to insure viability of aquatic species of concern.</p>		
<p>Please disclose how soil and land productivity has been affected in the project area and forestwide due to soil disturbing activities and noxious weed infestations. What is the total existing percent of detrimental soil disturbance in the project area? Please cite monitoring results addressing any FS assumptions that soil damage mitigations work as intended. R-1 Soil Quality Standards methodology for “activity areas” inherently encourages gerrymandering areas never logged into project “activity areas”, helping to artificially dilute the amount of effective detrimental soil disturbance from previously logged units by creating a more favorable average.</p>		
<p>Please disclose the efficacy of noxious weed treatments being carried out on the IPNF under previous IPNF decisions.</p>		
<p>The Ninth Circuit Court of Appeals ruled that the Forest Service “must both describe the quantity and quality of habitat that is necessary to sustain the viability of the species in question and explain its methodology for measuring this habitat.” (Lands Council v. McNair). Assuring viability of most wildlife species is forestwide issue. The RFP is not based upon scientific research regarding the forestwide amount and distribution of habitat needed to insure viability of vertebrate species of concern. Furthermore, the FS maintains an inaccurate old-growth inventory. What is the FS’s way of “describ(ing) the quantity and quality of habitat that is necessary to sustain the viability of the species in question” on the IPNF? Also, please “explain (the) methodology for measuring this habitat.” Extensive science argues that the strategy of “moving towards” DCs for restoring wildlife habitat and populations is scientifically deficient. The Committee of Scientists, 1999 recommended management emphasis contrasts with the IPNF’s current management strategy merely emphasizing manipulation of habitat for insuring wildlife viability:  ...An emphasis on focal species, including their functional importance or their role in the conservation of other species, combines aspects of single-species and ecosystem management. It also leads to considering species directly, in recognition that focusing only on composition, structure, and processes may miss some components of biological diversity.  Has the FS adopted the focal species approach on the IPNF?</p>		
<p>Please provide an estimate of how much old growth in the project area has been destroyed by logging. What is the HRV for old growth forestwide? Please disclose the natural historic range vs. current conditions regarding patch size, edge effect, and amount of interior forest old growth in the project area and forestwide.</p>		

<p>Climate change science suggests that logging for sequestration of carbon, logging to reduce wild fire, and other manipulation of forest stands does not offer benefits to climate. Rather, increases in carbon emissions from soil disturbance and drying out of forest floors are the result. Managers of national forest lands can best address climate change through minimizing development of forest stands, especially stands that have not been previously logged, by allowing natural processes to function. Furthermore, any supposedly carbon sequestration from logging are usually more than offset by carbon release from ground disturbing activities and from the burning of fossil fuels to accomplish the timber sale, even when couched in the language of restoration. Reducing fossil fuel use is vital. Please analyze, disclose, and consider the full range of scientific information on carbon storage, vegetation management, and wildfire. Please disclose the body of science that implicates logging activities as a contributor to reduced carbon stocks in forests and increases in greenhouse gas emissions.</p>		
<p>We are opposed to further management manipulations in roadless areas—whether “inventoried” or left out of the official inventory during some arbitrary previous FS process. The PA doesn’t explain why its “purpose and need” cannot be adequately achieved in the roaded portion of the project area.</p>	<p>????</p>	
<p>Please conduct an economic analysis of this proposal that goes beyond the likelihood of receiving bids on the proposed timber sale—an analysis that also discloses all FS costs and expenses. The public has a right to know the true bottom line for this action. Also disclose economic impact of the recent and foreseeable logging on land of other ownership in this vicinity, in order to provide a wider economic perspective of the relatively minor contribution from national forest land.</p>		
<p>Nothing in the scoping letter informs the public about wildland fire ecology. The FS seems institutionally incapable of recognizing the highly restorative and beneficial effects of wildland fire, irrationally maintaining a position that management alone restores forests.</p>		
<p>The NEPA analysis must take a hard look at the condition of all streams and water bodies in the watersheds affected by the PA, and explain how those conditions contribute to fish population and trends.</p>		
<p>Please analyze and disclose the cumulative effects of past, ongoing, and proposed management actions, within a logically defined cumulative effects analysis area, on land of all ownerships. Please disclose the name of any other past logging projects whose analysis area(s) intersect the project area. Please disclose if the FS has performed all of the monitoring and mitigation required or recommended in those NEPA documents, and the results of the monitoring. The FS would be unable to properly analyze and disclose cumulative effects of management plan implementation if it is not adequately informed by past project monitoring and plan-mandated monitoring.</p>		
<p>Please evaluate impacts on species that are affected by human activity including species such as the grizzly bear, fisher, pine marten, wolverine, Canada lynx, native trout and other fish, elk, woodpeckers, owls and other raptors, bats, amphibians, and reptiles. Please disclose all reliable data and the best available science the FS possesses concerning population trends of these species on the IPNF.</p>		
<p>Please explain how your proposal would comply with the Clean Water Act and all state water quality laws and regulations. Designating BMPs is not sufficient for compliance with CWA and NFMA. Please discuss the actual effectiveness of proposed BMPs in preventing sediment from reaching streams in or near the analysis area. What BMP failures have been noted for past projects with similar landtypes? We would like to see a thorough discussion of the BMPs and mitigation measures you would propose. Also, please disclose which segments of roads in the watersheds to be affected by this proposal would not meet BMPs following project activities.</p>		
<p>Please conduct an analysis to determine if the IPNF’s roadless inventory relevant to the project area is accurate. An analysis of potential effects on roadless areas is can only occur if the boundaries are accurate and logical.</p>		

