

Comment Tracking Form  
Tongass National Forest  
Proposed Forest Plan

Page numbers refer to published text.

Name	Page	Location on Page	Review Comments	Notes and Suggestions	Resolution or Response
Krosse		General	I am confused somewhat to the organization of the sections for the Forest Plan. Chapter 2 – Goals and Objectives lists “Resources”. These “Resources” are different than the “Resource” listed the summary tables following each LUD in chapter 3. Question: What is the difference between “resources” as listed in chapter 2 and 3, and subsequently the list of S&Gs in Chapter 4?	Perhaps instead of the term “resources” we should call these S&G categories. I believe the term “Resources” is appropriate for the Chapter 2 discussion, but since Biodiversity, as an example, does not have specific S&Gs, then perhaps the tables in Chapter 3 should be called “S&G category or something to that affect.	Replaced Resource with Category in Chapters 2 and 3.
			<b>Chapter 1</b>		
Rickards	1-1, 4-45		This change to “closed unless designated open” appears to have the effects briefly covered in the DEIS effects on pg. 3-235. Just a <b>heads up</b> to watch for comments on this, as it could be a big deal that we would want to respond to strongly and/or beef-up the effects discussion, especially given the comments from the ATV users at the open house in Juneau.		Lee: We need to keep emphasizing the importance of district travel management plans in making the final call as to where future OHV opportunities will be.

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<b>Chapter 2</b>					
Krosse	2-2	Chapter 2	The biodiversity objects currently are “old-growth”-centric and as written, do not include the full suite of habitats for biodiversity.	Change Objective statements to read as follows: Maintain a Forest-wide system of old-growth <b>and other</b> forest habitats (including reserves, non-development LUDS and beach, estuary and riparian corridors) to sustain species diversity in all habitats, particularly old-growth associated species and resources. a) Ensure that the reserve system meets the minimum...” b) Provide sufficient habitat to preclude the need for listing species under the Endangered Species Act <b>or from becoming listed as Sensitive</b> due to National Forest habitat conditions. c) and d) leave as is.	Changed
Kessler	2-2	Desired Conditions	“resources In accordance” should be “resources in accordance”		Changed
Thompson	2-2 to 2-6	Goals and Objectives	The Goals and Objectives section needs some work to align with Appendix J.		Lee: I will take a close look at this but I don't think we want to do more wholesale changes to goals and objectives given that this is an amendment. I will look at a better connection between the two.
Thompson	2-2	Goals and Objectives	The introduction incorrectly refers to Appendix L.	Search the entire Forest Plan for all references to appendices to make sure they are correct. There are many errors.	Changed L to J

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Thompson	2-2	Biodiversity	Shouldn't this refer to Appendix K? there are no criteria for reserves in Appendix I.		Changed to K
Thompson	2-4	Research	The objective needs updating. Consider something a bit broader, given the work that still needs to be done on Appendix B		Lee: Keep the first part of the objective and cut the last. Should read: Cooperate with PNW in pursuing the high priority information needs identified in Appendix B, Added as per above
Kessler	2.4	Scenery	"tour ship and small boar routes" should be "tour ship and small boat routes."		Changed
Kessler	2.5	Wild and Scenic Rivers	Appendix E is actually communication sites, there is no Appendix for WSR.		Changed
Kessler	2-4	Goals	If restoration is one of the four priority areas to be implemented through the forest plan, why are there only vague references to restoration goals and objectives, no restoration LUD and related management prescriptions for restoration areas, no standards and guidelines for restoration activities, and no monitoring and evaluation guidance related to the effectiveness of restoration activities?	The FY 2007 – 2012 Strategic Plan, Objective 1.5 states "Restore and maintain healthy watersheds and diverse habitats" with a performance measure of 5 percent improvement in terrestrial and aquatic habitat "consistent with forest plan direction." The TLMP lacks such direction. Restoration should be analyzed and presented to the public in a formal and comprehensive manner	Added a restoration objective under the biodiversity goal: restore watersheds to provide healthy diverse terrestrial and aquatic habitat."
Thompson	2-5	Soil & Water	Reference for Integrated Resource Program (watershed restoration projects) should be Appendix J (not Appendix C).		Changed to J

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Thompson	2-5	Timber	Remove reference to Appendix B for non-clearcutting silvicultural research priority. No longer there. Probably should refer to Appendix J		Dropped reference to B, <b>Lee: the objective is still a good one.</b>
Krosse	2-5	Chapter 2	Wetlands Goal is to “preserve and enhance wetlands functions and values”. I don’t see us in the business of “enhancing” wetland functions and values on this forest. We have a difficult enough time to preserving them.	Suggest deleting the word “enhance” from this goal statement and replace with the work “maintain”.	Decommissioning roads may enhance some existing wetland functions. Recommend leaving as is.
Rickards	2-5		Timber objective: suggest that the actual ASQ number be included, once we know what the decision is		<b>Lee: This may be difficult if we move to an implementation strategy where the ASQ is a long term ceiling and may not be attainable unless demand greatly changes</b>

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Kessler	2-6	Wilderness	there is very little in the plan that directly addresses the purposes of wilderness as defined in the enabling legislation. Section 4(b) of the Wilderness Act says “ <i>except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.</i> ”	General Forest Service management agendas and Tongass-specific management plans related to each of these purposes should be addressed for Wilderness LUDs	Lee: Lets modify the very first goal statement at the beginning of the wilderness LUD Manage all designated Wilderness for the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” As provided in the Wilderness Act of 1964, but subject to the.....
Kessler	2-6	Wildlife	In addition to an objective to improve an average of 8,000 annually across the forest, there is an objective to “ <i>design and implement an average of 75 structural wildlife habitat improvement projects annually across the Forest.</i> ”	The Forest Service no longer has targets for wildlife structures, nor is there a performance measure relating to wildlife structures. The dropping of wildlife structure targets was a particularly favorable development for the Alaska Region, as the concept never made sense here. This objective should be eliminated from the plan.	This is carried over from the 97 plan. Dropped the numbers.
Thompson	2-6	Wildlife	Objectives need updating to align with Appendix J, or at least make them less specific in terms of acres or numbers of structures.		See above.
Chapter 3					

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Krosse	3-4	Chapter 3: Management Prescriptions	Under Research Natural Areas: second paragraph state “The following areas, as described in Appendix D of the 1997 FEIS, were recommended to the Chief....” These recommended RNAs were essentially “established” under the 1997 ROD.	Combine the two lists of RNAs that are “established” (Cape Fanshaw, Dog Island, as well as Kadin Is., Marten River etc) and state the following: “The following will be managed as established Research Natural Areas: Cape Fanshaw; Dog Island; Limestone Inlet; Old Tom’s Creek; Kadin Island; Marten River; Rio Roberts; Robinson Creek; Tonalite Creek; War Pass; West Gambier Bay	Larry: I agree
Stanley	3-4	Special Interest Areas	The Naha Recreation Area (KMRD) is missing from the lists of Special Interest Areas		Added
Krosse	3-4	Chapter 3: Management Prescriptions	Same comment as above, but for Special Interest Areas	Combine the two lists, because they essentially are the same. They are both “designated as “Special Interest Area classification”.	Larry: I agree
Rickards	3-4		RNAs: all these RNAs are formally established by the Regional Forester (has not been a Chief’s decision since the mid-90s). Randy Coleman has the history on this, if needed. I assume all these RNA acres are included in the 58,788 LUD acres (pg. 3-2)? I also wonder if the wild, scenic & recreation river LUD acres include the recommended WSR rivers (table, pg. 3-2)?		Larry: WSR do need to be recommended and then designated by Congress (check authority); therefore having both recommended and designated will be needed.

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Hood	3-5	Experimental Forests	If the reason the Young Bay Experimental Forest cannot be modified is because people do not want to see timber cut there and they cherish it for its wilderness values, then: The area should be managed under Recommended Monument Wilderness once the Experimental Forest is moved. The hold on mineral leasing should remain in place.	The Experimental Forest should be moved to Corner Bay where timber harvesting has already occurred. Moving it to the Davies – Cowee Creek Drainages would be placing it in the largest old-growth forest off the Juneau road system and the Experimental Forest would face the same opposition to cutting it did in Young Bay.	Lee: Corner bay is being considered but at this point Davies-Cowee remains the first choice for PNW
Baichtal	3-5	Special Interest Areas	Note changes to the boundaries of the Geologic Special Interest Area on Suemez Island (Suemez Island Volcanics) and on one of the small North-central Prince of Wales Geologic Areas. I believe you should have the edited special area coverage from John Stevens in Thorne Bay but we can provide it to you once more.	Also, Appendix L, pages L-4 and L-5	Already noted for Suemez, North-central POW is new so no reason to note boundary change here. Baichtal is re-working Karst Appendix.
Kessler	3-7	Wilderness Goals	delete space between 3 <sup>rd</sup> and 4 <sup>th</sup> paragraph which is actually one sentence.		Changed
Clabaugh	3-7	Monument goals	may want to consider whether the wording does not encourage research that would need to require use of helicopters for inventory. The argument could be made that this is a goal, and the forest plan encourages research.	On page B-10, it says, “Continue and expand ongoing ecological studies, such as lichen research, migratory bird use, and brown bear population dynamics.” I am concerned with all the research proposals in wilderness now it will make it more difficult to limit the number of helicopter requests.	Lee: material in B-10 will be removed. Monument designation included research as an objective. We believe direction is in place to do that in a manner consistent with wilderness

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Houser	3.7	Goals	Keep wilderness untrammeled...including actions taken to manage wilderness.	This precludes a lot of the work we do to protect wilderness character.	Lee: This language is very consistent with the wilderness act and is compatible with most of our management activities
Clabaugh	3-7 and 8	Objectives	don't need the language "or other applicable wilderness designation acts in the first goal on 3-7, and the desired condition on 3-8.		Lee: Since ANILCA and TTRA are the two acts that established wilderness on the Tongass we can modify these statements to read: subject to the special provisions and exceptions in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the tongass timber reform act of 1990 (TTRA).
Clabaugh	3-8	Desired Condition for National Monument Wilderness	"Appropriate research is encouraged and supported within the constraints of wilderness designation" – again not sure we want "encourage"		Lee: given the monument establishment direction this seems ok. Direction is in place to insure that research takes place in a manner consistent with wilderness values



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Kessler	3-8	Objectives	“Objectives specific to National Monument Wilderness” should read “Objectives Specific to National Monument Wilderness.”		Changed
Houser	3.8	Objectives	“Why maintain capacity to provide information about ecological processes.”	Is this referring to capacity analysis? How does this refer to information?	Intent is to manage wilderness to maintain natural processes so we can study how these processes work.
Tierney	3-11	FISH 112	Why are we allowing unnatural fish ways and fish ladders in the wilderness, we are supposed to manage these as natural areas		Because ANILCA Section 1315(b) lists restoring and maintaining fish production in Alaska at the optimal level as a goal for wildernesses established under ANILCA.

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Krosse	3-12	Wilderness Management Prescriptions	<p>Currently, this sections reads as follows: Forest Health Management: Non-natives, invasives HEALTH 3 A. Non-native, invasive species monitoring and treatment will be accomplished in accordance with specific District or Forest level plans and strategies.</p> <p>Forest Health Management: Air Quality HEALTH 4 A. Air Quality monitoring will be accomplished in accordance with specific District or Forest level plans and strategies.</p>	<p>Neither HEALTH 3 nor HEALTH 4 are standards/guidelines listed in the forest wide S&amp;Gs, i.e., do they actually exist? 2. Forest Health Management isn't where they've chosen to put invasive species guidance (but we are suggesting that Forest Health be inclusive of invasive species – see comments below). 3. Forest Health Management isn't where Air S&amp;Gs are either.</p>	<p>1. These S&amp;Gs are specific to Wilderness, they do not have to be forest wide S&amp;Gs before they can be included here? 2. Adding inv. Sp. To Forest Health. 3. See #1 <b>Lee: we have an AIR category in Ch 4. Could we add that category to the LUDS and then move this to that spot. If that is a hassle I would leave here as it seems as good a place as any.</b></p>
Houser	3-13	Karst and Caves	Karst section is contradictory, first it says seek interpretive opportunities then it says not to interpret them in the wilderness.		Baichtal: drop “Interp. will occur outside LUD.”
Clabaugh	3-26	WILD12, Wilderness Planning, I.B and C	just for clarification, the MRDG is not a required format – a minimum requirements analysis is what is required		Changed
Hummel	3-19 and 21	REC122.C.1 and A.4	The party size exception for the Stikine River does not apply to outfitter/guide operations.		Corrected

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Clabaugh	3-19 and 21	REC122.C.1 and A.4	<p>“Group size is limited to no more than 12 persons for commercial or general public use of a wilderness unless otherwise approved by the appropriate line officer. Exceptions authorized by the Forest Plan include: The Stikine River valley and tidal estuary below 100’ elevation, not including Shakes valley upstream from the outlet of Shakes Lake.”</p>	<p>So, are you making the exception in the Stikine River valley for commercial use? I would be very careful to make one exception. There will be other requests for this exception in other areas. We need to look at the ROS class for the area. There may be other outfitter/guides that want to provide a primitive experience and will not like seeing groups of 20. (the same comment applies to the language on page 3-21).</p>	<p>Lee: This was an error in the draft. The exception is for private use on the stikine. No exception for the limit on outfitted use. We have this in the errata on the website.</p>
Reeck	3-43	Special Interest Area (LUD):	<p>Please consider withdrawing Duke Island from mineral entry as it has very high cultural and zoological interests.</p>		<p>Larry : I do not agree, primarily because even if withdrawn the existing mining claims are still valid and would remain so as long as they are kept current. If we withdraw or propose such, the mineralized area would either be carved out or default to valid existing rights. Thus I see no reason to do this. Worth a discussion at management level.</p> <p>Forrest: We will work with all parties on this issue.</p>

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Baichtal	3-47	Timber	<p>This section now states....</p> <p>A. Forested land is classified as unsuitable for timber production. Timber removal associated with development or maintenance of interpretation activities in Special Interest Areas is nonchargeable to the Allowable Sale Quantity. Forest products are available for continued traditional Native artistic use, if not in conflict with Special Interest Area purposes,</p> <p>B. Manage personal use wood harvest and Christmas tree cutting activities to be consistent with LUD objectives.</p>	<p><u>Suggest or would like to see wording to the effect:</u> “Within Geologic Special Interest Areas, along existing roads limited salvage of windthrown timber shall be allowed as long as karst and cave resource values are not compromised. Many Geologic Special Interest Areas contain areas of past harvest. Opportunities for management of the young-growth stands in these areas should be considered when karst and cave resource values are not compromised.”</p>	<p>Changed but modified word order.</p>
Thompson	3-55	Goals	<p>Reference should be “Safe Drinking <b>Water</b> Act”</p>	<p>Addition in red.</p>	<p>Corrected</p>
Tierney	3-71		<p>No direction for fish is included in semi-remote recreation</p>		<p>Aho: The forest-wide S&amp;Gs are enough</p>
Clabaugh	3-86	REC122.E	<p>“Designation of motorized routes for OHVs in Wild Rivers is generally not allowed. Designation may only occur where documented local traditional use has occurred and the route is compatible with a Primitive or Semiprimitive.” The wording is good that relates to traditional use.</p>		<p>No changed needed</p>

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Tierney	3-103	TIM114	Why is there no High SIO here?		Monaco: There is no high in Rec. River, as per national direction
Tierney	3-117	TIM114	Why is there no Low SIO here?		Monaco: There is no low in Scenic Viewshed, as per national direction
Tierney	3-121	FISH	Why is there no Fish direction here?		Aho: The forest-wide S&Gs are enough
Tierney	3-129	FISH	Why is there no Fish direction here?		Because there was no fish subsection in the 1997 plan and none was added by the Fish or riparian staff. Will check with Aho.
Reeck	3-127	Desired condition	I really wish you would drop the word balance all together or what the balance is supposed to be by age class and what those age classes are? If it is truly our desire to strike a balance, how does the Forest Plan or a project know what to apply or determine when they have reached the desired condition? This paragraph begs for a standard and guideline in order for projects to be able to achieve or contribute to the desired condition.	I could not find anywhere in the monitoring section where it talks about whether we are monitoring this condition and under what parameters of age classes. Are we in balance or not? This language is unique to the Timber Production LUD. It differs quite a bit from the Modified Landscape LUD. A fix here would make a lot of project level planners happy.	Lee: the sentence reads fine with out the word balance. Strike the word.  Dropped

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Rickards	3-132	Timber Sale Prep TIM114 – B.	It seems odd that these scenery objectives would be here instead of under the “scenery operations – VIS1” on pg. 3-131. It’s just a logic & flow problem that could cause confusion?		Lee: I agree with this. Let’s run it by Dom Dom agreed, Moved to VIS1, which in now SCEN 1
Kessler	3-135	Objectives	- for mineral activities, bullet 4: Change “Apply Best Management Practices to meet State Water Quality Standards” to “Apply Best Management Practices and meet State Water Quality Standards.”		Changed
Tierney	3-140	TIM112	Why was this added? “Consider new LUD designation for tree farm, allow CT to contribute to ASQ in non timber LUDs.”		Appears to be out of place. Dropped.
Tierney	-	Nat. Monument Wilderness	What is a "prescribed natural" fire??? Do we prescribe for a fire and wait for one to occur?? Or do we need to sneak out and anonymously torch it off?		This is text that was deleted, see the note above (Page 12 (16) Deleted 12/2/06).
Tierney	--		All too often, the text remaining in and around these deletions and large fonts, does not make sense. What is going on here (and in other places throughout the document)?		This whole section is how the track change program works. It sums up all the deleted words, sentences, and paragraphs at the end of the chapter.

