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Management



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

Executive Summary

Prepared by the

*Content Analysis Enterprise Team
October 1998*

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Executive Summary

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Introduction

Background

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

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

Introduction

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

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

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

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.

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

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

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

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.

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

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.”

Public Involvement Process

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.

National vs. Local Stakeholders

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

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

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

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

Introduction

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

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
Total	39.84%	33,030

* 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

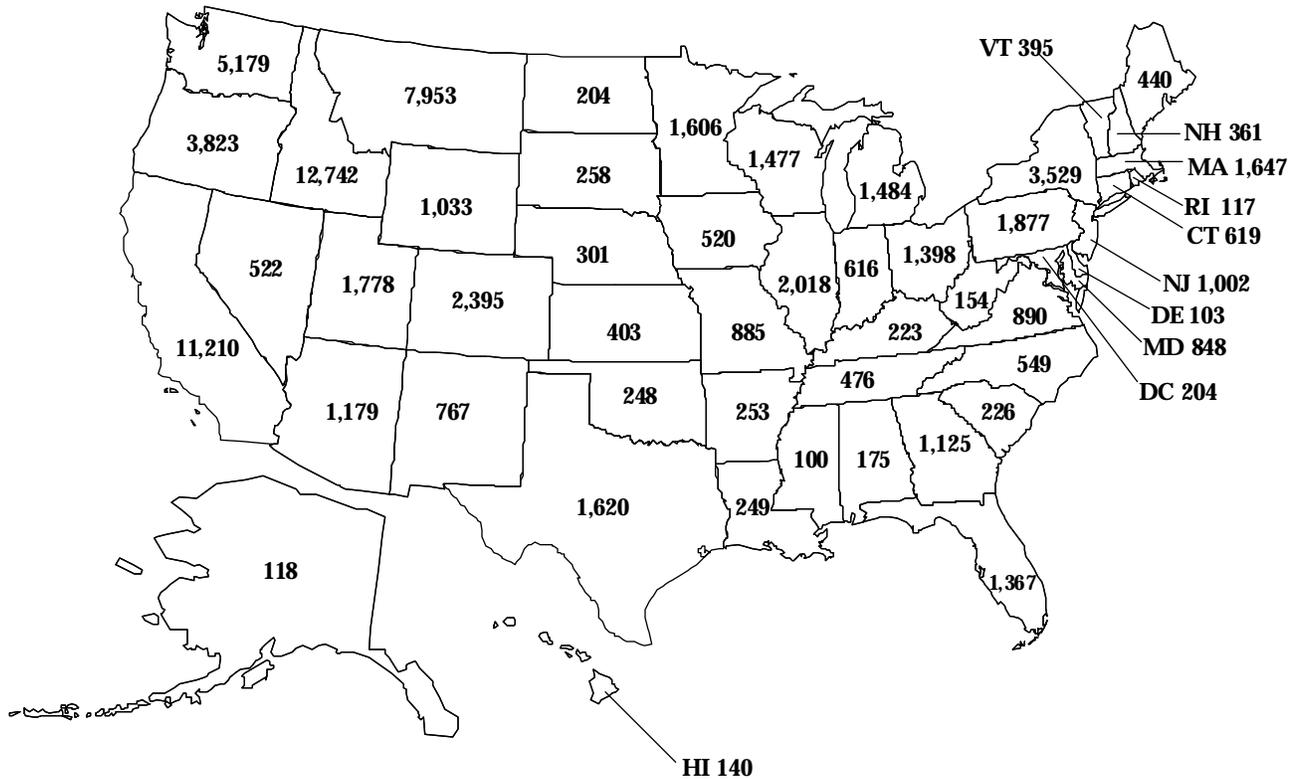


Figure 1. Number of comment letters received, by State.

