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<th>Number</th>
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<tr>
<td>1</td>
<td>13-15</td>
<td>10.1</td>
<td>10.1 - Authority 2: Based on our understanding that CWK2 can be either &quot;Regional CWK2&quot; or &quot;Forest CWK2,&quot; we recommend inserting &quot;Forest Projects&quot; after CWK2, as follows: &quot;... and CWK2 (Cooperative Work, Knutson-Vandenburg, Regional Projects, and Forest Projects).&quot;</td>
<td>Decline</td>
<td>JM - CWK2 is technically regional projects. The funds are still for projects within the region, but are just managed at the forest level. CWKX is the funded program under CWK2 for the KV outside the sale area converted to CWK2. ML - Each Region manages the K2 funds differently, this should be reflected. Group – Chp 20 is for clarifying forest vs. regional.</td>
<td>None</td>
<td>JMM 03/30/2021</td>
</tr>
<tr>
<td>2</td>
<td>13-16</td>
<td>10.2</td>
<td>10.2 - Objectives We recommend editing the 2nd sentence as follows: &quot;The program allows for performing reforestation, timber stand improvement, community protection, maintenance of forest roads, watershed restoration ...&quot; These statistically authorized activities (16 USC 576b) must be included.</td>
<td>Accept</td>
<td>JM – In the 2010 handbook this was not included under objectives of CWKV, but was under CWK2. It was however included under the list of examples of appropriate activities. Does OGC need to weigh in on this? ML – In item 2 under authority, the last sentence states &quot;Unless noted in this chapter, ... apply to both of these programs.&quot; 10.2 Objectives captures all aspects of both KV and K2. Group – accept but change wording from timber stand improvement, to stand improvement. OGC was consulted on this in 2005/2006 and said that these uses were for both CWKV and CWK2.</td>
<td>None</td>
<td>JMM 03/01/2021</td>
</tr>
<tr>
<td>3</td>
<td>13-17</td>
<td>10.3</td>
<td>10.3 - Policy We recommend editing #5 as follows: &quot;When ... coordinate the funding needs CWKV collections with other needs, such as National Forest Fund, Brush Disposal deposits, ...&quot; #12 appears to conflict with #6 regarding how to handle excess CWK2 balances, we recommend reconciling that apparent conflict. We also recommend editing 10.41 - #9, 10.42b - #10, 10.5 - Unused CWKV funds, and 10.5. Unused KV funds for clarification and consistency.</td>
<td>Partially accepted</td>
<td>Group – declined, but reorganized policy. Added &quot;or converted to CWK2&quot; to bring this statement to the present and the two options of sending excess to CWK2 or the treasury unless one of the other exceptions applies.</td>
<td>None</td>
<td>JMM 03/30/2021</td>
</tr>
<tr>
<td>4</td>
<td>13-18</td>
<td>10.43</td>
<td>10.43 - Regional Foresters We recommend adding 1.a. as follows: &quot;In development of SAI plans, identify a desired level of CWKV collections for use outside the sale area.&quot;</td>
<td>Decline</td>
<td>Responsibility is listed in 20.43. Repetition is not necessary. Ch 10 focuses on CWKV and Ch 20 focuses on CWK2.</td>
<td>None</td>
<td>JMM 03/01/2021</td>
</tr>
<tr>
<td>5</td>
<td>13-19</td>
<td>10.44</td>
<td>10.44 - Forest Supervisors We recommend editing 4.b. to replace &quot;Unused&quot; with &quot;Excess,&quot; and adding the following to the end of it: &quot;... including an outline of proposed Forest KV (CWK2) for use on projects outside the sale area.&quot;</td>
<td>Partially accept</td>
<td>Changed unused to excess as described in comment 13-17. The second portion of the comment was declined, as it is covered by 20.44. The forest supervisor is responsible for developing an inventory of unfunded needs for CWK2 funding.</td>
<td>None</td>
<td>JMM 03/01/2021</td>
</tr>
<tr>
<td>6</td>
<td>13-20</td>
<td>10.45</td>
<td>10.45 - District Rangers We recommend adding a new 1.a. as follows: &quot;In development of SAI plans, identify a desired level of CWK2 collections for use outside the sale area.&quot;</td>
<td>Decline</td>
<td>10-45, 1, 2, and 3 sufficiently cover this premise when it is stated that the district ranger sale priorities for non-required CWKV funded work and develops SAI plans in accordance with land and resource management plan objectives.</td>
<td>None</td>
<td>JMM 03/01/2021</td>
</tr>
</tbody>
</table>