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Krosse		Chapter 3: General	When reviewing the summary tables for each LUD stating the “resource” and associated sections and subsections that apply to the LUD, I notice that the narrative summaries of the S&Gs (following the summary tables) do not contain the full list of each “resource”. Is there a reason? It looks like the additional S&Gs have been added to the table (such as for plants and invasives), but nothing is written in the narratives for them.	I suggest changing the header for the first column of the summary tables to say “Standard and Guideline” instead of “Resource”. Do you consider “Invasives” or “Facilities” as a resource? So the term “Resource” is misleading in these tables and as stated in Chapter 4. It also conflicts with the designation of “resource” provided in Chapter 2 for goals and objectives, which I believe should remain as is. Also, add narrative statements of how the other “resources” will be applied to each LUD, such as air, beach, invasives and plants.	<p>Lee: change resource to “category” Changed</p> <p>Tables refer to the S&amp;Gs found in Chapter 4, not those that follow the table (in Chap. 3).</p> <p>Who will provide these statements? Lee: don’t see a need to do this</p>
<b>Chapter 4</b>					
<b>Forest Wide Standards and Guidelines – Beach and Estuary</b>					
Krosse	4-5	BEACH2.II.D	Add the following words to #4 and #5: 4. Manage OHV use to prevent degradation of wildlife, fish, and <i>rare plant</i> habitats. 5. Manage recreation and tourism use to maintain wildlife, fish, and <i>rare plant</i> habitats	This was suggested in previous comments. Stating that the OHV will be managed according to the ATMP does not ensure that fish, wildlife and rare plant habitat will be considered.	<p>Lee: See no reason to change item 4. we need to put emphasis on the ATM plans. If we are doing #5 and maintaining habitat we can’t very well be degrading it. For item 5, I see no particular significance in the order these are listed.</p>

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Rickards	4-5, 4-66 to 4-80, 4- 100 etc.		The terminology that describes timber harvest that does not count toward the ASQ because it was not included in the ASQ calculations is mixed: unprogrammed v. no programmed v. no commercial v. no programmed commercial v. not scheduled v. chargeable timber volume	I suggest pick one, or just use the ‘timber harvest that does not count toward ASQ’ description, which is probably the easiest to understand for non-planners & non-analysts –	Sever a word search reveals that we used “unprogrammed timber” 5 times “programmed timber” 32 times and “chargeable” 11 times. Use Timber harvest that does not count toward ASQ’
			<b>Forest Wide Standards and Guidelines - Facilities</b>		
Krosse	4-6	FAC22.I. Construction Requirements	Add E. Develop a revegetation plan using approved plant species (see Invasive species, Plants and Soil and Water S&Gs)	This was suggested before. Also, the suggestion to provide references to other S&Gs that one should look at was not implemented. As a user to this document, I can assure you that the reader does not necessarily look at all the S&Gs when doing NEPA analysis. It is important to provide linkages to the reader to where they can obtain more information. Therefore, I suggest that the references are maintained.	Should be F not E. Added statement.  <b>Lee: There is no end to the possible links one could make and it simply isn’t a priority with this amendment given the schedule we have.</b>
			<b>Forest Wide Standards and Guidelines - Fire</b>		
Krosse	4-7	FIRE12.I.A.	Change second sentence to read: “Use prescribed fire, as appropriate, for silvicultural site preparation, wildlife habitat improvement, <b>invasive plant removal/disposal</b> , or slash hazard treatment”.	This was suggested before and was implemented, but you forgot to mention invasive species removal. Fire is a viable option for invasive plant control and therefore should be included in this list.	Added



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Tierney	4-8	FISH112.III.B	<p>Many do not agree with the designation of Fish Value Class without the presence of fish. Just because it could support fish is not a strong enough reason to treat these streams as though they DID have fish/anadromous fish. It's kind of similar to "if it had water, it would be a good stream....". "Habitat" should include the idea that it is actually used, at least part of the time, no??? It also conflicts with other stream class designations. For example, take a close look at the last part of the definition for Class II and Class I. They conflict.</p>		<p>Protecting “high quality resident fish waters or habitat above fish migration barriers known to provide reasonable enhancement opportunities for anadromous fish” is consistent with Forest policy.</p>
Tierney	4-9	FISH112.III.B.5	<p>Something is wrong with the 1 foot bankfull width (and maybe 5 foot for class III, too). One and five feet seem AWFUL small and may cause folks to upgrade stream classes when it, perhaps, is not warranted.</p>		<p>This is the definition in the Handbook.</p>

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			<b>Forest Wide Standards and Guidelines - Fish</b>		
Sever	4-8	FISH112. III	Change “Fish stream value classification” to “Fish stream classification”		Changed
Aho (also Sever and Thompson)	4-8 and 4-9	Fish stream value classification	<p>The descriptions for Class I, II, III, IV, and non-streams are not the most current.</p> <p>Definitions of the stream value classes are also located in the Glossary of the Forest Plan, on page 3-60 in the DEIS, page 3-33/34 in the DEIS, and possibly in other locations too.</p> <p>The definitions should be current and consistent in all locations.</p>	The definitions in the Amended Forest Plan are old and should be replaced with definitions provided by Tongass working group lead by Steve Paustian in September 2006. Both Class I and II streams have either fish or fish habitat, and Class III streams may be identified by five characteristics (a thru e) if the stream doesn’t meet the 5 ft bankfull width and 15 ft incision depth. I can provide a copy of the current definitions if that would help.	Correct, the edits Paustian sent did not get in. We will correct this here, in the glossary, and in the FEIS. Paustian sent the final of the Fish/RipTeam’s final updates to the Stream Class definitions on 3/30/07.
Jacobson	4-8 and 9	FISH112.III.B	The 1986 definition stated Class II as streams could include streams from 0-6% gradient not 0-5% gradient. The definition used in the 1997 Plan was supposedly superseded by the definition used in the 2001 Aquatic Habitat Management Handbook which stated Class II streams as generally steep (0-25% gradient or higher). Other changes to stream definitions.	I say we keep with the 0-6% and 0-25% as they are more logical than what you have in the draft TLMP. Also, you need to add in “or fish habitat” as it is stated in the 2001 Handbook.	Using Paustian version, see above.
Jacobson	4-8 and 9	FISH112.III.B	Don’t use subjective wording like highly incised – just stick with actual numbers when available for insision.	Use channel incision greater than 15 feet.	Using Paustian version, see above.

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Jacobson	4- 9	FISH112.III.B	Also refer to the channel incision depth chart used in the TPIT clarification paper.		Using Paustian version, see above.
Jacobson	4- 9	FISH112.IV.C.3.1	Where did this come from and why add “When feasible...” -- Leaves room for interpretations.		Lee: take out the “where feasible”
Rickards	4-9		Class IV streams are defined, but then there is little or no direction given for Class IVs– does this mean there are no protection measures (S&Gs) for Class IVs		Using Paustian version, see above.
Sever	4.9	FISH112.IV.B.7	What is D50?		It’s the median partial size, as the words that follow state. Will clarify.
Kessler	4-8 to 12	FISH	We think the new standard and guides in the draft are good. The biggest issue is how we handled the fish crossing standards. The new standards say “ <i>will be designed to current standards.</i> ” This allows for new developments in crossing regulations. The additions concerning passage design are well done.		No change needed
Aho	4-11	VI. Management Activities	Change order in series to: “fish program that includes anticipated inventory needs, proposed habitat improvement and maintenance projects, and monitoring requirements.”	Small point and easy fix.	Changed.
			<b>Forest Wide Standards and Guidelines - Forest Health</b>		

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Krosse	4-13		Should this section also include references to invasive species? It should. The fact that the S&PF branch of the U.S. Forest Service specifically deals with Invasive spp. in its Forest Health department is one good example of where this subject should be placed. I realize you have designated "Invasive spp." as its own "resource", but I think this is faulty because it is not a resource we are managing for, it is a problem we are fighting against. The resources invasives <b>affects</b> are biodiversity, forest health, plants, wildlife and fish.	We recognize the desire to highlight invasives as an important issue, thus providing its own section in the S&Gs. If this concept continues, we suggest also providing wording relative to invasives in the other sections where it is appropriate (as you have done for biodiversity, plants, fish and wildlife), including Forest Health.	Lee: respond by saying no specific language provided
Krosse	4-13	HEALTH1.I.A.1.	Forest Health Management Group is obsolete.	Delete reference to this group or replace with the name of a different working group responsible for providing data on forest health.	Dropped line.
Krosse	4-13	HEALTH1.I.A.2.		Add words to the section to read, "Consider Forest Health Management information dealing with insects, diseases and invasive species recommendations on management alternatives. These recommendations will include analysis of ecological effects of insects, diseases and invasive species and management alternatives..."	Added first statement, second is redundant. Lee: Agree with response
Krosse	4-13	HEALTH1.I.B.		Add to read, "Evaluate insect, disease and invasive species impact(s) to resource".	Added invasive plants to sentence.
Krosse	4-13	HEALTH1.I.B.1.		Add to read, "Conduct on-site evaluations to assess past, current and future insect, disease and invasive spp. impacts and their effect upon desired forest health".	Added invasive plants to sentence.

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			<b>Forest Wide Standards and Guidelines - Heritage Resources</b>		
Marvin	4-14 to 20	All	Just wanted to let you know that I completed my review of the Tongass DEIS and Forest Plan that was the version released to the public. I'm pleased to see all our earlier suggestions were incorporated in this version.	One absence that I know was going to be left out but which we still need to develop (Mark needs to anyway!) is to come up with a Monitoring and Evaluation Plan for Sacred Sites.	See 6-8
Krosse	4-14	HER.I.D.	Add the following: "Coordinate the management, access and use of forest products to perpetuate Alaska Native cultures and art forms ( <b>see Plants S&amp;G and Timber S&amp;G</b> ).	Suggest maintaining references to other S&Gs that are linked, such as these.	Added statement.
Reeck	4-17	Sacred Sites Protection Activities 1A and 1E	Paragraphs 1a and 1e mention the "protection of the physical integrity" of a sacred site. To me this tells me there is some kind of boundary. But on page 4-18 under mitigation IVb it mentions contamination or violation with the wording "in or around". The "around" aspect will be a bone of contention when put into the context of physical integrity. The word "around" tends to be boundless and is very subjective. I would prefer to talk about contamination in terms of physical integrity of those site boundaries.	McCallum: Suggest adding (in I A): EO13007 defines a sacred site as "any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site."	McCallum: Sacred sites must :be delineated by physical boundaries. They cannot be boundless or without boundaries. Executive Order 13007 provides a precise definition that includes a "specific, discrete, narrowly delineated location on Federal land..." See box to left for suggested addition

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Reeck	4-19	Sacred Sites Monitoring Line A1	I worry about saying that we will monitor those sacred sites. To monitor means keep record in a database. From what I have seen, the tribes do not want is keeping records on their sacred sites, the information may leak out		McCallum: II C (p. 4-18) addresses the issue of site confidentiality. Sensitive information, such as site location and description, is protected from public disclosure by manual direction (FSM 1563.03.7) and by law (National Historic Preservation Act, Section 304 and the Archaeological Resources Protection Act, Section 9). The Tongass has a good track record of not divulging sensitive information that could jeopardize the physical or spiritual integrity of heritage resources
			<b>Forest Wide Standards and Guidelines - Invasive species</b>		
Krosse	4-20	II. Project Planning	Change the words “District Ranger” to “responsible Line Officer”		Changed.

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Aho	4-20	Entire page	This is the new forest-wide standards and guidelines for invasive species. It is written with a bias toward invasive plants. I suggest broadening the scope to include invasive animals (particularly fish, like Atlantic salmon).	Under Invasive Species Prevention include a subheading: II. Invasive Animal Surveys A .Conduct periodic inventory of known invasive populations to monitor for changes in distribution. B. As appropriate, conduct periodic inventory to monitor for invasion by new species.	Added text.
Krosse	4-20	Inv. Spp. EDRR (I.B.) and Control and Management (I.A).	Change sentence in B to read as follows: ERDD I.B. “Treat priority species infestations as practicable, <b>using an integrated pest management approach.</b> ”  Control and Mange I.A. Change sentence to read as follows: “Reduce population sizes and/or limit the spread of Priority Invasive Species on the TNF <b>through an Integrated Pest Management Approach</b> ”	Suggest adding Integrated Pest management to <b>glossary</b> to read as follows: <u>Integrated Pest Management.</u> Integrated Pest Management, or IPM, is a long-standing, science-based, decision-making process that identifies and reduces risks from pests and pest management related strategies. It coordinates the use of pest biology, environmental information, and available technology to prevent unacceptable levels of pest damage by the most economical means, while posing the least possible risk to people, property, resources, and the environment. IPM provides an effective strategy for managing pests in all arenas from developed residential and public areas to wild lands. IPM serves as an umbrella to provide an effective, all encompassing, low-risk approach to protect resources and people from pests. (From the National Roadmap for IPM.)	Changed text. IPM is already in glossary, changed definition as requested.

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Reeck	4-20	Invasive Species Early Detection and Rapid Response and Invasive Species Control and Management.	there is no FSH 2080. We do have a FSM 2080 reference, perhaps that is what is intended here?		Changed
			<b>Forest Wide Standards and Guidelines - Karst and Caves</b>		
Baichtal	4-21	KARST II.G	I strongly believe that these need to be up front within the Forest guidelines.	G. Karst assessment requires professional skill and judgment, as well as experience with karst environments. It is essential to maintain staff with specific experience and/or training in karst assessments overseeing karst resource evaluations. General experience in karst processes is required at a minimum but Southeast Alaska-specific experience is necessary to fully characterize the karst systems found here. The Forest should develop a karst resource and management training program so that staff and other resource specialists could better integrate the management of karst resources into their professional activities. Training would provide inexperienced staff with the required knowledge and confidence to actively participate in effective karst resource management.	this comment was dropped from the last round because reviewers said that requiring specific staffing levels did not belong in the S&Gs.
Thompson	4-21 to 26	Karst S&Gs	I don't understand the intent of App H since so much of it duplicates the content in the S&Gs.	Suggest that Appendix H contain only the more technical inventory, classification, and analytical guidance, and the S&Gs in Chapter 4 focus on actual standards and guidelines relevant to land mgt	Baichtal is re-doing the appendix.



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Rickards	4-21 to 26	Karst S&Gs	Karst & Cave – it appears much of the direction that used to be in Appendix H has now been incorporated into its own S&G section, but now there is some (if not all) duplication with Appendix H – maybe Appendix H goes away now? At the very least, get rid of the duplication, which will cause confusion or information that gets missed –		See above
Thompson	4-21	KARST II.E	Karst VII doesn't have information needs	Delete? Pending work on Appendix B	Changed to “See Appendix B for....”
Baichtal	4-22	KARST.III.D.2.a	Insert “shall” where underlined below. Note space added between high and vulnerability near bottom of paragraph.	Road Construction. Existing roads <u>shall</u> be utilized in preference to the construction of new ones. Roads <u>shall</u> avoid sinkholes and other collapse features and sinking or losing streams. Roads <u>shall</u> not divert water to or from karst features.	Changed
Baichtal	4-23	KARST.III.D.2.c	Delete redundant sentence and add the following:	<u>It is suggested that the specific design of the buffers be an IDT recommendation working with the karst management specialist during the planning process for any given project. Not all features will require the RAW buffer considering the specific characteristics of each.</u>	The text already contains this statement (with slightly different wording).
Thompson	4-23	KARST III.D.2c	Cite Landwehr 2006 for RAW buffer guidance. (Forest Plan EIS reference)		Added reference
Anne	4-23	Karst D.2.c.i	last sentence <b>Duplicate sentence mentioned verbatim four lines above.</b>		Deleted
Baichtal	4-23	KARST III.D.2.c.iv	Suggested wording:	iv. <u>Require protection of (delete and replace with-) Protect</u> all sinking or losing streams and their tributaries irrespective of whether the channels carry perennial, ephemeral, or intermittent flows.	Changed

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Baichtal	4-24	KARST III.D.3	Suggested wording ( <u>delete in parentheses</u> ).	Timber management and related activities ( <u>should</u> ) are ( <u>be</u> ) excluded from these lands. Limited recreational development may be appropriate. Recreational facilities and trails ( <u>would have to</u> ) <u>must</u> consider karst resource values ....Roads are considered inappropriate ( <u>with the following exception if no other</u> ) unless no other route or option is ( <u>available</u> ) feasible. g) The karst management specialist ( <u>needs to</u> ) will work closely with engineering	Changed
Anne	4-24	Karst 3	Roads are considered inappropriate with the following exception if no other route or option is available Sentence needs "." Paragraph continues towards end, before items, to say... If roads must be built across areas of high vulnerability the following guidelines apply. See Appendix H for additional guidance. Karstlands found to be of high vulnerability shall be identified and removed from the commercial forestlands suitable land base.	Sentence(s) seem to contradict one another or have undesirable placement for clarity. Suggest placing last sentence towards upper part of paragraph, noting that it is for forest planning level whereas exceptions apply to project planning level.	Added period Moved sentence. Also, see Baichal comment above.
Anne	4-24	Karst 3.b.	says... This most likely will be possible since the slope gradient of these areas are generally less than 15 percent. Change verb tense.		Changed

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Anne	4-24	Karst 3. V.4	<p>Pre-commercial thinning to near the edge of karst features or the bank of sinking or losing streams is allowed, however, no slash or debris may fall or be placed in these features.</p> <p>Believe the statement should begin with “Pre-commercial thinning too near the edge...”</p> <p>Couple sentences down... Generally, no thinning shall be permitted on lands determined to be of high vulnerability such as within 100 feet of a cave entrance, a karst feature accepting surface flow or of the edge of a sinking or losing stream within 0.25 mile upstream of their swallow hole or loss point.</p>	<p>Believe the sentence should be “on the edge...”</p> <p>Next to last sentence in same paragraph has hanging quotation symbol...No yarding across or through the untreated area surrounding the feature will be allowed.”</p>	Changed
Baichtal	4-24	KARST III.D.2.c.vi	Add the following	<p>Given the nature of the karst landscape and vegetation, even with intense field survey and karst resource inventories, it is possible that individual karst features may be missed. At any time during project development or implementation that an un-inventoried karst feature or features are discovered, all activity in the vicinity of the feature or features shall cease until a karst vulnerability assessment can be conducted.</p>	Added

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Baichal	4-25	KARST.V.	Suggested wording ( <u>delete in parentheses</u> ).	( <u>It is preferable that a</u> ) A zone equal to one tree height <u>will</u> be left untreated to insure that no slash or debris will be placed in these features..... ( <u>It is preferable that a</u> ) A zone equal to one tree height <u>will</u> be left Untreated.... Directional falling and split yarding away from the karst depressions and features ( <u>should</u> ) <u>is expected to</u> provide adequate protection	Changed
Anne	4-24	Karst 3. VI	Suggested wording ( <u>add last sentence</u> ). ..	<u>Before harvest, the sale administrator, purchaser representative and the karst management specialist should walk through the harvest unit to review the layout and resource management concerns</u>	Added, also edited existing text for sentence structure..
Baichal	4-25	KARST.V.	1 <sup>st</sup> sentence. Delete extra “.”		Deleted
Anne	4-26	Cave G.2.f.	Item G.2.f. suggest replacing “possess a dog or cat” with “allow domesticated animals access.”		Changed
Stanley	4-27		At one time, we had discussed the need for a LANDS Standard and Guideline addressing LUDs on newly-acquired parcels. Is this still needed ?	I neglected to submit wording for this but will work on it pronto if it is still needed.	<u>Lee: I agree it is needed.</u>
			<b>Forest Wide Standards and Guidelines - Minerals and Geology</b>		
Anne	4-39	MG12.1.C	last sentence. Delete extra “ ; ”		Deleted
Anne	4-39	MG12.IV. D	Omit “For” at beginning of sentence.		Deleted
Krosse	4-40	MG12.III.B.3.	Under <b>Plan of operations B.3.</b> Reclaim disturbed areas in accordance with an approved plan of operations. <b>Apply approved seeding mixtures as needed (see Plants S&amp;G).</b>	Making connections to other S&Gs will be helpful, especially to this group.	Added statement.