<p>The grizzly bear population size in the CYE is approximately half of the recovery goal of 100 bears (Kendall et al. 2016), with human-caused mortality being the primary factor keeping the population in peril. The RFP doesn't recognize the likely downward trend for the CYE grizzly bear, the failure to approach recovery goals, and the need to repeatedly augment the population in order avoid virtual extirpation here.</p> <p>The RFP doesn't consider most of the U.S. taxpayer funded costs of grizzly bear management in the CYE to be significant for analysis purposes, externalizing a lot of the cost of implementing the logging and other resource extraction directed by the RFP.</p> <p>The FS fails to recognize that Bear Management Units (BMUs) do not protect enough habitat to satisfy most individual grizzly bears' needs in the CYE.</p> <p>The FS has no plan to provide scientifically defensible habitat protections outside the RZ that would allow for a larger protected zone and/or natural augmentation from outside the RZ. The FS has no cogent methodology that provides scientifically defensible habitat protections inside the RZ that would facilitate functional connectivity between and among BMUs.</p> <p>The FS's failure to make and document positive gains across the CYE toward or consistent with even the inadequate BMU core, OMRD, and TMRD standards is consistent with a resource extraction agenda. There is no deadline. And allowing activities that reduce core and increase road densities within and outside the RZ, however "temporary," is also part of this pattern and practice.</p> <p>The RFP direction itself doesn't result in compliance with MS-1 requirements to favor this functionally endangered species.</p> <p>AWR also participated during the public process as the Northern Rockies Lynx Management Direction (NRLMD) was developed, and continues to believe that the RFP/NRLMD does not consider the best available science. The lynx issue was also raised in the AWR RFP Objection concerning Indicator MON-FLS-01-02 and FW-DC-VEG-04.</p>		
<p>I support the efforts of the Forest Service and efforts to protect wildlife and their habitat.</p>		
<p>In order to balance forest openings with wildlife security needs, we recommend providing visual buffers between roads and openings, especially in the seedtree and bum units that border open roads. Ungulate use of openings drops off sharply between 200 to 250 yards from security cover. Therefore, including pockets of reserve trees in units over a quarter square mile will improve habitat suitability in canopy-free areas. Additionally, several of Idaho's Tier I SGCN are terrestrial, cold-air dependent macroinvertebrates, such as the magnum mantleslug and marbled jumping slug. These species are Tier I due to their rare status, low mobility, and subsequent vulnerability to climate change given their cold thermal requirements. Retaining reserve tree clumps in the larger units will be beneficial to both big game as security cover and cold-air dependent macroinvertebrates as a local population source.</p>		
<p>The need for pollinator habitat augmentation is becoming increasingly evident nationwide; four bumblebee species are currently on the State SGCN list, three of which are found in northern Idaho. Adding native, pollinator-friendly seeds to planting mixes (including roadside revegetation) may help keep Idaho pollinators off the endangered species list.</p>		
<p>We recommend at least a three-year weed management plan following burning or logging, especially around travel corridors. Applications are time sensitive and need to be administered annually to limit noxious weed spread and reduce the amount of herbicide applied. Delays can limit the effectiveness of weed control. W whenever possible, we recommend spraying before plants have flowered to protect pollinators.</p>		
<p>Given the growing demand for motorized trails in the region, we recommend signed, legal closures coupled with targeted enforcement efforts to make these closures effective.</p>		

While many of the objectives of the project are upland-focused, we recommend protection of water quality and instream habitat remains a priority throughout the planning and implementation process. We agree that helicopter and skyline yarding will help limit erosion and disturbance compared to ground-based yarding. Additional road decommissioning could decrease sedimentation risk and reduce gate enforcement needs. The replacement Middle Fork of Boulder Creek culvert will restore accessibility of approximately 4 km of additional habitat for fluvial fish. Conservative management in the Riparian Habitat Conservation Areas coupled with monitoring and maintenance of stormwater control features are critical to preserving the resilience of the cold water fisheries in this area.

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