The Forest Management Divide: Evidence From Administrative Comments on U.S. Forest Service Projects Indicating Why Environmental Interest Groups in the Northwestern U.S. Choose Whether or Not to Collaborate

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Authorization to Submit Thesis

This thesis of Eric A. Anderson, submitted for the degree of Master of Science with a Major in Bioregional Planning and Community Design and titled "The Forest Management Divide: Evidence From Administrative Comments on U.S. Forest Service Projects Indicating Why Environmental Interest Groups in the Northwestern U.S. Choose Whether or Not to Collaborate," has been reviewed in final form. Permission, as indicated by the signatures and dates below, is now granted to submit final copies to the College of Graduate Studies for approval.

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Abstract

This thesis combines current research on interest group's attitudes and behaviors toward collaboration, with interest group theory to better understand the factors driving their participation in, or opposition to proposed Collaborative Forest Landscape Restoration Program projects. This study departs from previous research by analyzing administrative comments made by stakeholder interest groups on collaborative Forest Service projects as part of the National Environmental Policy Act's notice and comment requirements. Results indicate that environmental interest group's collaborative strategies may not be influenced by specific values, but rather, their environmental philosophy and level of trust in other stakeholders appear to influence collaborative strategy. As long as the external political opportunities remain, the results indicate that collaborative forest management contributes to greater environmental interest group participation in Forest Service management proposals; thereby, enhancing rather than detracting from stakeholder interest group's influence on National Forest policy.

Acknowledgements

I would like to acknowledge my committee members: Professor Patrick Wilson, for his unique perspective; Professor Tamara Laninga for her insight; and Professor Jerrold Long for putting up with me. Thank you.

Dedication

To my wife Jennifer for patiently listening to me; to my parents Alan & Barbara for patiently believing in me; and to Bill W., for giving me the tools to make them proud.

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CHAPTER 1: The Issue and the Context

> Unfortunately, in the opinion of lots of conservation groups around the country, some of the "collaboration" currently taking place … is viewed negatively because it feels more like a takeover of our public forests by largely well-funded organizations, the timber industry, local governments and politicians. On top of that, many of the meetings never seem to be about understanding the latest science, research, or legal requirements. It's more about supporting the Forest Service's projects by attending these meetings, smiling, nodding in agreement, eating your bag lunch and then going out and running a PR campaign … .
>
> -Matthew Koehler, Director of the WildWest Institute
>
> I … strongly support local collaboration and ICL has helped be a catalyst for and participant in several noteworthy examples. Collaboration is not easy. What's also not easy is making actual forward progress without it. Conservationists have made an art form out of stopping bad things, and that's important and often necessary work. But stopping bad is a lot different than advancing good. Conservation, in my view, is a public interest movement and if it is to endure it must be built on public support and moving forward. A 'movement' that only fights bad can too easily be reduced just to being a special interest. Collaboration between a diverse set of players, when it's working, is a fascinating process to watch and be a part of.
>
> -Rick Johnson, Director of Idaho Conservation League

Directors Koehler and Johnson disagree over using local collaborative decision-making to solve National Forest management conflicts in the Northwestern United States. Both oversee environmental interest groups. Both groups confront National Forest management, wildlife and habitat conservation issues. Why then, would the two groups appear at opposing ends of the collaboration spectrum? Until recently, empirical research addressing interest group's decisions to use collaboration as an environmental decision-making and conflict resolution technique has been negligible (Bingham and O'Leary 2006). This study seeks to expand on the limited research by testing the influence of two

factors driving stakeholder interest group's strategy toward participation in, or opposition to the CFLR Program.

1.1 Problem Orientation

National Forest management was founded on the basis of the managerial and pluralist models of decision-making and public participation (Beierle and Cayford 2002). These models move decisions through a bureaucracy that prioritizes professionalism, expertise, and efficiency. But where there are multiple, conflicting interests and values at stake, these models struggle to meet discrete policy goals by inadvertently creating an "us vs. them" mentality (Brunner and Steelman 2005). This mentality encourages power-balancing politics between opposing user groups, and tactics such as constituency influence and litigation to garner support for one side and to "prevail" over their opponents (Brunner and Steelman 2005). As groups seek to defend their interests, participation in decision-making becomes reactive, resulting in some interests always being dissatisfied. This equates to additional analysis by the Forest Service and appeals by dissatisfied interests that delay policy formulation while disagreement continues, and agency costs accrue (Mazmanian and Kraft 1999).

In response to the shortcomings of centralized governance and power balancing politics discussed above, a new collaborative model has emerged (Schultz 2012). The collaborative model is thought to encourage stakeholders to work with multiple, often-opposing interests, to solve problems shared in common together (Schultz 2012). It has also been found to open new opportunities for stakeholders to participate in decision-making where interests work to cooperate by focusing on the problem rather than the opposition (Schultz 2012). Additionally, collaboration may facilitate solutions allowing

everyone to come away with something, but possibly not everything desired (Schultz 2012). It allows interests to work together to make decisions that put "good" projects on the ground that achieve shared goals (Burke 2011).

Environmental interest groups appear to have differing stances on which governance model best meets their needs, with some saying the old pluralist model works just fine (Burke 2011). These groups use the appeals and litigation process established by state and federal environmental laws to negotiate favorable policy, and think collaboration sidelines some environmental interests groups allowing further environmental deterioration (Burke 2011). They are not convinced that the additional time and resource-consuming decision-making processes is warranted (Baker and Kusel 2003), considering that those best able to participate are corporations who dominate the local collaborations to satisfy their financial interests (McCloskey 1996). These groups also point to the cession of agency authority to the local level where environmental protection interests are marginalized due to weakened national decision-making standards, public input, and enforcement of environmental laws (Coggins 1999).

Environmental interest groups from the opposite perspective think the old models constrain durable conservation projects, and that collaboration can better put work on the ground (Weber 2000, Welsh 2004). From their perspective, the emphasis on process in collaboration is an opportunity to find joint gain and shared solutions having the ability to transcend politics-as-usual and invest in economies, communities, and ecosystems (Weber 2000). These groups envision potential to borrow from local creativity, wisdom, and perspectives to build effective local environmentalist participation capacity (Welsh 2004).

Until recently (Burke 2011), only secondary evidence – as in the introductory quotes -- has existed to show that environmental interest groups are divided in their views on the best means to participate in the National Forest management decision-making process (Wynsma 2013). The only empirical research examining whether and why the divide exists is a mixed method design that triangulates survey, documentary, and interview data from grassroots environmental interest groups throughout the contiguous eleven States west of the Mississippi (Burke 2011). This thesis builds upon that research by analyzing administrative comments on Collaborative Forest Landscape Restoration Program ("CFLR Program") projects by environmental interest groups in the Northwest. Using administrative comments on CFLR Program project proposals provides two advantages over previous research designs. First, the comments are a reliable source of evidence that demonstrate a group's strategic intent because the comments must be a part of the administrative record to allow a group that is dissatisfied with a Forest Service proposal to proceed beyond the administrative appeals/objection review, to the federal courts. Second, because the sample is taken directly from interest groups commenting on CFLR Programs, the data is focused specifically on those groups that are either participating or abstaining from the collaborative process. This is advantageous because the comments represent the culmination of environmental interest group's views on any particular Forest Service proposal. With these advantages this study helps to further expand on the literature seeking to understand factors influencing both participative and confrontational collaborative strategies.

The focus of this research is narrowed in three initial ways. First, earlier research on this topic focused broadly on decision-making in the context of National Forest

management, to showcase the "clash between traditional and collaborative governance" (Burke 2011). Here, the research is narrowly focused on CFLR Program actions to more precisely measure environmental interest groups response to collaboration by sorting which groups are actually participating and which are abstaining. Second, the data sample is narrowed to comments made by environmental interest groups on *vegetation management projects* in the *Deschutes, Okanogan/Wenatchee, Lolo and Clearwater/Nez Perce National Forests* that are associated with the *Collaborative Forest Landscape Restoration Program* since the programs inception in *2010 to present*, including comments on projects currently undergoing NEPA analysis. (U.S. Forest Service FOIA Request).

1.2 Decision-Making Context

National Forest management in the Northwest provides an appropriate context to demonstrate differences between traditional and collaborative governance (Burke 2011). Conflict between environmental interest groups and the timber industry over public land management has a storied history in this region (Baker and Kusel 2003). Interested stakeholders lobby the Forest Service, and appeal/object or litigate project decisions that run contrary to their public land use goals (Baker and Kusel 2003). Thus, finding durable solutions to implement proposed forest management projects has proved illusory. In response, collaboration has been advanced as a tool the Forest Service can use to help balance interests in the National Forest (Cheng and Fernandez-Gimenez 2006). Environmental interest group's use different strategies to affect National Forest management due to the decision-making context they must operate in, and the gravity of

the decisions they potentially seek to influence (Cheng and Fernandez-Gimenez 2006). To better understand this concept an overview follows of: i) the historic Forest Service decision-making process, ii) the current substantive and procedural laws shaping project development decision-making, and iii) how project development laws relate to the CFLR Program.

1.2.1 *Historic Decision-Making Context*

The Transfer Act of 1905 created the Forest Service by transferring jurisdiction over the forest reserves from the Department of Interior to the Department of Agriculture (16 U.S.C. § 472). Gifford Pinchot was its first Chief, and was guided by a utilitarian management philosophy of "the greatest good of the greatest number in the long run" (Pinchot 1947, 261). Because forests are rurally located, Pinchot directed the agency to ensure that the communities economically tied to the forests could access the resources. Autonomous forest managers were there to meet the need (Pinchot 1947). Thus, the Forest Service's foundational focus was on supplying timber, using professional foresters with expertise and discretion, whose emphasis on the utilitarian values of rural society predisposed it toward valuing natural resources as a commodity (Pinchot 1947).

In the early 1960's; however, Congress began passing laws that expanded the scope of the Forest Service's management activities, and provided ways for the public to begin impacting the agency's decision-making process. The Multiple Use Sustained Yield Act of 1960 ("MUSYA") was passed to address the often conflicting multiple uses the public expected from its National Forests (Cubbage, O'Laughlin, and Bullock 1993). The Act required that fish, wildlife, recreation and range considerations should have

weight equal to that of timber and watersheds when administered by the agency (16 USC §528). Thus, in theory the Forest Service had to begin managing all resources in a way that satisfied the public, with weight given to resource values, not just the highest financial payoff (16 UCS §531). The MUSYA; however, does not tell the Forest Service how to evaluate the *importance* of each resource, and reserves decision-making authority to the agency (Cubbage, O'Laughlin, and Bullock 1993).

Increasing public pressure over the next decade questioning agency expertise and the public's ability to impact agency decision-making processes led to the passage of the National Environmental Policy Act of 1969 (NEPA)(42 U.S.C. § 4321), and the National Forest Management Act of 1976 (NFMA)(16 U.S.C. §§ 1600 *et seq*.). NEPA requires federal agencies to analyze the environmental impact of actions they are proposing by issuing Environmental Impact Statements ("EIS") and Environmental Assessments ("EA"). NEPA is generally regarded as a procedural law devoid of substantive requirements, but the required procedures force agencies to take certain actions. NFMA on the other hand, establishes substantive requirements for the Forest Service to establish management plans for each unit in the National Forest system. Because the agency's mandate was becoming increasingly complex, some thought it prudent to require the agency to develop long-range management plans that considered public input (Cubbage, O'Laughlin and Bullock 1993). The law requires that plans integrating multiple uses be developed for each forest, with rules and procedures in place for public input, review, and objection to the forest plans. Substantively, NFMA provided management guidelines to decrease the effect of clear-cutting by increasing restrictions on its use (Cubbage, O'Laughlin and Bullock 1993). Procedurally, however, the law further exposed the

Forest Service's decision-making process to scrutiny and appeal, and reduced the agency's autonomy and discretion for managing its lands (Coggins et. al. 2007).

Both NEPA and NFMA require the public to be involved in the Forest Service's project decision-making process through their public involvement provisions, but largely leave the amount and timing of the involvement to the discretion of the agency (40 C.F.R. § 1506.6a-f). Subsection (a) states that agencies shall "make diligent efforts to involve the public in preparing and implementing their NEPA procedures." Subsection (c) requires agencies to allow public meetings or hearings "in accordance with the statutory requirements applicable to the agency." Thus, in compliance with NEPA's mandate to involve the public, the Forest Service promulgated its public involvement rules in accordance with the Appeals Reform Act of 1993 ("ARA") (16 U.S.C. § 1612).

The ARA forms the basis of the Forest Service's notice and comment process for proposed land and resource management actions. In this process, the Secretary must generally give notice to the public prior to proposing what constitutes a major action under NEPA (40 C.F.R. § 1508.18). After notice is provided in the Federal Register, the Secretary is then required to accept comments from the public for 30 days (16 U.S.C § 1612(a)). Once the Forest Service has collected all the comments from the public, and made a decision based upon the information it has obtained, an individual who had commented could then file an appeal of the proposed action with the Forest Service (40 C.F.R. § 215 *et seq.*). The person filing the appeal would then be entitled to meet with a designated employee of the Forest Service to clarify the party's positions, and if a resolution was not found the appeal would be taken up by an appeals review officer. If the Reviewing Officer rejected the appellant's position, one final appeal could still be

made to the Secretary (40 C.F.R. § 215 *et seq.*). Interest group participation in the administrative appeals process is gravely important because subsection 215.21 of the ARA indicates that "any filing for Federal judicial review of a decision subject to appeal is premature an inappropriate unless the plaintiff has first sought to invoke and exhaust the appeal procedures in this part."

As the appeals process became increasingly litigious over the years – in addition to the time and documentation required by the agency to manage it -- many in Congress began working to reign in the appeals process (Vaughn and Cortner 2005). For example, in 1994 the timber industry lobbied Congress to take advantage of a severe fire season and expedite the salvage of as much useable timber as possible. Thereafter, Congress exempted salvage logging from environmental laws (Bevington 2009) by passing the "Salvage Rider" in 1995. Shortly after this stinging defeat for the environmental community, President Bush was elected in 2001. Major wildfire events around that time led to a renewed debate on forest health, where it was argued that injunctions on forest management projects meant increases in hazardous fuel for wildfire (Pyne 2004). This argument was also submitted as a threat to community safety and to the fire fighters responsible for protecting the community (Vaughn and Cortner 2005). Many environmental interest groups felt accused for the delays that contributed to catastrophic fire. Then, in 2003, Congress passed HFRA.

1.2.2 *The Existing Decision-Making Context*

HFRA changed the long accepted NEPA rules -- when applied to hazardous fuels reduction projects -- by limiting the number of alternatives to be analyzed in an EA (16

USC §6514-16). But perhaps more substantially for stakeholder interest groups, § 6515 entirely upended the administrative appeals and judicial review processes established by the notice and comment provisions of the ARA. Subsequent amendments to the Act ultimately led to the repeal of 36 C.F.R. § 215's requirement to generate an EA, collect public comments, and make a final decision -- which then becomes appealable.

Instead, 36 C.F.R. § 218 established the current "pre-decisional administrative review process." The *objection* process, as it is called, begins after the Forest Service completes an EA or EIS, and ends not later than the final project decision. An objection is defined as "The written document filed with a reviewing officer by an individual or entity seeking pre-decisional administrative review of a proposed project or activity … ." To be eligible to file an objection, the objector must have submitted "specific written comments" which, to be considered for the purposes of the rule, should be: i) within the scope of the proposed action, 2) have a direct relationship to the proposed action, and 3) must include supporting reasons for the responsible official to consider." Furthermore, the comments must have been submitted during scoping, or the draft EA comment period, to be eligible to participate in the administrative review process. Once a reviewing officer has received a valid objection, prior to issuing a written response, discussions may occur between the parties to try to resolve the issue. Once the reviewing offer has issued the written response the issue is final. Having exhausted all administrative remedies at this point, an *objector* is now free to pursue a civil action (36 C.F.R. § 218).

HFRA also introduced the first federal provisions requiring collaboration among National Forest Stakeholders. Governments, Tribes, and interested parties must all be

consulted when fuels reduction proposals are designed, and community collaboration must be present when preparing Community Wildfire Protection Plans (16 U.S.C. §§ 6514-6516). HFRA's collaboration mandate indicates public interest in proactive processes to gather information during the agency decision-making process, instead of reactive public participation after the decision is made (Sturtevant et al. 2005). National Forest Service resource planning based on NFMA also includes a section on collaboration (36 CFR §219.12-18). However, there is a chance collaboration could weaken federal regulations to benefit wealthy stakeholders; or upset the national public's interests for those of resource-extractive communities (Coggins 1999, McCloskey 1996), raising eyebrows among those made skeptical by the Bush years. It is in this light that collaboration was introduced as an alternative to traditional decision-making for National Forest management -- its popularity among its advocates is partially revealed with the passage of the Forest Landscape Restoration Act ("FLRA")(16 U.S.C. § 7301).

1.2.3 *The CFLR Program Decision-Making Context*

In 2009, Congress passed the Forest Landscape Restoration Act, establishing the Collaborative Forest Landscape Restoration Program, to be administered by the Forest Service (16 U.S.C § 7303). The purpose of the Act is to "encourage the collaborative, science-based ecosystem restoration of priority forest landscapes . . . ." (16 U.S.C. § 7301). In many ways, the CFLR Program is part of a longer-term policy shift emphasizing large-scale, collaborative, and adaptive planning (Schultz 2012). However, it is also innovative in that it provides communities with an opportunity to work collaboratively with Forest Service resource managers to seek funding to implement

landscape-scale restoration programs (Schultz 2012). Proposals are selected for funding through a competitive process, which creates a system for prioritizing landscapes for the allocation of CFLR Program dollars (16 U.S.C § 7303(c) & (d)).

The primary objectives of the CFLR Program are to: 1) promote ecological, economic, and social sustainability, by 2) leveraging local resources, and 3) reduce fire management costs through the reestablishment of natural fire regimes and reduction of the risk of uncharacteristically severe fires, while 4) demonstrating the degree to which restoration activities achieve ecological/watershed objectives and affect fire activity and its associated costs, and 5) showing how capturing the value of forest restoration byproducts can reduce treatment costs and support local economies (16 U.S.C. § 7301). The CFLR Program solicits proposals developed jointly by the Forest Service and stakeholders for landscape-scale restoration programs of work to an advisory commission formed for the purpose of selecting proposals (Schultz 2012).

A critical aspect of the CFLR Program is that projects must be socially and economically viable. All projects must be "developed and implemented through a collaborative process," and explain how they will use existing or proposed infrastructure to process restoration byproducts in a way that will support jobs and local economic development ((16 U.S.C. § 7303(c)(2)). The CFLR Program requires projects to be based on a landscape restoration strategy that prioritizes restoration treatments for a 10-year period across landscapes that are at least 50,000 acres in size and comprised primarily of National Forest System lands, but may include other federal, state, tribal, or private land (16 U.S.C. § 7303d-g). The Act is meant to encourage landscape-scale projects across multiple land ownerships, in line with the Secretary of Agriculture's call for an "all

lands" approach to land management (US Forest Service 2009), by supporting projects developed and implemented through a collaborative process that leverages local, private, and other federal resources with CFLR Program funding awarded for work on National Forest System lands (16 U.S.C. § 7303d-g).

Following the passage of the FLRA in 2009, the Forest Service began to solicit the first round of proposals, which were submitted by the regional foresters in early 2010 (Schultz 2012). In the summer of 2010, the Federal Advisory Committee authorized to select proposals recommended 10 projects for funding (Schultz 2012). One of the selected proposals, the Four Forests Restoration Initiative (4FRI) provided an illustrated timeline on their website that is a helpful aid to understanding the chain of CFLR Program decision-making (Appendix A). As outlined below, however, it must be remembered that no two CFLR Programs are identical.

All of the individual CFLR Programs are at root a collection of individuals working cooperatively among their respective organizations in a collaborative process (Antuma, et al. 2014). Each collaborative group, forest, and community is a unique set of individuals and interest groups joining around a shared landscape to develop restoration proposals considered for implementation by the Forest Service. The ranges of experience in the collaborations vary widely between the CFLR Program locations. Some have long histories of strong existing collaborative groups before becoming part of the CFLR Program, while others formed relatively recently. But what all the CFLR groups have in common is that they are attempting to solve pervasive challenges surrounding environmental regulation by developing trust and support through collaboration (Antuma, et al. 2014).

Due in possible part to the lack of standard governance structures between different CFLR Programs, literature characterizing the collaborative processes used to develop proposed restoration projects is limited. One case study, however, provides accurate descriptions of thirteen CFLR groups authorized in 2012 (Antuma, et al. 2014). The Kootenai Valley Resource Initiative (KVRI), authorized two years after the CFLR Programs comprising this case study's sample, provides one excellent example of the sample area in this study:

> Boundary County, Idaho, is located in the northern Idaho panhandle bordering Canada. The County is sparsely populated with only 11,000 people and an unemployment rate in 2009 of 16%. Ecologically, the region is experiencing encroachment of fir forests on lands that were historically comprised of more fire-resilient species such as ponderosa pine and western white pine. A significant amount of past conflict over natural resource issues in the community led to adversarial relationships between the community and the natural resource management agencies. The Kootenai Tribe has been very active in pursuing ecological work in the region, leading activities aimed at restoring the Kootenai River and its surrounding habitat. At the time of KVRI's founding, the Kootenai Tribe was engaged in litigation with the USFS over implementation of the agency's Roadless Rule. Since then, KVRI has engaged in collaborative efforts with federal agencies including the U.S. Army Corps of Engineers and U.S. Fish & Wildlife Service on fish restoration projects.
>
> Given the past conflict, community leaders recognized that the current way of doing things was not working, and they wanted to take a different approach. The Mayor of Bonners Ferry and the Boundary County Commissioner joined efforts with the Tribal Chair of the Kootenai Tribe of Idaho to form the Boundary Economic Development Committee, which works to address economic issues and develop solutions to sustaining local jobs. At the same time, the Tribe was expanding work on water quality issues. The pairing of these two initiatives led to the formation of KVRI.
>
> KVRI is a large collaborative group with many subcommittees, and it addresses a variety of environmental and economic issues in the area. The group has met very consistently, eleven times a year for the past twelve years, with fairly steady board membership. The Bonners Ferry Mayor, a County Commissioner, and the Tribal Chair are the three co-chairs of an 11-member board, which is the decision-making unit for the collaborative

> group. All subcommittees engage board members. Since board members are never blindsided by projects and can give input as projects are developed, most subcommittee proposals are approved. The forestry committee is the group that deals specifically with the USFS and the CFLR Project.
>
> KVRI submitted the lower Kootenai River Watershed as a CFLR Program proposal because the restoration needs were substantiated through Tribal, Federal and State assessments. The assessments identified the area as a high priority for restoration and provided the foundation for effective treatments that would enhance ecosystem function and resiliency. Based on that science, the proposal's strategy ensured balance between social and ecological needs such as watershed and ecosystem health, wildfire use and protection, recreation and public access and economic sustainability for local communities.

(Antuma, et al. 2014).

In support of the goals outlined in the assessments listed above, the following treatment objectives were developed for the landscape restoration proposal: 1) Reduce the risk of unwanted wild-land fire on the landscape, 2) Increase the resilience of the landscape to the effects of unwanted wild-land fire in the event that such a fire occurs, 3) Increase the resilience of the forested landscape to insect and disease epidemics, 4) Protect and enhance fish and wildlife habitat, 5) Increase the number of watersheds that are in fully functional hydrologic condition, 6) Provide high quality outdoor recreational opportunities, 7) Reduce the impacts from invasive species, and 8) Provide the opportunity for the utilization of a variety of wood products, including but not limited to lumber, biomass and alternative energy sources.

The lower Kootenai River Watershed proposal was funded at $324,000, with identified NEPA ready projects for 2012. The Kootenai Valley Resource Initiative (KVRI) Forestry Subcommittee, a subset of the parent collaborative, met on February 27, 2012 to approve the work program. The approved program includes projects that will

achieve the following outcomes: invasive plant management (400 acres), culvert upgrades (3), fish passage/culvert replacement (1), road decommissioning (11.2 miles), road maintenance (30 miles), timber harvest (1307 acres, including biomass utilization), and reforestation (61 acres) (Forest Service 2012).

The Forest Service provided KVRI with several NEPA ready projects, differentiating between "projects with signed NEPA decisions," and those with "NEPA decisions pending." For example, the "Ruby Copper" project, with a signed NEPA decision, seeks to restore slope hydrology and aesthetic values. To do so, the project will: implement a 182 acre habitat burn to ensure structural diversity; pre-commercial thin 128 acres of less desirable trees so other trees may better grow; decommission 27 miles of roads; and perform vegetative treatments on 525 acres using helicopter logging. The pending NEPA approval "East Fork Meadow Creek" project on the other hand, would accomplish many of the aforementioned goals, but also treat noxious weeds along 19 miles of roads to be decommissioned (Forest Service 2011).

All of the CFLR groups discussed in this case study also have in common the fact that they have proposed projects that are subject to the National Environmental Policy Act (NEPA), which mandates specific planning processes including wide-ranging transparency and inclusiveness for public participation (Antuma, et al. 2014). This regulation appears in conflict with the status given to formal collaborative groups through the CFLR Program (Antuma, et al. 2014). There is a need to understand how sites are navigating this potential source of tension (Antuma, et al. 2014). Past research indicates that exclusive reliance on formal NEPA processes exacerbates mistrust (Fleeger and Becker 2008). Previous studies also indicate that stakeholders often do not believe that

they are actually affecting management decisions using that approach (Cheng and Mator 2010). Instead, iterative processes for designing specific management plans can produce high level community buy-in, and hybrids of these two have been shown to, not surprisingly, lie somewhere between the extremes (Antuma, et al. 2014). As such, the CFLR Program creates space for environmental interest groups to pursue different strategies to influence National Forest management policy. In doing so, the Act also allows for the creation of a record by which to measure factors driving the stakeholder interest group's support or opposition to the CFLR Program through their administrative comments on CFLR Program proposals necessitating NEPA review.