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			<b>Forest Wide Standards and Guidelines - Plants</b>		
Krosse	4-42	Definitions: Invasive Plants	Need to add a definition here. Simply referencing the Invasive spp. S&G is inadequate, since that S&G does not contain definitions.	"Invasive species" means an alien specie whose introduction does or is likely to cause economic or environmental harm or harm to human health. (From Executive Order 13112 on Invasive Species (Feb. 3, 1999): Feb. 3, 1999):	Added definition.
Reeck	4-42	III Rare Plants B	The inference to FSM 2670 is incorrect in the context that we are assuming under definitions above. Should remove the 2670 reference. FSM 2670 does not address rare plants as per the Alaska Natural Heritage Database or program.		2670 includes Exhibits on Alaska Region Sensitive Species List, Sensitive Species Evaluation Criteria Procedure to Determine When Project-Level Field Survey for T & E, Proposed, or Sensitive Species is Necessary <b>Lee: I agree</b>
Rickards	4-42 to 49		Where is the plant TES list? Should be a cross-reference here		TES list changes over time, therefore, not included in Plan

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Benna	4-42	Rare Plants	same concerns for Rare Plant Guidelines as expressed for sensitive over buffers etc. And what does it mean if no buffer is applied to maintaining distributions throughout the Forest – so a decision document would be the authorization of to collect or disturb rare plants – again is the buffer optional or is it directed by these guidelines?		Lee: The standard above states Avoid, minimize or mitigate adverse affects to rare plants, a buffer is one way to do that but not the only way.
Tierney	4-42	Rare Plants	Numbering is off		This has been corrected.
Tierney	4-42	Rare Plants	Why are there no specific resource guides in this section? These elements would be very helpful. I get the impression that a certain few overstory tree species are being considered rare plants and need some protection. These resource guides would explain that plainly. Folks may very well miss it the way this is currently written.		S&Gs are located in the Plant section of the Proposed Plan
			<b>Forest Wide Standards and Guidelines - Recreation and Tourism</b>		
Tierney	4-44	REC111.I.A	Does "maintain the inventory of" mean a) maintain AN inventory or b) maintain THE inventory of? IE: are we to maintain an inventory of recreational opportunities or must we maintain all our inventoried recreation opportunities????		This statement refers to the inventory, the subsection deals with data not facilities. Changed to “an”

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Clabaugh	4-45	REC112.II.D.	<b>The Forest is closed to Off-Highway Vehicles (OHV) except where designated open.</b> “closed to OHVs” is negative and not really true. The forest is not closed, just limiting travel to roads and trails. I think you are really going to have to be careful that this amendment does not get tied up in litigation due to travel management wording and changes.	Here is my suggested wording: Off-Highway Vehicle travel is limited to roads and trails unless areas are identified in the travel management planning process on each district. Cross-country travel is not authorized.	The new OHV rule states that all areas not designated open are closed. The Satate says this conflicts with ANILCA. The travel and access management plan EAs will have to resolve this, see below.
Tierney	4-44	REC112.II.D	This is really pissing the public off. You can't ride a 4-wheeler (personally, I have a 6-wheeler) on the highway, on forest roads nor off road (no off road because of resource damage). Why can't folks use these vehicles on old logging roads and 'closed' roads that remain accessible by these vehicles? What's the harm in riding on a road that is inaccessible by a standard highway vehicle or pick-up truck?		This has been restated as “The Forest will be closed to off-highway vehicles (OHV), except where designated open, upon completion and approval of unit Access Travel Management Plans. See above response.
Clabaugh	4-46	REC112.III.A.6.	Commercial services may be performed within the wilderness to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the area.	I am not sure why this is here – we cover this under special uses, and we don't single out other resource areas. We don't need to add an emphasis on wilderness outfitter/guides. There are already areas that may be beyond capacity	<b>Lee: The intent is the opposite, to emphasize that commercial services should only be those that meet wilderness objectives not something that could be better done outside wilderness.</b>

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Clabaugh	4-54 and 55	ROS Class, Primitive and SPNM Access	Cross-country travel and travel on non-motorized trails is typical. This needs to be clarified, maybe say nonmotorized cross-country travel and on trails...		Changed to non-motorized
Slayton	4-50	REC122.II.3.e	items (e)(1) and (e)(2) should be items (d)(3) and (d)(4).		Changed
			<b>Forest Wide Standards and Guidelines - Riparian</b>		
Kessler	4-61	RIP1	Suggested Revised Definition: <i>Riparian areas encompass the zone of interaction between aquatic and terrestrial environments associated with streamsides, lakeshores, and floodplains and display distinctive ecological conditions characterized by high species diversity, wildlife value, and resource productivity.</i>		Changed
Kessler	4-61	RIP1.II.A.5	Suggest Revised Language: <i>Protect water quality by providing for the beneficial uses of riparian areas.</i>		Changed
Sever	4-61	RIP2.II.D	Delete: D. Soil Inventory Field verify and define high hazard soils during project level planning.	Covered under soil, better wording	Not correct. Soil section doesn't talk about identifying MMI 4 soils, just says maintain SRI <b>Lee: I agree</b>
Aho	4-62	Subheading E	This section refers to "high risk factors" and "low risk factors" for blowdown. It would be useful to further explain these factors or provide a reference.	I wasn't able to find these risk factors in either BMP 12.6a or the process group standard and guidelines.	<b>This is new text from by Paustian on 10/25/07</b>
Kessler	4-61	RIP2 I. A	Identify and delineate Riparian Management Areas (RMA's for each project where ground disturbance will occur <b>or resources will be extracted.</b>		Added



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Kessler	4-62	C. 2	Logging <b>systems</b> ? and aquatic specialists		Changed to Logging engineers
Thompson	4-62	RIP2, I,E	“Checklist for determining need for Reasonable Assurance of Windfirmness Buffer” is appropriately cited here, but the EIS citation of the same reference is different.	Include “Landwehr 2006”, consistent with EIS citation.	Will add to EIS., added reference to Plan.
Jacobson	4-62 and 63	RIP2.I.E and II.F	What are these multiple high risk blowdown factors – where to find them?		Paustian: refer to Landwehr, 2006
Jacobson	4-62	RIP2.I.E	Where is the Checklist (for determining RAW buffers)located? Will it be an appendix to this document or added into the Soil & Water Handbook?		Paustian: refer to Landwehr, 2006
Jacobson	4-62 and 63	RIP2.I.E and II.F	Define high value resources-at-risk? This is different than the “high quality sport systems, right? Where is this better defined?		Paustian: inserted Class I streams and water supplies in text to define “high value

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Jacobson	4-63	RIP2.I.F	What about the general statement of “Apply Best Management Practices – this statement seems to imply that we only need to apply “additional” BMPs AS NEEDED. Why did we have to change the original #3 which stated “Apply Best Management Practices to minimize the effects of timber harvest and related land disturbance activities on beneficial uses of water”. Why combine the old #3 and #4? You have already deleted the specific BMP language from the old #9. I suggest adding these back into this section.	‘As needed’ is a subjective statement. Can this be clarified? Or deleted?	Using new Riparian section supplied by Steve Paustian. As needed, is dropped.
Jacobson	4-63	RIP2.I.F.3	This statement infers that we need a permit to cut firewood. Is this indeed supposed to be happening? Is a firewood permit the only thing someone would need to cut firewood in an RMA? Watershed Analysis?		Paustian: Texted changed to refer to “free use” harvest permits.
Sever	4-63	RIP2.II.F.4	<i>Drop the following text: In locating and designing timber harvest activities, require special consideration and mitigation to ensure that Riparian Management Area characteristics for fish and wildlife habitat, water quality, and other riparian-associated resources are maintained.</i>		Paustian: I concur that this item is vague and that other guidance contained in section F adequately addresses the intent of this paragraph. Item 2.II.F.4 should be dropped.

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Sever	4-63	RIP2.F.6	Change: <i>“When stream crossings are required to harvest timber, perform investigations to compare the environmental consequences of road crossings versus yarding corridors, and select the action of least impact.”</i>	Replace with: <i>“When stream crossings are required to harvest timber, assess the environmental effects of road crossings versus yarding corridors, and select the action of least environmental impact where practicable.”</i>	Changed
Kessler	4-63	RIP2.II.F	We see that there are standard and guides for timber harvest near class IV streams that are different in Alternative 6 than for the other alternatives. But, it is not clear in the Standards and Guides section (page 4-72) how those standards might be different from the other alternatives. If any standards and guides for riparian buffers are changed from the 97 plan, then they need to be perfectly clear. This could very well be a place our critics will first look.	Because this may be a large focal point of critics, we need to include more information here. If these modifications really do not affect resources, then why are they not included for all alternatives? If they do have impacts, they need to be thoroughly discussed.	Not clear what this refers to, perhaps to the EIS. S&Gs in this Plan apply to Alt. 6, the proposed action <b>Lee: a rather moot point now as the final plan will apply to the road and alternatives will be rather irrelevant</b>
Jacobson	4-64	RIP2.II.H	Should be termed “storage” according to terminology.		Roads can be closed by placing them in storage or by decommissioning them. <b>Lee: I agree</b>
Jacobson	4-63	RIP2	Why was the original Section E removed? It had defining reasonings for commercial timber harvest, programmed timber harvest, and definition for salvage harvest. Are these now located elsewhere?	Add under RIP 2.II.F.1: <b>c. “No programmed commercial timber harvest” means that no timber harvest will be scheduled but unprogrammed harvest could be allowed where it meets Process Group objectives.</b> <b>d. “Salvage harvest” means removal of dead standing or down trees and may include incidental removal of green trees if needed to make logging safe.</b>	<b>Paustian:</b> I agree that these definitions are needed for interp of riparian guidelines and I can’t locate another section of the Plan where these harvest categories are defined. <b>Probably put back in</b>

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Tierney	4-64	RIP2.II.F	Personally and professionally, it is my opinion that this is much too restrictive. Damage to riparian vegetation (insects, disease, fire or windthrow) may have catastrophic effects on the riparian and stream systems. If we must wait for a watershed analysis we may be too late to prevent major disruption in these systems due to failed vegetative cover without prompt, corrective action. This no salvage provision for RMAs also appears to conflict with many individual process group S&Gs below which call for no programmed harvest but seem to allow unprogrammed harvest under varying requirements (inconsistent wording between process groups for RMA unprogrammed harvesting).		TTRA Sec. 103 (a) states: there will be no commercial timber harvesting within 100 feet of Class I streams or on Class II streams that flow into Class I streams. Text was added to F.1 defining commercial harvest as harvest that counts toward ASQ. Other harvest can take place if it meets resource objectives.
Tierney	4-64	RIP2.II.F	salvage can be allowed following watershed analysis with line officer approval (see appendix C for guidance)	This text is a big concern. We are prohibiting vegetative management along most all class III streams in addition to the class I and II streamside RMA areas without lengthy analysis. PLEASE RECONSIDER SALVAGE in these areas.	Veg mgt, including harvest that does not count toward ASQ can take place but requires approval as stated. Salvage within the riparian reserve can affect water quality; therefore, a watershed analysis is needed. See above.
Thompson	4-65	Top	Spelling error in 2nd box (should be "anadromous")		Corrected

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Jacobson	4-65	Figure	“Is the stream a Class II?” and “Follow Process group S&Gs for Class II streams.” Wouldn’t this need to be considered a non-direct stream?	Add non-direct	Paustian: Non-direct situations are covered in the first text box of the key.
Jacobson	4-66	Objectives	Should say Complete a NEPA document that included a watershed analysis. Fix for every process group.	See MC Process group for wording to be consistent.	Paustian: This change was made to all PG descriptions
Kessler	4-67	I, II & III	Second Paragraph, Insert: <i>Recognize that alluvial fans are places of inherent instability where roads, borrow pits, or structures will be continually threatened by migrating stream channels.</i>		Added
Jacobson	4-69	I, II, & III Harvest Controls	Is this 5% any more attainable than the 1% that was here prior?		Paustian: Yes, 1% is not feasible.
Thompson	4-70	High Gradient Contained, III	“Following watershed analysis, Riparian Management Areas which become available for timber harvest will be converted from nonsuitable to suitable forested lands. (On a forest-wide basis, it is anticipated that this change will occur along 25% of the class III streams in this process group.)”	Delete. In ten years this hasn’t happened yet. It isn’t likely to happen at this scale.	Deleted

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Rickards	4-71	High Gradient Contained, IV	Class IV stream direction – I guess this is all there is, so why tie so tightly to timber sale contract clauses? What if we do stewardship contracts, or fuel removal contracts or ??	It seems to me that the S&G is to protect Class IV streams using 1 of the following techniques, depending on the situation: a) directional felling along and full suspension of logs yarded across streams, immediate cleanout of logging debris and may include partial retention of standing trees along stream courses or b) split yarding when practicable, partial log suspension when yarding across channels and stream cleanout once logging is completed	Paustian: Go ahead and use the wording on the left. At the end include: Use stream protection measures most amenable to local site conditions: (refer to “b” & “c” stream protection measures, FSH 2409.18)
Jacobson	4-71	IV Timber Harvest	“contract provisions for b and c stream protection measures are the most amenable to local site conditions...” This seems to leave open interpretations potentially to the advantage of timber harvest.	I suggest using different wording. Also, have you defined the provisions prior to putting into the document here?	Paustian: see wording change for 4-71.
Tierney	4-81 and others	Process Groups	All process group S&Gs focus attention on harvest within the RMA. What about some guidance for intermediate treatments (including commercial thinning) which may be both programmed and commercial and may also be of benefit to the riparian resource?		Programmed harvest, including comm.. thinning is not permitted in the riparian buffer. Thinning designed to improve habit is, this would not be programmed volume. See WIL22, wildlife habitat improvement.
			<b>Forest Wide Standards and Guidelines - Scenery</b>		
Monaco	4-83	VIS11.1C	Changed assigned SIO to adopted SIO		Changed

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Monaco	4-84	Adopted SIO chart	Change 'Seldom Seen Areas' to 'Seldom Seen/Non-Priority' for consistency with text on previous page.		Changed
Monaco	4-84	Adopted SIO chart, footnote 1	Revise 'Seldom Seen or Non-Priority' to 'Seldom Seen/Non-Priority' for consistency with text on previous page.		Changed
Sever	4-85	VIS11.II.A.2.c	Change "LTFs are generally not appropriate in this setting" to	LTFs must be compatible with the LUD objectives.	Monaco did not agree.
Tierney	4-85	II.A.2.b	cut stumps as low as possible and angled away from the viewer. Incorporate this treatment in the timber sale contract.	I'm not sure there is a provision for this in contract language.	This is in the 1997 plan.
Sever	4-86	VIS11.III.A.	Change 'area' to 'unit', 'legacy trees' to 'reserve trees', 'likelihood of blowdown' to 'windfirmness', and 'play an important part in determining' to 'determine'	Need to check with Coleen if this is the two-aged definition	Changed
Sever	4-86	VIS11.III.B	Uneven-aged management - single-tree or group selection. Meeting a High or Moderate SIO in a low VAC setting requires a relatively small percentage of stems removed on a single-tree basis - anywhere from 5 to 20%. The exact amount <del>cannot be stated since a lot</del> depends on the slopes, viewing distances, and natural characteristics of the stand. To meet a Low SIO, <del>it is possible that</del> a larger percentage could be removed.	This is not a realistic prescription, we've found it is inoperable in most cases. Also, it doesn't match SIO moderate low VAC which says group selection or clearcutting to 10 ac. I'm discussing with Dom and Colleen.	Dropped strikeouts but Monaco doesn't agree with dropping this. <b>Lee: Ok let's say that.</b>
Tierney	4-87	D.III.A	Uneven-aged management should not remove (on average) more than 1/3 of the BA in the stand. The end result must be at least 3 age classes (three entries, each removing an average of 1/3) to be considered uneven-aged.		Changed 40% to 30%.

