

V Public Comment on the Draft EIS and Forest Service Response

A Introduction

This chapter discusses efforts to involve and consult with the public during formulation of the Forest Plan and Final Environmental Impact Statement (FEIS). It also lists and responds to the comments received during the public comment period for the Proposed Forest Plan and Draft Environmental Impact Statement.

The Forest Service conducted an active public involvement program throughout the forest planning process. Federal, State, and local government agencies were informed and consulted. Individual Forest users and interest groups participated in meetings and sent in their comments.

"Consultation With Others Between the Draft and Final EIS" is the first section in this chapter. This section summarizes the public involvement efforts undertaken throughout the planning process, and the number, type, and general tone of the responses received during the comment period.

"Comment Summaries and Forest Service Response" is the next section. This section contains summaries of all the comments received during the comment period. A Forest Service response to the concerns mentioned in the summaries will follow each issue summary.

"Copies of letters received from Federal Agencies, Elected Officials, and Indian Tribes" is a section containing reproductions of the letters and comments received during the public comment period, from Federal Agencies, Elected Officials, and Indian Tribes.

"List of Agencies, Organizations, and Persons to Whom Copies of the Statement Have Been Sent" is the last section of this chapter. It lists all of the people, organizations, and agencies to whom copies of this environmental impact statement and Forest Plan have been sent.

B Consultation with Others Between the Draft and Final EIS

The Proposed Forest Plan and Draft Environmental Impact Statement were filed with the Environmental Protection Agency and made available to the public on August 14, 1987. A Notice of Availability was published in the *Federal Register* on that same date. News releases were prepared for the media throughout Oregon.

Approximately 1,800 copies of the Overview and 900 copies of other sets of the documents were distributed to the people and organizations on the mailing list. Copies were also available for review in public and college libraries in Burns, Bend, Ontario, Eugene, Corvallis, and La Grande, and at Forest Service offices throughout Oregon. The deadline for submission of written comments was November 14, 1987. This was later extended to December 14, 1987.

Four public meetings were held during September, 1987, to present the Proposed Plan and to answer questions. The public meetings were announced through the media and through posters placed throughout Grant and Harney counties. These meetings were held in John Day, Burns, Praine City, and Long Creek. Approximately 100 people attended these meetings.

1 Public Comments

The Malheur National Forest received input from 3,563 people, organizations, and agencies in the form of letters, questionnaires, petitions, coupons, and form letters. Table V-1 displays the number of each type of response received. These inputs will be generically

referred to as letters, except when greater detail is indicated, throughout the rest of this chapter.

Table V-2 displays a summary of who commented. Table V-3 shows where the letters came from geographically.

Accompanying some of these tables are Figures (V-1, V-2 V-3) to visually display the relationship, numbers, and percentages of each table component.

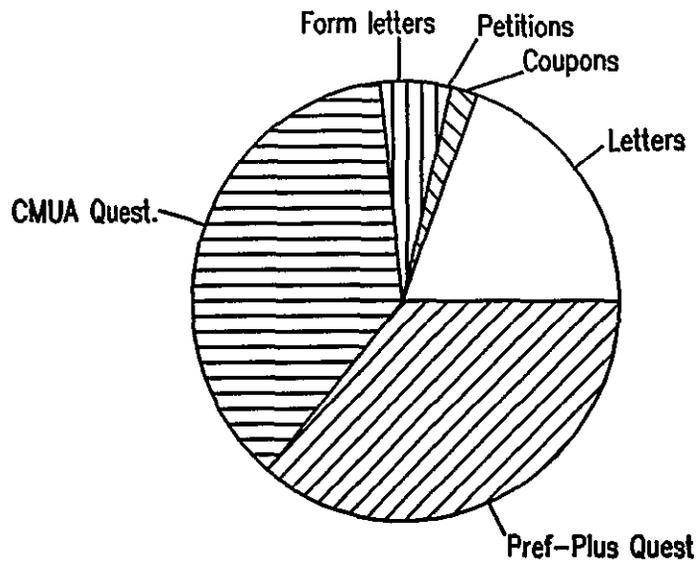
TABLE V-1: Public Response by Input Type

Input type	Total	Additional Comment _{1/}	No Additional Comments _{2/}	Not supporting That Alternative
Letters	686			
Coupons	71			
Petitions	4			
Form Letters	191			
Citizen's Multiple Use Questionnaire Preferred-Plus Questionnaire	1,324	1,185	6	133
	1,287	985	184	118
Total	3,563			

1/Additional comments were written on the response form by the respondent.