1.3 Research Question and Contributions

This research addresses the question, "What factors in the administrative comments, submitted by stakeholder interest groups on Forest Service vegetation management projects associated with four CFLR Programs in the Northwest, are driving the group's decision to support or oppose the CFLR Program proposal they are commenting on?" To find the answer to this question, the individual group's comments on CFLR Program developed project proposals are categorized into an informal framework that is guided by both interest group theories, and the latest research on why environmental groups collaborate. Once categorized in terms of the theoretical framework, comments falling into specific dimensions of the framework are quantified for statistical testing. The results are then discussed in relation to the latest research on why environmental interest groups collaborate, and why the results speak to the need for a more in depth study of the potential influence of factors on groups decision to support of oppose collaboratively developed vegetation management projects.

This research exists within the larger outline of interest group theory, and contributes to it in three ways. First, this research will test theories pertaining to factors driving environmental interest group's collaborative strategy, which will add to both the interest group and collaboration knowledge base. Second, it will sharpen our understanding of grassroots environmental interest groups collaborative strategy. Research contributing to knowledge about factors influencing the strategies of grassroots interest groups has largely taken a backseat to national organizations. However, given Lester (1994) and Rabe (2000) have established the continued deterioration of environmental policy at the federal level, local grassroots groups should stand out more in defining stakeholder interests moving forward. Thus, this research helps to better understand the dynamics shaping their strategies. Finally, this research will build on the recently established literature (Burke 2011) concerning the use of collaboration as a potential strategy for effecting National Forest management policy and practice.

The institutional context of natural resource management is changing (Burke 2011). The Forest Service's budget has long been shrinking (Long and Arnold 1995). Decision-making authority is becoming more localized (Coggins 1996, Welsh 2004), and collaboration is increasingly relied on as a National Forest management tool (Cheng 2006, Conley and Moote 2003). But when long-standing procedures and decision-making process are disrupted, it stands to reason that some environmental interest group's opportunities to impact forest policy will also be disrupted. For example, an article in *Public Administration Review* (2006) exploring collaboration focused on bettering our knowledge of how true equality in terms of participation impacts the process; factors driving participation and how it affects the full range of stakeholder interests; and

whether there are winners and losers in collaboration.

This thesis helps address the aforementioned concerns by contributing to the research base in three additional ways. First, this research provides additional evidence that some of the smaller, more litigious environmental groups are choosing not to participate in CFLR Programs. Some believe that "steps need to be taken to mitigate marginalization of such environmental groups to ensure their survival and influence, and to protect the diversity of the environmental movement" (Burke 2011). This study helps clarify whether these groups serve better though participation or adversity. Second, because some groups are choosing to abstain, the legitimacy of the collaborative outcomes may be questioned. This study helps clarify the necessity and desirability of full participation in the National Forest management context. Finally, as the Forest Service works to improve National Forest management through collaboration, this research provides insight into the factors that are causing some environmental interest groups to oppose collaboration and offers suggestions to address them.

1.4 Structure of the Thesis

Chapter 2 provides a literature review on collaboration and the CFLR Program, along with a review of interest group strategy formation. Chapter 2 also explores how these research on collaboration and interest group theory inform the research question and hypotheses. Chapter 3 provides a description of the research design and methods. Chapter 4 outlines the specific results. Chapter 5, the final chapter, provides a discussion of the major findings of the research, the significance of the findings within the broader research base, and the take home messages and policy implications that follow.

CHAPTER 2: Literature Review

Inconsistent federal land management policy in the recent past has forced environmental interest groups to reconsider their strategies (Bosso 2005). For instance, public forest management, long committed to the scientific managerial model (Brunner and Steelman 2005), is seeing an increase in acres committed to management by collaboration (see Ansell and Gash 2008). But collaboration appears to threaten certain environmental interest groups, who would rather practice traditional strategies (Koehler 2012). Whereas, other groups think collaboration makes sense and are participating (Johnson 2012). Why the differences in strategy?

This research is shaped by the literature on environmental interest groups and recent research findings on collaborative national forest management. First, environmental interest groups are defined for research purposes. Differences between inter/national and grassroots environmental interest groups are discussed. Next, collaboration is explored as an environmental decision-making tool, with a short discussion of the anecdotal evidence regarding environmental interest group's opinions on collaboration. Finally, factors driving environmental interest group strategy are explored in regard to collaboration, and hypotheses are set forth that follow from the literature review.

2.1 Defining National and Grassroots Environmental Interest Groups

Interest groups are organizations that engage in political activity, attempting to influence legislative, executive, or judicial decisions through various means; which are open to membership, but members are not financially compensated for their participation

(Nownes 2001). Environmental interest groups are made up of individuals whose interest or cause concerning the environment motivates them to join ranks with other like-minded individuals (Berry 1977). Such organizations promote preservation and conservation of ecological and constructed environments and the diversity the environment sustains (Cox 2006). Various authorities think groups fit specific environmental categories (Bosso 2005) such as: land trusts, conservation and preservation groups, and environmental justice groups. The environmental movement has undergone marked change in its composition over the last five decades, and over time the movement has fragmented into inter/national and grassroots groups (Bosso 1991). In addition, membership characteristics, interests, and resources further divide national and grassroots environmental interest groups (Burke 2011).

Some research has found that environmental interest groups vary according to their structure and resources. Salazar (1996) found that environmental interest groups focused on national issues use their large budgets, technical resources, professionally trained staff, and technical and political expertise to exert policy influence. Other research indicates that grassroots environmental interest groups get by with fewer resources through mobilizing volunteers around an attractive cause, using generous contacts to effect policy change (Burke 2011). Bosso has also shown that the two types of interest groups differ in the size of their ambitions (1991). National groups largely operate out of Washington DC (Bosso 1991), whereas, grassroots groups confront local issues throughout the U.S. (Gottlieb 1993). National groups confront big goals, perhaps of global proportions, with many diverse members (Freudenberg and Steinsapir 1991). Grassroots groups typically confront local or regional issues at the federal project level,

and the constituency usually has a personal stake in the matter with smaller numbers but a deeper commitment to the cause (Burke 2011).

The recent literature on environmental interest groups is mainly concerned with National groups; whereas, grassroots environmental groups have been largely overlooked (Andrews and Edwards 2005). But since the smaller grassroots groups tend to focus on localized issues, research has suggested it follows that they would participate in local collaboration (Burke 2011). Furthermore, grassroots groups enjoy closer access to local collaborations than nationally based organizations; suggesting amenability to collaborations where they can be a part of the decision-making process (Burke 2011). Anecdotal evidence; however, indicates that the grassroots environmental interest groups do not all agree that collaboration is in their best interests (Jones 1996).

2.2 Collaborative Natural Resource Management

2.2.1 Evolution in Natural Resource Governance

The managerial model that first dominated National Forest management (Beierle and Cayford 2002) was ultimately found to inhibit transparency and exclude citizen input (Kerwin 1999). Thus, with the rise of environmental awareness (Andrews 1999) the managerial gave way to a pluralist model, where federal officials negotiate between conflicting public and private stakeholders (Stewart 1975). But pluralism has critics that say it inflames conflict between stakeholders (Dryzek 1997). It also may allow the agency to favor certain interests in the decision-making process (Able and Stephan 2000). Thus, to improve public participation and public interest in government decision-making,

more local democratic models such as collaboration are called on (Baker and Kussel 2003).

Collaborative management has been defined as a system for "operating in multi-organizational arrangements to solve problems that cannot be solved, or easily solved, by single organizations" that offers citizens a deliberative process to implement environmental, economic, and social outcomes (O'Leary, Gerard, and Bingham 2006, 7). Moote and Lowe found that collaboration is a "process by which multiple stakeholders work together to solve a common problem or achieve a common goal" (2008, 3). Whereas, Zanetell defines it as a "dialogue, deliberation, and negotiation among stakeholders who have mutual or competing interests in an issue or an area, and who work together to affect the future of that interest" (2001, 2). However defined, factors influencing collaboration by the environmental interest groups most likely to be engaged or opposed at the local National Forest level continues to be understudied given the stakes involved (Burke 2011).

Laws enacted of late also demonstrate a growing belief in collaborative National Forest management. For example, HFRA seeks to reduce wildfire risk "through a collaborative process of planning, prioritizing, and implementing hazardous fuel reduction projects" (16 USC §6501). Recent NFMA based Forest Service regulations for land and resource management planning also require "collaboration and cooperatively developed landscape goals" (36 CFR §219.12). If collaboration is being *required* by recent legislation for stakeholders to participate in certain hazardous fuel reduction projects and planning landscape goals, who is collaborating must be considered.

2.2.2 Representation in Collaborative Management

Collaborative management is touted as a tool enabling representation of many diverse stakeholders to mitigate disputes and get projects out of the courtroom and on the ground (Moote, McClaran, and Chickering 1997). But factors associated with participation and representation play key roles in collaborative forest management process (Bingham 1986). Collaboration is thought to better engage stakeholders that have been discouraged from participating in National Forest management decisions because of the inherent pitfalls of organizational pluralism and scientific managerialism (Ansell and Gash 2008). But many suggest that the effectiveness of participatory collaborative process hinges on all stakeholders being identified and involved (Burke 2011). Collaboration must be broadly inclusive of all stakeholders affected by the issue (Chrislip and Larson 1994), including potentially ‘‘troublesome’’ stakeholders who might delay the implementation of projects (Burke 2011).

Many studies on collaborative representation such as surveys (Schuett, Selin, and Carr 2001), theoretical overviews (Lane and McDonald 2005), case studies (Beierle and Konisky 2001, Rockloff and Moore 2006), interviews (Smith and McDonough 2001), and meta-analyses (Margerum 2007), conclude that *all* of the potential stakeholders should participate if possible. But an examination of 76 western watershed partnerships found that most failed to include every critical interest (Leach 2006). Collaborative management has been found inadequate because representation was insufficient (Coggins 1999, Edmunds and Wollenberg 2002). And it has been established that detractors of collaboration regularly hold environmental views and air issues about why they won’t participate (Sturtevant et al. 2005). But, little research exists on the internal factors

driving why environmental interest group's decide if participating in collaboration is a viable strategy; or, which groups would be negatively effected by collaboration if they do/not participate (Burke 2011).

2.2.3 Why Interests Collaborate

Research shows modest indications that collaboration equates with better environmental outcomes, but there is little consensus on the benefits or drawbacks of collaboration in general (Koontz and Thomas 2006). Various Federal laws and regulations employ collaborative processes, but it has been shown that mandated collaboration may backfire (Cheng 2006). Outside of mandated collaboration; however, situations do exist where it is in a stakeholder's interest to collaborate (Burke 2011). One significant factor is whether an interest group thinks it can get what it wants without collaborating (Ansell and Gash 2008). But researchers have also identified five other factors stakeholders consider when deciding whether or not to collaborate.

First, because court is expensive and often fails to produce the desired result, some interest groups choose to avoid problems necessitating litigation (Zanetell 2001). As an alternative to the courtroom some groups choose collaboration (Gray 1985). Second, suing to force the desired result is deemed a worthwhile investment of resources by other groups, which would rationally have no desire to collaborate (Burke 2011). Next, participation is one hundred percent when collaboration is mandated and interests don't have a choice (Ansell and Gash 2008). Fourth, if interest groups perceive they are dependent on others for the desired outcome the chances are higher they will participate than if goals can be met alone – a factor that can have continued relevance after the

current event (Logsdon 1991). Finally, environmental interest groups will also collaborate to improve communication and relations with others if the probability of continued reciprocation is high (Council on Environmental Quality 2007, Schuett and Selin 2002).

Unequal power and resource allocation between groups also influences whether or not stakeholders think they can get what they want through collaboration (Gray 1985). Burke found that the probability an interest group having perceived power in a collaborative setting will participate is high (2011). On the other hand, the odds were low that those without the power *to participate* – because of perceived ability, status, or resources – will collaborate (Burke 2011). A stakeholder that thinks she has a better chance in another venue will also not be motivated to collaborate (Ansell and Gash 2008). Importantly, the final consideration hinges on a stakeholder's anticipation of a durable outcome (Ansell and Gash 2008). If an interested party thinks their participation will benefit the policy outcome, it is suggested it is more likely they will participate in collaboration (Ansell and Gash 2008). Conversely, the probability is lower for a stakeholder who thinks his efforts are meaningless (Ansell and Gash 2008).

2.2.4 Collaborative National Forest Management

The use of collaboration in National Forest management began to challenge the managerial and pluralist models in the early 1990s (Cortner and Moote 1994) through a push "to conserve and restore forest ecosystems while improving the well-being of the communities that depend on them" (Baker and Kusel 2003, 8). Ultimately, the inability of earlier management models to overcome gridlock gave rise to collaborative management

on the National Forests (Schultz 2012). Forest dependent communities and workers began networking with "local governments, universities, nonprofit organizations, agency personnel, and political leaders." (Burke 2011, 22). The citizens and entities wanted new solutions to feeling shut out of the forest, gridlock and animosity, and loss of jobs and forest health issues perceived as resulting from the business-as-usual approaches (Baker and Kusel 2003).

Collaborations on National Forests in the Northwest are numerous and increasing. Among them are the: Lemhi County Forest Restoration Group (Salmon Valley Stewardship 2010), Northeast Washington Forestry Coalition (2010), Beaverhead-Deerlodge Partnership (Montana Forests 2010), and Applegate Partnership (Applegate Partnership and Watershed Council 2010). Two other recent examples, the Clearwater Basin Collaborative (CBC 2010), and the Kootenai Valley Resource Initiative (KVRI 2012) are associated with the subject of this study -- the CFLR Program.

2.3 Interest Group Strategy Choices

Environmental interest groups tendency to employ general strategies impacts the methods they adopt, even though they may have many advocacy tools available (Berry 1977). No group; however, employs just one strategy or tactic to influence policy, as demonstrated by many interest group studies. (Baumgartner and Leech 1998). A strategy is an encompassing plan, which uses basic approaches to change policy, involving multiple tactics used in different contexts. A tactic is the specific action advocating the policy position (Milbrath 1963). Strategies have also been called repertoires of action, consisting of tactics used by environmental organizations when striving to bring about

change (Carmin and Balser 2002). Strategy implies the force that an environmental interest group thinks it can best employ to meet its goals (Baumgartner and Leech 1998). To understand strategy then, this research explores both the *interests* environmental interest groups bring to bear on an issue, and their *beliefs* about the potential for and optimal means of acting within the reality of the political opportunity they are dealt.

Different actions are thought to influence group's choices of strategy and tactics categorized by scholars. Berry (1977) found four strategies signaling a groups tactical choice: 1) information, which includes tactics like testifying before Congress, 2) law, which includes tactics like litigation, 3) embarrassment and confrontation, which includes public relations campaigns, and 4) constituency influence and pressure, which includes tactics such as publicizing voting records. Gais and Walker (1991) organize tactics into inside and outside strategies. Inside strategies use tactics such as lobbying and litigating. Outside strategies use tactics such as civil disobedience and sponsoring teach-ins. Dalton, Recchia, and Rohrschneider (2003) reveal four strategies groups use, including: 1) conventional, includes lobbying officials, 2) unconventional, includes protesting and litigating, 3) mobilizing, includes influencing public opinion, and 4) networking, includes coalition building. Andrews and Edwards (2005) found five strategies: 1) policy change: meeting with influential people, 2) direct action: litigation and protests, 3) organizing: grassroots mobilizing, 4) public awareness: environmental education with the media, and 5) prefigurative: model sustainable lifestyle.

What is missing in all of these studies is any mention of participation in collaboration. Coalition building is the closest analogue; however, coalitions are working relationships among *allied* organizations (Berry 1977). This differs from collaboration,

where many groups can be in conflict but agree to pursue opposing goals while trying to overcome a shared problem. This research enlarges the study of environmental interest groups behavior by analyzing collaboration as a political strategy, to be employed as opportunities present themselves. Therefore, as a strategy, collaboration implies a group willingness to trust in order to build relationships and work with other stakeholders to overcome conflict by finding shared goals (Burke 2011).

2.4 Theoretical Drivers of Interest Group Strategies

This section of the literature review focuses on the generally accepted theoretical factors driving interest group strategy. Four primary theories have been explored concerning the factors driving environmental interest group's collaborative strategy: resource, interest, political opportunity, and experience theory. Each is addressed below; however, this study will only test original hypotheses in regard to the interests and political opportunities theories. The literature review of resource and experience theories is therefore limited in scope for two reasons; the second reason being a product of the first. The first reason is that any variables that could be measured relating to both experience and resource theories would be unsuitable for measurement using administrative comments. The second reason is that other studies have explored the influence of these theories using different data and methodologies that capture the variables more accurately. Resource and experience theories will be touched on below; however, to better inform the discussion of the interest and political opportunity theory findings. Only factors relating to interest and political opportunity theory variables, and their links to interest group's decisions to participate in collaboration are emphasized.

2.4.1 Resource and Experience Theories

2.4.1.1 Resource Theory

McCarthy and Zald's (1977) resource mobilization theory found that group behavior depends upon the resources the group can marshal to confront a given problem. The theory has three stages. First, interest groups must accumulate resources like money and labor so they can begin fomenting change. Next, forming a structure enabling the group to utilize acquired resources to achieve its goals requires mobilizing its base. Finally, people and entities external to the main group begin to control the necessary resources, thereby acting as external sources of support (McCarthy and Zald 1977). Unfortunately, very little research has delved specifically into the impact of resources on an environmental groups collaborative strategy (Burke 2011).

Only one study has specifically looked at how grassroots environmental interest group's resources drive their response to collaboration (Burke 2011). There, it was hypothesized, "organizations with a large budget, large full-time staff, field offices, a professionalized structure, and a large percent of foundation or government funding will participate in collaborative decision-making" and conversely "organizations with a small budget, small or nonexistent staff, no subunits, a non-professionalized structure, and a small but highly active membership will not participate in collaboration." (Burke 2011, 39).

The study found the resource theory variable played a statistically significant role in environmental group's choice of a collaborating strategy (Burke 2011). Groups with big budgets that were highly professional and in receipt of government funds all exhibited a collaborating strategy. Conversely, groups with smaller budgets, not as professional, and adopting a confronting strategy exhibited a negative attitude toward

collaboration and did not place a high importance on participating in collaboration. Burke (2011) concluded that the resource theory variable was a significant factor driving environmental interest groups collaborative strategy, but only that portion contributing to whether the group is *able* to participate, not whether it is *willing* to do so (Burke 2011).

2.4.1.2 Experience Theory

Factors driving collaborative strategy that have been tested relating to experience are: the founding event, tactical maturity, age of group, and effectiveness (Burke 2011). In regard to the founding event, Truman (1951) suggests that group formation occurs because of a specific disturbance, some crisis or threat that leads individuals who share an interest to come together to protect it. Dalton, Recchia, and Rohrschneider (2003) discuss tactical maturity, specifically how the choice of protest and confrontational tactics can strengthen the anti-establishment identity of an organization, which limits its ability to seek influence through conventional channels. In regard to age, Wilson (1995) found that the passage of time typically translates to increasing conservatism and professionalization in interest groups. And finally, group leaders seeking to increase effectiveness may adopt new tactics as a result of evaluating trends in the environment, recent organizational performance, and the utility of their current activities, and making a strategic choice to try something new (Child 1972).

2.4.2 Interests Theory

Interests (Mutter, Virden, and Cayer 1999), ideology (Dalton 1994), and values (Carmin and Balser 2002), feature prominently in interest group behavior research. An interest is a value that can be the impetus for collective action when shared (Truman 1951). Interests have also been defined as common denominators among stakeholders trying to exert influence in the political world (Dalton 1994). An interest group's *interests* have been found to influence both the resources it can acquire, and its facility to turn political opportunities to its advantage (Dalton 1994).

2.4.2.1 Values and Ideology

Environmental interest group studies indicate that values are closely linked to political strategies (Dalton, Recchia, and Rohrschneider 2003). The researchers noted that two value systems that stood out among environmentalists (2003). Conservationists valued species, habitat protection and looked for ways to influence the existing sociopolitical structure through acceptable channels (2003). The ecological movement, on the other hand, sought systemic sociopolitical change to tackle advanced industrial problems and used protest and mobilizing activities instead of more accepted channels (2003). Although the conservationist system potentially characterizes environmental interest groups in the Northwest, Burke (2011) did not find the ecological characterization to fit the region as well.

Other research identifies as many as six different environmental interest groups value systems (Brulle 1996). Of those six, the "preservation" and "conservation" value systems have been found to align most closely with environmental interest groups in the

Northwest (Burke 2011). Those with conservationist values held managerial values toward nature that allow for sustainable development of natural resources to meet humanity's extended demands (Brulle 1996). Those with preservationist values held spiritual values toward nature allowing for its uniqueness, provision of solace, and for education and art. A group having this value system will want to preserve natural resources for their intrinsic value (Brulle 2000).

2.4.2.2 Political Institutional Structures Supported

Dalton (1994) has shown thata group's interests can impact how that group perceives the political landscape, how that landscape functions, and how it is constructed. Strategy choice can also be influenced though political understanding, shaped by how the group interprets the institutional environment (Carmin and Balser 2002). Related to these findings, is research showing that some environmental interest groups think existing institutional controls work best through regulations to protect the National Forests by control and coercion (Weber 2000). They endorse federal authority as the best protection for the environment and use public comments, appeals, and litigation to act as public attorney's general (5 U.S.C. § 504), upholding the integrity of the institutional edifice (Weber 2000). Conversely, research also exists indicating that new systems are needed to help the government address complex environmental issues (Innes & Booher 2012). And that, although the government is necessary, it best serves the public by including them in the decision making process (Innes & Booher 2012). Research has also found collaboration playing a role among locally impacted stakeholders giving them voice within the legal superstructure (Weber 2000). These groups are more likely to pursue

options allowing greater local participation during decision-making and to work with place-based entities to better provide a role for the local public (Weber 2000).

2.4.3 Political Opportunities

Within the major schools of interest group theory much research focuses on organization's selection of tactics from among the available repertoires (Carmin and Balser 2002). The choice of a repertoire of action is shaped by structural factors such as resources, and socio-political conditions (Carmin and Balser 2002). Research examining how and why movement organizations select particular action repertoires suggest that shifting political opportunities are one of the socio-political factors associated with the repertoires (Tarrow, 1998; Tilly, 1978). Political opportunity theory typically refers to how the political system channels collective action on particular issues, such as by incentivizing or mandating the use of certain strategies (Tarrow 1996).

According to Tarrow (1998), political opportunities comprise the "consistent—but not necessarily formal or permanent—dimensions of the political environment that provide incentives for collective action by affecting people's expectations for success or failure" (p. 76). Political opportunity has also been referred to as the degree of access that individuals and groups have to the political process, with access influenced by conditions such as access to elites and the presence or absence of political cleavages (Tarrow, 1998). When the opportunity structure is relatively open and accessible, movement actors typically rely on institutional avenues of influence. In contrast, when the structure is relatively more closed and difficult to penetrate, activists tend to adopt more expressive and unconventional repertoires of action (Eisinger, 1973; Tarrow, 1998). Political

opportunity research also indicates that opportunities impact interest group strategies through the institutional structure (McCarthy, Britt, and Wolfson 1991). The "political party in power, the state of the economy, what venues are accessible, and the specific policy situation all provide external cues that guide organizations toward one strategy or another" (Burke 2011, 44).

In addition to the established research indicating environmental interest group's strategies are influenced by political opportunities, recent research indicates that the decision to pursue one political opportunity over another is driven by the shared values, beliefs, and understandings of organizational actors (Carmin and Balser 2002). Organizational members do not merely respond to institutional conditions, but rather engage in a sense-making process that leads to the development of subjective interpretations of reality (Berger& Luckmann, 1966; Klandermans, 1991; North, 1990;Weick, 1995). This interpretation of reality is shaped by cognitive schema, or filters, that afford a particular, subjective view of situations (Weick, 1995). Stated differently, a sense-making perspective suggests that environmental interest groups view the sociopolitical, cultural, and natural environments through different cognitive filters. These filters lead to interpretations and the construction of meaning that in turn provide a foundation for action (Carmin and Balser 2002).

A variety of cognitive filters can shape the interpretations that contribute to the selection of an action repertoire (Carmin and Balser). According to Dalton (1994) and Brulle (2000), beliefs about the relationship of humans to nature, or environmental philosophy, is an important filter shaping tactical choice in environmental movement organizations. Taken together, these studies suggest that groups sharing a similar

environmental philosophy should undertake similar action repertoires (Carmin and Balser 2002). In a study of why the environmental groups Greenpeace and Friends of the Earth chose different repertoires of action even though they shared similar environmental philosophies, Carmin and Balser (2002) sought to address the discrepancy by decoupling environmental philosophy from other filters. Based on previous social movement and organizational research, they distinguished between four different schema that environmental interest groups use in the sense-making process -- experience, core values and beliefs, environmental philosophy, and political ideology – that have been found to influence interpretations of efficacy, acceptability of an action, and understandings of opportunities and constraints in the social and political environments.

To decouple the influence of environmental philosophy from other filters, the *experience* variable was defined as "formative events that change the policy trajectory of key players within environmental organizations" (Carmin and Balser 2002, 368). Similarly, the *core value and beliefs* variable was defined as "normative views about what should be rather than what is … includ[ing] shared beliefs among members of an environmental interest group about issues such as violent tactics, or peaceful protest" (Carmin and Balser 2002, 369). An environmental interest group's *environmental philosophy* was defined as "the collective beliefs about how humans' relationship with nature should be structured" (Carmin and Balser 2002, 340). Narrower in scope than core values and beliefs, a groups environmental philosophy specifically relates to the natural environment and interactions between humans and nature (Carmin and Balser 2002). Finally, a group's *political ideology* was defined as "its understanding of how the political system works and should be built, with trust or skepticism for example" (Carmin

and Balser 2002).

Studies of organizational repertoires generally have focused on how resources and political opportunities shape actions. But by testing the influence experience, core values and beliefs, environmental philosophy, and political ideology on Greenpeace and Friends of the Earth's responses to different actions over time, Carmin and Balser (2002) found that while environmental philosophy was a significant predictor of environmental interest group's responses, so too were their experiences, core values and beliefs, and political ideologies. The researchers concluded that "the combined effect of these four filters shapes organizational interpretations of the acceptability of different types of action, the significance of the issue, the source of the problem, and the nature of the political environment" Carmin and Balser 2002, 385). Thus, the narratives of FOE and Greenpeace suggest that an environmental interest group's response to political opportunities may be shaped by – experience, core values, environmental philosophy, and political ideology.