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Tierney	4-88	Figures	Without some text to explain what we are looking at here, I'm not sure what to make of these pictures. WHAT ARE WE TRYING TO DISPLAY/EXPLAIN HERE???		As noted in the text, they are graphic illustrations of the harvest activities designed to meet each of the SIOs.
			<b>Forest Wide Standards and Guidelines - Soil and Water</b>		
Krosse	4-89	S&W1111.I.B.		Add the following, "Use the National Hierarchical Framework of Ecological Units (TEUI) to inventory and classify ecosystems.	Already there. Added (TUEI)
Anne	4-90	S&W112.A.5	2 <sup>nd</sup> to last sentence before numbered items. <b>Delete extra "."</b>		Deleted
Anne	4-90	S&W112.A.7	Item 7. Soil Map Units (SMU's) with McGilvery soil meet the criteria for tentatively suitable forest land, but require harvest systems capable of at least partial suspension over the entire length of the yarding distance over the McGilvery soils. SMU's with McGilvery soil may be considered for harvest on a case-by-case basis. <b>Believe research on McGilvery soils is complete and that this item can be deleted in its entirety. Verify with Dennis Landwehr, TNF Soil Scientist.</b>		Dennis Landwehr says to leave it in, it still applies in some situations.
Sever	4-91	S&W2.I.A.3	Drop commercial nurseries		Dropped



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Krosse	4-91	S&W2.I.A.3.	Delete the following: “Native plant material sources include <del>commercial nurseries</del> , agency native seed programs and local seed collections”. Add the following: “If the use of non-native seed is necessary, consult FSH 2080 for current Forest seeding direction. See Biodiversity and Plants S&Gs).”		Deleted and added as requested.
Sever	4-91	S&W2.I.A.5	Drop ‘and storage’ from ‘Road decommissioning <del>and storage</del> projects to improve watershed conditions should pay special attention to fish passage, channel stability and water quality issues’	Need to keep storage and decommissioning separate.	Still need to pay attention to fish passage etc. if storing a road. <b>Lee: I agree</b>
Thompson	4-91	S&W112.II.A.	“A watershed analysis must be documented as part of the NEPA decision in these circumstances. Watershed analysis (as described in Appendix C) is otherwise not required, but may be conducted at the discretion of the responsible line officer.”	New paragraph (separate from #2): The first sentence was intended to apply to both #1 and #2 (not just #2). The second sentence applies more generally to the topic.	Changed
			<b>Forest Wide Standards and Guidelines - Subsistence</b>		

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Rickards	4-93		has this been checked with the recent FSH 2090.23 (R10 supplement - 2006)? The draft plan language seems dated compared to the newer supplement – could there just be a cross-reference to the new FSH supplement?		O'Connor– This is a valid concern – the language is outdated compared to the newer Handbook. I will work with Dave Johnson in subsistence on this and either incorporate the language in its entirety or (my preference) refer to the Handbook for the specific info.
Reeck	4-94	SUB.I.D	How are changes in subsistence patterns and activities measured or determined at the project level. There is not guidance here. How much change is acceptable or is there a threshold to be used? I am not sure a project level analysis could address this point.		O'Connor– I do not suggest any change – this comment is really a Forest Plan implementation issue. The standard does not specify the scale of analysis and should not be interpreted to be project scale. Also, the monitoring plan displays how trends in subsistence resources are monitored.
			<b>Forest Wide Standards and Guidelines - Threatened, Endangered, and Sensitive species</b>		

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Benna	4-95	I.A.2. last line	“Accomplish baseline inventory needs commensurate with other forest inventory efforts.”	so is this truly something we can implement? gathering baseline information? seems we have a lot of baseline inventory needs – not only in the wilderness – can we expect funding for this?	O’Connor: Address in information needs
Kessler	4-95 to 99	TE&S.II	Kittlitz murrelet was added to the Sensitive Species List about 3 years. Its absence from this section is now an omission.		O’Connor: Check to make sure, if it did get added it’s both a candidate and a sensitive spp. Check with Steve
Sever	4-97	TE&S.II.K.	Delete Northern Goshawk S&G, they’re replaced with legacy S&Gs.		I don’t think this is correct. O’Connor– Do not change. We did not replace all of the goshawk standards with legacy, only those pertaining to leaving residual structure on the landscape.
Sever	4-97	TE&S.II.K.1.e	I want to discuss this one with the Wildlife folks first – I’m not sure of its interpretation and its impact on the timber program.		O’Connor: This will be considered in the final edits of this S&G.

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Benna	4-97	TE&S.II.K.1.	So once buffered, a goshawk nest is always buffered? The raptor section provides for if two years not occupied then buffers removed but I don't see this here – although then in c) it says that activity restrictions are removed for active nests that become inactive or unsuccessful but again doesn't say if inactive for two years – or just a year after buffer applied.		O'Connor: We will consider adding language to specify when a goshawk nest is no longer active in the final edits of this S&G.
Kessler	4-97	TE&S.II.K	The plan specifies that “ <i>Activity restrictions are removed for active nests that become inactive or unsuccessful;</i> ” however, there are no definitions or direction provided as to what constitutes an inactive or unsuccessful nest. They need to offer a definition; for example “There is no evidence of occupation, as defined in K(1)(a)(1–6) for 2 or more consecutive years.”		O'Connor: We will consider adding language to specify when a goshawk nest is no longer active in the final edits of this S&G.
Tierney	4-97	J	So, if an old nest is found and is continually unoccupied, why are we protecting unused sites? When does an old, unoccupied nest become not a nest anymore?		See above.

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Benna	4-97	K.1.e	This 300 acres – this is only if found while under sale or contract – so we do not have to add the 300 in our planning if we know there is a nest or this applies too in the planning – or only if known nests are active when we sell it? And again is this forever? Or if nests are inactive do we get the 300 acres back – do they go back to being available for development? How about again the 100 acres? or are these – mainly the 300 acres only applied to that year so “that year’s brood ...[can] successfully fledge from the nest.” Is it just the 600-foot nest buffer that stays?		O’Connor: We will consider adding language to address this in the final edits of this S&G.
Tierney	4-97	K.1.b	100 acres is ALOT. Why are we providing sooo much more protected land for a hawk that is on the very edge of its range than we do for our National Bird??? Don't you see a correlation between how much habitat these birds need and the fact that they are hare hanging in here by a string at the edge of their range? (yes, I don't like goshawks - sorry)		See above, also, eagles mainly nest in the beach buffers, which are already protected
Reeck	4-97	TE&SII.J	The term “Seek to maintain abundance and distribution”? This term is confusing.	Some people are of the opinion that maintain means no reduction in abundance or distribution from the original condition. How can a project meet this element? Timber harvest will usually always reduce the abundance and distribution of some resources such as deer at a project scale.	O’Connor: I could not find this language in the TES section but found in the subsistence section. Leave as is – it sets broad objectives for subsistence resources at the Forest level.

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Tierney	4-97	L	15 miles! That's seems close to the safe radius for a nuclear explosion! Do we REALLY NEED that much distance??? For a historical nest site???		This is unchanged from the 1997 Plan. The objective is to avoid affecting prey species.
Benna	4-98	N. Osprey	again do we have reasoning for keeping buffers even if nests are inactive for two years? #5. Providing trees for osprey – only in osprey habitat areas? only in areas near water and so far inland from water? Only where we find osprey or observe activity? or just where nests are identified? or anywhere? And does the legacy retention count for the reserve trees for osprey? How much retention is expected with the reserve trees? If legacy is not applied, what is the criteria – just reserve trees – again inconsistent application across the Forest – unless we have published literature/science that we are going to cite for our decisions for the amount of reserve trees left and where, or why we aren't leaving reserve trees in some areas.		O'Connor: Legacy would not likely count towards this, but they may. However, this is a nest buffer issue and should not be confused with retention of structure.
Krosse	4-96	TE&S II. Sensitive Spp. H.1.	Conducts biological evaluations...	Change word "protocol" to "guidance"	Changed.
Rickards	4-96 to 99		doesn't kittlitz murrelet belong in here somewhere?		It is not a sensitive species, just a candidate species

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Jacobson	4-97	TE&S.II.K	Why did the “Conduct inventories to determine the presence of nesting goshawks for proposed projects.” get deleted from this section? We are still directed to conduct project level inventories to identify heron rookeries and raptor nesting habitat using the most recent inventory protocols in the WILDLIFE S&G Heron and Raptor Nest Protection section (this applies to hawk and owl). Is this why it was dropped from the TES S&G section?	O’Connor Agree – will include this but have changed all inventory language to allow flexibility to change protocol as new methods are developed.
Benna	4-99	R. Sensitive Plants 1	Overall, this section concerns me because while we want the FP to guide us with room to move and become project specific, consider providing a buffer – this means that a buffer is not necessarily required? In what situations or what would be the justification for not applying a buffer with this kind of language? and “a suitable buffer in the area around the known plant locations that meets the habitat needs of the species” – where would that information be – I mean I would hate to see one district give a species 50-foot and another district 100-foot for the same species – where is the published science on appropriate buffers (sizes) for different species – just seems too wishy washy and slippery – open to a lot of inconsistent application across the Forest – unless there is some definite science out there we can point to for our buffer decisions at the project level - Are buffers for one plant? or only if several are found? What if it is the only place to put a road? What if we have to impact the plant – and again does just one plant get a buffer – or consideration of a buffer? Has the impact of this been considered on timber harvest, economics? Can retention in the area count as the buffer – say if legacy is being applied, can it be the retention around the plant? would we still have to identify a buffer size that is being accounted for through the legacy – or other retention in the unit? (same comments for rare plants)	Krosse  Need to leave flexibility to IDT and use adaptive mgmt.

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Benna	4-99	R. Sensitive Plants 2.	<p>where it is necessary to protect (again what is the criteria we use in our consideration of a buffer to decide yes or no) implement a monitoring and eval plan – I’m assuming this will be part of the annual monitoring and be in the report and that there will be adequate funding for this and it will be accomplished at what the SO level? or are districts expected to do this – can this be accomplished thru sale admin folks? And again could this be for only one plant?</p>		<p>Krosse</p> <p>RF-Appropriate place to make decisions on this is the project specific analysis</p>
Reeck	4-99	TE&SII.R	<p>This whole section lacks the substance that is needed for direction at the Forest Plan level. We need to have a clearer direction and discussion about the plants. More similar to the animals mentioned in this section.</p>	<p>Where would a project find direction on what a “suitable buffer” might be? That seems too open ended, and what would be used as a reference or source? We have specific number under point R3 but not under point 1, why? Manual or handbook direction anywhere???</p>	<p>Krosse</p> <p>RF-Appropriate place to make decisions on this is the project specific analysis</p>



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			<b>Forest Wide Standards and Guidelines - Timber</b>		
Sever	4-100	TIM111-1.I.B	Change “Reinventory vegetation” to Reinventory forest vegetation		Changed
Reeck	4-100	TIM 111-2.1.D	Last sentence. “A silvicultural analysis for project planning should address both stand and landscape conditions.” What is the definition of the landscape? VCU, Watershed, WAA, ecological subsection, or Forest??? Some clarity would be appreciated.		See the Glossary for definition of VCU, Watershed, WAA, ecological subsection, and Forest, will add Landscape
Tierney	4-100	TIM111-2.I.I	Pacific Yew, Pacific Silver Fir, and Alpine Fire are considered rare tree species (see S & G Plants Section C).	It is very unclear what the protections need to be for these tree species.	See rare plant section indicated.
Reeck	4-101	TIM112-3.I.A	I believe we have abandoned the “ten-year timber sale schedule” for a 5-year schedule. Not operating under the 10-year schedule.		Dropped section
Reeck	4-100	TIM 111-2.1.D	B. do we mean plan period = decade or 160 years? Suggest we use the # of years B. 2. Do we really need NIC I & II anymore? Seems like so little is in NIC II, what’s the point other than a constraint in the model to make sure some of the least economical land gets scheduled?		Planning period is a decade, see Glossary <b>Lee: Correct reference is 112.1b use decade NIC still required.</b>
Sever	4-101	TIM 112.I.B.2	<del>Track and report project volume separately for each NIC component; use the Sales Tracking and Reporting System (STARS). Base volume estimates on available project data.</del>	Delete this, it is FMS direction and doesn’t need to be repeated.	Dropped

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Rickards	4-101	TIM112-3.I.A	I'm not sure there is a 10-year timber sale schedule anymore – isn't the Tongass just doing 5-year schedules?		Dropped section
Sever	4-101	TIM112-3	Drop entire section		Dropped section
Tierney	4-101	TIM111-2.I.L	Can we cover some guidelines regarding treatments that attempt to 'break up' the continuous canopy of large even-aged stands? There are proposals to essentially create large temporary canopy gaps in very large stands/groups of even-aged stands to get some vertical structure back into these areas. Can we call such treatments intermediate with an objective of creating new age classes?		<p>Uneven-aged management could be used to open stands, similar to gap-phases disturbance. Lee??</p> <p>RF-Appropriate place to make decisions on this is the project specific analysis – stand-specific prescriptions. Goals and Objectives are in FP.</p>
Sever	4-101	TIM113.I.A	Add: 'Timber harvest unit cards will document resource concerns and protection measures, include a map with relevant resource features and be included in NEPA documents.'		Added (with minor word change)

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Rickards	4-101	TIM113	B. Is this SAI and KV language still current?		Sever: The Sale Area Improvement (Knutson-Vandenburg [K-V] Plan) developed during the inter-disciplinary NEPA process identifies resource improvement opportunities within the sale area. Schedule other reforestation prioritized by mitigation or enhancement needs.
Rickards	4-101	TIM113	C. Wouldn't the 2006 ACMP programmatic agreement come into play here?		Sever: I suggest we move A and B (using the above wording) under TIM112 since they are more related to planning and IDTs than coordination with other agencies and delete TIM113 altogether.
Sever	4-101	TIM113.I.B	Change 'The project NEPA analysis, which forms the basis for the Sale Area Improvement (Knutson- Vandenburg [K-V] Plan) identifies resource improvement opportunities within the sale area. Schedule essential reforestation prioritized by mitigation or enhancement.	To: 'The Sale Area Improvement (Knutson-Vandenburg [K-V] Plan) developed during the interdisciplinary NEPA process identifies resource improvement opportunities within the sale area. Schedule essential reforestation prioritized by mitigation or enhancement.'	Changed
Sever	4-101	TIM113.I.C	Drop		Dropped

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Sever	4-101	TIM114.I	Drop scenery section	Discussed with Dom Monaco.	Monaco agreed, Dropped
Rickards	4-101	TIM 114.I.A	“Design all vegetative mgt. activities to meet SIOs” reads like a standard – shouldn’t this be a guideline: in timber production LUDs, all veg. mgt. activities should be designed to meet SIOs to the extent practicable” – seems to be more compatible with the mgt. rx language on pg. 3-132 that other resource objectives are OK if they “do not have a significant adverse impact on the timber resource goals”.		This section has been dropped, see above.
Rickards	4-102	TIM 114. II.A.1	suggest that this can and should be part of the silvicultural report, not necessarily part of the NEPA process – is this section still current?		Sever edited this, see below.
Sever	4-102	TIM114.II.A.1	Change to:	Consider silvicultural systems other than clearcutting to meet other resource objectives at the project level. As part of the project NEPA process, analyze current scientific information related to the applicability of alternative timber harvest methods.	Changed
Reeck	4-102	TIM114.III.B.3	FMS should be FSM.		Changed
Sever	4-102	TIM114.II.B	Drop		Dropped
Sever	4-102	TIM114.III.B	Drop last line		Dropped
Sever	4-102	TIM114.III.B.1	Use clearcutting <b>only</b> where <b>such-a practice is</b> determined to be the best system to meet the objectives and requirements of Land Use Designations.		Changed with minor edit

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Sever	4-102	TIM114.III.B.2	Change 'Generally apply' to 'Apply'		Changed
Sever	4-102	TIM114.III.B.3	Change 'FMS 2470-R-10-2400-2005-1 clarifies limitations on "clearcutting". It is limited to areas where it is essential to meet Forest Plan objectives and involve one or more of the following circumstances'	FMS 2470-R-10-2400-2005-1 clarifies limitations on "clearcutting" to areas where it is essential to meet Forest Plan objectives and may involve one or more of the following circumstances'	Change not grammatically correct, left original but added "may" as requested.
Rickards	4-103	TIM 114. IV. C and D	<p>Size of Clearcuts: check this with FSM direction to make sure consistent – seems like we've mixed delegated authorities, and the new language is much less restrictive: FSM 1921.12(e)): Here's what's in the FSM now:</p> <p>2. Established maximum size openings may be exceeded when carrying out projects and activities after appropriate public notice and opportunity to comment and after review by the officer one level above the Responsible Official.</p> <p>3. Maximum size openings do not apply to the size of areas harvested because of catastrophes such as, but not limited to, fire, insect and disease attack, or windstorm.</p>	<p>Server: Where it is determined by an environmental analysis that exceptions to the size limit are warranted, the actual size of openings may be up to 200 acres, if required due to natural biological hazards to the survival of residual trees and surrounding stands, and up to 150 acres for the remaining factors, with the approval of the Forest Supervisor.</p> <p>The Forest Supervisor will identify the particular conditions under which the larger size is warranted by considering the benefits to be gained.</p> <p>Exceptions to the 150-acre size limit (200 acres for natural biological hazards) are permitted on an individual timber sale basis after 60 days public notice, and review and approval by the Regional Forester.</p>	<p>Sever: Move this under III. Even-aged Management since that's only where it applies and use the wording provided. I did talk with Colleen about this one also. See recommendation in column to the left.</p>
Sever	4-103	TIM 114. IV. G	Change 5 years to 10		Changed

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Sever	4-103	TIM 114. VI. A	Drop: <del>There is very little experience and research in using uneven age methods in southeast Alaska's western hemlock-Sitka spruce forest type.</del>		Dropped
Sever	4-103	TIM 114. VI. B.1	Drop adaptive management, add economics and commercial harvest, drop monitoring	Use uneven-aged management where the interdisciplinary process determines the system is appropriate to meet the goals and objectives of the Land Use Designation including the protection of excessively steep or unstable soils, scenery, wildlife and fish habitat, recreation, timber supply and economics and to supply of commercial and noncommercial wood products.	Changed
Sever	4-103	TIM 114. VII. A	Drop: <del>'Continue development and application of the Alaska Region Second Growth Forest Management Program.'</del>		Dropped
Sever	4-103	TIM 114. VII. B	Drop 'commercial' and add: 'Promote and emphasize commercial treatments. Promote stewardship treatments as funding permits.'		Changed
Sever	4-103	TIM 114. VII. C.1	Drop: last line		Dropped
Sever	4-103	TIM 114. X	Drop		Dropped
Sever	4-103	TIM 114. XII	Drop		Dropped Lee: I agree

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Tierney	4-103	V. A	Leave strips between openings must be of sufficient size and composition to be managed as a separate stand. (minimum stand mapping size is 5 acres)	Are we back to a FP directed minimum mapping size for GIS????	Lee???  OK, we will remove the reference to minimum mapping size
Sever	4-104	TIM114.VIII.D	Not sure if this MOU still exists: "A Memorandum of Understanding between the State of Alaska and the Forest Service on coordination of beach log salvage dated April 23, 1980 provides direction.		Lee: Pull this out and send to me. I may send to the state and Larry. Sever sent replacement text.
Tierney	1-104	TIM114.VIII.A	Salvage cutting is the removal of dead trees or trees being damaged or dying	The recent court assertion sheds some dim light on the idea of "dying" trees and the salvage including these undead. The court said that "dying" does not equal "dead" and salvage applies to dead stems. - Just a note for caution!	Lee?  Leave as is. This needs to be addressed at the project NEPA stage
Tierney	1-104	TIM114.VIII.F	Allow no timber salvage in Riparian Management Areas with the following exception: salvage could be allowed, with Line Officer approval, following watershed analysis if the salvage activity is needed to meet or further riparian management objectives for the process group	This is not a good move. We shouldn't be forced to wait for a lengthy analysis so we can salvage. There is either a benefit to be gained or not for the riparian resource and that should be the only question we need to ask.	Salvage within the riparian reserve can affect water quality; therefore, a watershed analysis is needed. Watershed analysis does not have to be a 200-page document!
Sever	4-105	TIM114.X	Drop. No longer used, proportionality was for the long-term contracts only		Dropped.
Sever	4-105	TIM114.XI	Drop.		Dropped. Covered elsewhere.

