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Forest Service Planning DEIS
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SENT VIA EMAIL AND FAX

The following comments are from Friends of the Clearwater and Wilderness Watch (the portions dealing with wilderness planning) regarding the National Forest Management Act (NFMA) planning rule. Friends of the Clearwater is an organization actively involved in national forest issues in North-Central Idaho. Friends of the Clearwater is engaged in all public aspects of national forest management. Wilderness Watch is a national conservation organization dedicated to the protection and proper stewardship of America's designated Wildernesses and wild rivers. Our board of directors and staff include many who have been involved in Wilderness designation, stewardship, and protection for many decades, including in some cases before the passage of the Wilderness Act in 1964. Our suggestions for the planning rule emphasize our concerns for the stewardship of Wilderness on the national forests.

Introduction

The current planning rule differs little from the past rule that was found illegal. The Forest Service has failed twice already in trying to implement a rule that is unpopular and amorphous. Indeed, it is time to end this experiment to make planning regulations less accountable, euphemistically termed "flexible" in the rule and DEIS. As flawed as they are, the agency should stick with the regulations as a baseline and offer only needed updates and improvements.

Had this occurred, many forests would have updated and revised plans instead of plans that are well beyond the legal limit. The Clearwater National Forest provides an example of this problem. In 1993, six years after the Clearwater National Forest Land and Resource Management Plan (hereinafter forest plan) was produced, a binding lawsuit settlement agreement was made between the Forest Service and plaintiffs. That agreement committed the Forest Service to immediately begin to revise the forest plan. That was 18 years ago. Besides, the plan itself is nearly 24 years old. The time frames of both the forest plan and the settlement agreement—1987 and 1993—are in excess of the maximum life of a forest plan.

Simply put, the effort by the agency to create a totally new planning rule has harmed the effort to timely revise forest plans. While the 1982 regulations are not perfect, they are a sufficient basis from which to create meaningful and accountable forest plans. The Forest Service claims it wants money to go to the ground yet the current effort to create a new rule harms the on-the-ground forest plan revision efforts by taking money and resources away from the local national forests. Rather than throwing good money after bad, the agency should halt this ill-advised process and begin the real work of revising forest plans in a timely manner.

One example of needed changes to the 1982 planning rule the proposed planning rule ignores deals with wilderness stewardship and planning. Nearly 20 percent of the National Forest System—more than 36 million acres—is designated as Wilderness and must be administered in accordance with the Wilderness Act. Yet despite its size and legal mandates, Wilderness on the national forests receives scant attention in the day-to-day affairs of the Forest Service. That is due in part to the dearth of direction provided by previous planning rules. We strongly urge the Forest Service to provide necessary direction in national forest plans to ensure that the agency is meeting its responsibility to protect and preserve the *resource of wilderness* on the national forests. We discuss this issue in more detail later.

Collaboration is mentioned throughout the rule and DEIS. If this were to be interpreted as a commitment to following the National Environmental Policy Act (NEPA), it wouldn't be a problem. However, it appears that is not what is intended. Indeed, the recent models and experiments in collaboration dealing with public land issues shows it to be undemocratic, controlled by local special interests, and in violation of NEPA. In essence, elite groups of local (or regional) people come together to make decisions, couched as recommendations with the support of Forest Service staff and resources unavailable to “ordinary” citizens. Since these recommendations precede NEPA analysis--and there is an implicit understanding the collaborative group's recommendation will be implemented—the NEPA process is rendered a pro forma exercise, contrary to the law. One example of a collaborative here in Idaho illustrates this problem. In an excerpt from an article about Senator Crapo's Clearwater collaborative, written by The Lewiston Morning Tribune's Eric Barker on May 30 2008, it states:

Tom Tidwell, regional forester in charge of national forests in northern Idaho and western Montana, pledged to work to implement whatever the groups come up with. He said anything done on Forest Service land will still have to go through the agency's public process. But he said having broad agreement up front will make the process smoother. “What ever comes out of this effort we are going to be supportive of it,” he said.

This is a tacit admission there won't be an objective analysis of other alternatives prior to a decision being made as is required by NEPA. The quote merely gives lip service to NEPA, stating that the Forest Service will support what the collaborative group decides.

Rather than using this flawed model of collaboration in forest plans, the agency should follow the spirit and letter of NEPA and make sure all views are heard. By diligently seeking out input from citizens and following our nations environmental laws, the agency can make better decisions. Instead of trying to get an upfront “fix” through a highly politicized collaborative process, honest implementation of NEPA will show better results.