2.4.3.1 External Forest Management Context

According to Carmin and Balser (2002), environmental interest groups draw from their experience, core values and beliefs, environmental philosophy, and political ideology to interpret external political opportunities, and thereby choose a course of action. Political opportunities providing a course possible course of action for environmental interest groups did not always exist. Management of National Forest resources, however, has existed since before the Forest Service's inception. The Organic Act of 1897 was the first law to set general guidelines for establishing and managing the

Forest Reserves that would in time become our National Forests (16 U.S.C. §§ 475-582). Under it's provisions, it was generally accepted that the Forest Service could harvest timber on public lands how, when and where it best surmised (Coggins et. al. 2007). Over time; however, the public began to press for a wider management vision for the Forest Service than Organic Act's allowance for timber, water and forest protection. The result was the Multiple Use Sustained Yield Act of 1960 (MUSYA) that listed five resources Congress felt the National Forests were to be managed for: recreation, range, timber, watershed, and wildlife and fish (16 U.S.C. § 528). However, the Act did little to disturb the wide latitude within the Forest Service to decide the importance of managing specifically for any one of the five resources.

The heart of the Act authorizes the Forest Service to manage "renewable surface resources of the national forest for multiple use and sustained yield" while giving "due consideration … to the relative values of the various resources in particular areas" (16 U.S.C. § 529). *Multiple use* essentially means utilization of the resources in the "combination that will best meet the needs of the American people" as defined by the Forest Service. *Sustained yield* means "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources … without impairment to the productivity of the land." If the MUSYA outlines *what* the Forest Service has a duty to manage, the National Forest Management Act (NFMA) outlines *how* the Forest Service is required to manage the resource including provisions governing: clear-cutting, allowable sale quantity, physical suitability of the land, watersheds and wildlife diversity (16 U.S.C. § 1604). Together, these two laws -- granting the Forest Service wide latitude to decide what and how to manage the

sustainable natural resources under its charge – continue to frame the external political opportunities for management of the National Forests by restraining the agency through the provision of legal tools by which environmental interest groups can take action.

In addition to the bedrock statutes governing the Forest Service's resource management policies, in this study, the CFLR Program adds an additional political opportunity. As noted above, the purpose of CFLR Program is to encourage the collaborative restoration of forest landscapes through a process that demonstrates the degree to which the use of forest restoration byproducts can offset treatment costs while benefitting local rural economies and improving forest health (16 U.S.C. § 7303). Thus, it is tacitly assumed that any interest group participating in the CFLR Program will accept a certain amount of forest management.

2.4.3.2 Assessment of Other Relevant Parties

Another political opportunity factor thought to drive environmental interest group strategy is other stakeholders, including allies and opponents (Berry 1977). The rational choice model suggests that environmental interest group leaders measure the interests and behavior of other parties before moving forward strategically (Levi 1997). In the present context, the party initiating the collaboration may be particularly significant to other actors. Furthermore, lack of trust is often ubiquitous in collaborative projects because of past conflict (Wondolleck and Yaffee 2000). Many times, landowners and environmental groups do not trust the US Forest Service; the US Forest Service does not trust landowners and environmental groups; and landowners, environmental groups, and industry groups do not trust each other (Burke 2011). As such, prior relationships

between groups participating in a collaborative may be a driver of individual group behavior. An "organization will be more skeptical of a collaborative project initiated by a person or group they distrust, than a project initiated by someone they trust" (Burke 2011). Thus, it is assumed that participation in collaboration requires, at minimum, a group's ability to temporarily suspend strongly held convictions about other stakeholder's integrity.

2.4.3.3 External Collaborative Context

The political opportunity structure describes how a political system guides issue advocacy by incentivizing or mandating the use of certain strategies (Tarrow 1996). One specific example is that Congress enacted a statute, the Forest Landscape Restoration Act (16 U.S.C. § 7301) as a strategy to incentivize collaboration through the CFLR Program (16 U.S.C. § 7303d-g), to guide traditionally opposed stakeholders to seek common landscape management ground. Some other contextual considerations are, what decision-making venues are available and accessible (Carmin and Balser 2002)? Does getting what the group wants depend on cooperating with others (2002)? Will future ex parte communication with other parties impact the group dynamic (2002)? Dreiling and Wolf (2001) found that external political opportunities don't cause interest groups to take action directly, but act as signals indicating potential areas of action. Others think interest groups make sense of the external context using ideology and interests to shape the perceptions of reality providing the basis for action (Carmin and Balser 2002). This means two interest groups with totally different interests could respond differently to similar political opportunities.

2.5 Environmental Interest Groups and Collaborative Forest Management

Research combining environmental interest groups and collaboration is largely descriptive, exploring the collaborative ideal (Bernard and Young 1997, Brick, Snow, and Van de Wetering 2001, Innes 1996, and Weber 2000), and less than ideal critiques of collaborative forest management (McCarthy 2006, Baker and Kusel 2003, Kemmis 2001). Researchers have also summarized the benefits (Moote and Lowe 2008, Yaffee 2002) and drawbacks (Kenney 2000, McCloskey 1999). Those advocating for collaboration say that it: presents more dynamic solutions (Innes 1996), mitigates discord (Moote and Lowe 2008), allows relationships and trust to grow (Bernard and Young 1997), increases support among groups for project decisions (Brick, Snow, and Van de Wetering 2001), and gets proposals implemented, versus sitting in courtrooms (Yaffee 2002). Critics of collaboration say that it: uses questionable techniques without evidence of better outcomes (Baker and Kusel 2003), uses more time and money (Kenney 2000), is biased toward industry (McCloskey 1999), is locally hijacking the democratic system (McCarthy 2006), lets the Forest Service turn its decision-making authority over to those without the grant to wield it (Kemmis 2001), and weakens laws like NEPA, NFMA and the ESA (McCarthy 2006). All of these descriptions; however, are based more on anecdotes than evidence (Burke 2011).

Little empirical research exists concerning why groups participate in collaborative forest management projects, despite questions that have arisen in regard to its efficacy in National Forest management (Koontz and Thomas 2006, Cheng 2006). One empirical study looks at environmental interest group's opposition to collaboration; however, it looks more at the group's opinion of collaboration, not factors relating to participation

(Hibbard and Madsen 2003). One explanatory study looks at how national environmental interest groups respond to devolution through collaboration (Welsh 2004). The author operationalizes responses as depending on 1) if groups view devolution as a positive or negative influence on their interests, and 2) if they think devolution is transitory (Welsh 2004). But neither of these studies offers an evidence-based look into factors driving environmental interest group's decisions on using collaboration for National Forest management.

2.5.1 *Recent Research Combining Interest Group and Collaboration Theories*

Only one study combines the literature on interest group theory, with current research on collaboration to answer the question: "What are the attitudes and behaviors of state and local environmental organizations toward collaboration for National Forest management, and what factors are influencing their response?" (Burke 2011). Utilizing the theoretical literature on interest group theory and collaboration, Burke (2011) sought answers regarding the contribution of four interest group theory variables. The independent variables *resources*, *interests and values*, *political opportunity*, and *experience* were tested for their influence on environmental interest group's collaborative strategy. The study used a sequential mixed-methods approach, combining documentary evidence with survey and interview responses to test the influence of the variables (Burke 2011). The survey first provided information about group's attitudes and behaviors with regard to collaboration, as well as data on some of the factors influencing their strategy choice (Burke 2011). Then, quantitative data from the survey was used to select four case study groups: two collaborating strategy groups, and two litigating strategy groups

(Burke 2011). Qualitative documentary and interview evidence was then generated from the groups to corroborate and bolster the quantitative findings (Burke 2011).

In general, the study found statistically significant quantitative support, for the resource variables, mixed quantitative support for the interests and values variables, weak quantitative support for the experience theory variables, and mixed qualitative support for political opportunity theory variables (Burke 2011). The findings led the researcher to infer that "environmental interest groups that participate in collaboration are more professionalized organizations with more resources, and pragmatic groups that seek to secure multiple values" (Burke 2011, 218-219). And, that the environmental interest groups less represented in collaboration are "amateur organizations with limited resources, and purist groups that prioritize environmental values" (Burke 2011, 218-219). The researcher went on to remark that the inference implies:

> Collaborative decision-making does bias environmental group representation. Organizations that have few resources and are less professionalized, and those that hold pure environmental values are at a disadvantage because they are unable or unwilling to participate in collaboration. This could lead to marginalization or decline of small and purist organizations that arouse enthusiasm, mobilize collective action, and strive for strong environmental protections. If the trend toward collaboration continues, careful consideration should be given to ensuring that all environmental organizations are provided opportunities to advocate for their goals through the strategy of their choice.

(Burke 2011, 228).

The following three sections each will describe: the study's supporting literature, how the study was carried out, and the results of the study.

2.5.1.1 The Study's Resources and Experience Theory Variables

This section provides a brief discussion of the study's hypothesized interactions between environmental interest group's collaborative strategy, and the resources and experience theory variables. The primary interest group theory finds that their behavior is dependent on resources (McCarthy and Zald 1977). Thus, Burke (2011) generated five resource variables to measure the impact on environmental interest group's collaborative strategy. It was hypothesized, "organizations with a large budget, large full-time staff, field offices, a professionalized structure, and a large percent of foundation or government funding will participate in collaborative decision-making" and conversely "organizations with a small budget, small or nonexistent staff, no subunits, a non-professionalized structure, and a small but highly active membership will not participate in collaboration." (Burke 2011, 39). To measure the influence of the resources theory variables, the survey was used in conjunction with tax forms and interviews to try and capture group's collaborative strategy (Burke 2011).

The results indicated a strong statistically significant relationship between a group's resources and whether they supported or opposed collaboration. Those with fewer resources were found to have a higher probability of adopting a litigating strategy that opposed participation in collaboration (Burke 2011). But it must be remembered that while the resource theory variable was a factor driving environmental interest groups collaborative strategy, it only drives only that portion contributing to whether the group is *able* to participate, not whether it is *willing* to do so (Burke 2011). As such, the variable is assumed to contribute little to understanding group's collaborative strategy.

Factors relating to experience theory are thought to be: the founding event

Truman (1951), tactical maturity (Dalton, Recchia, and Rohrschneider 2003), age of group (Wilson 1995), and effectiveness (Child 1972). Using the aforementioned research Burke (2011) hypothesized that participation in collaboration would be greater among environmental interest groups that: formed to advance multiple values, have experience working with different interests, are older, and believe collaboration can help them achieve their goals. The influence of the experience theory variables on environmental interest group's response to collaboration was measured using survey responses, interviews, member communications, news articles, and the mission statements from the group's websites (Burke 2011). Overall, the qualitative evidence provided poor support for weak relationships in the quantitative survey responses (Burke 2011). The author thought it "likely that a group's age combines with other variables, like interests and resources," thereby, confounding statistically significant results (Burke 2011). Because the researcher finds that the variable is confounded with other variables already explained by the literature, the variable is assumed to contribute little to better understanding environmental interest group's collaborative strategy.

2.5.1.2 The Study's Interests and Political Opportunity Theory Variables

To measure the influence of the *interests* theory variables – environmental, economic, equitable, and institutions supported – the survey was used in conjunction interviews, member communications, news articles, and the groups mission statements on their websites (Burke 2011). To measure the *political opportunity* theory variables -- external context and external stakeholder assessment – no empirical evidence was generated. Instead, the researcher relied on qualitative evidence in the form of: interviews

with the four groups, news articles, and the group's mission statements on their websites (Burke 2011).

To establish the influence of the *interest* theory variables, the study first defined the values being measured. Environmental values indicated a "concern for natural resources such as forests, wilderness, watersheds, wildlife, and habitats" (Burke 2011, 42) Economic values indicated a "concern for helping rural economies while improving environmental quality" (Burke 2011, 42). Equitable values indicated a "concern for participatory decision-making and decisions that improve stakeholders' quality of life" (Burke 2011, 42). The study also sought to test the influence of the interest theory variable *political institutional structures supported* (Burke 2011). Environmental interest groups that are more interested in utilizing existing institutional structures like NEPA's public comments, appeals, and litigation process by acting as public attorney's general (5 U.S.C. § 504), endorse federal authority as the best protection for the National Forests (Weber 2000). And although the federal institutional structure is necessary, some groups choose to pursue options like collaboration that allow a greater local voice during decision-making and to work with place-based entities providing a role for the local public (Weber 2000). Thus, Burke (2011) defined groups supporting collaboration as "organizations that support strengthening existing institutional structures with local points of access" (Burke 2011, 43). Conversely, groups supporting a litigating strategy are defined as organizations that "endorse federal [institutional] authority as the best protection for the National Forests" (Burke 2011, 43).

To measure the influence of the political opportunity variables, the study interpreted the latest political opportunity literature solely in terms of collaboration. The

researcher interpreted the findings by Carmin and Balser (2002) to mean that environmental interest group's "subjective interpretation" of the political opportunity created by collaboration could be responded to in different ways (Burke 2011). Thus, the study hypothesized that "participation in collaboration will be greater among organizations that interpret the political context as necessitating collaboration" (Burke 2011, 45). The researcher's review of the literature also found that mistrust often pervasive in collaborative projects, due to past interactions and stereotypes among the various stakeholders (Wondolleck and Yaffee 2000). That literature was combined with the researchers observation that the party initiating collaboration plays a significant role in whether environmental interest groups support or oppose a collaborative project (Burke 2011). Thus, the study also hypothesized that "participation in collaboration will be greater among organizations that have a positive assessment of other stakeholders" (Burke 2011, 45).

2.5.1.3 The Study's Interests and Political Opportunity Theory Results

Evidence was supportive, but mixed in regard to the relationship between the study's interest theory variables -- environmental, economic, and equitable values – and the group's collaborative strategy. The group's priority issues and mission statements were examined to determine their value variables. Expressing multiple values on the survey was weakly correlated with participation in collaboration (0.27, 0.051), and moderately negatively correlated with taking legal action (-0.33, 0.016) (Burke, 2011). In addition, the group's expression of multiple values in their mission statements was moderately correlated with participation in collaboration (0.39, 0.002), and moderately

negatively correlated with taking legal action (-0.33, 0.011). Thus, "organizations with multiple values were associated with a collaborating strategy, and organizations with a single, environmental, value were associated with a confronting strategy" (Burke 2011, 191).

Due to the design of the study; however, the political opportunity variables were tested qualitatively. To test these variables, Burke (2011) used the quantitative data obtained from the survey to choose two groups the results predicted would adopt a collaborative strategy, and two groups the results predicted would adopt a collaborating strategy. The executive directors of these groups were then questioned using a semi-structured interview based on, and triangulated with, the survey and documentary evidence (Burke 2011, 54). The political opportunity variables studied were whether the environmental interest group viewed the *external context* as conducive to collaboration or litigation; and whether the groups *stakeholder view*, of other actors in the policy arena was positive or negative.

Qualitative support was found for the study's hypothesis that "organizations that interpret the political context as conducive to or necessitating collaboration would have a collaborating strategy, and organizations that believe the context is conducive to or necessitating litigation would have a litigating strategy (Burke 2011, 197). For example:

> One aspect of the local context was local communities and timber industries, threatened by reduced harvests and global competition, seeking ways to revitalize their timber businesses. The [litigating groups] interpreted this as a dangerous context in which to allow collaborative decision-making because collaboration gives extraction-minded local interests control over management decisions and results in trees cut. Instead, the situation required legal action to object to the timber projects that would harm the environment. In contrast, the [collaborating groups] interpreted this context as creating more moderate and reasonable

> communities and industries that were willing to identify any opportunity to stay in business. That meant they would be willing to compromise, and thus collaboration with these groups could result in positive environmental outcomes.

(Burke 2011, 197-198). Qualitative support was also found for stakeholder view variable that "an organization that has a positive view of other relevant actors would adopt a collaborating strategy, and an organization that has a negative assessment of other actors would adopt a confronting strategy." (Burke 2011, 198). For example, the litigating groups reported "other actors, including the Forest Service, timber, community, and motorized recreation to be self-serving" (Burke 2011, 199). Whereas; while the collaborating groups reported an "equally low opinion of the Forest Service," they "had a more sympathetic view of timber and community interests" (Burke 2011, 199). Notably, the study downplays the importance of the political opportunity variables. Burke summarizes by stating, that while "there was support for both [political opportunity] variables in the case study data … the evidence suggests that an organizations interpretation of the political context and its assessment of other actors in the policy arena, which guide it toward one strategy or another, are shaped by its interests. This lends further support to the importance of interest-based theory for explaining environmental organizations choice of strategy for affecting forest management." (Burke 2011, 201-202). But sources of both primary and secondary evidence indicate that there may be reason to question the foregoing assertion.

2.6 Alternative Interests and Political Opportunity Theory Evidence

Evidence indicating that there may be alternative explanations for environmental interest group's choice of collaborative strategy exists in primary and secondary forms.

Primary evidence, in the form of the latest literature, predominantly raise questions concerning the findings from the aforementioned study's political opportunity theory variables. Secondary evidence, in the form of newspaper articles/editorials, predominantly raise questions concerning the findings from the interests theory variables.

In regard to the interest theory variables, environmental interest groups often use the media to sway public support. Few would disagree that the Alliance for the Wild Rockies (AWR) in Helena, MT., adopts a litigating strategy. In fact, a GAO study revealed that the group "filed and won more lawsuits against the agency than any other organization," where "28 percent of all environmental suits [] against the Forest Service" were instituted by them (St. Clair 2014). Thus, if there was ever an environmental interest group that conforms that to the finding that "organizations with a single, environmental, value [are] associated with a confronting strategy," it is AWR. However, in the Missoulian -- a Western Montana newspaper – the Executive Director of AWR Mike Garrity states:

> The Missoulian also ignores the fact that [Senator John] Tester's mandated logging would cost taxpayers more than $140 million since almost all Forest Service logging in Montana loses money. Given that the price of timber is recovering fine on its own, there is no reason that taxpayers should allow Tester's effort to spend millions more of taxpayer dollars on welfare for timber corporations than they already do.

(Missoulian 2013). In addition, AWR's website also describes Mr. Garrity as "a professional economist [who] has a long history of working with AWR, ensuring our programs are based as much in sound economics as biological science" (Alliance 2015). Thus, it appears that AWR might have economic, as well as solely environmental interests.

Secondary evidence also supports questioning whether environmental interest

groups that adopt a litigating strategy are not also interested in equitable values.

For example, the Missoula, MT. based WildWest Institute is a recurring co-plaintiff of AWR (See *Native Ecosystems Counsel v. Tidwell*, 599 F.3d 926 (9th Cir. 2010)). It's Director, Matthew Koehler, stated in an online response to a newspaper editorial in the Helena Vigilante, that:

> These 'collaborative' processes outside of the official, open, transparent and inclusive NEPA process are all OPTIONAL. The ONLY process citizens of the United States are required to participate in to have a say in the management of their federal public lands is the NEPA process. Nobody is required to attend invite-only, hand-picked political dog-n-pony shows.

(Missoulian 2014). Mr. Koehler also reveals in a different editorial response that:

> Fact: Senator Daines has not invited Friends of the Bitterroot, Swan View Coalition, Friends of the Wild Swan, WildEarth Guardians, Alliance for the Wild Rockies or the WildWest Institute to any of his More Logging Roundtables, so it's just bizarre that he'd complain the groups didn't show up to his hand-picked, largely invite-only affair.
> He also said, "Some of these groups just are not part of this collaborative process. Over the course of a number of years across Montana they seem to be outside of this process versus in it. We'd love to have dialog with some of these groups, but they're difficult to bring to the table, to bring to meetings like this." -Senator Daines
> Fact: All of the groups listed above have been part, to one extent or the other, 'collaborative processes." Again, Daines never invited us to these meetings, and I'm not sure a politically-motivated More Logging Roundtable made up of mostly timber industry officials and supporters is the best way to management America's public lands, much less if it could be considered a 'collaborative process."

(Missoulian Feb. 2015). These comments appear to implicate the fairness of the participatory process, not interests directly related to the environment. Thus, it appears that the WildWest Institute may have equitable, as well as solely environmental interests.

Primary evidence, in the form of the latest literature, predominantly raises

questions concerning the findings from the political opportunity theory variables, and the interest theory variable *political institutional structures supported*. First, the political institutional structures supported variable seems to find greater support in the political opportunity theory literature. Political opportunity theory parsimoniously describes the factors driving environmental interest group's collaborative strategy in the Northwest. The secondary evidence cited above appears to support Carmin and Balser's (2002) four different schema that environmental interest groups use in the sense-making process -- experience, core values and beliefs, environmental philosophy, and political ideology – that have been found to influence interpretations of efficacy, acceptability of an action, and understandings of opportunities and constraints in the social and political environments. For example, Mr. Koehler's quote introducing this study stated "collaboration … is viewed negatively because it feels more like *a takeover* of our public forests by largely well-funded organizations, the timber industry, local governments and politicians." Similarly, many groups "political ideology" exhibit a *takeover* mentality, signaling categorical distrust of government and industry motives. Congruent with the takeover mentality, are the "core values" of many environmental groups that adopt a position of "institutional protest" through objections and litigation to forest management proposals. But of the four variables, "environmental philosophy" seems to most closely define the dynamic driving environmental interest group's opposition to or acceptance of collaboration. However, Burke (2011) did not include any reference to the influence of "environmental philosophy" (Carmin and Balser 2002) on environmental interest group's collaborative strategy in that study's literature review (Burke 2011).

A group's environmental philosophy relates to its normative views about how

humans should interact with nature. As outlined *supra*, some environmental interest groups take a conservationist stance that allows for sustainable extraction of forest resources for human needs. Other groups take a preservationist stance. Their view is that too much of nature has already been developed and "managed." Thus, if one environmental interest group has a conservationist type environmental philosophy, and another has a preservationist type philosophy, the two groups can be anticipated to have widely different views on the efficacy of humans managing nature. Because the bedrock forest management statutes and the CFLR Program provide different political opportunities to achieve different forest management outcomes, it appears inevitable that they would utilize different political opportunities to influence forest management. It follows then, that an interest group's environmental philosophy is essentially synonymous with the group's position on vegetation management projects in National Forests. Therefore, it is assumed that one factor driving whether an environmental interest group participates in collaboration may be whether it is willing to support the Forest Service in management proposals utilizing vegetation management technique. As such, studies utilizing interest theory to explain the creation of an "institutions supported" test variable may not be capturing nuances driving political opportunity decisions. Rather, the institutions supported by an environmental interest group are the institutions granting a particular group to best influence proposed National Forest management outcomes ascribe most closely with their environmental philosophy.

2.7 Hypotheses Concerning the Relationship Between Environmental Interest Group's Collaborative Strategy and Interest and Political Opportunity Theory Variables

Secondary evidence appears to cast doubt regarding recent research on the influence of environmental interest group's environmental, equitable, and economic interests, on their collaborative strategy. Therefore, this study formally hypothesizes:

- **The presence of administrative comments expressing multiple environmental, economic, and equity values will not be related to CFLR Program participation. Conversely, the absence of administrative comments expressing economic, and equity values will not be related to CFLR Program non-participation.**

Recent literature also suggests that support for institutional structures (such as the CFLR Program or the NEPA process) is better viewed through the lens of political opportunity theory than interest theory. Therefore, this study formally hypothesizes:

- **The presence of administrative comments questioning a proposed CFLR Program forest management outcome will be not be related to CFLR Program participation. Conversely, the absence of administrative comments questioning the Forest Service's proposed forest management outcome will be related to CFLR Program participation.**

Neither primary nor secondary evidence appear to cast doubt on the latest research examining the influence of intra-stakeholder trust, or the perceived necessity to collaborate. Therefore, in the interest of confirming and strengthening recent findings, this research formally hypothesizes:

- **The absence of administrative comments questioning the motives of other stakeholders will be related CFLR Program participation. Conversely, the presence of group comments questioning the motives of other stakeholders will not be related to CFLR Program participation.**

This research also formally hypothesizes:

- **The presence of administrative comments expressing the necessity to collaborate will be related CFLR Program participation. Conversely the absence of administrative comments expressing the necessity to collaborate will not be related be CFLR Program participation.**

CHAPTER 3: Research Design, Methods, and Analysis

3.1 Research Design

Factors driving environmental interest group's collaborative strategy have been explored by only one study that utilized self-report data. To expand on this earlier research, this study sought new evidence, which might also reveal factors influencing group strategy. This study departs from earlier research by analyzing administrative comments made by environmental interest groups on vegetation management proposals developed under the authority of the CFLR Program. To analyze the administrative comments a rudimentary deductive content analysis research design was employed (Elo and Kyngas 2007).

Content analysis is a way of analyzing data (Cole 1988) in a systematic and objective manner to describe and quantify phenomena (Krippendorff 1980, Downe-Wamboldt 1992, Sandelowski 1995). Content analysis is flexible enough to employ either qualitative or quantitative data, in either an inductive or deductive manner (Elo & Kyngas 2007). It allows better understanding of qualitative data by assigning concepts into fewer content areas, and assumes the distilled categories; words, phrases, sentences, paragraphs, or documents share similar meanings (Cavanagh 1997). The benefits of content analysis are that it is content-sensitive (Krippendorff 1980), flexible in design (Harwood & Garry 2003), can be used to develop meaning (Cavanagh 1997), identify processes (Lederman 1991), intentions, consequences and context (Downe-Wamboldt 1992). Critics maintain, however, that content analysis is neither quantitative nor qualitative enough (Morgan 1993). Some maintain that it is possible to "attain simplistic results by using any method whatsoever if skills of analysis are lacking" (Weber 1990).

While others maintain that the "method is as easy or as difficult as the researcher determines it to be, and quality research discloses the ease or difficulty of the method (Neundorf 2002).

Content analysis has three main phases: preparation, organizing and reporting. Preparation begins by selecting the unit of analysis (McCain 1988, Cavanagh 1997, Guthrie et al. 2004). The unit of analysis ("unit") must be representative of sample population (Elo and Kyngas 2007). A unit can consist of more than one sentence and can contain several meanings. Depending on the research question, the unit can also be a letter, word, sentence, portion of pages or words, or an entire document (Robson 1993, Polit & Beck 2004). According to Robson (1993), researchers are guided by the aim and research question of the study in choosing the contents they analyze.