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Jacobson	4-105	TIM114.XII	Add the following sentence to existing paragraph: “As laid out” (or phase II) unit cards are a useful tool for facilitating application of protection measures during sale administration and for monitoring compliance with and implementation of standards and guidelines.	(This sentence was added to the riparian section under Timber Resources so rightfully it should be added in the Timber S & G’s).	XII was dropped because it is covered in Riparian section. See above
			Unit cards should document mitigation and protection measures displayed and documented in NEPA documents.	Please reinforce the previous requirement to have "as layed out" unit cards (and GIS layers) prior to contract. Apply this requirement to all presale harvest /treatment unit activities.	See above.



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Jacobson	4-105	TIM130.I.A	Add the following as stated in the TPIT Clarification for personal use Timber Harvest and Salvage of Standing Green Trees in OGRs and Beach, Estuary and Riparian Buffers:	Each Ranger District should identify priority areas for personal (free) use timber harvest in LUDs considered suitable for timber harvest. Old Growth LUDs and beach, riparian, and estuary buffers will be considered for personal use timber harvest only when the accessibility of other suitable lands are not feasible, such as when the eligible permittee lives in an unroaded area with no feasible access to designated “suitable timber” lands, and when the LUD objectives can be met. Personal use timber harvest will be regulated and its’ cumulative effects monitored in LUDs that are unsuitable for timber harvest to assure that the LUD objectives are fulfilled. Line officers will determine if LUD objectives will be compromised before approving personal use timber harvests.	Sever? <b>Lee: yes send to her but point out that we are trying to incorporate tpit clarifications</b>  Sever: Info on personal use in Beach and estuary, and riparian is in several places, leave as is. I don’t think using “permittee must live in unroaded area” is consistent with ANILCA  O’Connor provided statement that incorporated TPIT intent.
Sever	4-105	TIM130.I.B	Replace existing standard with	Make Non-timber Forest Products (see Plants S & G) available and consistent with LUD management objectives. Consult the Tongass National Forest Interim Special Forest Products Resource Management Policy for guidance on non-timber forest products' permit ting and NEPA issues.”	Changed

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Krosse	4-105	TIM 130 I.B.	Change 'Make Special Forest Products available, such as berries, mushrooms, Sphagnum moss, cones, bark, Christmas trees, boughs, trolling poles, spruce roots, cedar bark, and transplants consistent with LUD management objectives. Integrate the use and availability of these forest products with historically used forest products. Work closely with local Tribes in order to avoid harvest of SFP's that would conflict with cultural or spiritual practices.' To:	Change to read the following: Make Non-timber Forest Products (see Plants S&G) available and consistent with LUD management objectives. Consult the Tongass National Forest Interim Special Forest Products Resource Management Policy for guidance on non-timber forest products' permit ting and NEPA issues."	Changed Special to non-timber.  See Sever's edit of same bullet above
Sever	4-105	TIM130.I.C and D	Add "personal use"		Added
Krosse	4-105	TIM 130 II.C.	Add: 'known to be' available		Added
Sever	4-106	TIM140.I.B	Integrated Pest Management Working Group is defunct.	Delete reference to Integrated Pest Management Working Group.	Deleted.
			<b>Forest Wide Standards and Guidelines - Trails</b>		
Krosse and Sever	4-109	TRA12.I.D.1.		Add to include the following, "Develop and incorporate in project plans an erosion control and stabilization plan for stabilizing all human-caused soil disturbances. Use approved seed mixtures for revegetation of disturbed sites (See Plants S&Gs)."	Added with minor edit.
			<b>Forest Wide Standards and Guidelines - Transportation</b>		

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Krosse	4-110	TRAN122.I.	Add the following section: “F. With road construction and maintenance, avoid the introduction and spread of invasive species. See <b>Biodiversity Standards and Guidelines and the Invasive Plant Management Handbook</b> , FSH 2080, for specific guidance.”	Delete reference to Biodiversity S&G, since there are none.	Dropped Biodiv. S&G, added Invasive Plant Mgt. Handbook etc
Rickards	4-110	110: TRAN122, I.A.1.	“Keep the NFS roads open to public motorized use unless:” – I think this should be re-worded in light of the “closed unless designated open” policy change. Maybe something as simple as: keep the <b>designated</b> NFS roads open ...		Lee: lets add the word “designated” as she suggests
Rickards	4-111	TRAN212, II.A.	I no longer have an Appendix J – does it still exist? Is it needed?		The 1997 Appendix J is now Appendix C
Tierney	4-116	TRANS24.A	Decommission roads identified through environmental analysis in a condition that maintains stream connectivity and minimize impacts to the watershed.	Do not decommission roads where future transportation needs will exist.	This needs to be determined during the IDT/NEPA process
			<b>Forest Wide Standards and Guidelines - Wetlands</b>		
Krosse	4-118	WET I.A.	Since assessing the “values” of our wetlands (other than in RMAs, estuaries and beach fringes) is not a requirement, I suggest we delete any reference to it in this S&G. Values are subject and not easily determine, nor monitored. I suggest we focus on more direct measures of impacts on known functions of wetlands.	Delete the words “and values”	Deleted

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Krosse	4-118	WET I.C.		Delete the words “and values”	Deleted.
Krosse	4-118	WET II. C.	This statement seems to be more of an information need than a S&G. It will be impossible to implement as presently written.	Delete statement C.	Statement is a guideline. Lee: I agree with response
Landwehr	4-119	WET III.A	Add: For non-exempt activities permit requirements may include compensation or replacement of any lost aquatic function.	Added based on COE comments April 23, 2007.	Added
Krosse	4-118	WET III.	Delete the current section E. This has been determined by the Administrative study by D’Amore and Julin.	Add Sections to read the following: E. Use a quantitative method to assess project effects upon wetlands. F. Mitigate to minimize impacts caused by activities when BMP’s do not perform as expected. G. When permanently decommissioning road through wetlands, remove cross-drainages and fill material to restore wetland habitat.	Changed
			<b>Forest Wide Standards and Guidelines - Wildlife</b>		
Krosse	4-119	WILD112.I.	This section needs references to the plants and soil/water S&Gs where it calls for the need for habitat (ecosystem) information.	Section E: Add “(See Plant and Soil/Water S&Gs).	Added reference in both places
Krosse		WILD112.I.		Section B. Add “See Plant and Soil/Water S&Gs).	Added
Krosse	4-119	WILD112.II		Section G. Add “(See Plant and Soil/Water S&Gs).	Added

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Rickards	4-120	WILD112, IV	Legacy Forest Structure – the euphemism for POG? Are we headed for a train-wreck because where we intend to concentrate harvest (N.POW, Etolin, Kup/Mitkof, Revilla/Cleveland) are also the VCUs that are higher risk and subject to the more restrictive POG retention? I can't tell from the VCU list in Appendix I where these are, has someone checked this out? Has this been reasonably modeled in spectrum? Suggest that the VCU list in Appendix I could at least be sorted by District or the 5 geographic zones to give people a spatial reference		O'Connor: Ignore – we have analyzed the effects of alternatives with legacy versus goshawk and marten S&Gs.  I do recommend we incorporate the comment about sorting the VCUs by geographic area or island.
Rickards	4-120	WILD112, IV. C.2	Is the Forest Plan planning horizon 160 years? Suggest put in (160 years).		100 or more years, added to Glossary

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Lerum	4-120	WILD112.IV	<p><b>Forest Legacy Standards and Guidelines</b></p> <p>These new standards and guidelines reflect a different approach in the conservation strategy and focus changes on how the matrix, or timber production lands, is managed. After a quick review of the DEIS, I could not find many specific scientific references for the justification of the increased importance of the matrix lands within the existing Tongass conservation strategy, to support the need for the legacy S&amp;G. Nor could I find an explicit display of how the legacy S&amp;G compare to the existing S&amp;G in terms of effects on resource outputs.</p> <p>NOTE: For reviewers, it would be useful to give references to where the objectives for matrix lands are described in the current conservation strategy. Overall, it appears the application of this legacy S&amp;G could have a substantial effect on potential timber yields where it is applied. Some of the reasons this approach would cause a decrease in potential timber yields include:</p> <ul style="list-style-type: none"> <li>○ This approach applies to all acres and all volume strata, whereas existing S&amp;Gs this is intended to replace applied only in certain areas and in the high volume strata.</li> <li>○ This approach assumes future harvest will occur in certain VCUs and addresses that potential future harvest by restricting ‘current’ harvest. That could lead to overcompensation now if the future harvest does not actually occur.</li> </ul> <p>Explain why steam riparian buffers would not be counted toward achieving legacy structure objectives.</p>	<p>O’Connor: We need to edit the Legacy S&amp;G to make sure it incorporates riparian buffers. We will consider adding language to address this in the final edits of this S&amp;G.</p> <p>OK, we have revised the S&amp;G to have less impact and be much simpler</p>
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Benna	4-120	Legacy Forest Structure	Just an fyi comment. In talking with our layout crew, while the Woodpecker sale may have had smaller units – PRD’s average size units are 20-40 acres so we are looking at the legacy structure s&g applied to most timber sale projects/units. Also, make sure standard/guidelines acknowledge when/where the legacy structure s&g is applied talk about whether the additional retention is needed or taken care of by the legacy s&g – repeat in every pertinent resource the phrase on page 4-122 under reserve tree/cavity nesting habitat A. “there fore is no need to leave additional reserve trees...”		O’Connor: We will consider adding language to address this in the final edits of this S&G.  We have increased minimum size to 20 acres and only to high risk VCUs. And will change the Reserve tree guideline back to the way it was
Tierney	4-120	WILD112.IV.	I continue to question the science behind all this. We have Wilderness and other non-development LUDs. We have additional old-growth reserve areas and riparian areas and connectivity corridors, adjacency requirements AND legacy requirements. Why sooo much???		The Forest is reviewing these Legacy S&Gs , see the two prior comments above
Tierney	4-120	WILD112.IV.	the measure is the percentage of the original productive old growth remaining in that VCU.	Sounds like we are creating another circular argument. Consider this: The purpose of legacy structure is to ensure sufficient residual trees within the harvest matrix to provide for the conservation strategy. If Legacy retention does this, then do we need to count recent management actions that leave sufficient legacy trees and treat these areas as past harvest? If so, why? This is much like the "when is young growth no longer considered young growth?" question.	O’Connor  Changed S&G – much more limited now. Specific VCUs are identified

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Tierney	4-120	WILD112.IV.	Within created openings > 10 acres, leave 30 percent or more of the area as legacy forest structure.	Well, at least AREA is a good deal easier to measure than % canopy cover! This constitutes a guaranteed 30% reduction in timber product output per given area, above and beyond whatever is not allowed to be counted. Speaking of which, what type of withdrawal/reserve qualifies as counting toward this required retention?????	O'Connor:  Changed S&G – much more limited now. Specific VCUs are identified
Tierney	4-121	WILD112.IV.F	Opening size is measured by considering all adjacent even-aged harvest that has not yet developed mature forest structural characteristics, regardless of ownership.	This is insane. Are we really going to consider ALL PAST HARVEST, REGARDLESS OF AGE as a FOREST OPENING??? This means that wherever there is any adjacency to past even-aged (or two-aged) management, we are virtually guaranteed to exceed the 10 acre limit for forest openings. What are we considering to be "mature forest structural characteristics"?? Do we mean old-growth characteristics? Or mature sawtimber characteristics???	O'Connor:  Changed S&G – much more limited now. Specific VCUs are identified
Tierney	4-121	WILD112.IV.G	Stream riparian buffers will be considered to be outside the opening and will not count toward legacy forest structure.	What about differences from LSTA to ROD regarding stream classification and RIP buffers??? Do we get to count surprises not currently mapped in GIS? Since the RAW is not part of the RMA, I assume we can count RAW buffers if they are not entered too heavily??	The RAW buffers can be counted. The Forest is considering whether to count the riparian buffer
Tierney	4-122	WILD112.IV.I	Therefore, legacy forest structure should remain indefinitely after harvest and shall be tracked through the life of the next stand. Salvage logging is generally prohibited unless the rationale is clearly documented and the effects are clearly neutral or an improvement	Why prohibit salvage of down retention?? It no longer meets the objective of providing some representation of old-growth trees and snags, only down wood (which there is plenty of if we are still entering old growth for harvest). Effects on what? The timber resource? The habitat? The stand structure?	O'Connor  It is not absolutely prohibited and can be done where it can be documented there are plenty of down logs



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Tierney	4-122	VI	Design projects to maintain landscape connectivity. Design young-growth treatments to accelerate old-growth characteristics to help increase connectivity for wildlife.	All young-growth treatments or just those for stands considered important to connectivity? We may find that we accelerate old-growth characteristics at the expense of timber production on timber production ground when these young stands were never intended to be old-growth again.	Matrix stands can contribute to connectivity even though the never become old growth.
Reeck	4-120	WILD112.IV.B	Some of the VCU's listed under Appendix I appear to be in error in their category classifications as compared to some project level analysis.		These are based on existing harvest from SPECTRUM analysis. Do you have a list of VCUs that are incorrect?

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Cady	4-120	WILD112.IV.C.2.a.	<p>Created opening is not defined. In particular, how would partial harvest units with some percentage of retention be addressed? How much canopy retention results in no “opening” being created. I think this is partially but not clearly addressed on the next page.</p> <p>“Area” is not defined. Do they mean the retention standards to apply to each unit? There is no clear mandate to protect coarse canopy, HVOG, or low-elevation old growth that is thought to be most important for many old growth dependent species of wildlife. Connectivity standards are unclear.</p>	<p>O’Connor: We will consider adding language to address this in the final edits of this S&amp;G regarding the definition of created opening. There is a clear mandate to protect old growth in the Forest Plan through the conservation strategy reserve system and through specific S&amp;Gs. The need to consider retaining additional old growth at the project level (for connectivity or species specific needs) cannot be dictated at the Forest Plan scale because there needs to be site specific information to determine whether additional OG is necessary and where it should be left on the landscape. The Plan gives direction to address these issues and gives the flexibility figure out how and where at the appropriate, project, scale. For connectivity, some edits were made to help clarify this but again, the Forest Plan addresses the large scale connectivity issues and the project scale should address smaller scale.</p>	<p>O’Connor: (see column to left for response, I couldn’t fit it all in this space!!)</p>
Cady	4-121	WILD112. IV.E.2.a.	change “fo” to “of		Changed

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Cady	4-121	WILD112. IV.F	<p>How is “adjacent” defined with respect to determining the opening size? If a strip 1 tree wide is left between nearly adjacent patches of harvest 9 acres in size, is this adequate to meet the requirement of openings less than 10 acres? Similar rules in the Pacific NW resulted in large harvest areas separated only by thin strips of trees to overcome the adjacency rules. Recommend adjacency be defined more clearly and that some distance be required to be maintained between neighboring patches that is biologically meaningful. How are mature forest structural characteristics defined?</p>	<p>Mature forest is one in which the dominate and codominate trees have passed CMIA (see glossary), similar to FEMAT definition.</p> <p>O'Connor</p> <p>Leave flexibility for IDTs</p>
Rickards	4-121	WILD112, IV. G	<p>I’m among those who wonder why we can’t count stream riparian buffers toward the legacy buffer? H. Why clumps? In general, SE Alaska forests seem very uniform, unless I’m looking at a muskeg – is that what we want to simulate?</p>	<p>O'Connor: We will consider adding language to address this in the final edits of this S&amp;G.</p> <p>Already considered in determining the specific VCUs to apply standard. In general, clumps are more likely to be used by more species and are more blowdown resistant</p>

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Cady	4-122	WILD112, IV.H	Recognizing this, site-specific adjustments to the amount of legacy forest structure left may occur if documented and justified through a landscape assessment or other mid-scale analysis process.”	This phrase makes it sound like all of the rules can be disregarded if a justification is identified in a mid-level analysis. This opens up any possibility from justifying full retention due to wildlife concerns or justifying no retention due to economic concerns. Perhaps a clarification of what kinds of adjustments are acceptable would be helpful.	<b>O'Connor:</b> We will consider adding language to address this in the final edits of this S&G to make it clear that site specific adjustments must be biologically based. However, we purposely left flexibility because deciding how much legacy structure to leave in an individual unit should be a function of the surrounding landscape and this gives the option to adjust based on this.
Reech	4-121	WILD112.IV.D.2	What is the definition of “Forest Plan planning horizon” in terms of years?		More than 100 years. See Glossary addition

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Sever	4-122	WILD112. IV.A	Change 'Identify important' to 'Assess values of'		<p>Other commentors didn't like the term "values"</p> <p>O'Connor: The only place I could find this text was under WILD112. VII A. We will keep the current language – by having the term "important" it implies we are only concerned with winter range that is of high value.</p>
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Reeck	4-122	WILD112.VI.A.2	The last sentence says “Designed corridors should be of sufficient width to minimize edge effect and provide forest interior conditions.” What is sufficient width and where is it explained and the proper reference? Can we put that width in here or reference the EIS? Sufficient is not providing enough direction here and this is a very important point.		O’Connor: Keep current language. Defining what a sufficient corridor width is best done at the project level and should not be prescribed at the Forest Plan scale. The Forest Plan gives guidance on the types of features to consider when determining the width, but biologists will need to consider the most current literature on corridors, the species of interest and the surrounding landscape attributes to determine if corridors are necessary and what width is appropriate.
Benna	4-122	WILD112.V.A. Reserve tree/Cavity Nesting	so do I understand that in all units under 10 acres we will still need to retain reserve trees for cavity nesters? And how much retention/how many reserve trees? – so no unit will be clearcut – we will always have reserve trees?		O’Connor: We will consider adding language to address this in the final edits of this S&G.

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Cadt	4-122	WILD112.V.A.1	There is no indication of how many or how much to retain for snags in areas where legacy standards are not applied. Need to know how much.		O'Connor: The language for Reserve trees was not changed from the 1997 Plan. We did not consider changing this during the amendment and will leave as is.
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Cadt	4-122	WILD112.V.A.2	Last sentence. How is sufficient width defined? Is only POG to be used in this analysis, or are other natural habitats acceptable? When contiguous POG is not available, how big of a gap is OK?		O'Connor: Keep current language. Defining what a sufficient corridor width is best done at the project level and should not be prescribed at the Forest Plan scale. The Forest Plan gives guidance on the types of features to consider when determining the width, but biologists will need to consider the most current literature on corridors, the species of interest and the surrounding landscape attributes to determine if corridors are necessary and what width is appropriate. The standard clearly states the intent is to provide connectivity with old growth habitat.
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Rickards	4-122	WILD112, IV. H	so far we've just talked about watershed analysis – now we're introducing landscape assessment or other mid-scale analysis process – these are not in the plan glossary.		O'Connor: Change landscape assessment to analysis at the landscape scale.
Rickards	4-122	WILD112, IV. I	Suggest “clearly” be dropped from the last sentence so it reads: effects are neutral or an improvement. The burden of proof for “clearly” is tremendous –		Changed
Rickards	4-122	WILD112, VI	Landscape connectivity – I thought small OGRs were supposed to provide some of this connectivity, yet they are not even mentioned here?		O'Connor: Add small OGRs under the discussion in 2.
Kessler	4-122	WILD112.VII	We were surprised to see the lack of content here. Only 2 general S & Gs are stated. Deer habitat analysis has proven to be the single most contested and problematic issue in project after project on the Tongass NF. Problems include questionable use of the deer HSI model in project-level analysis, inconsistent procedures in applying the model, calculation errors, and inadequate documentation.	This plan amendment strikes us as a golden opportunity to clean up these problems by setting forth clear standards and guidelines for the analysis of deer habitat in project planning	O'Connor: This has not changed from '97 TLMP. Forest Plan sets broad direction and this is a specific analysis tool best left outside the plan.