How many of those who commented specifically supported the above understanding of collaboration in the scoping comments? How many of those rejected this definition of

collaboration? How many of those mentioned collaboration at all? As noted above, there already exists an avenue for the agency to democratically obtain input from the public and that is NEPA. NEPA, though imperfect, is far more open and democratic than collaborative groups that, by necessity, must limit the number of participants.

Frankly, the rule, which prohibits appeals, seems designed to force unpopular decisions. If you honestly implement NEPA and objectively evaluate alternatives, there is no need to limit citizens rights to administrative reviews of forest plans. In fact, as our scoping comments noted, we also recommend that the planning rule revise the administrative appeal process to provide for a more independent review of appeals. The current process gives those who are very close to the decision too much influence in determining the outcome of appeals. A process that involves “outside” agency personnel, perhaps those with expertise in the issues being appealed, in the review process could result in less bias and better outcomes, and would likely result in fewer instances of litigation over forest plan or project level decisions. This is a far better idea than initiating a pre-decisional objection process which seems to occur at a period in time when neither the agency nor objectors know the final decision.

The comment is divided into two main sections. The first is the rule itself. The second deals with the DEIS. However, there is considerable overlap, especially in the discussion in the federal register preceding the rule itself and the DEIS. Thus, the divisions are not absolute and the comments, including this introduction, should be read as a whole.

The Rule

The rule notes, “Plans should not repeat laws, regulations, or program management policies, practices, and procedures from the Forest Service Directive System.” Only the CFR’s in the directive system or items that have been published in the federal register are actually enforceable. Thus, this seems merely an attempt to make the forest plans less accountable.

The guidelines section of the rule is essentially meaningless. If guidelines are discretionary, then why include them? The standards are far more useful for judging progress and all guidelines should be standards. Currently, in site-specific cases where standards are problematic, the agency amends the forest plan. This process is more transparent and better involves the public.

Wilderness

Wilderness is not addressed in any detail in the proposed planning rule. Many national forests wildernesses have plans that were developed apart from the normal forest planning process, though most have been incorporated into the forest plans. What will be the protocol for developing wilderness management plans in the future?

The direction in the proposed rule for wilderness (219.10(b)(iv)) is confusing and seems inconsistent with the Wilderness Act. First does the requirement to protect the “ecologic and social values” apply to designated wilderness or only recommended wilderness?

Second, protecting the “ecologic and social values” is not precisely the same as the mandate to protect the wilderness character of an area. The mandate in the Wilderness Act is to protect the wilderness character of wilderness. Third, there is no National Wilderness System; there is a National Wilderness Preservation System. The draft planning rule must be changed to reflect statutory mandates and language.

We reiterate our suggestions from our scoping comments:

- Provide clear direction for protecting the wilderness character of each area in the National Wilderness Preservation System (NWPS). This is necessary to meet the statutory mandate in the Wilderness Act: “...each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area.” Each forest plan or wilderness stewardship plan should include measurable indicators and standards that will achieve this goal.
- Define the set of “minimum requirements” for preserving the wilderness character of each Wilderness. These minimum requirements will provide direction for project level decision-making to ensure that wildernesses are administered in accordance with section 4(c) of Wilderness Act.
- Establish a *wilderness character* monitoring and reporting requirement, based on the *Keeping it Wild: An Interagency Strategy to Monitor Trends in Wilderness Character Across the [NWPS]*. USDA Forest Service General Technical Report RMRS-GTR-212. July 2008.
- Require that every administrative structure or installation be reviewed and assessed to determine whether it is the minimum required to preserve Wilderness, and to determine the disposition of each structure or installation. This review and assessment is necessary to determine whether each Wilderness is being administered in compliance with the prohibitions in section 4(c) of the Wilderness Act.
- Clearly document and describe any identified need for the administrative use of motor vehicles, motorized equipment, or mechanical transport.
- Provide for limiting visitor use in accord with a level that will preserve each area's wilderness character including outstanding opportunities for solitude and a primitive and unconfined recreation experience, and that allows natural processes to operate freely. This is similar to the requirements of the 1982 rule at 36 C.F.R. 219.18. In meeting this requirement, consideration should also be given to party size and day use.
- Provide direction and standards for determining to what extent a trail system is needed and is in accord with preserving the area’s wilderness character.