Next in the analytic process, the researcher strives to "make sense" of the data and to learn 'what is going on' (Morse & Field 1995) and obtain a sense of whole (Tesch 1990, Burnard 1991). The goal is to become steeped in the data, which is why the data is combed through multiple times (Burnard 1991, Polit & Beck 2004). After making sense of the data, analysis is conducted using an inductive or deductive approach (Kyngas & Vanhanen 1999). If prior research exists about the concept in question then the deductive method is proper (Lauri & Kyngas 2005). A deductive approach is based on earlier theories or models; and therefore, moves from the general to the specific (Burns & Grove 2005). Deductive content analysis is often used in cases where the researcher wishes to retest existing data in a new context (Catanzaro 1988).

Once it is understood that a deductive content analysis is necessary, the next step is to develop a categorization matrix and to code the data according to the categories. In

deductive content analysis, either a structured or unconstrained matrix of analysis can be used, depending on the aim of the study (Kyngas & Vanhanen 1999). If the matrix is structured, only aspects that fit the matrix of analysis are chosen from the data (Patton 1990, Sandelowski 1993). It is generally based on earlier work such as theories, models, mind maps and literature reviews (Sandelowski 1995, Polit & Beck 2004, Hsieh & Shannon 2005). After a categorization matrix has been developed, all the data are reviewed for content and coded for correspondence with or exemplification of the identified categories (Polit & Beck 2004). This can also be called testing categories, concepts, models or hypotheses (Marshall & Rossman 1995). The structured matrix of analysis allows the researcher to choose only the aspects from the data that fit the categorization frame or, alternatively, to choose those that do not.

3.2 Research Method

In this study, the content analysis units are administrative comments submitted to the Forest Service by environmental interest groups seeking to influence the implementation of CFLR Program vegetation management proposals through the public notice and comment process (36 C.F.R. § 218). Administrative comments were chosen as the analysis unit for two reasons. First, as evidenced by the CFLR Program timeline in Appendix A and the discussion of the KVRI, administrative comments do not exist in a vacuum. Sophisticated environmental interest groups often use the comment periods to target specific concerns they may have with a project proposal in order to: gain standing to file a lawsuit, supplement the administrative record in anticipation of a lawsuit, or directly influence the Forest Service's final project decision (Long 2015). To comment

effectively, the group must be engaged enough throughout the project development phase to be able to comprehensively understand the project's proposed management outcome. Thus, whether a project proposal is developed by the Forest Service and adopted by a CFLR Program, or whether the Forest Service adopts a proposal developed by a CFLR Program, sophisticated environmental interest groups are attending to the ultimate proposed management outcome, and establishing their positions on whether or not the outcome is constituent friendly. After what may often be years of project development, this study assumes that the administrative comment periods represent the culmination of the group's position on the management outcome. As such, it is assumed that these comments will effectively reveal factors that are driving some groups to collaborate, while driving other groups away.

The second reason administrative comments were chosen as the unit of analysis is the legal gravity attached. To use a colloquial phrase, it is assumed that the commenting environmental interest groups have skin in the game. Self-report data, while useful in its own right, may not reflect group behavior as reliably because the groups are not as invested in the process and may just be telling researchers what they want the public to perceive. It is assumed that this is strictly not the case with administrative comments. Based on these assumptions, it is anticipated that the comments will provide a reliable source of previously untested data that accurately represents the sample population.

Having chosen the unit of analysis, the next step in this study's content analysis preparation phase was procuring the data. The comments were obtained from the Forest Service through a Freedom of Information Act (FOIA) request (5 U.S.C. § 552). The request stated:

> Under the Freedom of Information Act, I am requesting access to any comments made by environmental interest groups on vegetation management projects in the Deschutes, Okanogan/Wenatchee, Lolo and Clearwater/Nez Perce National Forests that are associated with the Collaborative Forest Landscape Restoration Program since the program's inception in 2010 to present, including comments on projects currently undergoing analysis.

The FOIA request indicates two additional content analysis preparation phase decisions. The first preparation phase decision concerns the chosen study area. The study area encompasses the four state region in the Northwest United States including: Washington, Oregon, Idaho, and Montana. These four states comprise USDA Forest Service Administrative Regions I (Montana & North Idaho), and VI (Washington & Oregon). One reason the study area was selected is because each state in the study area has in common the fact that a CFLR Program was authorized in 2010. This lends consistency to the study, as well as the fact that all of the states are located in the Ninth Circuit Court of Appeals. Restoration projects designed in cooperation with the Southwestern Crown of the Continent Collaborative (SWCC) are located on the Lolo National Forest near Missoula, MT. The Clearwater Basin Collaborative (CBC) focuses on projects located on the Clearwater/Nez Perce National Forest near Lewiston, ID. The Deschutes Forest Restoration Collaborative (DFRC) focuses on projects located on the Deschutes National Forest near Bend, OR. And the Tapash Sustainable Forest Collaborative (TSFC) is located on the Okanogan/Wenatchee National Forest near Wenatchee, WA.

The study area was also selected because Regions I and IV have seen far more opposition to Forest Service vegetation management proposals in the form of appeals and litigation than any of the other eight regions in the U.S. over the past 20 years (Miner, Malmsheimer, and Keele 2014). Little surprise, because controversial politics have been the norm in western forest policymaking, and environmental groups have regularly

employed confrontational behaviors to sway the decision-making process (Baker and Kusel 2003). The local public, often employed by the land for a living, have been frustrated by the lack of input into decision that affect their livelihood (Baker and Kusel 2003). Because so much western land is owned by the public, perceived shortcomings by local land management agencies are widely noted and calls for increased power of local problem solving is growing (Kemmis 2001). Given that the CFLR Program is in response to many of these concerns, it is logical that administrative comments concerning project proposals should be well attended to by environmental interest groups either participating in, or opposing collaboration.

The second preparation phase decision in the FOIA request reveals the type of project proposals this study focused on -- vegetation management proposals. This type of project was chosen for two reasons. First, because secondary evidence indicates that many environmental interest groups view the term as a euphemism for commercial logging projects (Weurthner 2008). Second, because commercial logging project proposals are assumed to be the most controversial proposals among environmental interest groups, which should generate the most interest and provide the largest sample.

Once the sample data was obtained, the next step in the content analysis process was to organize the data. The first step in this study's organizational phase was to comb through the data multiple times to become steeped in it (Burnard 1991, Polit & Beck 2004), making sense of the data to learn what is going on (Morse & Field 1995) and obtain a sense of whole (Tesch 1990, Burnard 1991). Having become steeped in the data this study then proceeded to the next step in the organizational process; deciding on the unit of meaning. Depending on the research question, the unit of analysis can be a letter,

word, sentence, portion of pages or words, or an entire document (Robson 1993, Polit & Beck 2004). Combing through the data allowed recognition of the fact that the administrative comments often possessed meaning from sentence to document level. For example, some comments contained sentences with multiple meanings. But some groups attached entire documents to their comments that contained only one meaning, such as specific research supporting a position on an endangered species. Thus, the units of meaning selected in this study were as small as multiple phrases within a sentence, to as large as an entire document.

The organizational process also allowed recognition of two other important distinctions. First, was the fact that an administrative comment submitted by one group, was often signed by multiple groups. This study recognized each signatory to an administrative comment as attaching to the submitted comment in order to capture the largest sample possible and to observe possible strategic advantages of this tactic. Thus, an administrative comment submitted by one interest group, but signed by three other groups, was ultimately counted as four separate administrative comments.

Second, not all the administrative comments received from the FOIA request were from environmental interest groups. A small percentage of the administrative comments were submitted by: wood products industry interest groups, motorized recreation groups, and governmental organizations such as Tribes, Cities, Counties, Universities, or other State and Federal Agencies other than the Forest Service. This study chose to utilize this additional data for two reasons. First, the comments were utilized to so that the full scope of participant, versus nonparticipant could be compared and contrasted, which it was assumed would better inform a discussion of the overall efficacy of the CFLR Program.

The second reason was pragmatic. Early on in the organizational process it was feared that the sample would be too small for useful logistic regression test statistic. As the study proceeded, however, the futility of the test became apparent for two reasons. First, the additional analysis only served to obscure findings that could be readily interpreted with the naked eye. Second, the rudimentary nature of the content analysis was not deemed sufficient to support statistical inferences that may have been drawn by the reader. But because the data had already been analyzed by the time this decision was made, the data was chosen for inclusion. However, the non-environmental interest group data is utilized only for comparison of the full participant/nonparticipant dynamic. Only environmental interest groups are included in regional and group type analyses.

The final step in the organizational phase is deciding whether an inductive or deductive content analysis is appropriate, followed by the development of an appropriate analysis framework. A deductive approach is based on earlier theories or models (Burns & Grove 2005), and is often used in cases where the researcher wishes to retest existing data in a new context (Catanzaro 1988). This study utilizes a deductive approach because it is based on an earlier theory, and seeks to retest the theory in a new data context. Once it is understood that a deductive content analysis is necessary, the next step is to develop a categorization matrix and to code the data according to the categories. In deductive content analysis, either a structured or unconstrained matrix of analysis can be used, depending on the aim of the study (Kyngas & Vanhanen 1999). If the matrix is structured, only aspects that fit the matrix of analysis are chosen from the data (Patton 1990, Sandelowski 1993).

This study utilizes a modified version of the interests and political opportunity

theory independent variables tested by Burke (2011). The three interest theory independent variables – comments reflecting environmental, equitable, or economic values – were modified to correspond with the most basic dictionary definitions. The modification was made because the definitions utilized by Burke (2011) do not flow from a well-developed literature base, and because that study's findings do not appear to be supported by the secondary evidence referred to earlier in this study. In addition, because this study is exploratory in nature it was assumed that the most basic definitions of what it means to possess environmental, equitable, or economic values would provide the best baseline for future research to expand upon. Thus, in this study's structured content analysis, only the administrative comments conforming to the following interests theory categorization matrix were selected:

- Environmental Value Comments: Indicate concerns "pertaining to the air, water, minerals, organisms, and all other factors surrounding and affecting a given organism at any time."
- Equitable Value Comments: Indicate concerns "characterized by fairness; just and right; fair; reasonable: equitable treatment of citizens."
- Equity Value Comments: Indicate concerns "pertaining to production, distribution, and use of income, wealth, and commodities."

(Random House Webster's Unabridged 2011).

This study also utilizes a modified version of Burke's (2011) political opportunity theory independent variables. Two of the variables – collaborative context and stakeholder context – were maintained because neither the existing literature, nor secondary evidence posed any reason for modification. However, in the interest of expanding on the narrow literature base, these variables were included because

administrative comments may reveal previously undiscovered relationship between these factors and environmental interest group's collaborative strategy. The third variable, management context, was added to the political opportunity varibales because the review of the literature indicated that Burke's interest theory variable "Political Institutions Supported" was better represented under political opportunity theory. This change occurred because the political institutions a groups support were assumed to be a secondary response to the political institutions position on vegetation management – or logging. A group that does not support management will not support an institution that is mandated to manage. Thus, in this study's structured content analysis, only the administrative comments conforming to the following political opportunity theory categorization matrix were selected:

- Collaborative Context Comments: Indicate administrative comments expressing the necessity to collaborate.
- Stakeholder Context Comments: Indicate administrative comments questioning other stakeholders' integrity.
- Management Context Comments: Indicate administrative comments questioning a proposed CFLR Program forest management outcome.

Relying on the foregoing categorization matrix, the last step in the content analysis process is to review all the data for content, and code it for correspondence with or exemplification of the identified categories (Polit & Beck 2004). The standard by which this study determined whether to select or ignore a perceived analysis unit is derived from the legal *rational basis* standard. Therefore, if there is a rational basis to argue for inclusion of a comment, the comment was included. This standard sets a fairly low bar for inclusion compared to more exacting legal standards such as the *clear and*

convincing, or *beyond a reasonable doubt* standards. The lower standard was selected because this study does not pretend to provide definitive proof of factors driving environmental interest groups collaborative strategy, but rather, it is exploratory in nature, seeking to capture the widest sample of variation possible.

In this study, the administrative comments were printed out and coded according to the rules specified above. The coded data was then transcribed into Excel so the data could be summed and averaged, and to summarize the data into tables that could be easily interpreted without the assistance of statistical testing. On entering the data into Excel, it was parsed into three frameworks. The first framework compares/contrasts all of the sample data into participants and nonparticipants to allow the reader to interpret the factors driving all interest groups collaborative strategy in the Northwest. The second framework parses the participants and nonparticipants by the four different case study regions to allow the reader to interpret the factors driving all environmental interest groups by case study. The final framework parses the participants and nonparticipants by group type. The following groups were identified: local environmental interest groups (LEIG), state environmental interest groups (SEIG), regional environmental interest groups (REIG), national environmental interest groups (NEIG), wood products industry (WPI), motorized recreation interest groups (MR), and governmental organizations (G). This categorization was provided to allow the reader to interpret the factors driving all interest groups by type.

Prior to discussing the study's threats to reliability and validity, it is necessary to first reinforce the fact that this study is exploratory in nature, seeking only to investigate a narrow body of theoretical research in order to suggest methods of further inquiry. That

said, this study has significant reliability and validity threats. As previously mentioned, some maintain that a content analysis allow the possibility to "attain simplistic results by using any method whatsoever if skills of analysis are lacking" (Weber 1990). Others maintain, however, that the "method is as easy or as difficult as the researcher determines it to be, and quality research discloses the ease or difficulty of the method (Neundorf 2002). This study is of the *easy* content analysis variety, which impacts its reliability. However, it seeks quality by disclosing the ease of the method, allowing the reader to plainly interpret the data to establish whether this study's interpretations have merit.

The reason the reliability of this study is diminished is because funding and time constraints did not allow steps to be taken to decrease the subjectivity of categorizing the units of meaning. To decrease the subjectivity of a content analysis, the process often uses multiple objective individuals who are taught the categorization framework. An iterative process is then applied, with each coder assigning the data to their own conception of the matrix. Each coded set of data is then compared to the others to establish inter-rater reliability until the statistical differences between the data are eliminated to within a prescribed limit. This study did not undergo this exacting process. Rather, the data is categorized by only the subjective interpretation of the researcher. However, to be transparent, this study provides an appended list of representative comments that were coded in Appendix B so that the reader can judge the objectivity of the methodology for themselves.

The validity of the study is also threatened because the study area is narrowed to only the Northwestern U.S.. It must be remembered that in order to achieve a sizeable sample the study area was chosen for its contentiousness. There is no reason then, to

assume that these findings can be generalized to other areas of the U.S. where litigation over public land decisions by the Forest Service may not as well attended to by environmental interest groups. Thus, the study's findings can only be validly generalized to the study area and should by no means be considered definitive, but should be viewed as evidence indicating the necessity of further study.

CHAPTER 4: Results

Overall, the results support the study's hypotheses, showing only modest differences between participating and non-participating groups in regard to the three interests theory variables; but marked differences between participating and non-participating groups in regard to all three of the political opportunity theory variables. To better understand the results they were organized into three frameworks. The first framework combines the results of all four case studies, but separates them between participants and non-participants for comparison. This was done to better analyze the different factors driving collaborative strategy across the entire region. The second framework parses the results by singling out each of the four case studies, and again separating participants from non-participants for comparison. This was done to better analyze the different factors driving collaborative strategy across the each case study region. The third framework parses the results by environmental interest group type – local, state, regional, and national – separating participants from non-participants for comparison. This was done to better analyze the different factors driving collaborative strategy across group type. The following sections will address the results of each framework respectively, which will be followed by a discussion of the implications and conclusions that follow from the three frameworks in Chapter 5.

4.1 Factors Driving Collaborative Strategy in the Northwestern U.S.

The combined results appear to confirm this study's hypotheses among environmental interest groups in the Northwestern U.S. As demonstrated by Table 1, minimal differences were found between participants and non-participants among all

three of the interest theory variables. Non-participating environmental interest groups

Table 1: Results of participating/non-participating interest groups in the Northwest combined.

COMBINED RESULTS:		**Enviro.**	**Equit.**	**Econ.**	**Mgmt.**	**Stake.**	**Collab.**
All Participants (43)	T	1126	488	191	14	7	78
	M	26.8	11.6	4.5	0.3	0.2	1.9
All EIG Participants (24)	T	830	328	119	7	4	50
	M	36.1	14.3	5.2	0.3	0.2	2.2
All EIG Non-Participants (17)	T	753	386	83	234	243	6
	M	44.3	22.7	4.9	13.8	14.3	0.4

* (T) Total, (M) Mean

made 77 and 36 fewer environmental and economic comments respectively than participating environmental interest groups did; but made 58 more equitable comments than the participating environmental interest groups. Whereas the non-participating environmental interest groups averaged 8.2 and 8.4 more environmental and equitable comments than participating groups; and only 0.3 fewer economic comments. In contrast, non-participating environmental interest groups made 227 and 239 more management and stakeholder context comments respectively, but made 44 fewer collaborative context comments. Whereas the non-participating environmental interest groups averaged 13.5 and 14.1 more management context and stakeholder context comments than participating groups; and 1.8 fewer collaborative context comments than participating groups.

In addition, non-environmental interest groups were also included in the combined analysis to better observe their impact on the collaborative process. The addition of 19 non-environmental interest groups appears to make a noticeable difference. The combination of all participating groups substantially increases the total number of comments on the interest theory variables, which serves to decrease the number of

environmental, equitable, and economic comments by an average of 9.3, 2.7, 0.7 respectively. However, the addition of the non-environmental interest groups makes almost no impact on the average number of participant's political opportunity theory comments.

4.1.1 *Discussion*

The results indicate that observable differences do exist between participating and non-participating environmental interest groups in regard to the amount of total and average comments per group made on the three interests theory variables. Whether or not the differences are statistically significant is beyond the scope of this study. However, both the participating and non-participating groups are making numerous environmental, equitable, and economic value comments in contravention of the recent literature on factors driving collaborative strategy. Appendix C – listing an abridged sample of comments fitting the categorization matrix – provides abundant evidence allowing the reader to discern the existence of the comments for themselves. However, to aid in this process several exemplary comments are provided of participating and non-participating group's environmental, equitable, and economic value comments.

For example, in regard to environmental values, one participant group stated "Scientific and site reviews by several of this letter's signers confirms that the Colt Summit Project will not have detrimental impacts to lynx and is designed to avoid treating areas that are currently used by lynx and currently provide high-quality lynx habitat" (SWCC- Montana Wilderness Assoc. #652). Whereas one nonparticipant group stated "Please demonstrate that this project will leave enough snags to follow the Forest

Plan requirements and the requirements of sensitive old growth species such as flammulated owls and goshawks" (SWCC – Native Ecosystems Council #772). Both statements were categorized as environmental values because they indicate concerns pertaining to the air, water, minerals, organisms, and all other factors surrounding and affecting a given organism at any time. In regard to equitable values, one participant group stated "Please continue to be open and transparent regarding your goals for specific treatment units" (SWCC - Wilderness Society #705). Whereas one nonparticipant group stated "The EA states that a transportation analysis was performed which identified the roads the Forest Service determined to be necessary. However, AWR believes that this is a process for which the agency should be inviting the public to fully participate" (SWCC - Alliance #815). Both statements were categorized as equitable values because they indicate concerns characterized by fairness; just and right; fair; reasonable: equitable treatment of citizens. In regard to economic values, one participant group stated "We also support the by-product of commercial wood products that come from this restoration project" (TSFC - Conservation Northwest #42). Whereas one nonparticipant group stated "The DEIS should tell the full economic story of just what the project's impacts would be to taxpayers, not just to local economic interests" (CBC – Friends of the Clearwater #101). Both statements were categorized as economic values because they indicate concerns "pertaining to production, distribution, and use of income, wealth, and commodities. These statements, and others in Appendix C, suggest that participants and non-participants alike have environmental, equitable, and economic values they would like to see fulfilled by the Forest Service's proposed projects.

The results also indicate observable differences between participating and non-participating environmental interest groups regarding the three political opportunity theory variables that suggest why participating and non-participating groups can both be interested in all three interests theory variables, but still assume different collaborative strategies. For example, in regard to management context variable, Table 1 and Appendix B indicate that participant groups only made a total of 7 management context and 4 stakeholder context comments, in contrast with 234 management context and 243 stakeholder comments by non-participating groups. Again, Appendix C provides abundant evidence allowing readers to discern the existence of the comments for themselves. However, to aid in this process several exemplary comments are again provided of participating and non-participating group's management and stakeholder context comments.

For example, in regard to the management context variable, a non-participating group stated "What the forest service sees as improvement objectives in table 15, we largely see as destructive over management" (DCFP – LOWD/BMBP #791). Another stated "Our major concern is that the FS appears to be putting logging as the number one priority, creating artificial problems that it can solve by mechanical manipulations" (DCFP - Alliance #809). Still another stated "But the package presented to us in this EA suffers from crippling deficiencies. It strikes us as basically a shell of restoration components over a conventional thinning timber sale" (TSFC – ALPS #11). However, as noted previously, participant groups did make some management context comments. For example, one group stated " … this project goes beyond the commonly supported restoration actions to include regen harvest, logging in moist Forest types that may not

need it, and logging too large a fraction of the project area" (DCFP – Oregon Wild #562). Another participant stated "An adaptive management approach should be applied to the entire project, not just the soils and fuels portions" (SWCC – Lolo Restoration Committee #835).

Non-participating group's stakeholder context comments are also revealing. For example, one group stated "Sorry, but the true purely economic motivation behind this sale is transparent and the sham rationales given for logging to such a low basal areas so soon after the last thinning are insulting, as well as a case of failure to disclose true intentions, purposely misleading the public" (DCFP – LOWD/BMBP #724). Or, "The forest service has apparently lost its moral and ecological compass and is no longer concerned about maintaining a functioning, biodiverse ecosystem" (DCFP – LOWD/BMBP #153). Another group stated "The LNF fails to take seriously the uncertain and precarious population status of the fisher" (SWCC – Alliance #164). And still another stated, "The reason why post-fire logging is so controversial is that bureaucrats, in responding to artificially-created social expectations, are playing politics with our public forests" (CBC – Friends of the Clearwater #24).

In regard to the collaborative context variable, the participating groups predictably made far more comments expressing the necessity for collaboration than non-participants, who only made a handful of comments questioning the legitimacy of collaboration. For example, one participating group stated, "The DFCP is a community initiative to restore and Steward our local forests. We are a collaborative group that seeks to bring stakeholders with diverse interests together. We have worked for three years to reach agreement on how to manage our forest for the benefit of the whole community and

then to facilitate the implementation of that vision" (DCFP – Oregon Wild #354). While another stated "I would be happy to work with you over the course of the coming months to work through these issues, to provide additional feedback and to assist the Forest in satisfying the diverse interests that have a stake in how our national forests are managed" (CBC – ICL #503). Conversely, one non-participant questioned the motive for collaboration, stating, "This is an enormous area of public lands to be prioritized for logging–typical CFLRP emphasis!" In general, however, the participating groups collaborative context comments were directed to the Forest Service to iterate their position supporting collaboration when they were already collaborating, rather than expressing *the necessity to collaborate*. In addition, the small sample of collaborative context variables and lack of variation due to the consensus nature of the comments suggests that the variable is not imparting any valuable evidence to help discern a relationship with the group's collaborative strategy.

4.2 Factors Driving Collaborative Strategy by Case Study Region

The individual case study results also appear to confirm this study's hypotheses among environmental interest groups by region. As demonstrated by Table 2, the results appear to support this study's hypotheses at the case study analysis level, in that, minimal differences exist between the results of participating and non-participating group's interests theory variables. However, marked differences appear to exist between the results from participating and non-participating group's political opportunity variables. Also of importance, is that there are apparent differences between the case study regions.

The Southwest Crown Collaboration case study was comprised of fourteen

participating environmental interest groups, and seven non-participating environmental interest groups. The participating groups submitted a total of 9 additional administrative comments than the non-participants, but 1.2 fewer comments per group. The SWCC participants made 84, 109, and 4 fewer environmental, equitable, and economic comments; and averaged 24.3, 20.5, and 2.5 fewer comments respectively. However,

Table 2: Results of Participating (P) and Non-participating (N) environmental interest groups by case study.

REGIONAL DIFFERENCES			**#**	**Enviro.**	**Equit.**	**Econ.**	**Mgmt.**	**Stake.**	**Collab.**
Southwest Crown:	P(14)	T	35	173	69	27	4	0	12
		M	2.5	12.4	4.9	1.9	0.3	0.0	0.9
	N(7)	T	26	257	178	31	94	106	2
		M	3.7	36.7	25.4	4.4	13.4	15.1	0.3
Clearwater:	P(8)	T	26	485	196	80	0	0	33
		M	3.3	60.6	24.5	10.0	0.0	0.0	4.1
	N(4)	T	16	236	123	29	63	61	0
		M	4.0	59.0	30.8	7.3	15.8	15.3	0.0
Deschutes:	P(5)	T	12	182	58	11	3	5	5
		M	2.4	36.4	11.6	2.2	0.6	1.0	1.0
	N(7)	T	21	243	83	29	75	83	4
		M	2.6	30.4	10.4	3.6	9.4	10.4	0.5
Tapash:	P(1)	T	3	20	5	1	0	0	0
		M	3.0	20.0	5.0	1.0	0.0	0.0	0.0
	N(2)	T	2	28	11	3	2	2	0
		M	1.0	14.0	5.5	1.5	1.0	1.0	0.0

* (T) Total, (M) Mean, (#) Number of administrative comments submitted

the participating groups barely made any management or stakeholder comments, resulting in 90 and 106 fewer total comments and 13.1 and 15.1 fewer comments on average respectively. The reverse was true for the collaborative context variable. There, the participating groups made 10 more comments for an average of 0.6 comments per group.

The Clearwater Basin Collaborative case study, on the other hand, was comprised of eight participating environmental interest groups, and only four non-participating

groups. The participating groups submitted a total of 10 additional administrative comments than the non-participants, but 0.7 fewer comments per group. The CBC participants made 249, 73, and 51 *more* environmental, equitable, and economic comments; but averaged 1.6 and 6.3, fewer environmental and equitable comments, while averaging 2.7 more economic comments. Like the SWCC, however, the participating groups barely made any management or stakeholder comments, resulting in 63 and 61 fewer total comments respectively, for an average of 15.8 and 15.3 fewer comments than non-participating groups. Again, like the SWCC, the reverse was true for the collaborative context variable. There, the participating groups made 33 more comments than non-participating groups for an average of 4.1 comments per group.