2/The respondent marked the boxes on the form but did not add any additional comments

FIGURE V-1 Public Response by Input Type



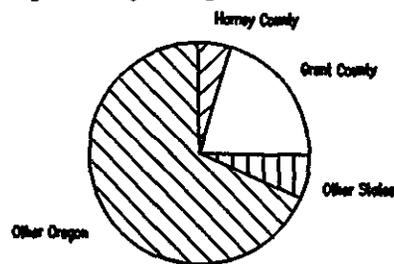
**TABLE V-2:
Response by Respondent Type**

Individuals	3,425
Local Agencies	8
Agencies from Other States	1
Federal Agencies	9
Local Elected Officials	6
Environmental Groups	13
Academic Groups	4
Professional Societies	2
Civic Groups	2
Business Groups	3
Commodity Interests	57
Service Interests	7
Mechanized-Recreation Interests	5
Nonmechanized-Recreation Interests	2
Hunting and Sports Interests	5
Tribal Governments	2
Other	2
Total	3,563

**TABLE V-3:
Response by Respondent Location**

Grant County	743
Harney County	165
Other Oregon	2,430
Other States	225
Total	3,563

**FIGURE V-2:
Response by Respondent Location**



The major conclusion that can be drawn from these tables is that the level of interest by individuals was high and that most of the respondents took the time to write down comments about their major concerns as opposed to checking a box on a form.

The major concerns of the respondents are summarized in the following tables. Table VI-4 displays the number of comments about each alternative considered. Table VI-5 displays the number of comments about various subject areas. These displays give a general indication of the subjects and alternatives which were of most interest to the people reviewing the planning documents.

TABLE V-4: Public Response by Alternative

Alternative	Number of Comments
A - No Action	7
B - Resource Planning Act	4
C - Maximum big pine, amenity emphasis	38
D - Moderate level amenity/commodity	4
E - Maximum small pine	10
F - Preferred	1,740
F - Departure	5
G - Maximum commodity with maximum roadless areas	4
H - Maximum big pine, commodity emphasis	9
NC - No Change	12
Preferred-Plus	1,438
Citizen's Multiple Use	1,716

FIGURE V-3: Response by Alternative

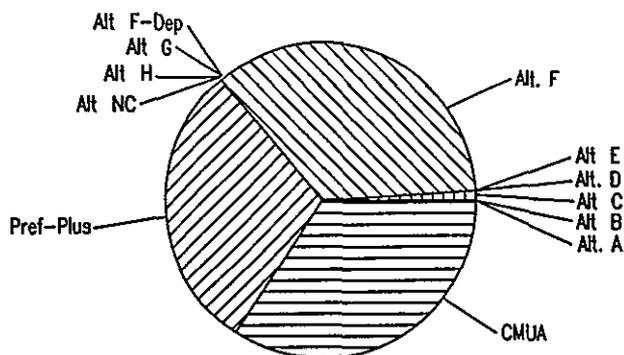


TABLE V-5: Public Response by Subject Category

Subject Category	Number of Comments
Timber	4,966
Range	3,581
Recreation	3,375
Wilderness	220
Roadless Areas	3,888
Wild & Scenic Rivers	82
Minimum Management Requirements	155
Wildlife	557
Old Growth	490
Big Game	3,540
Fish	1,761
Water	2,025
Riparian Areas	597
Visuals	180
Lands & Minerals	415
Protection	245
Insects & Disease	137
Roads	2,013
Air	16
Soils	231
Research Natural Areas	35
Economics	2,257
Social Factors	224
Indian Rights	22
Cultural Resources	24
Outside the Scope of Planning	
Log Exports	9
Sustained Yield Unit	47
Grazing Fees	66
Development in Wilderness	9
Grazing in Wilderness	5
Other Miscellaneous	40

TABLE V-6: Public Response by Selected Sub-Categories

Sub-Category	Number of Comments
Timber - general	77
Reforestation	104
Departure from long-term sustained yield	6
Below cost sales	60
Species mix	71
Land suitability	35
Harvest methods/logging systems	465
Timber stand improvement	47
Utilization standards	81
Uneven-age management	144
Yield tables	32
Conversion ratio	13
Inventories	8
Timber values	35
Firewood supply	31
Accessibility of firewood	7
Quality of firewood	3
Long-term sustained yield	277
Ponderosa pine management	198
Sale level of 203 MMBF	1,461
"Current" sale level	24
Sale level of 260 MMBF	929
Sale level of preferred alternative	237
Other sale level	521
Road management	84
Range - general	186
Range condition	61
Range productivity	120
Wild horses	14
Permit administration	136
AUM levels	2,940
Other (mostly noxious weed control)	124
Recreation - general	100
Road management for recreation (esp hunting)	1,318
"Hunting, fishing, and recreation"	1,356
Hunting	141
Fishing	77
Trails	138
Dispersed recreation	76
Off-road vehicle use	63
Handicapped/elderly access	32
Camping	20