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Benna	4-122	VII Deer	<p>Just a general comment – the current FP defines important deer winter range with canopy structure – which is not always what the deer model produces based on the four variables – sometimes low elevation, southern aspect and low snow will rate an area with shrubs (or a clearcut) as higher value and it will make the high value quartile for important deer winter range. The definition for important deer winter range (containing canopy structure) was actually under the wolf management s&amp;gs and I don’t believe this contradiction is in this version – but we want to be really clear about it – and of course we would want to acknowledge this about the model’s outputs, especially if we are using the model for the amendment.</p>	<p>O’Connor: I can’t find references in the Plan to this tie between important deer winter range and canopy structure. The Plan allows the model to adapt and change with new information.</p>
Cady	4-123	IX.B	<p>Define “a large amount of brown bear feeding activity on salmon”. In some locations where habitats are generally poor, a few streams may be supporting the only bears around for many miles. While feeding by just a few bears may not constitute “a large amount of brown bear feeding activity”, these smaller population density areas may be important for genetic connectivity between larger metapopulations of bears in other locations.</p>	<p>O’Connor: The Plan has sufficient information to help determine what important brown bear feeding sites are at the project level. The intent was not to buffer every place brown bears feed, but leave larger buffers where large concentrations of bears are found. Riparian buffers will be maintained on all salmon streams and afford adequate protection for those areas.</p>

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Rickards	4-126	XIV.A.1.c.	<p>It has always struck me that the less than 0.7 – 1 mile/mi<sup>2</sup> open road density is weird – wouldn't it be more clear to say less than 1 mile/mi<sup>2</sup>, and lower is better? This doesn't bother anyone else? And, this is causing considerable lack of consistent analysis approaches among the project IDTs now – about how to calculate this – below 1200 ft.? by WAA? It seems like clarification here would help everyone – even what's in TPIT could be clarified in the amended plan.</p> <p>Also – this has the 13/17 deer/ mi<sup>2</sup> – what's the 18 deer/ mi<sup>2</sup>, that we're using now? Again, this section should be updated and clarified, incorporating TPIT and whatever other informal direction is out there.</p>	<p>O'Connor: Change to 18 (this should have been changed). Again, mixing project level analysis with broad Plan direction.</p> <p>Changed to 18.</p>
Cady	4-126	XIV.A.1.c.	<p>“Where road access and associated human caused mortality has been determined, through this analysis”. Currently, our “analysis” on this topic consists of asking ADFG biologists whether or not they have a mortality concern. If a particular analysis is to be done besides this that involves processing road density and harvest data, perhaps it needs to be outlined more clearly for consistent application across the forest.</p>	<p>O'Connor: This is an implementation issue and not a Forest Plan document issue. We will work with ADFG to better define this issue.</p>
Kessler	4-126	XIV	<p>it seems odd that the only substantive and quantitative direction for deer comes under the section on wolves.</p>	<p>O'Connor: noted, but no change proposed.</p>

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Reeck	4-126	WILD112.XIV.A.2	The second sentence is very confusing saying 13 deer/sq mi. and then saying it equals 17 deer/sq.mi in brackets. What is the real number we are using 13 or 17? If the 13 does come from a model where is it coming from and why are we mentioning it if it does not relate to model analysis?	Suggest a clarification here or you will have projects all confused.	O'Connor: This is the 1997 plan language but will add language to clarify.
Kessler	4-126	XIV	There is a problem with the statement “ <i>Provide sufficient deer habitat capability to first maintain sustainable wolf populations, and then to consider meeting estimated human deer harvest demands. This is generally considered to be 13 deer/square mile (which equates to 17 deer/square mile using habitat capability model outputs) in biogeographic provinces where deer are the primary prey of wolves.</i> ” Specifically, what sense is the reader supposed to make from the parenthetical phrase? Why would 13 deer/sq mi equate to 17 deer/sq mi?		O'Connor: This is one we need to see if we can craft a change that makes in clearer yet keeps the intent.  Tricia edited this to make clearer
Benna	4-126	XIV.A.2. Wolves	I was under the impression we were using 18 deer/mi <sup>2</sup> – not 17. And then we know that we don't like to use the deer model to talk about deer numbers but here we have made a standard that we now have to talk about model outputs in terms of deer numbers which we know are not good and a slippery slope – they are not real deer numbers and I've been told are pretty meaningless in terms of management – we have been impressed to use the model and report outputs in terms of habitat acres – something we can actually locate on the ground – so this standard keeps us wrapped up in using deer numbers. While I appreciate the clarification of deer numbers actual versus model output – 13 vs 17 – where is the foothold/explanation/justification for this (something to put in our planning records)? How do we know that 17 deer model deer equals 13 real deer?		O'Connor: Change to 18.

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Sever	4-126	XIV Wolf	This standard has resulted in a lot of public comments and appeals and confusion with IDTs. It's clear if you read it completely but everyone puts their spin on it. I will see if I can work with someone in Wildlife on it.		O'Connor We have clarified this to some extent. No specific change proposed.
Tierney	4-127	XIV .c	Here we are again, managing wildlife by road density. What about bag limits, game regulations and enforcement?? Quit putting our resources at odds with each other, needlessly!		O'Connor: This will be clarified and language added to make it clear that we do road management only where its been determined to be a significant issue.
Benna	4-127	XV. Mountain Goat. 3.	Just wanted to say that there are times where corridor use is argued – Port Houghton/Cape Fanshaw (PHCF)– is there documented use? ADFG believes an area is used. Is it identified? It is the only area to put a road to access rest of peninsula...etc. I realize PHCF is slated to remain undeveloped in several alternatives, however identifying a corridor and maintaining it – I can see the arguments for such an area like PHCF – arguments that belief is not documented evidence of use. That maintaining a corridor could mean gating an area during winter or breeding seasons – could that be true?		O'Connor: Don't change, provides the ability to protect if needed.
Sever	4-127	XVI.B	We often get comments that we need to do surveys in order to find nests.	We need to make it clear that these are found by accident.	O'Connor - will clarify to make it clear we protect nests we find incidentally during project work.
Sever	4-127	XVI.B	Buffers may be removed if site remains inactive for two or more nesting seasons.	How many?	O'Connor: will clarify to two nesting seasons.

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Sever	4-127	XVIII.A.1	Ditto as with wolf, how do we determine these mortality concerns.		O'Connor: This is an implementation issue and not a Forest Plan document issue. We will work with ADFG to better define this issue
Benna	4-127	XVII. Moose Habitat. 3	I'd like to see clarification here like there is in the wolf section about road management/hunter and trapper pressure and moose – meaning the language “”where road access and associated human caused mortality (hunting and trapping)...etc. That ADFG and FS will work together..etc. I believe left as is, the language will open us up to the problems (appeals) we have been having with marten and wolves.	Please change this language to reflect to cooperation of agencies and the trapping/hunting plus road access connection in management – road access alone does not cause mortality – hunting/trapping limits and seasons also play a heavy hand. We don't want to set ourselves up to manage species by road access alone.	O'Connor: This will be clarified and language added to make it clear that we do road management only where its been determined to be a significant issue.
Benna	4-127	Marten XVIII.A.1.c	again I would encourage the wolf language that not only talks about road access as the mortality factor but that the associated hunting/trapping pressure needs to be part of the solution – SEE WOLF LANGUAGE. We want to make sure if there is such a mortality concern that the State is co-responding. If we are closing roads in response, the State (ADFG) needs to be limiting harvest/seasons, etc. Again we don't want the responsibility of controlling/fixing mortality concerns with road access/density alone.		O'Connor: This can and should be clarified.  Tricia edited this to make clearer

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Brainard	4-126 and 127	Wolf and Martin	Add this language to marten, wolf, heron and raptor, marbled murrelet, endemic mammals, goshawk and osprey S&Gs found in the legacy standard and guideline.	The legacy forest structure standard and guideline considers snags and replacement snag needs; therefore, there is no need to leave additional reserve trees (residual trees) where legacy percentage is applied.” I do not understand the thinking that trees left standing in buffers should not be counted toward retention.	O’Connor: We will consider adding language to address this in the final edits of this S&G. Tricia edited this to make clearer
Brainard	4-127	Marten	Include wording from wolf S&Gs into marten S&Gs concerning road closures. We should not be unilaterally making changes to road access. ADF&G needs to step up to the plate. If they are unwilling to change hunting and trapping regulations then why should we limit access? They need to become full partners, not stand back and throw stones!		O’Connor: This can be clarified  Tricia edited this to make clearer

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Brainard	4-127	Marten	<p>I believe we need to address the subject of endemic marten (<i>caurina</i> clade). We need to get ADF&amp;G to work with us. They need to change the sealing requirements and make it mandatory that all carcasses be turned in during sealing. We can assist ADF&amp;G doing necropsies to get the needed data to make good management decisions. This worked well on Northern Chichagof Island for Fadden and Parsley. This will help with the population determination by delimitating gender and age distribution within the population and the trappers success rates. We can follow those protocols established during that effort. Then we send the carcasses, or samples, to the state museum for genetic studies to determine if the animals are <i>americana</i> or <i>caurina</i>. This will go a long way to quell the comments of our detractors.</p>		<p><b>O'Connor:</b> This is primarily an implementation issue but we also will address the issue of endemic mammals in information needs.</p>
Cady	.....	Other comment	<p>Previously, retention for NOGO and Marten were targeted in areas below 1500' elevation. Without these clear requirements for retention, more retention is bound to be kept at higher elevations in less valuable wildlife habitats. Incorporate an elevation requirement into retention standards such as, where applicable, retention should be located below 1500' elevation.</p>		<p>O'Connor Legacy needs to be retained in the actual unit, so if the harvest unit is below 1500', you can't substitute retention at a higher elevation, it has to be retained in the unit.</p>



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Sever	4-122	WILD112.XV	Recommend dropping section on reserve tree/cavity nesting habitat		O'Connor The language for Reserve trees was not changed from the 1997 Plan. We did not consider changing this during the amendment and will leave as is.
Sever	4-122	WILD112.XVII	Recommend dropping section		O'Connor Moose is a significant issue on some parts of the Tongass and we will retain S&Gs to address moose habitat management.
Sever	4-122	WILD112.VI	Recommend dropping section		O'Connor The issue of connectivity is important to consider at the project level, especially since we know we have concerns in certain geographic provinces. We will retain S&Gs for connectivity.
Sever	4-128	WILD22	Recommend text attached below		O'Connor: The new language gives more emphasis and I would keep.

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**Wildlife Habitat Improvement: WILD22**

*I. Improvement Projects*

A. Continue a young-growth management program to maintain, prolong, and/or improve understory forage production and to increase development of old growth characteristics in young-growth timber stands for wildlife (deer, moose, black bear, and other species) benefit.

1. Consider stands for young-growth treatments which meet the following conditions:

- a) Historical deer winter range with high deer use.
- b) Historical or potential moose winter range.
- c) Areas with important and accessible consumptive and non-consumptive human uses of wildlife benefited by young-growth management.
- d) Young-growth timber stands which have a relatively high tree stocking density which would result in early loss of understory forage. Plant associations containing hemlock or spruce and *Vaccinium* or skunk cabbage on high site potential should be considered for treatment.
- e) Along areas of fragmented beach fringe where thinning young-growth stands will accelerate development of potential future bald eagle nest trees.

2. Consider the following for precommercial thinning:

- a) Time precommercial thinning before desirable forage species are shaded out by trees, although trees should fully occupy the site. Generally, highly productive sites will need to be thinned at a younger age (15-20 years) than moderate or low productive sites (20-25 years). Use site-specific conditions to determine the timing of precommercial thinning.
- b) Vary tree spacings according to site specific information and dependent on a desired condition. Consider spacings from 16 feet by 16 feet to 24 feet by 24 feet. Site-specific objectives should be developed in conjunction with silvicultural staff and should identify spacings to be used. Consider variable spacings and leaving some unthinned thickets and corridors to create future structural diversity.
- c) Generally, slash disposal treatments will not be necessary. In some site-specific areas, slash treatments may be needed to facilitate animal movements or increase forage production and availability. Slash treatments may include girdling trees, falling trees away from high forage areas, piling trees, or lopping and scattering of slash.

3. Consider the following for canopy gaps:

- a) It is generally recommended that canopy gaps be created at the same time as precommercial thinning activity.
- b) Generally, slash disposal treatments will not be necessary. In some site-specific areas, slash treatments may be needed to facilitate animal movements or increase forage production and availability. Slash treatments may include girdling trees, falling trees away from high forage areas, piling trees, or lopping and scattering of slash.
- c) Site-specific objectives and analysis should identify the gap sizes.

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Tierney	4-128	XVIII	Here we are again, managing wildlife by road density. What about bag limits, game regulations and enforcement?? Quit putting our resources at odds with each other, needlessly!		As noted in text: this applies where road access has been determined, through the analysis, to be the significant factor contributing to unsustainable marten mortality
Tierney	4-129	WIL22.I.A	I hope we don't go too far in "developing old-growth characteristics in young growth timber stands" at the expense of timber production on timber production lands!		Check if this is most appropriate in non-development LUDs  Most appropriate in NonDev LUDs and in Dev LUDs with significant past harvest - look at Plan wording to emphasize this?
Tierney	4-129	WIL22.I.A.2.c and d	Generally, slash disposal treatments will not be necessary. In some site-specific areas, slash treatments may be needed to facilitate animal movements or increase forage production and availability.		Several recent studies of thinning young stands in SE Alaska do not note any problems with the slash.

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Hood	----- -	MIS	If they are not already on the Management Indicator Species, I request that the following species be added: Lynx Wolverine	I'd like these two added because they are reclusive animals that represent positive indicators of solitude, one of the aspects of wilderness for which we manage. Marbled Murrelet This sea bird is a poor flyer that nests in forests and consequently requires the large fat branches of old-growth trees for landing and launching.	O'Connor: These 2 species are rare, elusive and difficult to inventory, let alone monitor and thus would be a poor choice for an MIS.
<b>Chapter 5</b>					
Rickards	5-3	Amendments	It appears that the new FSM 1926 language was paraphrased and some of the bullets combined, and #3. "Fluctuations" added – strongly suggest just sticking to the FSM 1926 language, perhaps even just refer to the manual here. Exact FSM 1926 language is included at the end of table.		Replaced with text from FMS 1926.51 as per direction from Rick Abt
Rickards	5-4	Adaptive Mgt.	I'm sorry, this will be the 1 & only editorial comment I make, BUT, please strike the first sentence – adaptive is NO longer new. This sentence was written over a decade ago.		Changed to: Adaptive management is the ecosystem management counterpart to "learning from experience."
<b>Chapter 6</b>					
Thompson	6-1 to 17	All	Entire chapter needs updating		This is being worked on. <b>Lee: Send all chapter 6 comments to carol seitz-warmth</b>

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<p>Susan Marvin, Regional Heritage Program Leader</p>	<p>Heritage Resources and Sacred Sites</p>	<p>General</p>	<p>Need to address the concept of Sacred Sites in the monitoring chapter also to ensure that the standards are being met. the Forest heritage staff (Mark McCallum) and Tribal Relations (John Autrey) should work together to come up with the monitoring question(s) and means for conducting the monitoring to answer those question(s). I would recommend that you contact either Mark or John and let them decide if some monitoring question(s) should be developed to ensure that the standards are being met. Then ask them to get the language to you if they think it should be included in the monitoring chapter.</p>	<p>John Autrey suggests adding sacred sites to heritage monitoring section:</p> <p>Are heritage resources and sacred sites standards and guidelines being implemented"? (I)</p> <p>"Are heritage resources and sacred sites standards and guidelines effective in protecting heritage/cultural resources/sacred sites as expected in the Forest Plan"? (E)</p> <p>and insert sacred sites accordingly in the evaluation criteria and sampling methods statements.</p>	<p>Added sacred sites as requested.</p>
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Aho	6-1 and 6-2	Roles and Responsibilities	I know the monitoring plan questions are going to be revisited before the FEIS is published. This comment is to also revisit the role of the Pacific Northwest Station in completing the Tongass monitoring. The Tongass has worked well with the PNW Station, but the Station does not complete all the items listed on p. 6-2 and probably never will. For example, they do not collect all the data for our effectiveness and validation monitoring. At least for the fish resource, the Tongass collects the data for the MIS monitoring and the Riparian effectiveness monitoring.		
Friberg	6-1	Introduction	The first paragraph and second sentence – consider removing “the public, the Forest Service, and other concerned agencies with”. The word “concerned” strikes me wrong and think that it not necessary to identify <u>who</u> this information is for.		
Friberg	6-1	Introduction	The second to the last sentence in the second paragraph – consider removing the words “precise” and “sampling”. The Handbook (actually isn’t it called a Guidebook) to date does not include detailed methods of the monitoring. Using the word precise suggests that it will (although I do encourage that the protocols are documented more thoroughly). In addition, not all the monitoring uses sampling.	Consider changing the term Methods Handbook to Guide to be consistent with the 2005 handbook (FSH 1909.12 (10) (12.2)).	