The third case study, the Deschutes Collaborative Forest Project, was comprised of only five participating environmental interest groups, and seven non-participating environmental interest groups. The participating groups submitted a total of 9 fewer administrative comments than the non-participants, but only 0.2 fewer comments per group. More similar to the SWCC than the CBC, the DCFP participants made 61, 25, and 18 fewer environmental, equitable, and economic comments; but unlike the SWCC averaged 6.0 and 1.2 *more* environmental and equitable comments, but 1.4 fewer economic comments. Unlike the SWCC and CBC, however, the participating DCFP groups *did* make management or stakeholder comments, but still resulted in 72 and 78 fewer total comments. In addition, the DCFP only averaged 8.2 and 9.4 management and stakeholder context respectively – noticeably less than the SWCC and CBC. In regard to the collaborative context variable, the participating groups only made 1 more comment than the non-participating groups, for an average of 0.5 additional comments per group

than the non-participants.

In regard to the Tapash Sustainable Forest Collaborative case study, the sample size is too small to calculate meaningful averages, or to interpret the total number of interest and political opportunity variables. Given the small sample, however, it appears that the trends in the other three case studies may apply. Both the lone participant group, and the two non-participating groups commented on all three interests theory variables. However, only the non-participating groups made comments in regard to the management and stakeholder context variables. None of the three groups made collaborative context comments.

4.2.1 *Discussion*

Generally, the results of the case study level of analysis appear consistent with the results from the combined analysis in Section 4.1. But the results also suggest differences in the way individual regions approach collaboration that go beyond the hypotheses, but might prove instructive for future collaborative efforts. For example, as demonstrated in Appendix B, the SWCC is comprised of nearly twice as many environmental interest groups of varying types (14) as the CBC (8) and the DCFP (5). One would anticipate then, that the SWCC would generate more administrative comments. However, the total and average number of comments is on par with both the CBC and DCFP.

Close scrutiny of Appendix B suggests that a lack of homogeneity and leadership may explain this outcome. Many of both the CBC and DCFP's comments were consensus comments signed by many other participating groups, but written by established state based environmental interest groups – Idaho Conservation League and Oregon Wild

respectively. In addition, the SWCC region also has seven non-participating groups commenting on CFLR Program proposals, which is on par with the DCFP at eight, but nearly twice as many as the CBC at only four. Furthermore, a quick internet search reveals that the SWCC region's non-participant environmental interest groups are all based in Western Montana within close proximity to the proposed CFLR Program projects. This is not the case with any of the other three CFLR Program case studies.

Also of interest are differences in the four case study's proximity to population centers. Both the SWCC and the DCFP are located in close proximity to large population centers in Missoula, MT., and Bend, OR. respectively. The CBC and the TSFC, on the other hand, are located in comparatively rural regions. As demonstrated by Appendix B, there also appears to be a correlation between the number of non-participating environmental interest groups and proximity population centers. Of the four case studies, the SWCC is both the most proximate both to a major population center, and the highest concentration of non-participating environmental interest groups.

Finally, of the four case studies, only the SWCC has seen litigation pursued by a coalition of non-participating environmental interest groups (*See* Friends of the Wild Swan v. U.S. Forest Service, 875 F.Supp.2d 1199 (2012)). One other noteworthy regional distinction is that the case was presided over by the Montana Circuit, Federal District Court Judge Donald Malloy. Secondary evidence suggests that judicial activism may be a regional factor driving collaborative strategy. For example, the High County News stated, "Many plaintiffs engage in 'venue shopping.' Environmentalists take their cases whenever possible to Molloy …" (2010). And the Billings Gazzette has stated "To read the blogs, Molloy is a 'green judge' and 'leftist' who, as one man put it in a letter to the

editor recently, 'would get the trophy for jobs/industries destroyed in Montana'" (2010). Which is not imply any veracity to these statements, but only that perceptions of judicial activism may be one previously unexplored factor driving environmental interest groups collaborative strategy.

4.3 Factors Driving Collaborative Strategy by Environmental Interest Group Type

Finally, the results of this study's analysis by interest group type appear to confirm the hypotheses as well. As demonstrated by Table 2, the results appear to support this study's hypotheses at the group type analysis level, in that, minimal differences exist between the results of participating and non-participating group's interest theory

Table 3: Results of Participating (P) and Non-participating (N) environmental interest groups by type.

GROUP DIFFERENCES:	**#**	**Total/Mean**	**Enviro.**	**Equit.**	**Econ.**	**Mgmt.**	**Stake.**	**Collab.**
Local Groups	P(11)	T	200	84	30	2	2	13
		M	18.2	7.6	2.7	0.2	0.2	1.2
	N(8)	T	319	139	35	109	117	4
		M	39.9	17.4	4.4	13.6	14.6	0.5
State Groups	P(4)	T	265	80	22	3	2	10
		M	66.3	20.0	5.5	0.8	0.5	2.5
	N(2)	T	56	35	5	17	21	0
		M	28.0	17.5	2.5	8.5	10.5	0.0
Regional Groups	P(4)	T	144	57	22	0	0	9
		M	36.0	14.3	5.5	0.0	0.0	2.3
	N(7)	T	378	212	43	108	105	2
		M	54.0	30.3	6.1	15.4	15.0	0.3
National Groups	P(4)	T	221	107	45	2	0	18
		M	55.3	26.8	11.3	0.5	0.0	4.5
	N(0)	T	NA	NA	NA	NA	NA	NA
		M	NA	NA	NA	NA	NA	NA

variables at the local, state, regional and national levels. However, marked differences appear to exist between the results from participating and non-participating group's political opportunity variables. The local environmental interest group sample was comprised of eleven participating environmental interest groups, and eight non-

participating environmental interest groups. The local participant groups made 119, 55, and 5 fewer environmental, equitable, and economic comments; and averaged 21.7, 9.8, and 1.7 fewer comments respectively. However, the participating groups barely made any management or stakeholder comments, resulting in 107 and 115 fewer total comments and 13.4 and 14.4 fewer comments on average respectively. The reverse was true for the collaborative context variable. There, the participating groups made 9 more total comments for an average of 0.7 comments per group.

The state environmental interest group sample was comprised of only four participating environmental interest groups, and two non-participating environmental interest groups. However, unlike the local participants, state participant groups made 209, 45, and 20 *more* environmental, equitable, and economic comments; averaging 38.3, 2.5, and 3.0 more comments respectively. However, the participating state groups barely made any management or stakeholder comments, resulting in 14 and 19 fewer total comments and 7.7 and 10.0 fewer comments on average respectively. The reverse was true for the collaborative context variable. There, the participating groups made 10 more total comments for an average of 2.5 more comments per group than the non-participant state based groups.

In contrast, the regional environmental interest group sample was comprised of four participating environmental interest groups, and seven non-participating environmental interest groups. Unlike the state participants, the regional participant groups made 234, 155, and 21 *fewer* environmental, equitable, and economic comments; and averaged 18.0, 16.0, and 0.6 fewer comments respectively. However, like the state and local groups, the regional participating groups barely made any management or

stakeholder comments, resulting in 108 and 105 fewer total comments and 15.4 and 15.0 fewer comments on average respectively. The reverse was also true again for the collaborative context variable. There, the participating groups made 7 more total comments for an average of 2 additional comments per group than the non-participating regional groups.

Finally, the national environmental interest group sample was comprised only of four participating environmental interest groups. However, the national participant groups made a prodigious 221, 107, and 45 environmental, equitable, and economic comments, averaging 55.3, 26.8, and 11.3 comments respectively. Predictably, however, the participating national groups barely made any management or stakeholder comments, only resulting in 2 management and no stakeholder context comments. The reverse was true for the collaborative context variable. There, the participating national groups made 18 total comments for an average of 4.5 comments per group.

4.3.1 *Discussion*

Generally, the results of the group type level of analysis appear consistent with the results from the combined analysis in Section 4.1. But the results also suggest group type differences at the local, state, regional, and national level that go beyond the hypotheses and might prove instructive for future collaborative efforts. For example, as demonstrated by Table 3 and Appendix B, with eleven participant groups and eight non-participant groups, local environmental interest groups are represent the greatest number of groups submitting administrative comments. However, the evidence indicates noticeable differences between the participant and non-participant groups in relation to

their how active or passive they are in the notice and comment process.

As demonstrated in Appendix B and C, the local participant groups played a more passive and supportive role, often signing on to consensus administrative comments submitted by larger organizations. One group defying this trend is the Great Burn Study Group that made comments far in excess of the other local participant groups. However, the GBSG is unique in the fact that it was a participant in both the SWCC and CBC, presumably due to the Great Burn Designated Roadless area's proximity to both the Lolo and Clearwater/Nez Perce National Forests. Another explanation, however, may lie in Professor Dale Harris' leadership role as co-chair of the CBC, and Director of the GBSG located primarily in the Lolo National Forest where the SWCC is also primarily located. Conversely, local non-participant groups such as League of Wilderness Defenders/Blue Mountains Biodiversity Project and the Friends of the Clearwater appear to take a much more active approach, presumably in response to the vacuum left by the lack of larger group types.

Another noteworthy observation is that some local environmental interest groups appear amenable to CFLR Program participation in certain circumstances. For example, the WildWest Institute based in Missoula, MT., is an active member of the Montana Forest Restoration Committee, whose thirteen restoration principles were used as guidelines for proposals developed by the SWCC. Furthermore, the WildWest Institute was *initially* a participating member of the SWCC (U.S. Forest Service 2010). However, as demonstrated by this study's opening quote by the WildWest Institute's Director Mathew Koehler, and by the SWCC comments numbered 520-539, it appears that the group broke with the SWCC primarily over the impacts of forest management decisions

on the threatened Canada Lynx. The Sierra Club-Juniper Group is another local group whose collaborative strategy appears outcome dependent. For example, even though the Juniper Group is not a DCFP participant, they incorporated by reference comments made by Doug Heikken, the Director of the participating State based environmental interest group Oregon Wild (DCFP – Sierra Club Juniper Group #233).

State based environmental interest groups were represented by four participant groups, and only two non-participant groups. However, the evidence again indicates noticeable differences between the participant and non-participant groups in relation to their how active or passive they were in the notice and comment process. As demonstrated by Appendix B and C, three State based participant groups appeared to play a large role in their respective CFLR Programs – Idaho Conservation League, Oregon Wild and the Montana Wilderness Association. Idaho Conservation League and Oregon Wild appeared to be driving forces in their CFLR Programs by not only writing/submitting the consensus comments, but also submitting comments on other proposed projects that were presumably not large enough or controversial enough to warrant a consensus administrative comment. The Montana Wilderness Association, on the other hand, appeared to take on a large role simply by reason of the amount of comments submitted on its own, presumably due to the SWCC relying less on consensus comments. In contrast, the two non-participating State based groups – Montana Ecosystems Defense Council and the Sierra Club Oregon Chapter – were more passive and supportive in nature. MEDC, for example, appeared to generally sign on in lock step with the regional groups Alliance for the Wild Rockies and Native Ecosystems Council. The Sierra Club Oregon Chapter was not active in this sample, submitting only one

administrative comment on proposed CFLR Projects.

Four participants, and seven non-participants represented regional environmental interest groups. These groups mirror the State based groups, in that they appear to play similar, but opposite roles in the notice and comment process. Here, the regional participant groups appear to be passive and supportive, signing on to the consensus comment made by a nationally based group in the SWCC. The Seattle, WA., based Conservation Northwest may be an exception to this trend, but unfortunately the TSFC sample was not large enough to begin drawing conclusions. In contrast, the non-participating regional groups appear to take on the same outsized influence that the State based participant groups seem to. As demonstrated in Appendix B and C, these groups plainly submitted more comments per group than any other participating or non-participating group. Furthermore, as the group type implies, some of the groups submitted or signed on to comments across the case studies. Alliance for the Wild Rockies submitted comments to the proposed SWCC, CBC, and DCFP projects, and Native Ecosystems Council did the same with regard to the SWCC and CBC.

Finally, of significant note is the fact that there was not one non-participating nationally based environmental interest group. Of further note is the fact that three of the national groups participated in multiple case studies, the exception being the National Wildlife Federation that only submitted comments on the proposed SWCC's CFLR Program projects. This is presumably explained by the significant investments the Nature Conservancy, Wilderness Society, and Trout Unlimited have expended on the successful implementation of the CFLR Program. For example, Schultz (2012) indicates that these organizations were fundamental in crafting the Forest Landscape Restoration Act – from

which the CFLR Program is authorized – and lobbying for its passage. As such, it would be uncharacteristic of these groups to not continue to exert their influence at the landscape level.

Chapter 5: Conclusions

The results of this study suggest that the interests theory variables – environmental, equitable, and economic values – may be influencing environmental interest groups collaborative strategy in a different way than the literature suggests. The evidence indicates that both participating and non-participating groups share interest in all three values, to varying degrees by region and group type. The political opportunity theory variables indicate, however, that there may be more subtle forces explaining why groups sharing all three values choose different collaborative strategies. Carmin and Balser (2002) found that the difference in this case might be explained by another factor not explored in the recent literature on collaborative strategy – environmental philosophy. A group's environmental philosophy relates to its normative views about how humans should interact with nature. Some environmental interest groups have a conservationist philosophy that allows for sustainable extraction of forest resources for human needs. Others have a preservationist philosophy, contending that forest resources are already overtaxed and that forest management only adds additional stress to an already overburdened landscape. Viewed through this lens, both participating and non-participating environmental interest groups can have environmental, equitable, and economic values, but their environmental philosophy may drive them to different means of attaining what they both believe to be the same outcome – forest health. Thus, a group with a conservationist philosophy may be willing to utilize the political opportunity created by the CFLR Program to collaborate with other stakeholders and the Forest Service even if the proposed outcome of the project portends "logging" of forest resources. Such may not be the case for a group with a preservationist philosophy. Rather

than collaborating with other stakeholders whom they suspect will sanction commercial harvest outcomes, these groups will choose the political opportunities created by the bedrock environmental statutes such as the NEPA, ESA, and NFMA to achieve a proposed outcome that meets their preservationist philosophy.

The results of this study appear to strongly support this theory. In addition to the comments highlighted in Section 4.1, some groups made comments capturing the essence of this study's foregoing conclusion. For example, George Weurthner commenting on a proposed DCFP project on behalf of the Alliance for the Wild Rockies stated, "The more the natural forest is 'managed' the more out of whack it becomes. Logging cannot restore 'natural' processes because it is fundamentally at odds with nature" (DCFP - Alliance #597). Commenting on a different DCFP project, he stated "There appears to be a philosophical and pejorative bias [on the Forest Service's behalf] against natural processes like wildfire, beetles, mistletoe and so forth that can achieve many of the goals without timber cutting" (DCFP – Alliance #809). He also states that "While there are aspects of the proposal that we fully support such as the closing of roads, reintroduction of fire as a natural process, and even some thinning of plantations in some circumstances, the main objection has to do with the means of getting to those ends—namely that all proposals except the No Action alternative recommend some degree of logging" (DCFP - Alliance # 808) In addition to issues of management, a LOWD/BMBP comment illustrates the distrust among some non-participating environmental interest groups, stating, "The West Bend timber sale is a public relations-orchestrated travesty that also gives us no hope for a good outcome. (DCFP - LOWD-BMBP #164).

In contrast, the participating groups generally appear to embrace some "logging" to achieve their forest management ends. For example, Idaho Conservation League stated, "We support the use of mechanical harvest followed by prescribed fire to achieve a shift in age structure to provide diversity on the landscape, consistent with historic conditions. We encourage consideration of a range of approaches to restoration forestry, especially in moist, mixed severity forests to achieve this diversity" (CBC – Idaho Conservation League # 1040). Also, stakeholder context comments questioning the integrity of others are largely missing from the participant group's comments. Instead, many comments express gratitude. For example, the Montana Wilderness association stated "We appreciate your willingness to meet with us on multiple occasions to discuss the Colt Summit project, and we are confident that through these discussions the project has improved" (SWCC – Montana Wilderness Association #399). Comments like these, and many others in Appendix C, appear to reinforce this study's major conclusions.

In addition to the conclusions that follow from the hypotheses, evidence from this study also supports inferences that may be helpful in crafting future collaborative efforts. The analysis at regional case study level suggests that three additional *proximity factors* may work in concert to influence environmental interest groups collaborative strategy. The SWCC is proximately located near a large urban area with a high concentration environmental interest groups that maintain a preservationist philosophy, and a judicial forum that *may* be perceived by some groups as empathetic to preservationist arguments. In addition, evidence from regional analysis supports the inference that strong State based environmental leadership, supported by a large consensus, *may* lead to better

implementation outcomes. Both the CBC and DCFP appear to fit this characterization, whereas the SWCC does not.

The analysis at the group type level also support one further inference that could prove instructive to future collaborative efforts. In the absence of larger State and Regionally based environmental interest groups, local groups (particularly non-participating local groups) appeared to pick up the burden. With the ubiquitous presence of nationally based groups supporting the implementation of the CFLR Program – and no countervailing National groups -- the importance of local group inclusion is manifest. As noted in section 2.2.2, successful collaborations should include *all* interested stakeholders, even though in reality all of the interested stakeholders are often not included due to willingness or ability to attend. Burke (2011) noted that collaboration may have the unintended effect of marginalizing local stakeholders, but while this study provides no evidence of that conclusion, future collaborative National Forest efforts should be aware of the important balancing role they may play.

This study also suggests areas of future research. To reiterate, this study was exploratory in nature, but suggests that future efforts exploring the factors driving environmental interest group's collaborative strategy should focus on the influence of Carmin and Balser's (2002) findings on the influence of the interaction between environmental interest group's environmental philosophy and prescribed project management outcomes. Future research in this vein is important because it may allow forest resource mangers and interested stakeholders to understand when and where collaborative efforts are necessary, and also aid in more efficacious outcomes.

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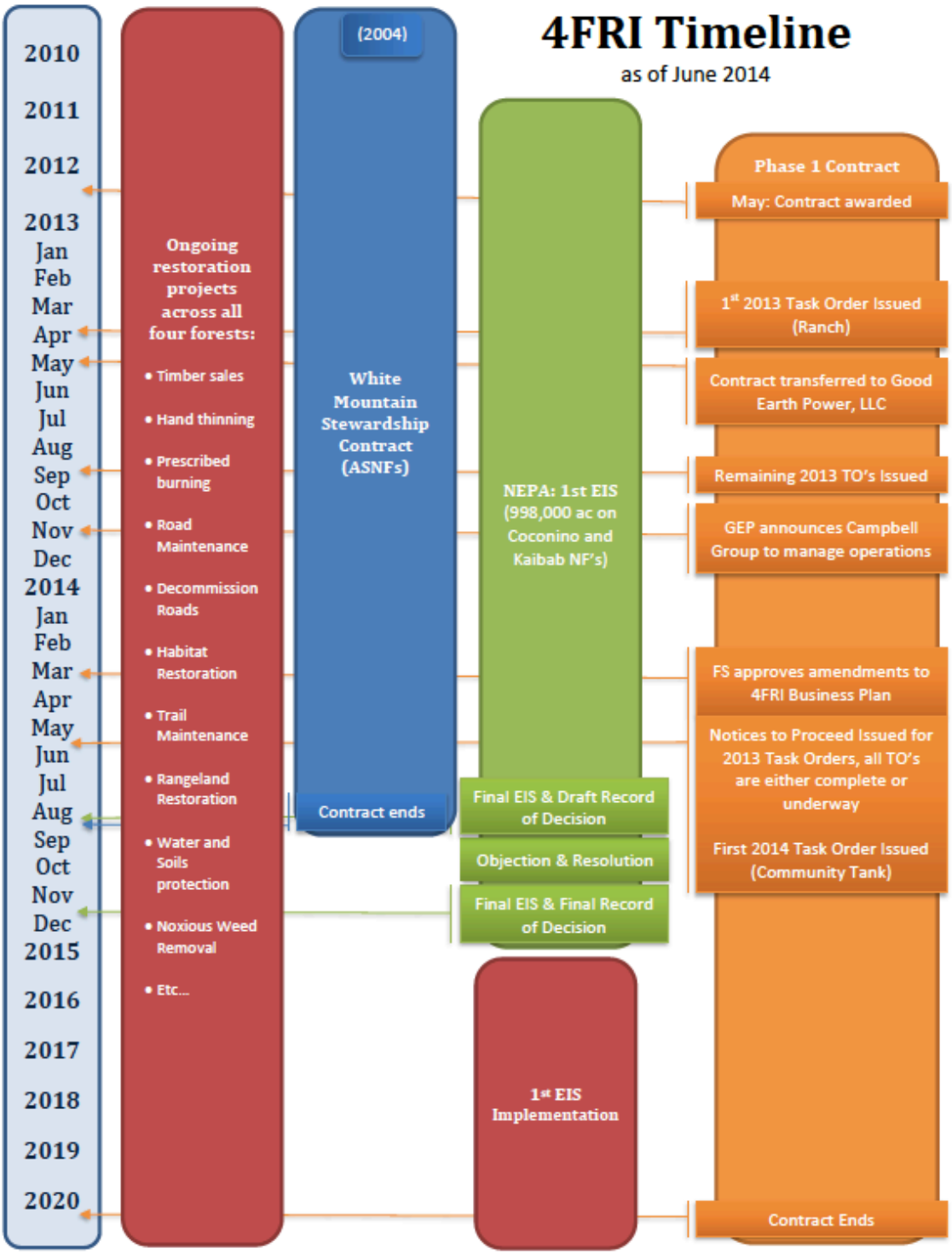
APPENDIX A


4FRI Timeline
as of June 2014
2010
2011
2012
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2016
2017
2018
2019
2020
Ongoing restoration projects across all four forests:
• Timber sales
• Hand thinning
• Prescribed burning
• Road Maintenance
• Decommission Roads
• Habitat Restoration
• Trail Maintenance
• Rangeland Restoration
• Water and Soils protection
• Noxious Weed Removal
• Etc...
(2004)
White Mountain Stewardship Contract (ASNFs)
Contract ends
NEPA: 1st EIS (998,000 ac on Coconino and Kaibab NF's)
Final EIS & Draft Record of Decision
Objection & Resolution
Final EIS & Final Record of Decision
1st EIS Implementation
Phase 1 Contract
May: Contract awarded
1st 2013 Task Order Issued (Ranch)
Contract transferred to Good Earth Power, LLC
Remaining 2013 TO's Issued
GEP announces Campbell Group to manage operations
FS approves amendments to 4FRI Business Plan
Notices to Proceed Issued for 2013 Task Orders, all TO's are either complete or underway
First 2014 Task Order Issued (Community Tank)
Contract Ends

APPENDIX B

4.1 Factors Driving Collaborative Strategy in the Northwestern U.S.

Table 1: All Participants

PARTICIPANT	En	Eq	Ec	Mc	Sc	Cc
1. Big Blackfoot Riverkeeper	8	4	1	0	0	1
2. Blackfoot Challenge	6	2	0	0	0	0
3. Clearwater Resource Council	5	2	0	0	0	0
4. Great Burn Study Group (2)	65	27	12	0	0	5
5. Kootenai Forest Stakeholders	5	2	0	0	0	0
6. Lolo Restoration Committee	13	5	2	1	0	0
7. Swan Ecosystem Center	21	6	1	1	0	1
8. Yaak Valley Forest Council	5	2	0	0	0	0
9. Framing Our Community	58	24	10	0	0	4
10. Miller Conservation Services	7	5	2	0	1	1
11. Project Wildfire	7	5	2	0	1	1
12. Montana Trout Unlimited	8	0	0	0	0	0
13. MT. Wilderness Association	22	10	7	0	0	4
14. Idaho Conservation League	79	28	10	0	0	5
15. Oregon Wild	156	42	5	3	2	1
16. Northwest Connections	8	4	1	0	0	1
17. Backcountry Hunters & Anglers	58	24	10	0	0	4
18. Rocky Mountain Elk Foundation	58	24	10	0	0	4
19. Conservation Northwest	20	5	1	0	0	0
20. National Wildlife Federation	8	4	1	0	0	1
21. Nature Conservancy (3)	83	34	15	1	0	6
22. Trout Unlimited (2)	65	29	12	0	0	5
23. Wilderness Society (2)	65	40	17	1	0	6
24. Lewiston O.H.V. Club	58	24	10	0	0	4
25. Public Land Access Year Round	58	24	10	0	0	4
26. Forest Business Network	8	4	1	0	0	1
27. Montana Logging Assoc.	3	2	1	0	0	1
28. MT Wood Products Assoc.	3	2	1	0	0	1
29. Cascade Timberlands LLC	7	5	2	0	1	1
30. Quicksilver Contracting	7	5	2	0	1	1
31. Interfor Pacific	24	20	15	7	1	1
32. Nez Perce Tribe	58	24	10	0	0	4
33. City of Bend	7	5	2	0	0	1
35. County of Deschutes	7	5	2	0	0	1
36. Deschutes County RFD #2	7	5	2	0	0	1
37. Deschutes Cty. Assets Comm.	7	5	2	0	0	1
38. OR. Dept. of Forestry	7	5	2	0	0	1
39. OR. Dept. of Fish & Wildlife	7	5	2	0	0	1
40. OSU College of Forestry	7	5	2	0	0	1
41. OSU Extension	7	5	2	0	0	1
42. Conf. Warm Springs Tribes	7	5	2	0	0	1
43. US Fish and Wildlife Service	7	5	2	0	0	1
TOTAL:	**1126**	**488**	**191**	**14**	**7**	**78**
MEAN:	**26.8**	**11.6**	**4.5**	**0.3**	**0.2**	**1.9**

Table 2: Environmental Interest Group Participants

PARTICIPANT	En	Eq	Ec	Mc	Sc	Cc
1. Big Blackfoot Riverkeeper	8	4	1	0	0	1
2. Blackfoot Challenge	6	2	0	0	0	0
3. Clearwater Resource Council	5	2	0	0	0	0
4. Great Burn Study Group (2)	65	27	12	0	0	5
5. Kootenai Forest Stakeholders	5	2	0	0	0	0
6. Lolo Restoration Committee	13	5	2	1	0	0
7. Swan Ecosystem Center	21	6	1	1	0	1
8. Yaak Valley Forest Council	5	2	0	0	0	0
9. Framing Our Community	58	24	10	0	0	4
10. Miller Conservation Services	7	5	2	0	1	1
11. Project Wildfire	7	5	2	0	1	1
12. Montana Trout Unlimited	8	0	0	0	0	0
13. Montana Wilderness Association	22	10	7	0	0	4
14. Idaho Conservation League	79	28	10	0	0	5
15. Oregon Wild	156	42	5	3	2	1
16. Northwest Connections	8	4	1	0	0	1
17. Backcountry Hunters & Anglers	58	24	10	0	0	4
18. Rocky Mountain Elk Foundation	58	24	10	0	0	4
19. Conservation Northwest	20	5	1	0	0	0
20. National Wildlife Federation	8	4	1	0	0	1
22. Nature Conservancy (3)	83	34	15	1	0	6
23. Trout Unlimited (2)	65	29	12	0	0	5
24. Wilderness Society (2)	65	40	17	1	0	6
TOTAL:	**830**	**328**	**119**	**7**	**4**	**50**
MEAN:	**36.1**	**14.3**	**5.2**	**0.3**	**0.2**	**2.2**