Sub-Category	Number of Comments
Big Game - general	85
Road management for habitat	1,450
“Deer and elk”	1,380
Elk winter range	125
Cover	120
Elk habitat-general	114
Deer habitat	105
Big game numbers	92
Competition for forage	59
Elk summer range	22
Other	8
Economic considerations - general	407
“Jobs and county revenues”	1,337
Jobs	243
Receipts to counties	85
Diversity in economy	76
Forest Service budget	53
Personal income	18
Present Net Value	11
IMPLAN	2
Fish - general	178
“Salmon, steelhead, trout”	1,355
Anadromous fish	103
Resident fish	62
Habitat enhancement	40
Mitigation	14
Water - general	45
“Watersheds, fisheries, irrigation”	1,349
Watersheds - general	335
Water quality	143
Water timing/irrigation	89
Water quantity	40
Other	24
Roads - general	115
“Constructed roads”	1,369
Miles of planned roads	245
Road closure management	170
Miles of existing roads	55
Road maintenance	34
Road costs	25

2. Citizens Working Group

In March 1988, the Forest invited all those who commented on the Proposed Forest Plan and Draft EIS to participate as members of a “Citizens Working Group.” The purpose of the working group was to bring together interested and affected publics, representing a variety of viewpoints regarding the management of the Malheur National Forest, to discuss the Forest Plan

The first meeting was held in April 1988 with over 50 people attending. Objectives of the meeting included (1) build rapport among participants; (2) clarify understanding of public comments of the draft planning documents, (3) planning process update, and (4) identify a smaller group to meet for a two-day meeting in May.

A second "Citizens Working Group" meeting was held in May 1988 with a group of 21 who had been chosen by the larger group at the first meeting. The objectives of this second meeting were to (1) continue to build rapport among participants; (2) review preliminary results of the analysis of issues; (3) review information about issues developed at the first meeting, (4) explore potential areas of agreement among participants, and (5) narrow the scope and clarify areas of continuing disagreement.

Both "Citizens Working Group" meetings were instrumental in the Forest effort of interpreting the public's concerns. It was perceived by most of those involved that the objectives for both meetings were met. In particular, the second meeting by virtue of being a smaller and more workable gathering, created a greater awareness of what the various publics were trying to tell the Forest.

The format and atmosphere of the second meeting seemed to be the key to providing the maximum amount of organized interaction possible in the time available. Once the group agreed upon the meeting objectives, each of the five major issues were addressed equally as follows.

A write-up was provided for each participant that described what had been proposed in the Plan, what the public comments said, and summarized the small group comments from the first "Citizens Working Group" meeting. A resource specialist for the issue at hand described the analysis that the Forest had done in response to public comment. The group then divided into three randomly chosen small groups to discuss the analysis information presented and to try and achieve the following goals: put themselves in the Forest Supervisor's shoes, ("if you were him, what would you do?"), describe evaluation criteria ("We don't know what you should do, but whatever you do, it MUST ") Each small group was also charged with exploring for areas of agreement and narrowing the scope of differences.

The following paragraphs are summaries of what the small groups said about the key issues.

Elk Habitat

There is public support for road closures in areas where elk habitat is of concern. Road management, including seasonal and permanent closures, is a key to managing big-game habitat. The road management policy should be area specific with clear objectives and be a key factor in project planning.

Habitat effectiveness levels should determine project planning and implementation. The affect of big-game herds on private lands should be seriously considered when managing habitat. The Forest should ensure that public lands are capable of supporting a healthy and vigorous population of wintering elk through proper timber management and forage enhancement. Timing and spatial distribution of activities on winter range should be considered in planning. Harassment of game needs to be limited, but all activities do not necessarily need to be stopped. Corridors through winter ranges need to be considered.

Roads

The Forest should develop a comprehensive road management policy for seasonal and permanent road closures. The Forest transportation network needs to be examined on a watershed basis, not a sale-by-sale basis, to ensure that long-term needs are met. Existing roads should be considered before new roads are built and both planned and

existing roads need to be reviewed for possibility of permanent closure. Roads no longer needed for management should be rehabilitated. Roads should be designed and built to the lowest standard that meets the management objectives. All resource values need to be considered in the design and construction of roads.