- Provide guidance to ensure agency coordination and of oversight of wildlife management to protect wilderness character.
- Provide guidance to ensure that search and rescue activities are conducted in a manner that has the least impact on wilderness character.
- Provide clear direction and standards for determining the extent to which commercial services are necessary for activities which are proper for realizing the recreational or other wilderness purposes of the area. Where a single wilderness or complex of wildernesses are administered by more than one national forest or administrative unit, ensure that the need for commercial services is coordinated among the individual administrative units.
- Identify staffing and funding levels required to "provide for the protection of [each area], the preservation of [its] wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness." (Wilderness Act section 2(a)).
- Ensure that each administrative unit that administers wilderness has within its staff individuals trained in the use of traditional ("primitive") skills and tools, or has identified other administrative units where those skills reside, such that each administrative unit can accomplish its wilderness stewardship objectives without the use of motor vehicles or motorized equipment.
- Require that each Wilderness have a fire plan that allows, to the extent possible, a natural fire regime to play its natural role in shaping ecosystems in Wilderness. Identify any obstacles to allowing natural fires to burn, and develop a list of actions to overcome or mitigate those obstacles.

Diversity and Viability

Species diversity and viability is a key concern. The proposed rule portions (sections 219.9, .10 and .12) that deal with species viability and monitoring eliminate important protections. The proposed rule substitutes all species and management indicator species with focal species which are poorly defined and do not reflect the consequences of all ecosystem changes or management actions. The 1982 rule provides the basis for a sound planning. Adding native plants and native invertebrates to the 1982 rule language will protect diversity.

Similarly, monitoring needs to follow the 1982 rule. If the agency only looks at habitat, it will not consider the implications of management actions. For example, ORV use may prevent species sensitive to human use from using habitat. Herbicide spraying may affect species as well. Changes to monitoring plans should not be done administratively (219.13) unless they are correction of mere clerical errors. Monitoring must ensure agency accountability to the public and this must be transparent.

Suitability

The suitability provisions leave open a gaping loophole, logging in unsuitable areas. The reality is every timber sale the Forest Service has proposed in recent times in our area is “justified” by reasons other than timber harvest such as so-called forest health or fire prevention. Under current Forest Service practice, the unsuitable lands will be open to as much logging as suitable lands. This is not what was intended in NFMA. Rather, unsuitable lands should prohibit all commercial logging. If tree cutting is needed, it should be done on a non-commercial basis through agency action.

The entire subpart B is intended to reduce public participation and make the agency unaccountable to citizens. It is also contrary to the Appeals Reform Act by placing the appeals process with a pre-decisional objection process to forest plan revisions and amendments. It should be entirely eliminated.

One example of how this subpart is biased against citizens and treats citizens differently is the provision mandating the agency to accept interested parties into the objection process even if they have not gone through the comment process that the objector was required to go through.

Furthermore, there is no clear commitment in the rule to prepare an EIS for forest plan revisions. The narrative in the federal register that is a preface to the proposed rule itself says an EIS will be required, but the proposed rule itself is not explicit. Thus, the opportunity for the public to actually comment on anything concrete is limited. Maybe only a scoping period would be allowed. Even if an EIS is prepared, would the formal comment period be on the draft EIS or would it be on the scoping period? Citizens are asked to provide comments on an amorphous and moving target. This appears to be a shell game where citizens will be told their comments were not explicit enough.

The DEIS

The purpose and need section includes reference to the FY 2007 to 2012 strategic plan. Did this plan go through NEPA, RPA and NFMA compliance? If not, why not? What level of public involvement took place for that plan? This is an important issue as it seems the forest planning regulations are tying to that document.

The DEIS alleges that the 1982 planning rule was too long and cumbersome. However, it has been 20 years since the agency embarked on a new planning rule, over twice the period of time between the 1982 regulations and the time the agency embarked on revising the rule. National forests in which Friends of the Clearwater is involved completed forest plans within the 1982 to 1991 time frame but have yet to revise those plans. As such, it is not the 1982 planning rule that is a problem, rather it is the Forest Service’s inability to produce planning rules consistent with NFMA and NEPA in a timely manner. How can the agency credibly claim the 1982 regulations are broken when forest plans were completed in a timely manner under those rules but the process has

stopped because the agency has spent years revising regulations that propose to limit public involvement and agency accountability?

Also, the DEIS admits the agency's 2000 planning rule, "would require significantly more time and budget than the Agency had previously committed to updating and maintaining unit plans." Since this rule is largely based on the approach of the 2000 rule (as were the various rule under the Bush Administration), how can the agency claim it will improve management? The data clearly suggest the 1982 rule, despite its problems, is the most effective one to implement.