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Friberg	6-1 to 2	Roles and Responsibilities	Consider dropping this section. These relationships may evolve and I am not sure the responsibilities of PNW are accurately depicted. PNW generally does not do effectiveness monitoring. They might argue they do not do monitoring at all. In addition there is too much detail in the PNW section and reference to administrative units is outdated. Consider putting the Forest responsibilities under a section called Monitoring and Evaluation Program		Changed Administrative Units to Forest. What about the rest?
Tierney	6-2	Monitoring Activities	In the past, we have always been told that implementation and effectiveness monitoring were FP activities not to be included in project level NEPA and resulting actions. Has this now changed? SHOULD we be doing effectiveness and implementation monitoring at the project level?		Lee Nothing has changed
Friberg	6-2	Relationship to Other Monitoring Activities	Second paragraph, last sentence - Consider not using the term “administrative study”. The public does not know what an administrative study is.		
Friberg	6-2	Relationship to Other Monitoring Activities	Third paragraph – Delete the sentence beginning with “Although there will be overlap between monitoring requirements” and the sentence starting with “Some project plans may impose monitoring”. Delete “Administrative Areas”.	Restate the last sentence in this paragraph: “Wherever possible project level monitoring should be designed so that compiling their results will fulfill Forest Plan monitoring requirements.”	Changed

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Friberg	6-3	Relationship to Other Monitoring Activities	consider replacing second sentence in first paragraph with the following:	“These are information that if developed would help inform planning and decision-making. Developing these information items are not a requirement and are not part of the Monitoring and Evaluation Plan.”	
Friberg	6-3	Annual Monitoring and Evaluation Programs	why is Programs plural? Suggest renaming Monitoring and Evaluation Program and nest the Annual Monitoring Evaluation Report information within this section. Also, consider adding the 5-year Monitoring and Evaluation Report and how it fits into the 5-year review. Take a look at the Chugach Forest Plan starting on page 5-3.		
Friberg	6-3	Annual Monitoring and Evaluation Programs	First paragraph, second sentence – not all monitoring questions are on an annual data collection schedule – clarify what is meant by “address each of the monitoring questions listed in this monitoring plan”. Nor is evaluation conducted annually for each monitoring question (at least it should not be).		
Friberg	6-3	Monitoring and Evaluation Items	(Items or Questions – Use term consistently) First paragraph, second sentence – Consider deleting and instead indicate the frequency of measurement of each item in Table 6.1.		



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Friberg	6-3	Annual Cost	Is there a need to update these estimates? Serious thought needs to be put into developing a forest plan monitoring program that is fully implementable within the declining NFIM budget.	The current estimate for implementation of the Tongass Monitoring and Evaluation Plan is not consistent with funding being provided by the WO (a little over \$400,000 for the Tongass). This dollar amount is not expected to ever increase to a level that could fund the current program on the Tongass.	
Friberg	6-4	Evaluation Criteria	Consider adding desired conditions to be compliant with FSH 1090.12 (10) (12). In addition, only include monitoring items that are linked to an evaluation criterion.		
Friberg	6-4	Sampling Methods	Consider changing to Suggested Methods. Not always going to be sampling so remove the term "sampling". Consider changing the term Methods Handbook to Guide to be consistent with FSH 1909.12 (10) (12.2). The Handbook to date does not include detailed methods of the monitoring. Using the word precise suggests that it will.		
Friberg	6-4	Biodiversity Implementation Monitoring – Invasive Species	"1. Inventory: Annually review files and recent information"..... - Based on the information provided this does not appear to be appropriate for forest plan monitoring. Appears to be inventory. The rest seems reasonable; of course serious thought is needed to determining what it means for treatments to be successful and how one would determine this before the monitoring is committed to.		

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Krosse	6-4	Monitoring Plan	Middle of page references Table 6-1: Biodiversity Implementation Monitoring – Invasive spp. This information is not even in Table 6-1. In fact, none of the plants or invasive spp. monitoring questions has been incorporated into Table 6-1.	Do not use the invasive spp or plants (TES) as examples in this section, since you have not incorporated these in Table 6-1.	<p>Plant monitoring is included in biodiversity sec. but invasive spp. not mentioned. Should we drop # 2 on page 6-4 or add invasives to table 6-1? See next couple of comments.</p> <p>Monitoring Chapter has been significantly revised</p>
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Friberg	6-4	Plants	<p>2. Consider a little more wordsmithing. It appears the question has both an implementation and effectiveness portion. If this is the case consider splitting into two questions.</p>	<p>a. Evaluation Criteria – I assume what was provided is for the second question. The question that comes into my mind is that rare plants tend to occur in habitats that we do not have mapped or quantified. In addition, rare plants are difficult to survey. If this is true then what does it mean for being able to track habitat changes and population trends? I am just brainstorming, but this points out that nailing down a good monitoring question is an iterative process that requires thinking about both the objectives of the monitoring and what that monitoring would look like. Rob DeVelice is working on how to monitor rare plants for the Chugach Forest Plan. Suggest that the Tongass work with him as well as Mary Stensvold and Barb Schrader.</p> <p>b.Sampling Methods – At this point there is not enough information provided for me to comment on. I would be interested in providing feedback on any protocol development. I could provide review from the perspective of whether the objectives are clearly defined and whether the sampling design will meet those objectives. Please consider calling the Chugach if you want some recent feedback regarding my reviews.</p>	
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Friberg	6-5	Wilderness	These in general need some wordsmithing. I suspect that these are the product of some brainstorming and that there are plans to continue to home in on the objectives of the monitoring. I also suspect that the Forest is considering questions and protocols used in the draft national Wilderness Character Monitoring Tech Guide. If not, this would be good starting place for exploring wilderness monitoring. See below:		
Friberg	6-5	Wilderness Item 1	As stated now this question is an inventory of actions taken in the wilderness that affect untrammeled quality. It is not stated as a monitoring question. I do not think that is the intent. I suspect the intent is to monitor whether management actions by the Forest are changing the untrammeled quality of wilderness and in what direction? Certain types of actions may be enhancing or diminishing the quality, but isn't it the overall quality that is of interest?	To help home in on the objectives of this monitoring perhaps think about what the threshold would be at that would trigger management review.	
Friberg	6-5	Wilderness Item 2	Could take a similar approach as 1.		
Friberg	6-5	Wilderness Item 3	Consider clarifying in all these questions what is meant by effects.		
Friberg	6-5	Wilderness Item 4	What is meant by "how" and "effected"? I think in this sentence the appropriate word would be affected.		Changed to affected.
Friberg	6-6	Resource Area and Monitoring Question	Again, the term "monitoring item" is used in the text. Is this the same as a monitoring question? If so then use consistent terminology.		

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Friberg	6-6	Annual Cost	Consider changing to “Estimated Annual Cost”. Consider updating the estimates. Consider taking the frequency of data collection out of the Sampling Methods column and putting it in with Annual Cost	See the Chugach Monitoring Strategy – They list Estimated Annual Cost and Frequency of Collection in the same column. They also list the frequency of evaluation in this same column. I think this is a clear presentation of the information. In the future I would move Frequency of Collection and Evaluation information to the Monitoring Guide, but it is required to be in forest plans under 1982 regs.	
Friberg	6-6	Evaluation Criteria	The definition provided (page 6-4) does not match the information provided in the table. Rather Table 6-1 seems to describe the monitoring indicators.	I think it appropriate and helpful that this column reference the desired condition, objective, and standard and guideline the monitoring addresses. To support the adaptive nature of forest plan monitoring consider taking out the Plan the detail in this column that appears to describe the indicator and instead including it in the Monitoring Guide.	
Friberg	6-6	Sampling Methods	Consider changing column title to “Suggested Methods”. Again to support the adaptive nature of the Forest Plan monitoring, consider reducing the detail included here. Provide the details in the Monitoring Guide.		
Friberg	6-6	References	This is valuable and helpful information. Suggest keeping as is.		

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Krosse	6-6	Table 6-1	Add Invasive and Plants monitoring questions to this table.	<p>PLANTS</p> <ol style="list-style-type: none"> <li>1. Are the Standards and Guidelines being implemented for known rare plants?</li> <li>2. Are management practices consistent with current knowledge regarding habitat requirements of rare plant species, and do not require rare plants to be federally listed?</li> </ol> <p>Evaluation Criteria: Habitat changes and population trends for rare plants.</p> <p>Sampling Methods: Annually calculate proposed changes in the amount of habitat acres that surround known rare plants. This is accomplished by annually reviewing botany resource reports and recent information regarding known rare plants on the Tongass National Forest. Consult with the Alaska Natural Heritage Program regarding the rare species and whether changes will be made to the State rankings of the plants of interest. Evaluate data collected on rare plant locations to determine the need for changes in the standards and guidelines for rare plants in the Tongass land management plan. Summarize the results of the botany resource reports and any associated monitoring recommended at the project-level level. Compile project-level monitoring projects to become part of the Tongass National Forest effectiveness monitoring program of rare plant S&amp; G.</p>	
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Krosse	6-6	Invasive spp.	Currently there are no Invasive spp. monitoring questions. Please add the following: Invasive Plants: 1. Evaluate control methods for effectiveness.		
Krosse	6-6	Biodiversity	Take question number 3 under Biodiversity and place it in its own section under TES. Take the evaluation criteria and sampling methods as well.		
Kessler	6-7	Fish	The sampling methods in the fish section are out of date. There have been new efforts in recent years to develop new methods for answering the questions for MIS fish species.		
Marvin	6.8	Heritage (or separately under Sacred Sites)	One absence that I know was going to be left out but which we still need to develop (Mark needs to anyway!) is to come up with a Monitoring and Evaluation Plan for Sacred Sites.	I suggested a couple of questions in my earlier comments, but really, since the whole concept of Sacred Sites was left out of the 1997 Forest Plan, this needs to be developed between now and the final version. I believe it would be best if Mark works with the Tongass archeologists in coming up with a practicable monitoring plan for sacred sites. I would be willing to assist if requested.	

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Krosse	6-13	Wetlands, 1st bullet	Under sampling method, drop last line which says : This monitoring is conducted in conjunction with BMP implementation monitoring and in conjunction with wetlands effectiveness monitoring, which may occur on a separate set of activities.		
Krosse	6-14	Wetlands 2 <sup>nd</sup> bullet	Loss of wetlands and/or <b>physical impacts to wetland hydrologic function</b> : WET III.B. (BMP 12.5).	Annually conduct field inspections in conjunction with wetland implementation monitoring to <b>qualitatively</b> rate the effectiveness of wetlands <b>baseline provisions and BMPs</b> .	<p>This looks exactly like what is already there?</p> <p>Monitoring Chapter has been significantly revised – this is probably too specific for FP</p>



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Friberg	6-15	Wildlife	<p>Considerable thought should be put into the value of the MIS questions for determining the effectiveness of the Forest Plan. Are the current MIS “good” indicators of the effectiveness of the Forest Plan? What aspects of Forest management effects are they good indicators of? Is population monitoring effective and financially/technically feasible? What about habitat monitoring? Note that the 2005 Planning Regulations (219.14) does not require MIS population monitoring for a forest plan developed under the 1982 regs. if that plan does not specify population monitoring. Habitat monitoring is still required. A plan under the 1982 regs must still have MIS.</p>	<p>Also, might want to consider approaching MIS from the perspective of whether they would fit in a plan developed under the 2005 rule. Since the 2005 Rule plans focus on ecosystem diversity (36 CFR 219.10(b)). In the case where a planning area has federally listed, species-of-concern, and species-of-interest requires special provisions then a species-specific approach may be appropriate (FSM 1921.7). Although none of the MIS are federally listed and are likely not to be determined a species-of-concern, consideration of the current MIS as species-of-interest might of interest sooner than later. Species-of-interest are defined in the 2005 rule as “those species for which the Responsible Official determines that management actions may be necessary or desirable to achieve ecological or other multiple-use objectives” (36 CFR 219.16).</p>	<p><b>O’Connor:</b> Agree and this is being considered and will be in the final decision.</p>
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Friberg	-----	General comment on monitoring	<p>Speaking of the 2005 Rule, consider whether steps can be made to transition to monitoring requirements of the “new rule”. Some requirements of the 2005 Rule to consider are:</p> <p>219.16 (b): Monitoring is focused on key social, economic, and ecological performance measures (the 1982 plans generally do not have performance measures, but could consider the key areas of monitoring)</p> <p>219.16 (b) (2): Required monitoring questions:</p> <p>Is plan implementation achieving multiple-use objectives?</p> <p>What are the effects of management activities on the productivity of the land?</p> <p>To what degree is on-the-ground management making progress toward desired conditions?</p>		
			<b>Chapter 7</b>		
Kessler	7-9	Discharge Velocity	<p>There is no hydrologically recognized concept referred to as discharge velocity. A word search of the document does not return “discharge velocity.” It is assumed that the authors were actually referring to “Discharge”</p>	<p>the definition would be “the volume of water moving past a given point on a stream or river over a given period of time, often expressed as cubic feet per second (cfs) in hydrology, or as millions of gallons per day (mgd) in engineering.”</p>	changed
Kessler	7-12	Escapement	<p>the first appearance of this term on this page needs to be deleted along with the incorrect definition associated with the first appearance.</p>		Term is misspelled should be epikarst

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Tierney	7-15	Forest Opening	Neither "Forest Opening" no "Opening" are defined. I recommend we define these terms in the Glossary as the current definitions being used in the Legacy S&Gs are NOT what we are used to!		O'Connor  Changed terms and S&G
Krosse	7-18	Integrated Pest Mgt.	Change to new definition.	See comment on 4-20	Changed
Tierney	7-21	Logging Residual	Check this. Not only is the definition bad english, terms and definitions need to be consistent with The Dictionary of Forestry.		Definition from page 108 of that book, provided by Regional Silviculturist. Corrected typo.
Tierney	7-23	MIRF	Maybe we should define this as a Management Induced Reduction Factor? or Mitigation Induced reduction Factor? (just kidding!) (or not?)		Definition not changed.
Monaco	7-24	Modification	Delete term and definition		Deleted.
Tierney	7-24	Motor Vehicle	Do we now need to make distinction between cars & trucks and OHV? By this definition, they are all Motor Vehicles and would be allowed per the Motor vehicle use map defined below unless otherwise indicated.		Not for this definition.
Tierney	7-24	Multiple-aged stands	this is an invalid term and an incorrect definition. Multiple-aged stands are those stands that have more than one distinct age class. Two-aged and Uneven-aged stands are both Multiple-aged stand conditions. Although the term is invalid, the correct definition would be "...have two or more distinct age classes. The term described age condition while the definition describes a structural condition.		This is from the 1997 Plan, deleted term.
Tierney	7-28	Off Highway Veh.	There are two definitions		Combined the two
Tierney	7-29	Partial cutting	Not a technical term. Not found in Helms Dictionary of Forestry. Literally defined, a "partial cut" is a cut not fully complete.		Noted this in definition.

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Tierney	7-33	RAW	Reasonable Assurance of Windfirmness (RAW) is not defined outside of the document text. It should be defined. Suggest defining it as a "Windthrow management area" (see below).		Added definition
Tierney	7-35	Rehabilitation	Shouldn't this definition steer away from enhancement and more toward a return or restoration of some value(s) regardless of time?		Changed
Tierney	7-39	Selective cutting	The term "High grade" does NOT appear in this glossary. Funny, and all too frequently - this is what is really happening when implementation of current S&Gs is combined with market poor conditions in a best attempt to make an economic sale.		Dropped term
Tierney	1	Silviculture	Incorrect definition! this makes the silv folks sound like economically driven timber beasts.	The correct definition is: "the art and science of controlling the establishment, growth, composition, health and quality of forests and woodlands to meet the diverse needs and values of landowners and society on a sustainable basis."	Used definition provided by Regional Silviculturist.
Tierney	7-40	Site Index	please use definitions found in the Dictionary of Forestry per FSH direction.		Used definition provided by Regional Silviculturist.
Tierney	7-51	Young Growth	Should this be re-termed and re-defined as RAW areas or buffers? That IS what we are describing here...(or at least a RAW buffer is one example of a windthrow management area)		No, but referenced this in RAW definition as suggested above
Tierney	7-52	Young Growth	Spelled error		Corrected

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Steward	Misc.	LUD change	Change Level Island from Semi-remote Recreation to perhaps Transportation. The island already has a significant amount of development as an FAA and Coast Guard navigation site which most likely will continue well into the future.		
			<b>Appendix A</b>		
Rickards	A-1		Strongly suggest this appendix be updated with the LSTA work, Russells work, and others? or have we really done nothing regarding tentatively suitable lands in 20 years. Also, the citations to the NFMA regs. are for the 1982 rule, and should be noted as such, or perhaps are no longer necessary. Suggest re-working this along the lines that that the initial work done in 1987 has been continually updated during implementation (true?), and for this amendment effort, here's what was done to update maps, model, etc.		Lee: Actually I believe Randy is updating this after getting comments from Jan Lerum
Tierney	A-10	Municipal Watersheds	Hey. Thorne Bay has a municipal watershed too.		This is a list of enacted municipal watersheds
			<b>Appendix B</b>		
Thompson	-----	All	Entire appendix needs updating		Is this being updated?

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Kessler	B-1	Priority Research	statement of commitment to carry out research on all 10 priorities: <i>“Each of the needs will be addressed within the next several years through an accelerated research program carried out by Pacific Northwest Research Station research scientists and through other cooperative research within and outside of the Forest Service.”</i>	Any one of the studies listed will be costly; in particular, the wildlife studies will be highly expensive to carry out. Considering the significant budget declines the Forest Service is experiencing, plus the diminished capacity of the PNW wildlife research program in Juneau, we do not see how the Tongass could possibly expect to deliver on the commitment as stated.	
Krosse	B-1-2	II. Priority research Needs	A basic information need for this Forest is a refreshed, updated existing vegetation map developed to meet the needs of multiple resource users. We will not be able to meet the needs of other primary questions listed in this section without these tools. (i.e. deer model, habitat quality predictions for MIS)	<p>Add the following:</p> <ol style="list-style-type: none"> <li>1. An existing vegetation classification for all life forms (forest, shrub, herbaceous) is needed for the assessment of <ul style="list-style-type: none"> <li>◆ Determining forage quality for deer species and the effect that management activities have on them</li> <li>◆ Wetland function and the impacts of management activities upon them</li> <li>◆ Assessing the habitat distribution of endemic species</li> <li>◆ Accurately quantifying and mapping all habitat types, forested and non-forested</li> <li>◆ Identifying the habitat distribution of rare or endemic animal, fish and plant species, as well as rare plant communities</li> </ul> </li> </ol>	

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Kessler	B-1	II	Number 4 reads: <i>“Collect additional information on endemic species, including their occurrence, habitat needs and potential management response.”</i> It is unclear what we are getting at here. This seems too general for a Priority List.	We could see it being on the other list maybe.	
Krosse	B-2	Biodiversity: Habitat	#2 Some words need changing.. Implement schedule for mapping of forested and non-forested existing vegetation for refreshment of the “Timtype” or “Existing_Veg” layers presently being used, as well as for use in wetland monitoring.	Implementation is not an information need.	Added: as well as for use in wetland monitoring. Rest is already there.
Krosse	B-2	Biodiversity: Habitat	Change #3 to read as follows: “Map ecological units at finer spatial scales for landscape assessments, watershed restoration plans and young-growth treatment opportunities/prioritization”.		Changed.
Krosse	B-3	Biodiversity: Habitat	#4, second bullet: change sentence to read as follows: “Accurately quantifying and mapping all habitat types using the most current methods and protocols (see TEUI and Existing Vegetation Technical Guides).”		Changed
Krosse	B-3	Biodiversity: Habitat	#8: change to read as follows: “Develop a forest-wide vegetation inventory which allows accurate descriptions, quantification and mapping of all vegetation types at multiple scales.”		