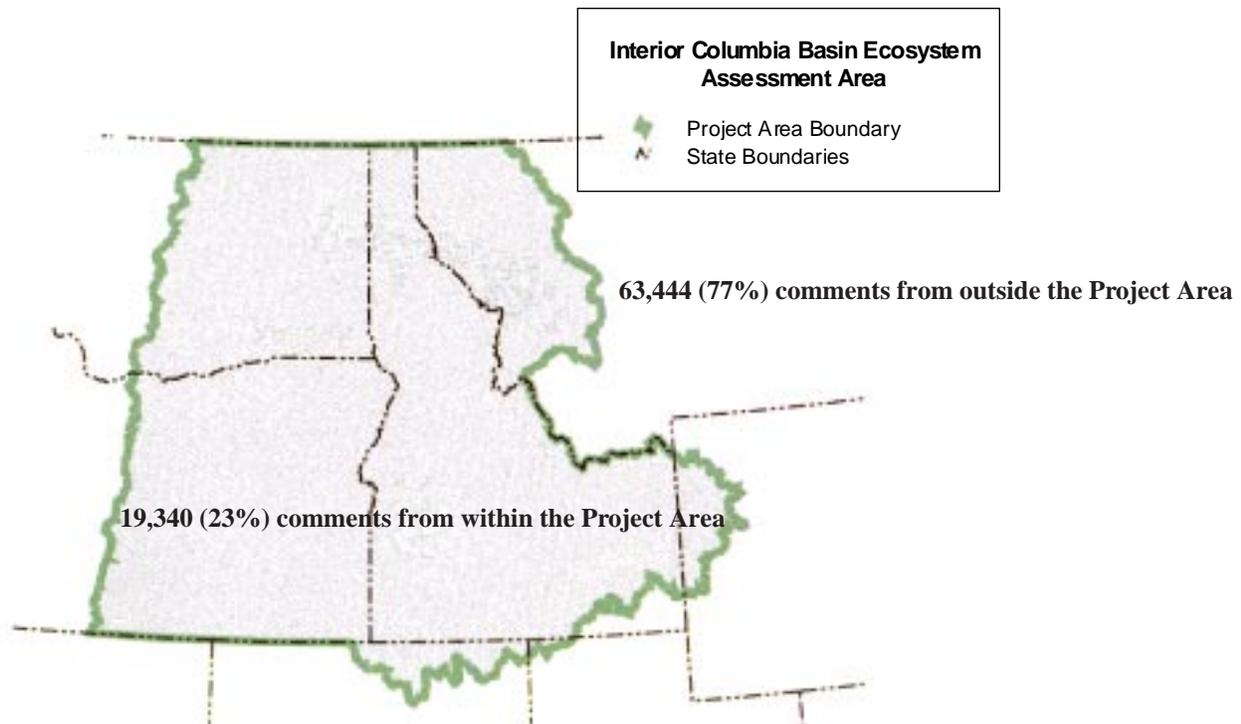


Figure 2. Comparison of the number of responses from within and outside the project area.