The purpose and need also states that science needs to play a greater role in the planning rule. How can the agency claim the 1982 planning rules are not based on science when the current proposal would weaken the scientific rigor of monitoring and biological diversity of the 1982 rule? Furthermore, how can the agency claim the new rule is more science-based when it appears to consider certain cultural values as the same kind of knowledge as science? Specifically, cultural values, "expressed through oral traditions, ceremonies, stories, dances, songs, art, and other means within a cultural context." Though these are important values for all cultures, the rule's apparent conflation of these cultural values with science is puzzling and verges on post-modernist ideology that was debunked by serious scientists and intellectuals in the 1990s. While a final forest plan will and should attempt to incorporate the values of society in making allocation decisions, science, which is ostensibly value neutral, should not be conflated with these other values.

Similarly, the agency tends to conflate science with values in order to try and claim its own agenda is based on science whereas other approaches are based on emotion. Agency decision makers need to be aware of their own values and biases. One of these biases can be illustrated by the study that suggests the 1982 regulations are too complex and cumbersome. The real issue is not the complexity of the 1982 regulations, rather the fact that the regulations require the agency to be accountable to the American public. The referenced "study" is more a political document, with some policy implications thrown in than it is a policy document informed by science.

The DEIS also addresses collaboration. The problem is this is a biased discussion that misrepresents issues. For example, there is no clear definition of precisely how collaboration would work. Unfortunately, elite groups making decisions outside of the public eye dominate the existing models. Collaboration, as it has been done, is not transparent and the DEIS is flawed in its analysis. What evidence supports the allegation that the agency, because of collaboration, is now more transparent in its dealings with the public? What is the legacy of collaboration in recent years? Without a clear definition, the DEIS inadequately analyzes collaboration. It includes no critique of how collaboration has proceeded in recent years. Examples such as the closed process called a collaboration that led to the Tester bill in Montana (now supported by the Forest Service) are simple backroom deal making. Simply put, the DEIS suggests collaboration is transparent when all the evidence suggests the contrary. A process that is locally driven and, by nature, can only include local entities, is not one that involves the broader public.

Unless collaboration is defined to mean giving equal weight to all American citizens versus those who live in the area and soliciting input from all without biasing those from the local area, then it is not a transparent or open process. Indeed, the DEIS rejected full analysis of an alternative that valued local input above others.

The range of alternatives is seriously flawed and inadequate. For example, why is there no alternative that provides the protection of the 1982 rule in terms of monitoring for biodiversity with the addition of plants and invertebrates?

Also, the comparison of alternatives is biased. The DEIS suggests, without proof, that collaboration will ensure a full spectrum of multiple-uses is considered. Is it the agency's opinion that it violated the MUSYA and other laws in forest planning in the past as this part of the DEIS suggests?

The DEIS is flawed in its analysis of resources and impacts. One of the most profound is the assumption that active fire suppression has profoundly altered ecosystems. One of the biggest problems with the section on vegetation is the mistaken belief that most of the national forest system has somehow been drastically affected by fire suppression. Scientific references that dispute the agency's outdated view of fire ecology are addressed below. Dr. William L. Baker. *Fire Ecology in Rocky Mountain Landscapes* (Island Press 2009). This book by a respected fire ecologist undoes the agency dogma with regard to fire.

Increasingly, scientists have discovered that CLIMATE not fuel amount is the main determinant of fire severity. Josh McDaniel, in an on-line article (<http://grist.org/news/maindish/2006/10/23/mcdaniel/?source=daily> Blazing Addles: What climate scientists have learned from Western wildfires, 23 October 2006) is revealing. That article discusses research that appeared in Science in August of 2007. McDaniel's article states:

For the past two decades, Swetnam has been examining the fire scars nested within tree rings of long-lived species across the West, such as ponderosa pine, juniper, pinyon pine, and sequoia. By precisely dating each fire recorded within the rings, Swetnam has been able to reconstruct periods of increased regional fire activity going back to the 18th century. Using climate data from the same period, he has been able to show the connection between severe wildfire seasons that appear in the historical record and El Niño and La Niña climate patterns. The wet years of El Niño encourage growth in forests and vegetation, while the following dry La Niña periods turn the forests into a tinderbox. Could it be that the present ratcheting up in wildfire activity is just part of that long-term pattern, and not attributable to climate change?