Table 3: Environmental Interest Group Non-Participants

NONPARTICIPANT	En	Eq	Ec	Mc	Sc	Cc
1. Cottonwood Env. Law	8	7	1	3	6	0
2. Friends of the Wild Swan	38	23	9	20	11	0
3. WildWest Institute	7	9	0	1	3	0
4. Friends of the Clearwater	97	48	13	28	25	0
5. Central Oregon Trails Alliance	5	5	1	0	0	0
6. Grant County Conservationists	6	1	1	2	1	0
7. LOWD - BMBP	114	32	9	55	71	4
8. Sierra Club - Juniper Group	44	14	1	0	0	0
9. MT Ecosystems Defense Council	44	29	5	13	19	0
10. Sierra Club - Oregon Chapter	12	6	0	4	2	0
11. Alliance for the Wild Rockies (3)	205	109	26	66	65	1
12. Alpine Lakes Protection Society	20	8	3	2	2	0
13. Cascadia Wildlands	30	9	3	3	0	0
14. Lands Council	23	18	1	3	4	0
15. Native Ecosystems Council (2)	89	62	10	33	31	1
16. Sierra Club - Cascade Chapter	8	3	0	0	0	0
17. Western Env. Law Ctr.	3	3	0	1	3	0
TOTAL:	**753**	**386**	**83**	**234**	**243**	**6**
MEAN:	**44.3**	**22.7**	**4.9**	**13.8**	**14.3**	**0.4**

4.2 Factors Driving Collaborative Strategy by Case Study Region

SWCC:

PARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Big Blackfoot River keeper	2	8	4	1	0	0	1
Blackfoot Challenge	2	6	2	0	0	0	0
Clearwater Resource Council	1	5	2	0	0	0	0
Great Burn Study Group	2	7	3	2	0	0	1
Kootenai Forest Stakeholders	1	5	2	0	0	0	0
Lolo Restoration Committee	2	13	5	2	1	0	0
Montana Trout Unlimited	1	8	0	0	0	0	0
Montana Wilderness Association	5	22	10	7	0	0	4
National Wildlife Federation	2	8	4	1	0	0	1
Nature Conservancy	3	20	9	5	1	0	1
Northwest Connections	2	8	4	1	0	0	1
Swan Ecosystem Center	4	21	6	1	1	0	1
Wilderness Society	7	37	16	7	1	0	2
Yaak Valley Forest Council	1	5	2	0	0	0	0
Forest Business Network	2	8	4	1	0	0	1
Montana Logging Association	1	3	2	1	0	0	1
Montana Wood Products Association	1	3	2	1	0	0	1
TOTAL:	**39**	**187**	**77**	**30**	**4**	**0**	**15**
MEAN:	**2.3**	**11.0**	**4.5**	**1.8**	**0.2**	**0.0**	**0.9**

NONPARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Alliance for the Wild Rockies	9	87	54	8	27	40	1
Cottonwood Environmental Law	1	8	7	1	3	6	0
Friends of the Wild Swan	4	38	23	9	20	11	0
Montana Ecosystems Defense Council	4	44	29	5	13	19	0
Native Ecosystems Council	6	70	53	8	29	24	1
Western Environmental Law Center	1	3	3	0	1	3	0
WildWest Institute	1	7	9	0	1	3	0
TOTAL:	**26**	**257**	**178**	**31**	**94**	**106**	**2**
MEAN:	**3.7**	**36.7**	**25.4**	**4.4**	**13.4**	**15.1**	**0.3**

CBC:

PARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Backcountry Hunters & Anglers	3	58	24	10	0	0	4
Framing Our Community	3	58	24	10	0	0	4
Great Burn Study Group	3	58	24	10	0	0	4
Idaho Conservation League	5	79	28	10	0	0	5
Nature Conservancy	3	58	24	10	0	0	4
Rocky Mountain Elk Foundation	3	58	24	10	0	0	4
Trout Unlimited	3	58	24	10	0	0	4
Wilderness Society	3	58	24	10	0	0	4
Nez Perce Tribe	3	58	24	10	0	0	4
Lewiston O.H.V. Club	3	58	24	10	0	0	4
Public Land Access Year Round (PLAY)	3	58	24	10	0	0	4
TOTAL:	**35**	**659**	**268**	**110**	**0**	**0**	**45**
MEAN:	**3.2**	**59.9**	**24.4**	**10.0**	**0.0**	**0.0**	**4.1**

NONPARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Alliance for the Wild Rockies	7	97	48	13	28	25	0
Friends of the Clearwater	7	97	48	13	28	25	0
Lands Council	1	23	18	1	3	4	0
Native Ecosystems Council	1	19	9	2	4	7	0
TOTAL:	**16**	**236**	**123**	**29**	**63**	**61**	**0**
MEAN:	**4**	**59**	**30.75**	**7.25**	**15.75**	**15.25**	**0**

TSFC:

PARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Conservation Northwest	3	20	5	1	0	0	0

NONPARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Alpine Lakes Protection Society	1	20	8	3	2	2	0
Sierra Club - Cascade Chapter	1	8	3	0	0	0	0
TOTAL:	**2**	**28**	**11**	**3**	**2**	**2**	**0**
MEAN:	**1.0**	**14.0**	**5.5**	**1.5**	**1.0**	**1.0**	**0.0**

DCFP:

PARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Miller Conservation Services	1	7	5	2	0	1	1
Project Wildfire	1	7	5	2	0	1	1
Oregon Wild	8	156	42	5	3	2	1
Nature Conservancy	1	5	1	0	0	0	1
Trout Unlimited	1	7	5	2	0	1	1
Cascade Timberlands LLC	1	7	5	2	0	1	1
Quicksilver Contracting	1	7	5	2	0	1	1
Interfor Pacific	6	24	20	15	7	1	1
City of Bend	1	7	5	2	0	0	1
County of Deschutes	1	7	5	2	0	0	1
Deschutes County RFD #2	1	7	5	2	0	0	1
Deschutes County Assets Committee	1	7	5	2	0	0	1
Oregon Department of Forestry	1	7	5	2	0	0	1
Oregon Department of Fish & Wildlife	1	7	5	2	0	0	1
OSU College of Forestry	1	7	5	2	0	0	1
OSU Extension	1	7	5	2	0	0	1
Confederated Warm Springs Tribes	1	7	5	2	0	0	1
US Fish and Wildlife Service	1	7	5	2	0	0	1
TOTAL:	**30**	**290**	**138**	**50**	**10**	**8**	**18**
MEAN:	**1.7**	**16.1**	**7.7**	**2.8**	**0.6**	**0.4**	**1.0**

NONPARTICIPANT	**#**	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Central Oregon Trails Alliance	2	5	5	1	0	0	0
Grant County Conservationists	1	6	1	1	2	1	0
LOWD - Blue Mountains Biodiversity Project	5	114	32	9	55	71	4
Sierra Club - Juniper Group	3	44	14	1	0	0	0
Sierra Club - Oregon Chapter	1	12	6	0	4	2	0
Alliance for the Wild Rockies	2	21	7	5	11	9	0
Cascadia Wildlands	4	30	9	3	3	0	0
American Forest Resource Council	3	11	9	9	0	0	0
TOTAL:	**21**	**243**	**83**	**29**	**75**	**83**	**4**
MEAN:	**2.6**	**30.4**	**10.4**	**3.6**	**9.4**	**10.4**	**0.5**

4.3 Factors Driving Collaborative Strategy by Environmental Interest Group Type

(P) LEIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Big Blackfoot Riverkeeper	8	4	1	0	0	1
Blackfoot Challenge	6	2	0	0	0	0
Clearwater Resource Council	5	2	0	0	0	0
Great Burn Study Group (2)	65	27	12	0	0	5
Kootenai Forest Stakeholders	5	2	0	0	0	0
Lolo Restoration Committee	13	5	2	1	0	0
Swan Ecosystem Center	21	6	1	1	0	1
Yaak Valley Forest Council	5	2	0	0	0	0
Framing Our Community	58	24	10	0	0	4
Miller Conservation Services	7	5	2	0	1	1
Project Wildfire	7	5	2	0	1	1
TOTAL:	**200**	**84**	**30**	**2**	**2**	**13**
MEAN:	**18.2**	**7.6**	**2.7**	**0.2**	**0.2**	**1.2**

(NP) LEIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Cottonwood Environmental Law	8	7	1	3	6	0
Friends of the Wild Swan	38	23	9	20	11	0
WildWest Institute	7	9	0	1	3	0
Friends of the Clearwater	97	48	13	28	25	0
Central Oregon Trails Alliance	5	5	1	0	0	0
Grant County Conservationists	6	1	1	2	1	0
LOWD - Blue Mountains Biodiversity Project	114	32	9	55	71	4
Sierra Club - Juniper Group	44	14	1	0	0	0
TOTAL:	**319**	**139**	**35**	**109**	**117**	**4**
MEAN:	**39.9**	**17.4**	**4.4**	**13.6**	**14.6**	**0.5**

(P) SEIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Montana Trout Unlimited	8	0	0	0	0	0
Montana Wilderness Association	22	10	7	0	0	4
Idaho Conservation League	79	28	10	0	0	5
Oregon Wild	156	42	5	3	2	1
TOTAL:	**265**	**80**	**22**	**3**	**2**	**10**
MEAN:	**66.3**	**20.0**	**5.5**	**0.8**	**0.5**	**2.5**

(NP) SEIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
MT Ecosystems Defense Council	44	29	5	13	19	0
Sierra Club - Oregon Chapter	12	6	0	4	2	0
TOTAL:	**56**	**35**	**5**	**17**	**21**	**0**
MEAN:	**28.0**	**17.5**	**2.5**	**8.5**	**10.5**	**0.0**

(P) REIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Northwest Connections	8	4	1	0	0	1
Backcountry Hunters & Anglers	58	24	10	0	0	4
Rocky Mountain Elk Foundation	58	24	10	0	0	4
Conservation Northwest	20	5	1	0	0	0
TOTAL:	**144**	**57**	**22**	**0**	**0**	**9**
MEAN:	**36.0**	**14.3**	**5.5**	**0.0**	**0.0**	**2.3**

(P) REIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
Alliance for the Wild Rockies (3)	205	109	26	66	65	1
Alpine Lakes Protection Society	20	8	3	2	2	0
Cascadia Wildlands	30	9	3	3	0	0
Lands Council	23	18	1	3	4	0
Native Ecosystems Council (2)	89	62	10	33	31	1
Sierra Club - Cascade Chapter	8	3	0	0	0	0
Western Environmental Law Center	3	3	0	1	3	0
TOTAL:	**378**	**212**	**43**	**108**	**105**	**2**
MEAN:	**54.0**	**30.3**	**6.1**	**15.4**	**15.0**	**0.3**

(P) NEIG	**En**	**Eq**	**Ec**	**Mc**	**Sc**	**Cc**
National Wildlife Federation	8	4	1	0	0	1
Nature Conservancy (3)	83	34	15	1	0	6
Trout Unlimited (2)	65	29	12	0	0	5
Wilderness Society (2)	65	40	17	1	0	6
TOTAL:	**221**	**107**	**45**	**2**	**0**	**18**
MEAN:	**55.3**	**26.8**	**11.3**	**0.5**	**0.0**	**4.5**

(NP) NEIG	En	Eq	Ec	Mc	Sc	Cc
NA	NA	NA	NA	NA	NA	NA

(P) WPI	En	Eq	Ec	Mc	Sc	Cc
Forest Business Network	8	4	1	0	0	1
Montnana Logging Association	3	2	1	0	0	1
Montana Wood Products Association	3	2	1	0	0	1
Cascade Timberlands LLC	7	5	2	0	1	1
Quicksilver Contracting	7	5	2	0	1	1
Interfor Pacific	24	20	15	7	1	1
TOTAL:	**52**	**38**	**22**	**7**	**3**	**6**
MEAN:	**8.7**	**6.3**	**3.7**	**1.2**	**0.5**	**1.0**

(NP) WPI	En	Eq	Ec	Mc	Sc	Cc
American Forest Resource Council	3	11	9	9	0	0

(P) MR	En	Eq	Ec	Mc	Sc	Cc
Lewiston O.H.V. Club	58	24	10	0	0	4
Public Land Access Year Round (PLAY)	58	24	10	0	0	4

(P) G	En	Eq	Ec	Mc	Sc	Cc
Nez Perce Tribe	58	24	10	0	0	4
City of Bend	7	5	2	0	0	1
County of Deschutes	7	5	2	0	0	1
Deschutes County RFD #2	7	5	2	0	0	1
Deschutes County Assets Committee	7	5	2	0	0	1
Oregon Department of Forestry	7	5	2	0	0	1
Oregon Department of Fish & Wildlife	7	5	2	0	0	1
OSU College of Forestry	7	5	2	0	0	1
OSU Extension	7	5	2	0	0	1
Confederated Warm Springs Tribes	7	5	2	0	0	1
US Fish and Wildlife Service	7	5	2	0	0	1

APPENDIX C

Case: SWCC

	GROUP	TYPE	P/NP	PROJECT	ACTION	RATING	COMMENT
147	Alliance for the Wild Rockies	R	NP	Colt Summit	Draft	Eq	Ranger Love came to Helena and meet with me to discuss the Colt Summit Project. Ranger Love said that Colt Summit is part of the Southwest Crown of the Continent Project which plans on $91.2 million of projects over the next 10 years in the Seeley Lake, Lincoln and Swan Ranger Districts yet this is not covered in the cumulative effects analysis of the wildlife section. Please fix this.
148						Eq	Did the Forest Service conduct NEPA analysis (i.e. an EA or EIS) for the Seeley-Swan Fire Plan
149						Eq	If the Forest Service did not conduct NEPA for the Fire Plan, please disclose the cumulative effects of Forest-wide implementation of the Fire Plan in the Colt Summit EA to avoid illegally tiering to a non-NEPA document. Specifically analyze the decision to prioritize mechanical, human-designed, somewhat arbitrary treatments as a replacement for naturally-occurring fire.
150						En	Will the Forest Service be considering binding legal standards for noxious weeds in its revision of the Lolo Forest Plan?
151						Eq	Will this Project address all Project area BMP needs, i.e. will the BMP road maintenance backlog and needs from this Project all be met by this Project?
152						En	What MIS did you find, how many and how did you look for these management indicator species?
153						En	Which wildlife species and ecosystem processes, if any, does fire-proofing benefit/harm?
154						En	What about the role of mixed severity and high severity fire – what are the benefits of those natural processes, How have those processes (mixed and high severity fire) created the

		ecosystems we have today?
155	En	What beneficial ecological roles do beetles play, and can the forest survive without them?
156	Eq	Will all WQLS streams in the project area have completed TMDLs before a decision is signed?
157	Sc	Why aren't you complying with the Regional Soil standards requirement of not exceeding the 15 percent areal extent of detrimental disturbance?
158	Mc/Sc	The LNF's intention is to continually substitute fire suppression, logging, and prescribed fire treatments for natural fire—the exclusion of which has led to larch being a "forest type at risk"!
159	Sc/Mc	If the FS were study the Northern Region Overview, connect the dots and disclosed the obvious conclusions, it would be clear that the any logging to prevent the effects of "catastrophic" fire areas would be severely detrimental to cavity nesting species, particularly the pileated woodpecker.
160	Sc/En	Since the FS is not meeting species viability requirements as discussed above, it is critical for the FS to take steps to develop a multiple species conservation strategy for the LNF.
161	En	Habitat should be located so that genetic exchange among all demes is possible.
162	En	For the fisher, scientific bases for conservation strategies are found in Witmer, et al., 1998, Jones (undated), and Johnsen, 1996.
163	Sc/En	The LNF has consistently ignored the Region's guidance document for old-growth species' habitat management.
164	Sc/En	The LNF fails to take seriously the uncertain and precarious population status of the fisher, as described in Witmer, et al., 1998:
165	En	The DM does not adequately consider cumulative effects on upland habitat for boreal toads.
166	Sc	In fact, the LNF has never performed a genuine analysis of cumulative

							impacts of logging activities on boreal toads.
167						Eq/Sc	The project area is heavily checkerboarded with Plum Creek land, and the EA fails to discuss cumulative effects of the actions of that landowner, notorious for its lack of regard for conservation issues.
168						Eq	We still believe that NEPA requires a full environmental impact statement be prepared for this project.
169						En	Please formally consult with the U.S. Fish and Wildlife Service to determine the impacts of the project on bull trout.
170						En	Please formally consult with the U.S. FWS to determine the impacts of this project on grizzly bears.
171						En	Please formally consult with US FWS on lynx
172						Sc/En	It is clear, then, that the FS must do more than follow its Forest Plans to protect lynx.
372	Nature Conservancy	N	P	Colt Summit	Supp.	Eq/En	In our view, the information and analysis included in the supplement confirms and strengthens our opinion that the Colt Summit project strikes a good balance of reducing the risk of uncharacteristic wildfire while simultaneously improving wildlife habitat and connectivity.
373						Eq	The supplement clearly laid out the guidelines for a cumulative impact assessment -- and explained in erms a layman can understand -- how the analysis was conducted, the results of the analysis, and how the analysis results relate to the Colt Summit project.
374						En	Figure 1 in the appendix clearly shows that lynx have avoided the Colts on the project area since at least 1998 -- the earliest year for which data are available. A closer look at the proposed treatment units within the project boundary reveal that there are no treatments proposed in areas where lynx have been documented.
375						En	This project provides a cumulative benefit to lynx.
376						En	We applaud you and your staff for incorporating wildlife considerations

							into the overall design of the Colts Summit project.
394	Montana Wilderness Assoc.	S	P	Colt Summit	Supp	Eq	The supplement is thorough and clearly articulate how The cumulative effects analysis was conducted as well as the results of the analysis.
395						En	Lynx telemetry data dating back to 1998 show that lynxs, by and large, do not use the Colt Summit project area.
396						Eq	Our review of the proposed action shows that the Colt Summit project complies with all lynx standards, including the northern Rockies lynx amendment.
397						En	The supplement suggests that the treatments may actually benefit lynx by moving stem excluded forest stands onto a trajectory to provide snow shoe hare and lynx habitat in the future and by avoiding treatment areas that currently provide lynx habitat.
398						En/Ec	We are confident that the project will meet the goals of reducing the risk of characteristic wildfire, improving fish and wildlife habitat and connectivity, and supporting the local economy.
399						Cc	We appreciate your willingness to meet with us on multiple occasions to discuss the Colt Summit project, and we are confident that through these discussions the project has improved.
650	Montana Wilderness Assoc.	S	P	Colt Summit	Supp.	Eq	The SEA clearly and thoroughly explains the Forest Service's rationale for developing the Colt Summit Project.
651						En	[The project] thoroughly describes how the project was designed to avoid impacts to Canada lynx and grizzly bear and explains how the proposed work will actually improve wildlife habitat – including lynx habitat – going forward.
652						En	Scientific and site reviews by several of this letter's signers confirms that the Colt Summit Project will not have detrimental impacts to lynx and is designed to avoid treating areas that are currently used by lynx and currently provide high-quality lynx habitat.

653						En	this project has the potential to improve connectivity in the area for lynx through a prescription designed to create suitable lynx habitat where none currently exists between two areas of regular use by this species.
654						Eq	We reiterate our support for a reissuance of the original decision on the Colt Summit Project so it may move forward as soon as possible.
655						En	The Colt Summit Project area has missed several fire cycles and is thus at risk of experiencing a more severe fire than would have been the case if fire had been allowed to play its natural part of forest ecology here in the last 100 years.
656						En	We believe that this treatment is important in significantly reducing the possibility of a much hotter, more severe fire here, which has the potential to destroy critical lynx habitat, than would normally be the case.
702	Wilderness Society	N	P	Center Horse	Scope	Cc	Collectively, we have visited the project area at least seven times on organized site visits in the past five years and have had the opportunity to discuss ideas for the project with your resource specialists and diverse groups of partners on many of these visits.
703						En	First of all, we are very impressed with and supportive of your commitment to landscape restoration, as evidenced by 160 miles of road decommissioning and over 3000 acres of prescribed fire, and fish and wildlife habitat enhancement, as evidenced by remedying at least eight fish passage barriers and by avoiding vegetation management activities in high-quality lynx foraging habitat.
704						En	To facilitate monitoring and adaptive management, please ensure controls are used with replication in restoration treatments in the mixed-conifer stands.
705						Eq	Please continue to be open and transparent regarding your goals for specific treatment units.

706						En	Please ensure that lynx, grizzly bear, wolverine, and native trout habitat are maintained or improved through the implementation of this project.
707						En	Please ensure that all stored and decommissioned roads receive the proper treatments to ensure they do not pose future threats to water quality and the overall integrity of the watershed.
708						Eq	In the context of road decommissioning, please describe the number of miles of roads – and which road segments – to be simply abandoned, the number to be fully recontoured/reclaimed, and the number to be stored.
709						En	Please ensure that monitoring programs are designed for this project to detect changes in sedimentation rates to waterways, presence/ absence of noxious weeds before and after treatment, and changes to habitat for key wildlife species.
762	Native Ecosystems Council	R	NP	Center Horse	Scope	Mc/En	We appreciate that you are proposing to close and obliterate some roads, but we would like you to consider a no commercial logging alternative.
763						Eq	Please solicit and disclose all necessary elements for a project EIS.
764						En/Eq	The agencies must prepare a biological assessment and biological opinion for the forest plan regarding impact on the threatened Canada Lynx and critical habitat.
765						En/Eq	The agencies should conduct ESA consultation for the wolverine.
766						En	The Forest Service's own management activities are largely responsible for noxious weed infestations; in particular, logging, prescribed burns, and road construction and use create a risk of weed infestations
767						En	What threatened, endangered, rare and sensitive plant species and habitat are located within the proposed project area?
768						En	What surveys have been conducted to determine presence and abundance of whitebark pine re-generation?

769	En/Eq	The FS must assess the fuel and fire risk situation across land ownership boundaries to understand, and disclose to the public, the likely fire scenarios across the area's landscape. Only then can the context of your proposal be adequately weighed on its merits and evaluated on its merits.
770	Mc	Since disruption of fire cycles is identified, the LNF needs to take a hard look at its fire policies.
771	En	For the proposal to be consistent with the Forest Plan, enough habitat for viable populations of old-growth dependent wildlife species is needed over the landscape.
772	En	Please demonstrate that this project will leave enough snags to follow the Forest Plan requirements and the requirements of sensitive old growth species such as flammulated owls and goshawks.
773	Ec	Please evaluate all of the costs and benefits of this project. Please include a detailed list of all the costs to the agency and the public.
774	Cc	We are concerned, however, that there maybe so many details already decided upon that both the general public involvement and even collaboration has been overly frontloaded.
775	Sc	A decide first, collaborate and involve the public later approach has been a contributor to major controversy with the Colt Summit project.
776	En	We are glad so much restoration of industrially abused lands is proposed.
777	Mc	The forest service has generally been extremely weak on performing scientifically based landscape assessment that adequately describes a natural, normal landscape patterns and spatial arrangement of patches of forest of varying age classes in mixed severity fire regime forests. This is been because the traditional industrial forestry paradigm focuses on maximizing timber growth in yield at the standard level which is what you're mapping of the proposed treatment suggests. We are willing provide scientific resources for the

							forest service to utilize for focusing on the former, if you're not too fixated on the latter.
812	Alliance for the Wild Rockies	R	NP	Horseshoe	Draft	En	Due to the project area's condition and location, this is clearly an area for which much active restoration is warranted.
813						Mc	Whereas we support the proposal to reduce fuels using mechanical means and prescribed fire, clearly this is not reestablishing fire "as a natural process."
814						Eq	We would appreciate it if the EA is corrected so as to educate the public and minimize confusion over what "fire as a natural process" means
815						Eq	The EA states that a transportation analysis was performed which identified the roads the Forest Service determined to be necessary. However, AWR believes that this is a process for which the agency should be inviting the public to fully participate.
816						En	In fact, the Forest Service must demonstrably pursue its policy to right-size the road network to achieve the ecologically sustainable minimum road system needed.
817						En	AWR appreciates that the proposal includes an 18"dbh limit on removal or cutting of all trees— live and dead—in recognition of the heavy industrial logging in the recent history of the project area.
818						En	For grizzly bears, who find habitat in the project area (although it's outside the Recovery Zone), the Forest Service should identify mitigation measures such as leaving sufficient cover along roads (especially open roads) where vegetation is thinned for fuel reduction, and seasonal restrictions on project activities.

