

- Enhance recreation settings and facilities with the goal of providing high quality experiences.

The following actions are proposed to meet the purpose and need: timber harvest and associated fuel treatment, including intermediate harvest and regeneration harvest; pre-commercial thinning; planting of conifer seedlings; prescribed fire; burning and/or slashing; road maintenance, road construction, temporary road construction using best management practices; change to yearlong, open access on roads to existing dispersed campsites along the Kooconusa Reservoir; access changes from motorized to non-motorized on five trails; watershed rehabilitation to include road decommissioning and intermittent stored service (storage) work; road storage; addition of some undetermined roads will be added to the National Forest System; cost-share between the Forest Service and the Montana State Department of Natural Resources and Conservation for several roads in the analysis area for access purposes; improved access to the recreation sites on the south side of the mouth of Fivemile Creek and in the Yarnell area; and a new non-motorized trail within the East Reservoir analysis area. Various design features and mitigation measures will also be implemented to maintain and protect resource values.

REVIEW OF THE OBJECTION (FAILURE TO COMPLY WITH 36 CFR 218)

LACK OF SPECIFIC WRITTEN COMMENTS & OBJECTION ISSUES

Upon review of your objection, it was immediately evident that you did not once reference the analysis in the Draft or Final EISs, or the rationale in the draft ROD, specific to the East Reservoir project. On page 14 of your objection you do reference a DEIS, pages 5 and 6; however, the information you cited was not found on pages 5 and 6 of the East Reservoir DEIS as it was determined you copied and pasted this issue from an objection submitted for the Beaver Creek project on the Idaho Panhandle NF.

I conducted a thorough content analysis of your objection and found that the majority of the content was copied and pasted from previous appeals and objections submitted on other projects in Region 1. It seems you predominantly relied on content from appeals/objections submitted on the Sparring Bulls, Minton Trout and Pilgrim Creek projects on the Kootenai National Forest (NF). Other content was also pulled from appeal/objections submitted for the Rennick Stark project on the Lolo NF; Trapper Creek, Fleecer and North Butte projects on the Beaverhead-Deerlodge NF; and Beaver Creek and Bussel 484 projects on the Idaho Panhandle NF. Some issues have been included on up to 20 appeals/objections across the region. While I will not take the time here to list each and every project, I will suffice it to say you have been provided adequate, numerous responses to these issues, which tend to be programmatic in nature (i.e. formal consultation requirements for NRLMD, identifying the minimum road system, data collection and use methods, identification and management of old growth etc.). I find no added value in continuing to respond to these issues on a project-by-project basis if you cannot demonstrate how the proposed actions of the project, as they relate to these broad topics, are contrary to law, regulation or policy.

36 CFR 218 includes a requirement for all objection issues to be based on previously submitted, specific written comments unless the issue is based on new information. The regulations place the burden on the objector to demonstrate compliance with this requirement, further specifying that the objector must include a statement that demonstrates the connection between prior specific written comments on the particular proposed project or activity and the content of the objection. In your email submitting the objection you state, "The issues raised in this objection were addressed in our comments on the East Reservoir DEIS or scoping comments or are based on new information contained in the draft ROD and FEIS." This vague claim in no way demonstrates how the content and issues raised in the objection are based on prior specific written comments, meaning the burden is then on my staff to review the comments previously submitted and determine if the objection issues are based on those comments. You have been notified in my previous letters accepting your objections that you are not meeting this requirement, yet you continue to submit objections that do not meet this requirement.