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Krosse	B-3	Invasive spp.	Most of the listed information needs are tasks. Delete the section and replace with the following: 1. Control and Management: Evaluate how herbicides act in SE Alaska soils.” 2. Rehabilitation and Restoration: Cooperate with research to pursue a better understanding of genetics and culture of plants to be used for revegetation and/or restoration work		
Krosse	B4-6	Heritage Resources	Recommend having heritage take a closer looks at these information needs, as it appears to be a laundry list of “tasks”.		
Krosse	B-7	Recreation	Add the following: 15. Determine the trampling affects of recreation activities (hiking, camping, ORV use) on various habitats within recreation use areas, including wetlands, beach fringe, estuaries, alpine areas and uplands. Develop recreation-use limits for susceptible habitats based on this analysis.		
Krosse	B-8-9	Soil and Water	Recommend having soils group take a closer looks at these information needs, as it appears to be a laundry list of “tasks”.		
Kessler	B-9	Subsistence	Information needs: none are listed now. The re-do of TRUCS has been deleted; this should still be listed as it was (a top priority) in 1997.		
Kessler	B-9	Subsistence	We’d like to see a priority to develop deer assessment tools such as the Subsistence Mgmt. Program is doing on Prince of Wales Island. (Tongass is spending NFIM funding on deer modeling as well.)		



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Reeck	B-9	TE&S Species 4	“Continue development of rare plant habitat probability models.” We need models for our sensitive species also.		
Reeck	B-9	TE&S Species 6	Conservation Strategies...” Are we going to consider conservation strategies for rare plants also or not? We should be more explicit.		

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Krosse	B-8-9	N. SOIL AND WATER	<ol style="list-style-type: none"> <li>1. Conduct a systematic review of existing soil and water related data available to the forest. Construct an electronic soil and wetland reference library.</li> <li>2. Perform quality control of existing soil GIS data, metadata, and interpretations.</li> <li>3. Assess the effects of land-disturbing activities on long-term soil productivity, water quality and quantity, sediment and nutrient yield.</li> <li>4. Validate Region 10 Soil Quality Standards, particularly for the young, nutrient poor soils at Yakutat.</li> <li>5. Evaluate the role of soil disturbance on soil productivity and on resultant species composition and abundance of young-growth stands.</li> <li>6. Conduct watershed condition surveys to determine improvement needs as part of the development of comprehensive watershed restoration/improvement plans.</li> <li>7. Determine whether native or non-native seed mixtures are more useful for erosion control and for wildlife forage plantings. Determine if non-native seed mixtures invade and reaten any native species or the function of natural ecosystems.</li> </ol>	<p>3 and 5 can be tied together into an overarching information need for understanding the effect of management activities on long-term soil productivity, water quality and quantity, sediment and nutrient yield.</p> <p>#6: this is more task-oriented. Is the information need the comprehensive watershed restoration/improvement plans for each District? again, is this really an information need as some Districts are chipping away at this successfully.</p>	
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Krosse	B-8-9	N. SOIL AND WATER, continued	<p>8. Develop and validate cumulative effects model based on the Ecosystem Management Decision Support application (NRIS tools) currently used for the Northwest Plan monitoring.</p> <p>9. Develop a scientifically based, cost effective, issue driven, watershed analysis protocol. This protocol should be designed to provide methods and procedures for linking watershed analyses with broader level landscape analyses to provide for effective integrated management at multiple scales.</p> <p>10. Determine appropriate or allowable development and forest uses in municipal watersheds (In consultation with ADEC).</p> <p>11. Determine the potential opportunity for, and cost investment needed to create a sustainable economy based on watershed restoration projects, commercial and pre-commercial thinning, and old-growth timber harvest.</p> <p>12. Collect information to determine the effects of a variety of timber stand treatments on rainfall interception, soil moisture and nutrient leaching.</p>	12. This is better stated in #13 so delete.	
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Krosse	B-8-9	N. SOIL AND WATER Continued	<p>13. Determine the effects of young-growth treatments on rainfall interception and water yield, soil moisture and nutrient leaching.</p> <p>14. Determine the effects of roads on groundwater and surface water movement in a representative sampling of wetland types frequently impacted by forest roads,.</p> <p>15. Continue to develop the forest-wide landslide inventory.</p> <p>16. Determine the effectiveness of leaving residual trees for slope stability.</p> <p>17. Develop and test protocols for estimating the effects of recreation projects (primarily trails) on soils and wetlands.</p> <p>18. Develop and implement wetland effectiveness monitoring protocols in consultation with the Corps of Engineers for assessing the effect of management activities upon wetlands.</p> <p>19. Develop a wetland classification system for the TNF to be used for communicating within and among agencies, and that has a one-to-many relationship with the vegetation classification being developed.</p> <p>20. Determine wetland hydrologic, biologic, and habitat functions for specific wetland types.</p>		
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Krosse	B-9	A. THREATENED, ENDANGERED, AND SENSITIVE SPECIES	3. Develop and validate rare plant habitat probability models. 4. Develop and initiate conservation strategies for sensitive plant species		
<b>Appendix C</b>					
Rickards	C-1 to 2	All	Appendix C – is this all still current? Just checking –		Yes.
Thompson	C-1 to 2	All	We’re working on edits to this, will submit as soon as possible.		Thompson
Sever	C-1 to 2	All	let’s keep this Appendix J to reduce confusion. Think it’s better – talked to Julianne and she was going to make some more edits		We would have to change all references in EIS and Plan Lee: Agree we need to stick with how numbered in the draft
<b>Appendix D</b>					
Rickards	D-1 to 8		Appears not to be updated with what’s in the riparian S&Gs – is this appendix even necessary anymore? Appendix D does not have the “0” channel types for FPO, HC0, MM0, PA0 and no lakes or ponds.		I agree that it is not needed, we should reference the handbook. Lee: Agree
Tierney	D-4	Stream Process Groups	This process group is not represented in our descriptions and use. Is it important to us and how does it differ from the rest of the groups?		The large contained process group has been renamed low gradient contained process group.
<b>Appendix E</b>					
Petersburg	E-3	Petersburg	Add two recently approved communication sites: Mt. McArthur and Kah Sheets		Added

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Appendix F					
Monaco	all		See track change version of Appendix F for edits.		Changes accepted.
Appendix H					
Rickards, Anne	H-1 to 15	Karst	much of this appears to be in the S&Gs (pgs. 4-21 – 4-26) – is this appendix still needed?		See below
Baichtal	H	Karst	It is suggested that appendix H be deleted or renamed. In my opinion, it is redundant and confusing to have an expanded and mostly duplicate set of Karst and Cave Resource Guidelines in an Appendix with the same outline. Maybe it would be best to only include what is excluded under the guidelines in Chapter 4 as “additional direction”.		Replacing with new appendix to be provided.
Appendix I					
Rickards	I-1 to 2	Legacy	Strongly suggest organizing this by geographic area or ranger district to give people a spatial reference. Also, I’m very concerned that where we plan to concentrate harvest is where the higher risk VCUs are located and question if we have adequately modeled this constraint in spectrum so the probable timber harvest levels are reasonably attainable.		We can do this if you want Lee: Run by Tricia O’Connor: agree
Reeck	I-1 and 2	VCU Categories	Some of the VCU’s listed under Appendix I appear to be in error in their category classifications as compared to some project level analysis.		These are based on existing and future harvest as noted in first paragraph. Future harvest from SPECTRUM anal.
Appendix J					

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Rickards	J-1 to 4	Program of Work	is this still required? Suggest maybe an EMS appendix would be more useful.		I think we decided that it is. Lee: Yes, Lee will review
			<b>Appendix K</b>		
Rickards	K-1 to 6	OGR Criteria	looks like the TPIT direction has been included and updated with recent co-op work = good. Suggest adding dates for when this work occurred, for future reference – maybe under IV. Review Criteria for OGRs (pg. K-2). Also note that references to Appendix N (pg. K-1) and TPIT (pg. K-2) means that we plan to keep these documents available to use to implement the plan?		Lee: Stangl is rewriting this so forward comments to her  Significant new edits
Reeck	K-2	K2 IV	K2 IV Review Criteria for OGRs last paragraph. TPIT		Stangl  Significant new edits
Reeck	K-5	K2 VII	3 locations of TPIT Is there any reason why TPIT direction could not be incorporated into the Forest Plan at this location. TPIT is largely being replaced in the amendment so why hold on to this one location. Why not incorporate it here and we will no longer have to always be looking for and turning to additional TPIT for direction.	I like to get my answers at one place rather than looking in numerous locations for direction.	Stangl  Significant new edits

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Powers	All	All	<p><b>Capitalization inconsistency:</b> Land use designation (LUD) references should be capitalized. Adjectives specific to those LUDs are also capitalized. This is notable under the Wilderness LUD, in that we are not referencing generic "wilderness" boundary or management, but the boundary of the Wilderness LUD, or the management of that Wilderness LUD. <u>Wilderness</u> boundary, <u>Wilderness</u> designation acts, <u>Wilderness</u> management goals. The same rule of thumb applies throughout the document in reference to other LUDs as well. "State" and "Federal": these are generally capitalized, according to the 1984 US GPO Style Manual pages 46, 48, and 57. Forest Plan: This is capitalized when referring to a particular forest plan, ie, "the Forest Plan". The Forest: Capitalized when referring to an entity (ie, a National Forest). Not capitalized if used in a generic sense (ie, "a thickly wooded forest"). Capitalization on many titles/headers is not consistent (ie, "Forest health Management" should have the H in health capitalized). This occurs in several different headings. Generally, minor "connector" words such as "and" and "or" are not capitalized in a title. "Minerals And Geology" is more properly written "Minerals and Geology", etc. This occurs in terms throughout the document. Capitalization corrections identified in, for instance, the Wilderness LUD section of Chapter 3, should be applied to all similar occurrences throughout the document.</p>	<p>The text for the Plan was supplied by various Tongass staff. The timeline did not allow rewriting sections that they did not change. The focus was on reaching agreement among teams and reviewers not on their use of capitalization. Note: the 1997 Plan did not capitalize federal and writers continue to follow this format.</p>
Powers	All	All	<p><b>Apostrophe use:</b> Apostrophes are most often used to 1) denote a possessive, 2) indicate missing letters in a contraction, or 3) occasionally clarify plurals to a letter. They should not be used in plural acronyms (ie, "LUD's" or "OHV's" are incorrect). In some places, a plural acronym with an apostrophe and plural acronym without an apostrophe were used in the same sentence.</p>	<p>New text did not use this format but unchanged text retained this form from the 1997 Plan. The timeline did not allow editing unchanged text.</p>



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Powers	All	All	<b>Spacing/formatting inconsistency:</b> In several places the amount of white space between lines varied between similarly styled headings and preceding text. If you are using the "Style" menu options (in MS Word) to format your text and headings, this should not occur. If you are cutting and pasting from other documents, be sure that the final document has correct styles consistently applied and that the formats are not changed by importing different specifications. In some places, the left margins on bulleted lists varied between its own list. In some places, the indentation distance varied from the text to the bullet when comparing similar lists. In some places, the left margin on a list header was not indented to match other similar headers. These are consistency errors that careful proofreading should identify.	See above
Powers	All	All	<b>Misspelled words:</b> Careful proofreading will catch a lot of errors that spell check will not. I found many.	See above,
Powers	All	All	<b>Tabular consistency on TOC pages preceding sections:</b> Font size differs between chapters for the Contents pages. Make them all the same. Chapter 3 does not include the chapter number in its page number format. Chapter 4 does not have the leader line between section titles and the page number. The main Table of Contents (page v) under FIGURES and TABLES is missing tab leader lines and is in Times font rather than Helvetica (or Arial) used elsewhere in the TOC, and a larger font. Make it consistent with the rest of the Table of Contents. Spacing of header from page top and word "Contents" varies among some chapters, notably between 4, 5 and 6. Pick a standard – say, Chapter 2 Contents – and use as a template for the other chapter contents.	See above
Powers	All	All	<b>Footer/header errors:</b> Footers should be "mirror" format on facing pages. If the date "January 2007" is used in the footer, it should consistently appear below the phrase "Draft Proposed Tongass Forest Plan" on the inside (bound) edge of all pages. The chapter/page number is ok in the middle and the outside edge can show the section name as in Chapter 3 or the descriptive name of the chapter (somewhat redundant with the header). The footer layout varies between chapters. The footer format differs between chapters and some of the appendices. Chapter 3, Non-Wilderness National Monuments has Non-Wilderness misspelled in the footer.	See above

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Powers	All	All	<b>Standards and Guidelines vs. Standards &amp; Guidelines:</b> There is no consistency regarding used of one form vs. the other form. I prefer "Standards and Guidelines" in all instances. However the primary problem is seeing both usages, "Land Use Designation Standards and Guidelines" and "Land Use Designation Standards & Guidelines", on the same or adjacent pages, along with "Forest-wide Standards and Guidelines" and/or "Forest-wide Standards & Guidelines". Pick a format and then stick with it throughout the document.	See above
Powers	All	All	<b>Use of numerals for years, units of measure etc.</b> Use a numeral when referring to years, time, or unit of measure, unless the reference occurs as the first word of a sentence. It is generally preferable to restructure a sentence so that the numerical reference is not the first word of the sentence. Therefore, the term "Five-year Plan" is technically incorrect. "5-year Plan" is correct. "One-half mile" is technically incorrect. Use "1/2 mile" or "0.5 mile" instead. For quantities 10 and greater, a numeral is used even for non-measurement references. Therefore, "three trees" is correct, and "26 trees" is also correct.	See above <b>Lee: I would just add an additional response that "we will address these as time allows between draft and final." The reality is that time will probable not allow.</b>
Powers	All	All	<b>Terminology details:</b> "Desired future condition" is no longer a correct term when referring to LUDs. The term "desired condition" is now used. "Log Transfer Facility" is no longer the correct term. This is now called "Marine Transfer Facility". Misty Fiords National Monument: "Fiords" is spelled that way. It is NOT "Fjords".	See above
Powers	All	All	<b>Glossary:</b> Capitalization inconsistency: For purposes of this glossary, most multi-word terms being defined should have the first word capitalized but not the following word(s), unless it is properly a name or a title that is commonly capitalized. For instance, "Commercial Thinning" should be "Commercial thinning" and "Cost Efficiency" should be "Cost efficiency". (Some glossaries have both words capitalized, which is ok too, but again, <u>consistency</u> is what we are striving for. Pick one way or the other and stick with it.). "Payment to States": Funding expired in 2006 so unless this previous funding legislation is referred to elsewhere in the document, this glossary reference should be deleted.	See above
Powers	All	All	<b>Word processing errors:</b> In several places, letters appeared superimposed on each other. Some instances include: Appendix F: throughout, Abstract page, Chapter 1 bleeder page. There may be other instances.	This in not evident in my copy.

FSM 1926 exact language (Rickards):

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**1926.5 – Amendment**

The need to amend a land management plan may arise from several sources, including the following:

1. Recommendations of the Forest, Grassland, Prairie, or other comparable administrative unit interdisciplinary team that are based on findings that result from monitoring and evaluating implementation of the land management plan (FSM 1926.7).
2. Findings that existing or proposed permits, contracts, cooperative agreements, and other instruments authorizing occupancy and use are not consistent with the land management plan, but should be approved.
3. Changes necessitated by resolution of administrative appeals.
4. Changes in plan guidance needed to correct planning errors.
5. Changes in plan guidance necessitated by changed physical, social, or economic conditions.
6. Desired implementation of projects or activities outside the scope of the land management plan.

Upon receiving advice from the interdisciplinary team that the plan requires change, the Responsible Official shall:

1. Determine whether proposed changes to a land management plan are significant or not significant in accordance with the requirements of sections 1926.51 and 1926.52.
2. Document the determination of whether the change is significant or not significant in a decision document.
3. Provide appropriate public notification of the decision prior to implementing the changes.

Findings of the Responsible Official regarding the consistency of projects or activities and actions with the land management plan and the determination of the significance of an amendment are an integral part of decisions. As such, they are subject to administrative review under 36 CFR 219.14.

**1926.51 – Changes to the Land Management Plan That are Not Significant**

Changes to the land management plan that are not significant can result from:

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1. Actions that do not significantly alter the multiple-use goals and objectives for long-term land and resource management.
2. Adjustments of management area boundaries or management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management.
3. Minor changes in standards and guidelines.
4. Opportunities for additional projects or activities that will contribute to achievement of the management prescription.

The Forest, Grassland, Prairie, or other comparable administrative unit Supervisor must prepare an amendment to the land management plan to accommodate a change determined not to be significant. Appropriate public notification is required prior to implementation of the amendment.

**1926.52 – Changes to the Land Management Plan That are Significant**

The following examples indicate circumstances that may cause a significant change to a land management plan:

1. Changes that would significantly alter the long-term relationship between levels of multiple-use goods and services originally projected (see section 219.10(e) of the planning regulations in effect before November 9, 2000 (see 36 CFR parts 200 to 299, revised as of July 1, 2000)).
2. Changes that may have an important effect on the entire land management plan or affect land and resources throughout a large portion of the planning area during the planning period.

When a significant change needs to be made to the land management plan, the Forest, Grassland, Prairie, or other comparable administrative unit Supervisor must prepare an amendment. Documentation of a significant change, including the necessary analysis and evaluation should focus on the issues that have triggered the need for the change. In developing and obtaining approval of the amendment for significant change to the land management plan, follow the same procedures as are required for developing and approving the land management plan. (See sections 219.10(f) and 219.12 of the planning regulations in effect before November 9, 2000 (36 CFR parts 200 to 299, revised as of July 1, 2000)).

**1926.6 – Revision**

The National Forest Management Act (NFMA) requires revision of land management plans at least every 15 years; however, a plan may be revised sooner if physical conditions or demands on the land and resources have changed sufficiently to affect overall goals or uses for the entire

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unit. To revise a land management plan, plan revisions initiated after January 5, 2005 must conform to 36 CFR 219, after obtaining approval of the Chief to schedule a revision. Plan revisions previously initiated before January 5, 2005 may continue to follow procedures set forth in section 219.12 of the planning regulations in effect before November 9, 2000 (See 36 CFR parts 200 to 299, revised as of July 1, 2000).