"It is possible. El Niño and La Niña cycles are important," says Swetnam. "However, the size and scale of the fires we have experienced over the last few years are orders of magnitude greater than anything from the past century. We are getting reports from the field of extreme fire behavior. In my scientific

judgment, there is a link between human-caused global warming and wildfires, but we do not have the evidence to prove that yet. Within the scope of our study we can say that the West has gotten warmer and that has led to more wildfires regionally. Other research is being done on causation."

*Swetnam says that **before he worked on this latest research**, he was skeptical that climate was driving the latest increase in fire activity. He thought the main drivers were forest conditions -- the large amount of fuels that had built up in western forests after decades of fire suppression and exclusion. In other words, Smokey Bear did his job a little too well. We have just been putting out too many fires. (Emphasis added)*

The last paragraph is important. Furthermore, one of the lead scientists for the Science article noted above, Anthony Westerling, is quoted in McDaniel's on-line article

"The fuels management story is very important in certain sub-regions, but the areas most affected by management are not generating the biggest share of the increase in wildfire," Westerling says. "The biggest share of the increase occurred in mid-elevation forests in the northern Rockies where fire activity was least affected by past management. Even in a place like the Southwest, where past management is very important, it is still the case that the area burned in early snowmelt years is more than two and half times as much as the area burned in late snowmelt years."

In essence, fire suppression has likely had little influence on the ecology over much of the Rockies. Simply put, trying to force the ponderosa pine model from the Mogollon Rim in Arizona and New Mexico (or longleaf pine in the Southeast) on the entire national forest system is scientifically wrong.

We also refer you to *Wildfire: A Century of Failed Forest Policy* (Foundation for Deep Ecology/Island Press 2006). It contains the best synthesis of the fire ecology in the Rockies region, if not the country, and a most extensive bibliography.

The justification given for this DEIS is based upon a false narrative. That narrative goes something like past fire suppression has caused more trees to grow in this area and we need to log the forest to save it from catastrophic fires, to prevent loss of homes, and to make the forest look more like it used to look (say, 1850). Fires used to be frequent and non-lethal and trees used to all be widely spaced. That is the falsehood the Forest Service and the timber industry have foisted upon the public. It ignores science and common sense. Problems with this narrative include:

1- Most of the forest types within the Rockies, especially the US Northern Rockies, naturally have lethal fire regimes. Most of these types have not been appreciably affected by fire suppression. Fire Groups 3, 4 and 5 consist of lodgepole pine and/or lower subalpine dry and/or moist habitat. The effect of fire suppression in these types are either "difficult to quantify" (due to the long intervals) and/or "fire exclusions has not

measurably altered” these forests, also because of the long fire interval. (Smith and Fischer 1997, INT-GTR-363). Even in the drier forest types in our region, lethal fires are natural (see for example recent research Baker et al. 2007. Fire, fuels and restoration of ponderosa pine-Douglas fir forests in the Rocky Mountains, USA. *J. Biogeogr.* (2007) 34: 251-259).

2- Climate, not fuel amounts is the main driver of fire lethality. Research is showing that it is climate that is contributing to the increase of fires in the last 10 to 15 years, the hottest years on record. Logging won't decrease but rather will increase the risk of fire.

3- Given global warming and other human or natural-changes, it may not be possible (nor desirable) to try and replicate some forest conditions of the mid-1800s. Indeed, the current classifications of forest types may drastically change due to global warming.

4- Research shows that forest function and health are best kept through natural processes (of which fire is a part). Logging is not a natural process. Processes are more important than structure.

5- Forest structural changes that have occurred on the landscape are mainly due to logging.

The existing scientific studies provide some important data that support the above-noted points. There is good evidence that, in high elevation areas, that these moderate (Barrett, S.W., et al.1991. Fire regimes of western larch-lodgepole pine forests in Glacier National Park, Montana. *Canadian Journal of Forestry Research* 21-1711-1720.) and severe fire regimes (Weir, J.M.H., Chapman, J.K., and E.A. Johnson. 1995. Wildland fire management and fire regime in the Southern Canadian Rockies. In. *Proceedings: symposium on fire in wilderness and park management*. Brown, J.K., Mutch, R.W., Spoon, C.W. and R.H. Wakimoto, tech. coords. 1993 March 3--April 1, Missoula, MT. INT-GTR-320. Ogden, UT: USDA, Forest Service, Intermountain Research Station.) have not been affected by fire suppression. Simply put, fire intervals are long and the supposed effectiveness of fire suppression (circa 1950 to 1990) was a wetter period across the West.