819						En	We are encouraged that soil rehabilitation off roads, of landings and skid trails, is to be a major focus of the project
820						Sc/Eq/En	Finally, AWR notes that the EA sidesteps the best available science on carbon sequestration, wildland fire, and mechanical treatments. Whereas we agree that the proposed action may achieve an overall net ecological benefit, the EA fails to disclose that mechanical removal of wood is a net contributor of CO2 to the atmosphere.
834	Lolo Restoration Committee	L	P	Horseshoe	Draft	En	Restore functioning ecosystems by enhancing ecological processes: The Horseshoe West project aims to restore historic tree species diversity and improve soil function in an area previously intensively managed for other objectives.
835						En/Mc	Apply adaptive management approach: An adaptive management approach should be applied to the entire project, not just the soils and fuels portions.
836						En	Use the appropriate scale of integrated analysis to prioritize and design restoration activities: The horseshoe West project was identified as a high priority treatment by the Southwest Crown collaborative(landscape scale) and the Seeley Lake fire plan (watershed scale). These levels of analysis, combined with project level analysis in the EA, meet the intent of this restoration principle.
837						En	Monitor restoration outcomes: Plans for monitoring vegetation treatments, weed treatments, road treatment, and economics should all be discussed in the EA or at least referenced if they exist in other documents.
838						En	Reestablish fire on the landscape: The extensive use of fire proposed in this project is commendable and will serve to reintroduce fire as a natural component of the project area.
839						Eq	Consider social constraints and seek public support for reintroducing buyer on the landscape: The Ranger district has done considerable outreach to neighboring landowner associations

		about fire and its use in this area.
840	Eq	Engage community and interested parties in the restoration process: the Ranger district clearly incorporated collaborative documents (Seeley Swan Fire Plan, MFRC principles, Southwestern Crown landscape strategy) in the development of the Horseshoe West project.
841	En	Improve terrestrial and aquatic habitat and connectivity: Aquatic habitat within the project area is limited. Proposed treatments are consistent with enhancing and improving elk habitat. The inclusion of a wildlife specific objective in the purpose and need statement of this project is commendable.
842	En/Ec	Emphasize ecosystem goods and services and sustainable land management: The horseshoe West project will enhance recreational opportunities for hikers, snowmobilers, skiers, and horseback riders. However, we suggest that future analysis include a more rigorous assessment of Forest product production and be expressed in terms of delivered values in order to reflect the cost of harvest systems and haul costs.
843	Ec	Integrate restoration with socioeconomic well-being: This project has the potential to create opportunities for local employment, but we are concerned that the heavy amount of labor associated with this project will favor nonlocal crews. We encourage the forest service to use contracting mechanisms that favor best value criteria and local contractors.
844	Eq	Enhance education and recreation activities to build support for restoration: The Ranger District has done considerable outreach to the community to build support for restoration.

845						En	Protect and improve overall watershed health, including stream health, soil quality and function, and riparian function: Opportunities to improve the aquatic environment in this project area are limited due to lack of water, but we are supportive of the road decommissioning proposed in culvert removals/replacements associated with this project.
846						En	Establish and maintain a safe road and trail system that is ecologically sustainable: We support the fact that the Horseshoe West project maintains public motorized access at current legal levels. We also support the decommissioning of spur roads and roads that cross wet areas as well as the creation of nonmotorized pathways.

Case: CBC

	GROUP	TYPE	P/NP	PROJECT	ACTION	RATING	COMMENT
22	Friends of the Clearwater	L	NP	Granite	Scope	En	There are many concerns with salvaging after a fire. In most respects, it is the worst time to conduct logging activity because the environmental impacts are even higher than in areas that have not been recently burned.
23						Mc	The entire notion of "salvage" as it pertains to forest management is a hoax—a scam to mislead the public into accepting ecosystem damage under the guise of "management."
24						Sc	The reason why post-fire logging is so controversial is that bureaucrats, in responding to artificially-created social expectations, are playing politics with our public forests.
25						Ec	Investing taxpayer dollars in damaging post-fire logging projects instead of proposing true restoration projects to deal with the vast mismanagement written all over the roaded portion of this National Forest is a huge waste.
26						En	Fire (and its aftermath) should be seen for what it is: a natural process that creates and maintains much of the variety and biological diversity of

		the Northern Rockies.
27	Sc	Put bluntly, there is a kind of ignorance, bordering on mass hysteria, that needs to be addressed in today's political climate, which sees all wildland fire as bad and all burned forests as wasted resources, a view which is every bit as dangerous (and actually quite consistent with) the now acknowledged FS ignorance that favored suppression of wildfires at all costs for many decades.
28	Mc/Sc	Rather than to trust nature to right the wrongs perpetrated by past misguided FS policies, the FS now insists upon managing itself out of the supposed "unnatural" conditions created by its own mismanagement, a kind of administrative hubris
29	En	The FS has yet to design a consistent, workable, scientifically sound conservation strategy to assure viable populations of black-backed woodpeckers.
30	En	In short, post-fire logging reduces important components of the forest ecosystem, and tends to further exacerbate stresses caused by the initial disturbance event.
31	En	There is also no scientific support that post-fire logging is needed to reduce risk of future fires.
32	En	Recent research suggests that post-fire recovery occurs best in the absence of logging and that logging hinders recovery.
33	En	We request that you thoroughly analyze the impacts of recent wildfire suppression activities on the forest.
34	Mc	We believe that high intensity forest manipulation as you are proposing will not lend towards restoring functional ecosystems. Rather, logging activities will lead to accelerated erosion and soil compaction and will disrupt the natural post fire regeneration.

35	Mc/Sc	Unfortunately, the philosophy underlying the proposal is hostile towards both the naturally functioning ecosystem's propensity to recover on its own, and towards those who advocate for natural recovery arguing against the politically-inspired and ecologically bankrupt "salvage" paradigm.
36	Mc	Any forest condition that is maintained through intense mechanical manipulation is not maintaining ecosystem function. We request detailed disclosure of the historical data used to arrive at any assumption of "desired conditions."
37	En	Post-fire forests are extremely susceptible to erosion. While roads have extremely detrimental impacts on unburned forests (through changing water flow patterns, increasing erosion, and influencing wildlife habitat and migration), their impacts are greatly intensified on burned landscapes. Your analysis must carefully consider the post-fire stability of roads in the project area.
38	Eq	Please disclose the results of monitoring of detrimental soil conditions following post-fire logging. Please disclose whether or not you've ever monitored such cutting units on the Forest.
39	En	Habitat modification associated with salvage logging may particularly impact cavity nesting birds.
40	En	Regenerating vegetation in post-fire forests generally offers substantial foraging opportunities for big game species such as elk, mule deer, and white-tailed deer. However, the post-fire environment is also fragile and offers little cover. The forest plan elk habitat standards must be met and that is doubtful, given the extent of the fire, to meet the summer habitat elk objectives.
41	Eq	Please disclose how stands to be logged compare to old-growth criteria.

42	Sc	Unfortunately, region-wide the FS has failed to meet Forest Plan old-growth standards, does not keep accurate old-growth inventories, and has not monitored population trends in response to management activities as required by Forest Plans and NFMA
43	En	Please include in your analysis the possible effects of noxious weed introduction on Sensitive plant populations and other components of biodiversity.
44	En/Eq	Please fully analyze and disclose cumulative impacts on soil productivity
45	En/Mc	The FS often makes a case for logging as a way to reduce insect and disease damage to timber stands. Is this one of the reasons for this sale? As far as we are aware, the FS has no empirical evidence to indicate its "treatments" for "forest health" decrease, rather than increase, the incidence of insects and diseases in the forest.
46	Ec	The FS insists that the economic system as it presently exists be a part of the equation for performing "ecosystem management." Although we disagree the way this is interpreted to mean that present economic interests must be served first, the FS should follow thorough and tell the full economic story of just what the project's impacts would be to taxpayers, not just to local economic interests.
47	Ec	In the name of increased responsibility to the taxpayer for providing the highest benefits in return for public investments, we request that you document how your decision would maximize net public benefit. In other words, you should give consideration to, and adequately document, who would benefit from this project and who would pays for it. Please provide an itemized list of monetary costs and benefits for the project.
48	En	For every project proposal, it is important that the results of past monitoring be incorporated into planning.

49						Eq	Please disclose the name of any other past logging projects (implemented during the life of the Forest Plan) whose analysis area(s) encompass the areas to be logged under this proposal.
50						En	The FS must consider the cumulative effects of activities on land of all ownerships in or adjacent to project area watersheds.
80	Friends of the Clearwater	L	NP	Clear Creek	Scope	En	RHCAs are of serious concern. There should be no thinning in these areas. Current policy des not allow logging in RHCAs so pre-commercial thinning is not needed within RHCAs for eventual logging.
81						En/Mc	Any forest condition that is maintained through intense mechanical manipulation is not maintaining ecosystem function.
82						En	For the proposal to be consistent with the Forest Plan, enough habitat for viable populations of old-growth dependent wildlife species is needed over the landscape.
83						Sc	The Nez Perce National Forest has a spotty record at best in insuring the viability of MIS and TES species.
84						Eq	Before approving a further set of activities, the agency must complete the revision of the Forest Plan in order to elucidate a truly sustainable ecological vision of forest management.
85	Alliance for the Wild Rockies	R	NP	Clear Creek	Scope	En	RHCAs are of serious concern. There should be no thinning in these areas. Current policy des not allow logging in RHCAs so pre-commercial thinning is not needed within RHCAs for eventual logging.
86						En/Mc	Any forest condition that is maintained through intense mechanical manipulation is not maintaining ecosystem function.
87						En	For the proposal to be consistent with the Forest Plan, enough habitat for viable populations of old-growth dependent wildlife species is needed over the landscape.
88						Sc	The Nez Perce National Forest has a spotty record at best in insuring the viability of MIS and TES species.

89						Eq	Before approving a further set of activities, the agency must complete the revision of the Forest Plan in order to elucidate a truly sustainable ecological vision of forest management.
90	Frinds of the Clearwater	L	NP	Clear Creek	Scope	Eq	The draft Environmental Impact Statement (DEIS) should indicate specifically how the various alternatives would meet specific DFCs in the Forest Plan
91						Sc/Eq	Often, the Forest Service conflates recommendations in non-NEPA documents with the DFCs in forest plans. They are not the same. If new DFCs are being introduced, via watershed analyses, and it appears they are, judging from t he scoping letter narrative, then both NEPA and NFMA requirements must be met.
92						En	The DEIS should fully analyze one or more action alternatives that don't build new roads or log
93						Mc	We believe that high intensity forest manipulation as you are proposing will not replicate natural fire.
94						Eq/Sc	For the proposal to be consistent with the Forest Plan, enough habitat for viable populations of wildlife must be maintained. The Nez Perce National Forest has failed to insure viability of MI and TES species to date.
95						En	Cumulative impacts need to be addressed. Early seral species (both plant and animal) tend to dominate in adjacent landscapes. Habitat security, later seral species and old-growth habitat are therefore more important on the national forests. Managing for more early seral stages on the national forests may shortchange late-seral species, which tend to be rarer.
96						Eq/En	Please disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities.
97						En/Eq	Please examine past logging activities, including such information as year and regeneration success level for each past activity in the analysis area and in the cumulative effects area. Please disclose the sizes and condition of manmade openings already existing

		in the area, and exactly where the proposed cutting units are in relation to the old logged areas.
98	En/Eq	Please fully analyze and disclose cumulative impacts on soil productivity.
99	Mc/En	What empirical evidence do you have to indicate “treatments” for “forest health” decrease, rather than increase, the incidence of insects and diseases in the forest. Please consider the large body of research that indicates logging, roads, and other human caused disturbance promote the spread of tree diseases and insect infestation.
100	Eq	It is extremely important the FS disclose the environmental baseline for watersheds. Generally, this means their condition before development or resource exploitation was initiated.
101	Ec	The DEIS should tell the full economic story of just what the project’s impacts would be to taxpayers, not just to local economic interests. Along with the costs of the specific project actions, the costs of road maintenance proportionately attributable to this project and the cumulative economic impacts of carrying out fire suppression policy and the resultant need to carry out such projects as this one should be disclosed
102	Ec	In the name of increased responsibility to the taxpayer for providing the highest benefits in return for public investments, we request that you document how your decisions and the selected alternatives maximize net public benefit. In other words, you should give consideration to, and adequately document, who would benefit from this project and who would pays for it. Please provide an itemized list of monetary costs and benefits for the project, including the no-action alternative.

103						Eq/Ec	Economics is another reason why we strongly desire to see an alternative that would only involve watershed rehabilitation and recovery. The long-term benefits of not having to spend money for doing road maintenance or other management activities and administration in the analysis area should be compared to the expenses incurred from both the action alternative(s) and the no-action alternative in the DEIS.
104						Sc/Mc	Herein is the crux of the controversy, the Forest Service is using outdated, scientifically-controversial material upon which to base its view of fire ecology and the role the amount of fuel plays in this region.
105						Eq/Mc	Another factor that needs to be considered when looking at this issue is that Jack Cohen's research clearly shows that for town or structure protection, anything beyond about 40 meters is ineffective. In other words, the WUI is in reality, about 40-meters wide.
106						En/Sc	Another important issue is the impact on the Clear Creek roadless area. The impacts on the roadless area (proposed as wilderness in HR 3334) must be evaluated. This would include the overt "trammeling" of this area by agency-ignited fire.
501	Idaho Conservation League	S	P	Clear Creek	Draft	En/Eq	We do have some questions with regards to water quality, temporary roads, wildlife, old growth/large tree retention, and soils and are confident that these issues will be further discussed and disclosed in the FEIS.
502						Eq	There may be opportunities to blend alternatives, to develop additional alternatives to respond to issues raised in response to the DEIS, and/or to address other outstanding issues related to the project.
503						Cc	I would be happy to work with you over the course of the coming months to work through these issues, to provide additional feedback and to assist the Forest in satisfying the diverse interests that have a stake in how our national forests are managed.

1028	Idaho Conservation League	P	Middle Fork	Scope	Cc/En/Ec	Since 2008, the Clearwater Basin Collaborative (CBC) has worked to enhance and protect the ecological and economic health of our forests, rivers and communities within the Clearwater Basin by working collaboratively across a diversity of interests
1029					En	The CBC supports the Forest Service's objectives on the Middle Fork Vegetation Management project as well as other projects designed to increase diversity and resilience across this landscape through emulation of natural fire regimes, promotion of early seral species and a range of age and size classes, and improvement of watershed function.
1030					Eq	Because the Middle Fork Vegetation Management Project proposal is based upon the CBC's CFLRP Proposal, we feel that it is appropriate for the Draft Environmental Impact Statement (DEIS) to reference the CBC proposal and adhere to the sideboards contained in the Collaborative Forest Landscape Restoration Act (CFLRA), which governs the application of funds that are being used to implement and monitor this project.
1031					En	we encourage the DEIS to illustrate how all alternatives: incorporate best available science, fully maintain the structure and composition of old growth stands (according to the pre-fire suppression character appropriate to the forest type), do not include the establishment of any permanent roads, and ensure a commitment to decommission any temporary roads constructed.
1032					En	In addition, the Act requires that the restoration treatments be carried out with a focus on small diameter trees, thinning, fuel breaks, and fire use. The Act further requires that retention of large diameter trees appropriate to the forest type are maximized.

1033	Ec	Timber harvested from the Middle Fork Vegetation Management Project area will be a critical measure of success for many who have been advocates for the CFLRP. Receipts from timber are an important component of CFLRP funding plan. Further, employment from timber harvest activity is critical to maintain and increase economic activity in the region and to meet the job creation objectives of the CFLRP proposal.
1034	En	It is important for the Middle Fork Vegetation Management DEIS to detail project-specific monitoring activities that the Forest Service will commit to. Because the Middle Fork Vegetation Management Project is a significant component of the Selway-Middle Fork CFLRP project, commitment to monitoring from the FS, as well as the MAC, is critical.
1035	Ec	Though the scope and scale of projects like Middle Fork Vegetation Management may appear daunting, we support this approach to effectively achieve objectives and reduce planning and implementation costs on a per acre basis.
1036	Eq	Additionally, as part of a landscape level strategy, we would encourage the Forest Service to include an explanation in the DEIS regarding the factors considered in the delineation of the Middle Fork Vegetation Management Project Focus Areas. A complete understanding of the “why here”, “why now”, and “what’s the cost of doing nothing” will help the CBC, and others, render support for the Middle Fork Vegetation Management Project.
1037	En	We hereby encourage the Forest Service to consider the following in the development of alternatives: We feel it is important in landscape-level planning that treatment units are designed to a size and scale appropriate for the topography, disturbance regime, and desired ecological conditions.

1038	En	We request that the Forest Service consider an alternative that maintains or improves old growth stands (as defined either by Forest Plan definitions OR Green et al definitions) and individual legacy trees according to the pre-fire suppression character appropriate to the forest type.
1039	En	We encourage the Forest Service to consider a range of options for temporary road construction while still achieving the objectives of the Project.
1040	En	We support the use of mechanical harvest and prescribed fire to achieve a shift in age structure and species composition to provide diversity on the landscape, consistent with historic conditions.
1041	En	We support the concept of larger treatment units, even if openings exceed 40 acres, to achieve a more natural disturbance pattern and landscape-scale objectives. We recognize the Middle Fork Vegetation Management Project is one of several projects being proposed as part of the restoration strategy of the Selway-Middle Fork CFLRP; and thus, must be considered as part of a much larger landscape-scale effort.
1042	En	We encourage the Forest Service to consider the importance of early-successional communities and management approaches that help create a range of age and size classes as well as species composition that better represents the historical range of variability for these factors at a landscape scale.
1043	En/Ec	Due to the topography, CFLRP limitations for permanent road construction, and aesthetic values associated with the Wild and Scenic River corridor, we support the use of helicopter logging in order to achieve both the ecological and economic objectives of the Middle Fork Vegetation Management Project.

1044	En	One of the overriding goals of the Selway-Middle Fork CFLRP proposal was to improve water quality conditions. We encourage the Forest Service to evaluate whether additional activities, such as riparian plantings and targeted invasive weed management may be appropriate to consider as part of the Middle Fork Vegetation Management Project.
1045	En	We encourage the Forest Service to consider targeted treatments and approaches that minimize the continued expansion of invasive species
1046	Eq	As part of an integrated, landscape-level approach to management, we encourage a review of existing and potential recreation opportunities in the Project area.
1047	En	We encourage the Forest Service to consider the scenic and aesthetic impacts of the proposed treatments and to consider a range of alternatives that minimize any impacts to the Outstandingly Remarkable Values of the Middle Fork Clearwater River in accordance with the intent of the Wild and Scenic Rivers Act and associated management plans for the Middle Fork Clearwater River
1048	Ec	The CBC requests that the Forest Service consider a temporally accelerated restoration treatment schedule in the design features for the Middle Fork Vegetation Management Project in order to minimize the loss of existing timber and biomass value, and thereby support the local milling infrastructure and related jobs, while still achieving the ecological objectives of the project.
1049	Eq	Protection around private property including structural risk management drastically increases the costs of wildfire suppression and management; thus, the creation of fuel breaks and defensible space areas around private properties as well as other areas of high value such as campsites and recreational areas is well supported.

1050						En	We recognize that the Middle Fork Face Roadless Area was not included under the Idaho Roadless Rule due to development that occurred during the 1997 Middle Fork Project, which resulted in the Area not meeting the minimum 5,000 acre criteria. Nonetheless, the DEIS for the Middle Fork Vegetation Management Project should consider the impacts of the proposed action on the undeveloped characteristics of the area.

Case: DCFP

	GROUP	TYPE	P/NP	PROJECT	ACTION	RATING	COMMENT
114	LOWD - BMBP		NP	Ursus	Scope	Sc	The Forest Service's "fear of fire" propaganda is wearing very thin as it is applied to forest types and elevations where stand replacement fire is a natural, needed disturbance to provide all the values mentioned as being "at risk" from fire.
115						Mc	Actually, wild fire evolved wildlife habitat, clean drinking water, and recreational opportunities are at risk from the proposed Ursus heavy logging.
116						En	This area is particularly important to protect from logging because of the inherent values that have evolved with stand replacement fire. These include large intact blocks of denser, closed canopy mixed-conifer forest with abundant snags and down logs that provide necessary habitat for such increasingly rare species as northern spotted owl's, Pacific fishers, American Martin, accipiter hawks, American three toed woodpecker, and Black backed woodpecker.
117						Ec	Recreational tourism is more at risk - along with the large economic revenue it creates Fort Bend and surrounding communities - from logging and clearcutting then from wildfire.
118						Sc	It makes no sense to rationalize heavy logging and clearcutting based on reducing fire risk in an obviously moist to wet high elevation mixed conifer forest that is naturally dense and

		which he evolved with historic mixed severity to stand replacement fire.
119	Mc	"Substantially changing the status quo" is an odd goal when the natural status quo is stand replacement or mixed severity fire.
149	En	Clearcutting and "salvage" logging breaks up continuity and connectivity of the forest needed for northern spotted owl disbursal and foraging, harming this listed declining species.
150	Mc	Likewise we see no need to cut surrounding trees out from around Ponderosa Pine in these forest types where Ponderosa pine was clearly a minor component of the stand historically.
151	En	Of course, clearcutting makes fire suppression easier in theory, yet that's not even a virtue in fire adapted forests where mixed severity or stand replacement fire is a natural, infrequent occurrence.
152	En	Therefore, removing standing and down dead trees is detrimental to that ecosystem and to dependent rare, management indicator, and listed species such as American Martin, Pacific Fisher, and primary cavity excavator species such as pileated woodpecker.
153	Sc/En	The forest service has apparently lost its moral and ecological compass and is no longer concerned about maintaining a functioning, biodiverse ecosystem. We care about protecting ecological integrity in biodiversity and will oppose this timber sale accordingly as it fails to do this.
154	Mc	This is anti-restoration logging– removing most or all of the snags, down logs, over story mature to large trees with no specified size limit, and young trees that create diverse habitat niches, canopy cover, vertical diversity, and moisture retention in natural mix conifer Forest.
155	Ec	"Fire hazard" and short term economic profit for corporations should not be the dominant or sole

		drivers for forest management.
156	Eq	People driving through the project area … do not want to see clearcuts and other heavy logging along the way.
157	En	The wildlife who benefit from less human disturbance and larger blocks of the intact habitat needed buffers from human activities along access roads which the Ursus project area forest now provides, not reduction of adjacent intact forest habitat and more human disturbance encroachment.
158	Sc/En/Ec	The forest service apparently wants to heavily log every last inch of available forest land no matter what the consequences too rare, listed, and management indicator species; recreational values; drinking water; carbon storage, or any other ecological or public value beyond short-term economic gain for local mills and theoretical contrived fire protection services for inholding often wealthy residential development.
159	En	We are concerned by the Ursus timber sale's foreseeable impact to species at risk from human increased disturbance, increased fur trapping, and loss of habitat.
160	Sc/En	It's revealing that scoping letters almost always leave out all the known and foreseeable ecological impacts of proposed logging –in this case Ursus sale elimination of habitat structure and security for most or all of the species already discussed in our comments.
161	Cc/Ec/Sc	Collaborative groups tend to have overrepresentation by the timber industry and local community members who were historically economically dependent on timber extraction or who are new to fire ecology forest and have inordinate fear of wildfire stoked by the forest service

162					Mc/Sc	Regarding the proposed action, why target immature fir in a naturally denser fir forest for removal? All Lodgepole Pine is susceptible to mountain pine beetle "attack", so that's become the public relations rationale for clearcutting and removing Lodgepole pine, which makes no sense.
163					Sc	This is all bogus. We have absolutely no reason to trust the Deshutes Forest Service "to do the right thing", given such recent old-growth logging tragedies planned and executed by the Deschutes as the EXF and Five Buttes timber sales.
164					Mc/Sc	The West Bend timber sale is a public relations-orchestrated travesty that also gives us no hope for a good outcome.
165					Cc	Collaborative group involvement should not be used to give a rubber stamp of approval to fundamentally hypocritical and ecologically destructive projects. There is a much broader frame of reference of public opinion and that represented by local collaborative groups. We do not consider collaborative projects immune from legal requirements or legal challenge.
166					En	The existing Lodgepole and Ponderosa pine plantations should be the focal point for changing this project to be restorative rather than destructive.
231	Sierra Club - Juniper Group	NP	West Bend	Scope	Eq	Forest planning, management and the monitoring of activities must be based on sound science, open decision making, and the full and regular involvement by the public, from the earliest planning function through the complete management process. We support this open process of comment and review by groups such as the Sierra Club, which represent an interested public willing to participate in the exchange of comment and opinion in the interest of seeing that our concerns regarding the management direction of our public forests are met.

232	En/Ec	It's our view that not only Central Oregon's economic health is dependent upon a clean, aesthetic, healthy environment, but all of Oregon's.
233		We have reviewed the comments sent in by Doug Heiken (Oregon Wild) and support them. We are attaching them to the Juniper Group's comments which are similar in many respects.
234	Eq	Provide for public comment on the NEPA document. Scoping is too early and not make enough information. Pre-decisional objections are too late because the agency is already too firmly invested in the project.
235	Eq	If this project calls for any plan amendment, the agency must use the traditional and NEPA process and considered a full range of alternatives.
236	En	HFRA only grants authority to remove "hazardous fuels." Do not remove any tree that provides useful shade to keep fuels cool and moist or that helps suppress the growth of future ladder fuels.
237	Eq	The agency must disclose conflicting scientific evidence that removing ground fuels and ladder fuels reduce fire hazard while removing canopy fuels cuts both ways.
238	Eq	Describe how this HFRA project will comply with the old-growth and large trees statutory language in the Act.
239	En	Considered a NEPA alternative that treats only surface and fuels and controls stocking while maintaining canopy cover that maintains cool, moist fuels, suppresses future ladder fuels, and provides wildlife habitat.
240	Eq	Collaboration must be consistent with the implementation plan, which makes clear that collaboration must be broadly representative and must be used to set priorities.
241	Eq	A full range of action alternatives should be considered for this project. These alternatives should include protecting all trees large or small with old-growth characteristics, wildlife enhancements and restoration, no commercial harvesting within the Skyliner and Tumelo unroaded areas,

						and minimizing road density in the area.
242					Eq	Please better describe the forest types and history, in the proposed prescription for commercial.
354	Oregon Wild	P	West Bend	Draft	Cc	The DFCP is a community initiative to restore and Steward our local forests. We are a collaborative group that seeks to bring stakeholders with diverse interests together. We have worked for three years to reach agreement on how to manage our forest for the benefit of the whole community and then to facilitate the implementation of that vision.
355					Eq	Our stakeholders expressed extreme interest in restoration of the West Bend planning area for many reasons, including: promoting access to and sustainability of prized year-round recreation areas …
356					Eq	Reducing the risk of high severity fire that could threaten the western edge of the city of Bend …
357					En	Improving the health of Ponderosa pine and dry mixed conifer forests …
358					En	Providing key habitat areas for multiple wildlife species …
359					Ec	And producing commercial saw log material to support our local forest products industry.
360					En/Eq	In the DCFP collaborative forest landscape restoration program proposal, we described the desired outcome for our landscape as follows: to restore a forested landscape that can be managed within a natural range of variability and provide a diversity of habitats, while protecting the surrounding communities.
361					Eq/En/Ec	Restoration will also help to achieve a variety of community goals such as reducing the risk of high severity fire in wildland urban interface residential areas and drinking water source watersheds, preserving the scenic and environmental quality of extremely high use recreation areas; supporting the reintroduction of anadromous fish

		into the upper Deshutes basin; protecting the future skyline community forest; and providing restoration jobs and wood fiber for local economic benefit.
362	En	We are particularly appreciative that you have formulated and selected a preferred alternative that responds to specific concerns of the collaborative, such as creating spatial variability and Retaining complex habitat features for species such as Black backed woodpecker and goshawks.
363	Eq	Addressing these issues resulted in the small modifications to treatments in the proposed action, but had a big impact on key stakeholder values.
364	En	As we proceed to implementation, there are aspects of the treatment objectives and methods that relate to key interest of our stakeholders, for example "the use of silvicultural treatments to provide high diversity of orest structure and associated wildlife habitats more in line with historical conditions."
365	En	As you know, DCFP stakeholders are very interested in the promotion of diverse forest structures and increased structural heterogeneity at all scales, which are both a central theme of the DCFP recommendations and critical to the restoration of important forest ecosystem processes and functions.
366	Cc	We are eager to engage in the discussion and development of prescriptions that will me this collaborative desired outcome by maintaining the operational feasibility of restoration treatments.
367	Sc	In conclusion, DCFP stakeholders express their support for the preferred alternative and an eagerness to see the project moving smoothly from planning to implementation – a reflection of the level of engagement, relationships, and trust between the Deshutes National Forest and the DCFP.