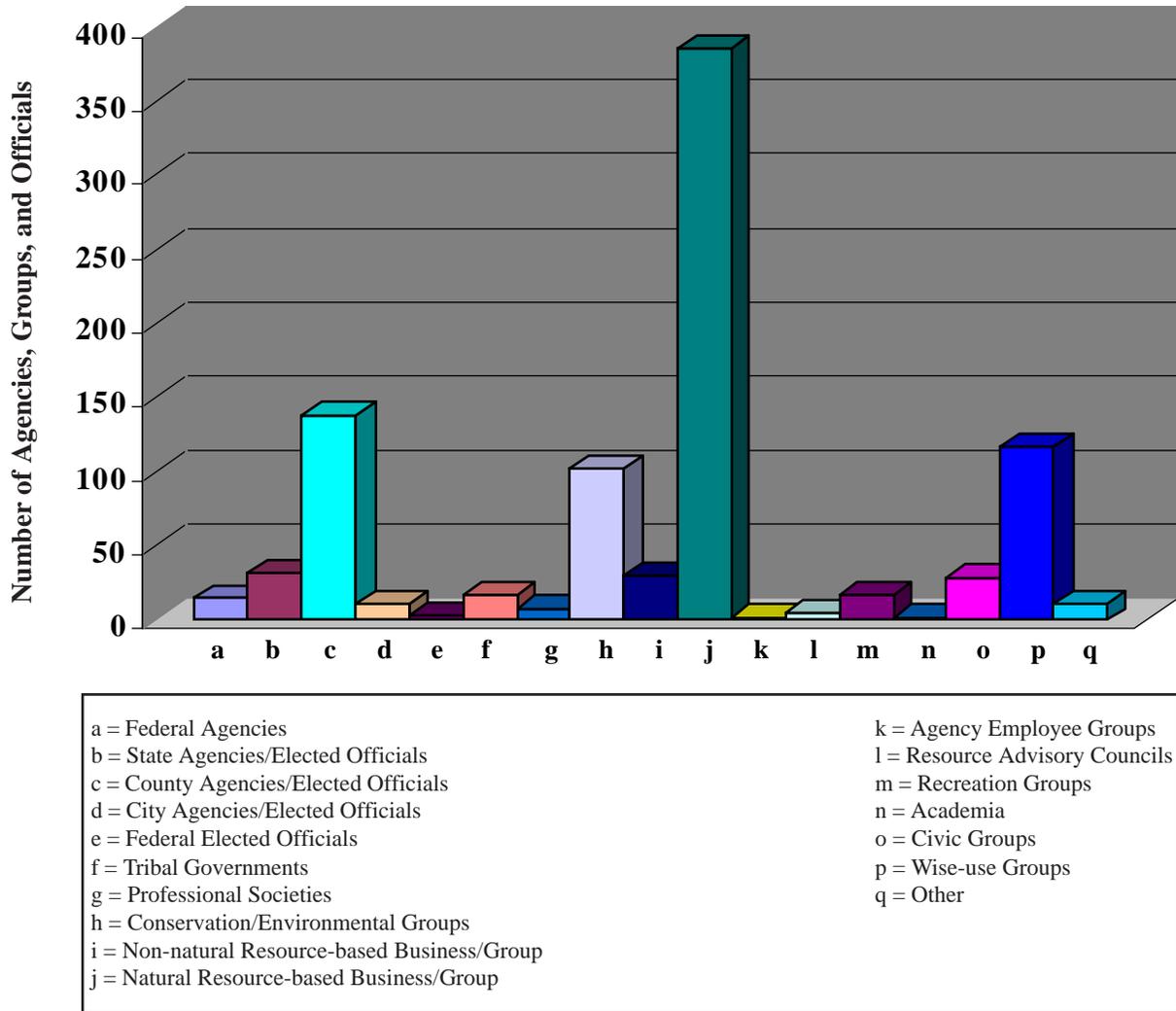


Figure 3. Organization type, excluding individuals.

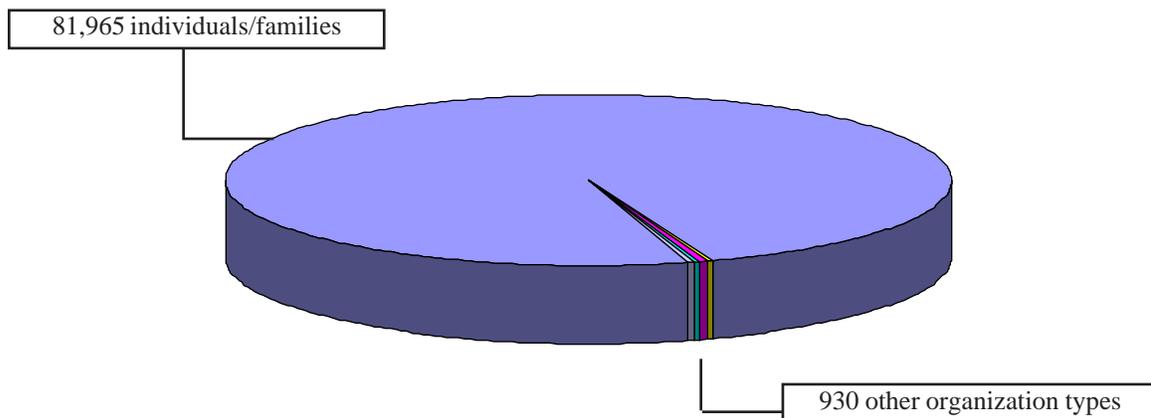


Figure 4. Organization type, including individuals.

INDEX: Issues Summarized in Executive Summary

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.