Riparian Areas

Riparian management is a national issue and needs to be looked at with a national perspective. There are many important values and resources to be considered when managing riparian areas. Anadromous fish should not be the only concern.

All groups agreed that it will be a challenge to implement riparian management standards. Generally, the option of no timber harvest in riparian areas was not favored; although, some did approve of this management practice. It was also a point of agreement that various options and alternate solutions be identified before decreasing grazing use in riparian area.

The Forest needs a standardized approach to riparian management. Baseline data (riparian inventory) is needed as soon as possible. There should be site-specific information and maps of unsatisfactory areas. The Forest should look beyond the immediate riparian area and into total watershed needs. There is a need for site-specific management which considers all impacts and values using an interdisciplinary approach, blanket solutions are not acceptable. Managers should be flexible to meet site-specific needs, using percentages/numbers as guidelines.

The Plan should clearly describe what kind of management will be applied. There needs to be an aggressive monitoring program.

Roadless Areas

A point of agreement was that there are many different values in each roadless area and there was support for the Forest reviewing specific attributes of each area. In the decision, the Forest needs to consider productivity of sites, soils, economics of timber harvest, and overall effects of management on the rest of the Forest, as well as site-specific attributes. The Forest should also consider other management options that recognize mutual compatibility of resource management. Everyone realized that no matter what management is chosen, there will be trade-offs.

Timber

Uneven-aged management. The options considered so far cause great concern about the loss in timber volume. The Forest should consider other options to reduce fall down and look at what the Winema and Deschutes have done with uneven-aged management. The biological factors of the site and impacts of management should determine the timber management system used.

Timber yields. Most agreed that there were major problems with the validity of yield tables. The Forest should analyze data before the plan is finalized and/or validate data during the first years of plan implementation.

Management of understories. There was agreement that they should be managed with multiple use objectives and meeting site-specific concerns. The estimate of the proportion of understories that are manageable should reflect data that has been collected on the ranger districts. Prescribed burning should be used as a tool. Pruning is not an economically viable option. It was agreed that the mix of species and size classes is important to the community. There needs to be more time to develop a market for fir.

Recreation (this was an optional lunch time discussion)

There was discussion about the potential of developing off-highway vehicle use areas that would be managed pro-actively to be competitive for available funds and attract organized users to the area. Some mentioned the advantages to include economic boost to area, management and resource protection, and meets the desires of some users. Others voiced the disadvantages as being overly restrictive for some users, resource damage in some areas, overly promotes area and brings people related problems (vandalism, etc)

General Messages

There were some points that appeared to be raised in every issue discussion. Due to the frequency of these points surfacing, it can be concluded that the groups agreed and felt strongly about the following points

- a Site-specific emphasis came up in all areas
- b Monitoring funding should be tied to project funding up-front. If you can't monitor, don't do it.
- c Forest standards and "best management practices" need to be more objective and less subjective
- d Need to address the impacts from surrounding Forests and communities on the local area (subregional analysis)

C Comment Summaries and Forest Service Response

The number of comments about a subject area is a general indication of the intensity of interest in that subject. The following is a summary of people's concerns about the various subject areas. Each comment summary is followed by the Forest Service response to those concerns.

REQUESTS TO ANALYZE ADDITIONAL ALTERNATIVES

Comment Summary

During the public review and comment period, the Forest was requested to analyze three additional alternatives. The first two requests were made by the Grant County Conservationists, for the "Grant County Conservationist Alternative" (GCC) and also an alternative called the "Citizen's Multiple Use Alternative" (CMUA). The latter alternative was developed by a coalition including the Grant County Conservationists, the Oregon Natural Resources Council, the Oregon Hunters Association, the Oregon Wildlife Federation, and other organizations. A considerable number of form letters were received suggesting that we adopt the "Citizen's Multiple Use Alternative."

Also during the comment period, a coalition of timber industry representatives developed their own alternative, "Alternative Preferred-Plus - The Community Oriented Plan." Again, a considerable number of form letters were received suggesting that we adopt "Alternative Preferred-Plus" as our preferred alternative. This alternative was also supported by such industry organizations as Associated Oregon Loggers, Northwest Forest Resource Council, the Northwest Forestry Association, and the Western Forest Industries Association.

Forest Service Response

Under the National Environmental Protection Act regulations, Federal agencies are Response required to consider all reasonable alternatives when preparing Environmental Impact Statements. If comments on the Draft EIS suggest that alternatives not analyzed in the Draft EIS should be considered, the agency must give them serious consideration.