562	Oregon Wild	P	West Bend	Draft	En/Mc	We can see some value in thinning encroaching small trees under larger trees in the dry Forest types, but this project goes beyond the commonly supported restoration actions to include regen harvest, logging in moist Forest types that may not need it, and logging too large a fraction of the project area.
563					Eq	Land management inevitably involves trade-offs among competing uses of national Forest. That agency must avoid portraying the effects of the proposed action in uniformly positive terms, well describing the effects of no action in uniformly negative terms. NEPA requires disclosure of the trade-offs among competing uses.
564					En	The wild fire hazard map for alternative 2 shows the homogenization that results from extensive logging with a focus on fuel reduction instead of Forest diversity. More landscape diversity can be accommodated when stands with higher density are spatially isolated by stands of lower density.
565					En	It is important to identify the proportion of the planning area that should be retained untreated so that natural processes like tree growth and mortality can produce natural levels of snags and dead wood which are critical habitat elements.
566					En/Eq	We urge the forest service to do a better job of considering a wide range of alternative mixes of treated and untreated [acres], and disclosing the ecological processes such as deadwood habitat recruitment that are foregone as a result of extensive logging.
567					En	The DEIS relies on "residual untreated areas" to mitigate for adverse effects on great grey owls. This is a good example of why it is necessary to optimize the mix of treated and untreated areas, instead of maximizing the fuel reduction objective.

568					En	The DEIS describes the logging alternatives in favorable terms saying where interlocking crowns remain in the over story various wildlife that may otherwise be adversely affected by logging, will continue to use logged stands. This is another example where the forest service should find the optimal level of low density and higher density conditions within and between stands.
569					Eq	It will be useful to know how many trees per acre will be removed and retained by logging.
570					En/Mc	The DEIS indicates that the project area contains very little habitat with abundant snags and down wood. Logging won't improve these conditions it will make them worse. This is a significant concern requiring mitigation alternatives and more untreated skips within and among treatment units.
571					Eq/En	Unfortunately, the DEIS does not show whether logging will move the landscape toward or away from desired conditions for key wildlife associated with snags and deadwood. The FEIS must do so.
572					En	In dry forest types that FS should consider the restoration concepts, vision, priorities, and recommended prescriptions described in Tim Lillebo and Oregon Wild's "Practical Guide for Ecological Restoration of Eastern Oregon's Dry Forests."
573					En	The location of temporary roads must be identified in advance so that sensitive sites can be identified and avoided.
593	Alliance for the Wild Rockies	NP	West Bend	Draft	Eq	We believe the FS has created purpose and goals that lead to a conclusion that management, particularly by logging, are the only alternatives. By creating a purpose and need that is biased towards logging the natural conclusion is to propose logging.
594					En/Mc	We disagree that logging will increase the resilience of the Forest–rather we believe that all management alternatives will degrade the forest ecosystem.

595	Sc	We also believe that the forest service talks out of both sides of his mouth. On the one hand it justifies logging to reduce the risk of wildfire, while saying the reason it has to log is because past fire suppression and logging – which it is continuing to practice created forest conditions that leaves of agency with no choice but to continue logging and fire suppression.
596	En/Mc	I support thinning of former plantations. I also support prescribed fire in the area. Indeed, I believe prescribed fire rather than commercial lodging should be the primary mechanism used for management, except for logging the aforementioned plantations.
597	En/Mc	The more the natural forest is "managed" the more out of whack it becomes. Logging cannot restore "natural" processes because it is fundamentally at odds with nature.
598	En	If that FS wants to manage for natural ecological processes, large fires must be encouraged.
599	En/Sc	Reduction in stand density is given as the rationale for logging to reduce insects, dwarf mistletoe and fire–all of which reduce standard density. It appears to me that the FS has a bias against natural thinning agents like mistletoe which is a native species that is important for various native wildlife like birds and butterflies.
600	Mc	We disagree with the statement that "compared to the forest structure that would have been sustained historically, mid-seral stages are greatly overrepresented in what was once mostly pure Ponderosa pine forest in the lower two thirds of the project area is now a mixture of Lodgepole and Ponderosa pine." This statement assumes that forest succession did not occur.

601	En/Mc	Or the FS suggests that many Ponderosa pine stands are too dense. Yeah it goes on to suggest that "many stands have been thinned at least once but are now stock at a level where the trees exhibit low vigor and are susceptible to bark beetle mortality." So why can't the FS allow beetles to reduce the standard density? Beetles will do a better job of determining which trees should be eliminated, plus they create wildlife habitat at the same time.
602	En/Sc	The entire section on Lodgepole appears to distort the ecology of this species. Lodgepole Pine is well known for long fire free periods. It's not "kept young" by frequent fires. That is total ecological malfeasance.
603	Eq	The FS needs to provide more evidence that its estimates for burning of the Forest was as high as suggested.
604	Eq/Ec	Wow we can understand the desire to reduce fire threat to homes built in the WUI, the best research suggests that reducing the flammability of homes, rather than trying to fireproof the forest works more effectively and is far more cost effective.
605	En	No logging in mixed conifer or Lodgepole Pine Forests.
606	En	No logging of trees over 21 inches.
607	En	Drop all timber sales overlapping the Tumalo Creek roadless area and any other roadless areas or potential wilderness in the unit.
608	En/Sc	No treatment of Lodgepole Pine. Plans propose up to 800+ acres of overstory removal because otherwise the trees might die from pine beetles. Is this the "Vietnam" forest approach– of destroying the land to save it?
609	Eq/Ec	Any substantial removal of trees by logging makes the forest look ravaged. This loss of scenic values is important to the economic health of this area.
610	En	I know of at least four sightings of the red fox in this area and it is extremely rare. I am wondering if the FS is going to analyze the impacts of logging on

						the red fox.
611					En	The agency must consider the impact of logging on forest genetics.
719	LOWD - BMBP	NP	Rocket	Scope	Eq/Sc	Why is the area around lava river cave designated as WUI went it was designated as a natural recreation site within a national Monument, and has no adjacent community urban area?
720					En/Mc	20 to 30 years is a very short rotation for commercial logging, cumulatively removing more and more mature trees that would otherwise become the desired condition of large old-growth trees, and which are needed to meet the bare minimum of wildlife habitat and recreational needs, as demonstrated by the ridiculously low basal areas proposed and the forest plan amendment proposed as well as by the significant incursion into the end NNVM.
721					Sc/En	The insects, disease, and fire risk basis for the need for action is the typical forest service public relations mantra. Yet lack of natural disturbance causes existing density of young trees and unnatural homogeneity, so why seek to block natural disturbances?
722					Mc/En	Why not use prescribed fire, and where necessary for controlled burns, truly small diameter noncommercial thinning to bring the area into balance since the last logging by removing only excess density in the small size class of trees that could have grown in during that 20 to 30 year interval since the last logging?
723					Sc	The forest service must have promised the public when the last sales in the area were planned that the results would be the desired condition or moving toward desired condition, yet here you are again, planning to remove more of the mature trees.
724					Sc	Sorry, but the true purely economic motivation behind this sale is transparent and the sham rationales given for logging to such a low basal areas so soon after the last thinning

		are insulting, as well as a case of failure to disclose true intentions, purposely misleading the public.
725	En	Leave the mid-seral stands alone to become LOS!
726	En	Don't log in thinned stands or in mostly healthy mature stands.
727	En/Sc	Reducing stocking levels to LOS levels now, when the trees are averaging only 60 to 80 years old or younger, is premature and artificial, not allowing for natural mortality from natural disturbance agents overtime–a weak excuse for logging again too soon.
728	Mc	Any natural increase in density from recovering from past logging will predictably slow diameter growth and increase the risk of mortality from pine bark beetles. So what? Why is this considered a problem? This is part of natural succession and tree growth cycles.
729	Sc	Again, we call foul for purposely misleading reasoning instead of accurate science.
730	En	We oppose logging in the Newberry volcanic monument, scenic view areas, goshawk PFA's, and deer habitat that is designated as such.
731	En	Keep all walking out of the two old growth forest management areas.
732	En	60 ft. of basal area is not enough to provide significant canopy cover for wildlife habitat.
733	Mc	Openings of 5 to 12 acres art clear cuts, not small openings.
734	Sc/Mc	It's crazy to create openings by removing mature trees, then replant with Ponderosa pine seedlings. This is blatant, outdated, old school business as usual forestry, not adaptive management.
735	Eq/Sc/ Mc	Recreational visitors want natural forest, not logged landscapes creating a sense of depth when viewed! What B.S, You don't enhance development of large trees by cutting down and removing many mature trees that would otherwise become large.

736					En/Mc	This project could be refocused toward diversifying even aged plantations. Natural fuels reduction and prescribed fire could be used without commercial logging where fire risk is that unnatural levels and near private homes.
737					Ec/En	Less drastic measures and methods of management also provide jobs and revenue and may be more effective at controlling fire or insect risk then subjecting the forest too often to logging impacts.
738					Sc/En	The reassurances in the paragraph about thinning methods on page 6 of the scoping letter is ridiculous and purposely deceptive when it is considered that stands would be taken down to only 40 to 60 ft. of basal area.
739					En	BR opposed to shrub mowing.
740					En	Limit under burning in the scenic corridors as per the Forest plan.
741					Eq	This project should require and EIS, given the proposed logging in a National Monument (!) And the intensity and scale of logging proposed.
764	LOWD - BMBP	NP	Rocket	Draft	En/Sc	Forest is not lost due to wildfire. Nor does wildfire destroy wildlife habitat. Fire is a natural disturbance in these forests. The forest service is more concerned about finding places to log heavily now and not losing green trees to be logged in plantations.
765					En	Leave stands that have already been commercially send alone– they're already wide-open, well spaced etc.– Logging them again now will gut essential forest structure, setting them back from attaining LOS status.
766					En/Mc	There is also a compelling need to allow natural disturbances play their roles and not to maintain the forest in a sterile homogenous plantation condition. The forest service should not be in the business of wild fire prevention.
767					Mc	So this begs the question of when the poor service will finally allow wildfires to burn– so far they prefer to over manage endlessly.

768	Sc	It's Orwellian and ridiculous to imply that logging increases deer hiding cover or somehow helps dear when the EA admits that the project area already has sufficient hiding cover available as recommended.
769	Sc/En	This is such a B. S. excuse for logging! This district has no shame. The Deschutes LRMP is grossly outdated at 1990 – there needs to be FS recognition of how much wildlife habitat and forest structural diversity has been lost to logging since then, and of more recent science and threats to species.
770	Ec	What economic efficiencies? This sale is not likely to be very economically viable except for being subsidized by the US treasury– For example taxpayers paying for the destruction of their public forests for private gain.
771	En/Mc	Logging would not maintain the same basic structure and ways of functioning, as heavy logging is planned with the intent of preventing natural disturbances from contributing to forest functioning. Such sterilized, immunized forests will lose their ability to self organize into adapt to stress and change, to the profound detriment of the ecosystem.
772	Eq	So which forest plan standards and guidelines apply in the monument and which don't?
773	En	There should be no logging within the RNA.
774	En/Sc	You don't get reestablishment of buyer based Ponderosa pine old-growth by greatly limiting or preventing wildfire. There is as yet no sign of forest service willingness to let wildfires burn– despite the rhetoric.
775	Eq/Sc	These are different forest plan amendments with the political motivs of getting out more timber volume.
776	En/Cc	This is an enormous area of public lands to be prioritized for logging– typical CFLRP emphasis!
777	Sc	Substitute "logging" for "restoration" and the true intent of these objectives become clear.
778	Sc/En	This is B. S., and not what recreationists want to see.

779	Sc/Mc	This is all one big phony excuse to log that would further threaten already precarious deer viability in the area.
780	En	We are in favor of a range of basal areas for all commercially logged units with the low end at 60 to 80 and the resulting density being higher where the forest would naturally be denser.
781	En	Drop commercial/mechanical thinning in the NNVM.
782	En/Mc	Ecologically, natural disturbance such as insects, disease, and wildfire is not "damage" or "loss" to the ecosystem but natural and beneficial to creating niches for biodiversity.
783	En/Mc	How long have the goshawk PF A's been occupied? If they have been used within the last five years, they should still be considered active and not be logged. Why are they now unoccupied? Is it due to logging?
784	Sc/En	We are greatly disturbed by the forest service apparent intent to cumulatively log most or all goshawk habitat –especially PFA's and other foraging habitat, cumulatively leading to the extirpation of this magnificent species that requires denser forest habitat.
785	Mc	It is contradictory to say the objective is to accelerate the development of larger trees and then log 15 to 21 inch diameter base height trees - the biggest trees in the stands. This is precisely why a lower dbh limit for logging is appropriate– The largest trees are usually greater than 21 inches diameter base height in these stands.
786	Mc	We still question the purpose and needs of the forest service in arranging the hiding cover in forage areas by logging while reducing or preventing natural disturbances that would otherwise naturally arrange hiding cover and forage.
787	Eq	We are opposed to all the proposed forest plan amendments, which we see as violations of the only existing forest plan and as a cumulatively significant with multiple timber sales across the forest adopting such forest plan amendments.

788					En	Read favor more of the management area being guided by natural processes.
789					En	We are opposed to the building of temporary road mileage because there's already too many roads and temporary roads open access by livestock, for trappers, all-terrain vehicles, and invasive or exotic plants as well as increasing human disturbance in wildlife habitat.
790					En/Eq/Ec	We are opposed to alternative 4 for logging too large a percentage of the forest in this area too heavily at the expense of the majority of the public, wildlife, and other ecological values, all for a small minority private profit.
791					Mc	What the forest service sees as improvement objectives in table 15, we largely see as destructive over management.
792					En	We support more road decommissioning and reducing unauthorized motorized use.
793					Mc	These sawlog volumes illustrate how this timber sale is trying to wring blood from an overlogged turnip that is generally lacking in mature trees.
794					Mc	We disagree that the planned logging would increase diversity or accelerate LOS.
795					En	We are opposed to the proposed mini clearcuts described on EA page 150 due to potential impacts to Townsend's big eared bats.
796					En	This is an insufficient cumulative effects analysis in that it fails to take into account other similar projects with similar effects across the rest of the Deshutes National Forest.
808	Alliance for the Wild Rockies	NP	Rocket	Draft	Mc	While there are aspects of the proposal that we fully support such as the closing of roads, reintroduction of fire as a natural process, and even some thinning of plantations in some circumstances, the main objection has to do with the means of getting to those ends—namely that all proposals except the No Action alternative recommend some degree of logging.

809	Sc	There appears to be a philosophical and pejorative bias against natural processes like wildfire, beetles, mistletoe and so forth that can achieve many of the goals without timber cutting.
810	Mc	Our major concern is that the FS appears to be putting logging as the number one priority, creating artificial problems that it can solve by mechanical manipulations.
811	Ec/En	For instance, the EA starts with the assumption that dense forest stand will likely be killed by beetles, that beetle kill will increase fire risk and that both dead trees and wildfires are somehow undesirable. With that starting point, the EA goes on to justify logging and further fails to consider the economic costs to taxpayers, nor the ecological costs of tree removal and other ecological consequences to the forest ecosystem
812	Sc/Eq	In particular, since a portion of this timber sale (euphemistically called "vegetation management") is in a national monument where natural processes are supposed to prevail, the proposed management alternatives are in direct conflict with that mandate.
813	En	The FS has not done any kind of analysis of the probability of a beetle outbreak.
814	En/Sc/Ec	Indeed, a major fire in this area would "reset" the ecological parameters and create exactly the mixed age, and stand densities that the Forest Service suggests is the main goal of the Rocket project, but without the negative impacts associated with logging, nor cost to the taxpayer.
815	Mc	Attempting to reduce or eliminate slow growing trees demonstrates once again the substitution of economic concerns for ecological values.
816	Sc/En	I also take issue with the statement on page 7 that exaggerates the results of any wildfire. First of all the only forest type that "may" have departed from historic condition is the ponderosa pine component. Fire

		intervals in all other forest types tend to be much longer than fire suppression has been successful.
817	Eq	The EA should acknowledge there is some debate about the occurrence of fire even in ponderosa pine forests.
818	Mc/Ec	On page 8 the EA says another purpose is to provide for local and regional employment. But there is no analysis if timber cutting is the best way to provide for such employment. Since all logging operations are money losing enterprises in the region, the question naturally arises whether there are other ways to spend federal dollars that might provide employment both in the short and long term without the negative impacts associated with logging.
819	Mc/En	I have less problem with thinning in previously logged areas dominated by black bark ponderosa pine, however, I strongly object to the removal of any dead trees. There is no upper limit on the value of dead trees that can be retained.
820	En/Ec	Whether fuel treatments are desirable or needed must be considered, and if the FS goes ahead with them, they should be effective—and many are not due to a lack of follow up maintenance—i.e. continued fuel treatments. Without effective follow up it is a waste oftax dollars to do any treatments in the first place.
821	Mc/En	It is my desire that the FS just drop the timber sale altogether because for the most part it is really not necessary. The Forest is fully capable of restoring itself and indeed is doing this via beetles, mistletoe and fire. Over time the best mix of trees will be growing on the site.
822	Sc	Given the FS pro logging bias, I doubt that the sale will be dropped.

823						En	I do object to use of any temporary roads. Temporary roads have many of the same impacts as permanent roads. Plus they often are taken over by ORVs and mountain bikers and thus converted into travel corridors anyway and become vectors for the spread of weeds.
824						Eq/Ec	I also object to any forest plan amendments. These violate the existing forest plans and should not be implemented just to facilitate a tax payer give away to the timber industry. Remember the FS is supposed to be working on behalf of all US citizens, not just the timber corporation stockholders.

Case: TSFC

	GROUP	TYPE	P/NP	PROJECT	ACTION	RATING	COMMENT
11	ALPS		NP	Roaring	Draft	En	We welcome the concept of a restoration project in the principal basins draining into lake Keechelus from the west.
12						En/Eq	We recognize the need for removing many miles of roads, for better maintenance of those which remain, and for controlling recreational impacts, particularly those arising from unmanaged dispersed motorized camping, and from widespread illicit motorized use.
13						Mc/Eq	But the package presented to us in this EA suffers from crippling deficiencies. It strikes us as basically a shell of restoration components over a conventional thinning timber sale, with a very inadequate amount of consultation and direction from the public given that this project utilizes the stewardship contracting authority.
14						En/Eq	Most conservationists active on these forests do not believe that these thins are beneficial to forest development, and do not accept the considerable aquatic costs which they incur. Decades of reading west-side thinning sale proposals, and decades of observing the unfortunate on-theland consequences, lie behind these attitudes

15	En/Mc	The planning area is climatically, if not geographically, part of the west side, and Wenatchee National Forest planners should appreciate that the actions they are proposing here will be judged by west-side standards. It strikes us, generally, as a much more difficult environment in which to achieve consensus in favor of, or acquiescence to, logging-financed restoration, than can be found in the drier portions of the Wenatchee.
16	En	ALPS has a number of reasons for generally opposing west-side commercial thins: 1) Commercial thins are typically accompanied by significant road system extensions.
17	En	2) Log landings, skid trails from ground yarding, and (to a lesser extent) drag lines in cable corridors, are further sources of persistent soil compaction and sediment delivery to aquatic systems, and facilitators of exotic weed invasions.
18	En	3) Felling and removal of a significant fraction of standing trees represents an important loss of woody biomass stocks, and a persistent reduction in woody biomass accumulation rates.
19	En	4) Thinning almost invariably reduces and bleeds out preexisting stand complexity.
20	En	5) For many forest types, such as hemlock- or silver fir-dominated stands, closed-canopy conditions represent the predominant natural development trajectory through maturity. Persistently opening such stands to raise subcanopy light levels at relatively young stand age moves them onto pathways rarely found in nature with many unknown and unacknowledged consequences.
21	En	6) On-the-ground implementation of protective or restorative features, or complex prescriptions, is usually poor and uncertain.
22	En	7) Road construction and removal of wood from within riparian reserves damages aquatic function.

23	En	Although ALPS generally regard west-side commercial thins as ecologically damaging, we certainly do not believe that they are all equally destructive. The preceding list suggests certain criteria for making thins more benign: Eliminate or greatly reduce road construction and "reconstruction" of former roads.
24	En	Site landings in areas of already destroyed or compacted soils.
25	En	Prefer cable yarding to ground-based yarding wherever possible. Within ground-based yarding, prefer cut-to-length to conventional tractor yarding.
26	En	Prefer simple previously manipulated stands as targets and avoid complex unmanipulated ones.
27	En/En	Respect riparian reserves, as defined under the NWFP and subsequent WSAs, by thinning them, if at all, more lightly than upland zones, by leaving in any case 100% no-cut buffers, and by not constructing or reconstructing any roads which enter or cross them.
28	En/Eq/Ec	In summary, this Roaring Thin project does not measure up to the general standard of stewardship authority projects in wet forests, and in several respects--the absence of any outside consultative group with a significant voice in the shaping of this project, the expenditure of revenues on road maintenance, campground hardening, and trail construction--appear to violate the spirit, and quite possibly the letter, of the stewardship contracting authority. These deficiencies need to be addressed before this project moves forward.
29	En/Sc	We believe, for example, that the entire road system tributary to 9070 on the south side of Cold Creek in section 28 should go, not just an unclassified spur or two. It is true that this system provides roaded access to the northern fringe of section 33, still in Plum Creek hands, but any inspection of the scalped high-elevation ground makes it seem most unlikely that Plum Creek would be using this system for silvicultural

		purposes in the next 50 years. In fact, as a management presence, Plum Creek seems entirely absent and negligent.
30	En/Sc	Another case of timidity can be found in 5480-124, a short spur which leads to a management-free zone, a disagreeable network of user-created roads reaching down through old forest to the shore of Lost Lake.
31	Eq/Ec	In fact, the only thing we can be really sure of if this proposal goes through is that the logging will be done, one way or another. Everything else is more speculative. In any case,you need to be forthcoming and transparent about the financial underpinnings of this work, and the economic constraint.
32	Eq	This EA has, effectively, a single alternative. One can see how that might be justified in a better developed stewardship project, where a credible representative outside body has a significant role in shaping the project
33	En/Eq/Ec	Within the checkerboard region,the project area stands out, by virtue of its location close to I-90 and just over Snoqualmie Pass, and its heavy recreational use, as a good candidate for a stewardship project area. We do not wish to discourage you. But we think you've got the mix wrong, both on the revenue side and the restoration expenditure side, and it would be to everybody's advantage to stop and think how to fix some of these problems, and how to more fully engage outside groups in this process.
34	Eq	The potential is there, but it has not been realized. ALPS cannot support the project in its current form, and in fact is likely to actively oppose it. We would much rather find a way to improve it.

35	Conservation Northwest	P	Roaring	Draft	En	The Interstate 90 corridor is a critical link for wildlife as recognized in the objectives of this project. It is also an area that our organization has a strong history in conserving and interest in restoring.
36					En	We fully agree with the recommendations of the Adaptive Management Areas (AMA) Plan to thin “plantations to accelerate late-successional forest conditions” and reduce “roads to improve habitat and watershed conditions”.
37					En	While there remains some debate about the values of plantation thinning, the current science shows that if practiced correctly it can contribute to increasing tree size faster and creating variability in the stand and landscape scale. Therefore, we support the Cle Elum Ranger District in moving forward these stewardship projects in the AMA simultaneously to other projects in fuels reduction elsewhere in the district.
38					Cc	We realize that your district did begin discussions to identify a collaborative effort to work with in these stewardship efforts, but there was not sufficient participation. For future stewardship projects, we suggest that this effort is made again and at the least that joint field trips between various interests are coordinated so that all interests can discuss the issues together.
39					En/Eq	For this project, our organization placed special attention to the prescription and marking to ensure greater variable density thinning design and consistency in implementation than past projects in this AMA. We truly appreciate the ability to have our staff involved directly in reviewing the prescription and visiting the project area during marking.
40					En	The final document should clearly state the expected life of the temporary roads and landings to help in analyzing their impact, and provide direction as to their removal on the

						contractor's way out of harvest operations.
41					Ec	Again, we support the use of stewardship contracting projects to achieve the ecological goals of this AMA.
42	Conservation Northwest	P	Walter Spr.	Scope	En	We support the objective of the project to "restore forest structure and species composition that is ecologically sustainable, while maintaining a diverse mix of forest cover types and age classes across the project".
43					Ec	We also support the by-product of commercial wood products that come from this restoration project.
44					Eq	Please provide greater information on the temporary roads that are proposed for this project including the total mileage, number of segments, rationale for construction, length of duration to be left open, and road construction specifics (ie width).
45					En	We fully support the closing and re-habilitation of all unauthorized roads and trails within the project area, and appreciate the scoping letter including this clear intention.
46					En	We recognize that winter logging impacts the seasonal recreation in the area, but feel that the ecological benefits outweigh a temporary impact to recreation.
47					En	We are interested in the overlap of elk calving grounds and cover of perennial streams with treatment areas. Higher retention of canopy density along perennial streams is strongly preferred to lessen the impact, and we are very interested in the removal of dense forest structure on north facing slopes for restoration purposes.