Fire lethality (catastrophic) tends to be mainly a function of climate (see Turner, M. et al. 1994. Landscape dynamics in crown fire ecosystems. *Landscape Ecology* 9(1): 59-77. and Turner, M. et al. 1994a. Effects of fire on landscape heterogeneity in Yellowstone National Park, Wyoming. *Journal of Vegetation Science* 5:731-451, and Pierce, Jennifer L. Grant A. Meyer and A.J. Timothy Jull. 2004. Fire-induced erosion and millennial-scale climate change in northern ponderosa pine forests. *Nature* Vol. 432 87-90.).

Fire suppression apparently has done little if anything to change the natural occurrence of lethal fires in this area. In any case, no fire year in the recorded past has come even close to approaching the size and intensity of the fires of 1910 which occurred before all of the so-called fire suppression.

Baker and Ehle (2001, Can. J. For. Res. Vol 31) note in the abstract of that peer-reviewed paper:

“Present understanding of fire ecology in forests subject to surface fires is based on fire-scar evidence. We present theory and empirical results that suggest that fire-history data have uncertainties and biases when used to estimate the population mean fire interval (FI) or other parameters of the fire regime. First, the population mean FI is difficult to estimate precisely because of unrecorded fires and can only be shown to lie in a broad range. Second, the interval between tree origin and first fire scar estimates a real fire-free interval that warrants inclusion in mean-FI calculations. Finally, inadequate sampling and targeting of multiple-scarred trees and high scar densities bias mean FIs toward shorter intervals. In ponderosa pine (Pinus ponderosa Dougl. ex P. & C. Laws.) forests of the western United States, these uncertainties and biases suggest that reported mean FIs of 2–25 years significantly underestimate population mean FIs, which instead may be between 22 and 308 years. We suggest that uncertainty be explicitly stated in fire-history results by bracketing the range of possible population mean FIs. Research and improved methods may narrow the range, but there is no statistical or other method that can eliminate all uncertainty. Longer mean FIs in ponderosa pine forests suggest that (i) surface fire is still important, but less so in maintaining forest structure, and (ii) some dense patches of trees may have occurred in the pre-Euro-American landscape. Creation of low-density forest structure across all parts of ponderosa pine landscapes, particularly in valuable parks and reserves, is not supported by these results.”

Even if we are to accept the agency’s hypotheses of fire-suppression and historic range of variability, it should be noted that Tiedemann et al. (2000) challenge the use of “historic range of conditions” and call into question the whole notion that we can, or even should, try to replicate such conditions by stating:

“Nearly 100 years of fire exclusion, possible climate changes, and past management practices may have caused these communities to cross thresholds and to reside now in different steady states.”

The above research contradicts the Fire Regime Classes used in the DEIS. At the very least, the DEIS should have presented the uncertainty surrounding the state of fire science and the emerging consensus that presents a picture far different than the high-frequency, low-intensity, equilibrium view of fire ecology implicit in the model used in the DEIS.

Rather than the approach in the DEIS, the agency needs to address fire policy in a sane way from ecological and economic perspectives. Much of the concern over restoration in the DEIS would be alleviated by letting natural fire play its role (it will do that anyway) and spending less on fire suppression efforts.

Another premise in the DEIS is that natural systems can't recover so we must muck about. The problem of unintended consequences is not adequately addressed. Much less emphasis on vegetative restoration (logging by another name) and more on intensive (road removal, culvert replacement, and dam removal) will be less expensive and more effective.

A major problem with the DEIS is that it completely misses wilderness as an issue for evaluation. The kind of planning rule that is adopted could have profound effects on the national forest component of the National Wilderness Preservation System.

The DEIS analysis seems to lead one to a pre-determined conclusion. The analysis is not comparable between alternatives and it seems different standards and assumptions are being applied. Examples of these issues are addressed above.

Given the lack of alternatives, the inconsistent analysis of impacts, it is difficult to determine long-term impacts of this proposed planning rule. Logic dictates that decreased accountability in terms of required standards will result in degraded resource conditions. The cumulative impacts of implementing a rule that has fewer enforceable standards will result in decreased water quality and species habitat given current and projected uses of the national forests.

Summary

The DEIS and proposed planning rule need significant revision. Keeping the body of the 1982 rule intact and adding additional necessary direction (wilderness, for example) is necessary. Please keep us updated on these planning regulations.

Sincerely,

//s//

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