Forest Service Directives Batch 2A, Public Comment  
FSH 2409.19, Chapter 10 - Knutson-Vandenberg Sale Area Program Management Handbook
We recommend adding a definition for "Required Reforestation" stating that it is the activity that must take place to implement a project. Section 11.21

Funding for the construction of dams on the National Forest System.

The identification of required reforestation needs and protection and improvement needs for the future productivity of the renewable resources of forest lands in the sale area. Identification of additional needs outside of the sale area should also be identified and prioritized for funding through CWKV.

The Public Law 92-367 relates to inspection and enforcement procedures by the Army Corps of Engineers. The public law is not related to the ability to spend CWKV funds on the building of dams.

We review the proposed changes to the Forest Service Directives, and write about the Knutson-Vandenberg funding for land conservation work that is a part of the proposed Directives. FSH-2409.19, Chapter 30 contains a definition for both dam construction and sedimentation. The public law is not related to the ability to spend CWKV funds on the building of dams.

We have reviewed the proposed changes to the Forest Service Directives, and write about the Knutson-Vandenberg funding for land conservation work that is a part of the proposed Directives. FSH-2409.19, Chapter 30 contains a definition for both dam construction and sedimentation. The public law is not related to the ability to spend CWKV funds on the building of dams.

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22 6-9 16.12 Section 16.12b refers to "Region 15, Unit 08". There is no region 15, so this error needs to be corrected.

13 - Purchaser Requirements vs. CWKV Funding

We recommend adding the last sentence in the opening paragraph as follows – "Examples of actions for which the purchaser or operator may be held responsible include..." Purchasers are only responsible for work identified in the contract as purchaser responsibility. Not all of the work in the example is always the purchaser's responsibility.

None JMM 03/02/2021

16 6-6 13

K-V funds should not be used to fund potentially harmful projects. In addition to using K-V funds to fund such projects, the Forest Service has proposed using this funding stream for other inappropriate activities. Section 15.6 inserts new requirements on how K-V money should be used. K-V funds are not to be used for..." Decline

None JMM 03/02/2021

17 6-7 13

Section 20.5. Units and regions that have been encouraged to sell the highest value products, i.e., the largest trees, to collect enough K-V money from projects to fund other inappropriate activities. Section 15.6 inserts new requirements on how K-V money should be used. K-V funds are not to be used for..." Decline

None JMM 03/02/2021

18 14-2 13

13 - Appropriate Use of CWKV Funds

* Considerations before performing activity with CWKV funds #5. "Regulations: the-substitution-surrounding-the-CWKV-activity-must-be-officially-closed" with "the substitution or Payment/Unit surrounding the CWKV activity must be contractually eliminated from the Project Area."

Accept

None JMM 03/02/2021

19 13-26 13.5

13.5 - Limitations on Use of CWKV Funds

We recommend that you add #12, as follows – "12. Activities that are the responsibility of the timber purchaser (including BD) under the terms of the contract. BD deposits are collected to fund each disposal by the Forest Service, not the Purchaser.

None JMM 03/02/2021

20 13-27 14

14 - Purchaser Requirements vs. CWKV Funding

We recommend adding the last sentence in the opening paragraph as follows – "Exemptions of actions for which the purchaser or operator may be held responsible include...". Purchasers are only responsible for work identified in the contract as purchaser responsibility. Not all of the work in the example is always the purchaser’s responsibility.

Accept

None JMM 03/02/2021

21 13-28 16.1

16.1 - Associated Costs and Collections

We recommend removing the 3rd sentence in 1st paragraph as follows – "Collect CWKV funds for timber cut from timber sales receipts during a contract or approval period from timber sale receipts for approved work..." Accept

None JMM 03/02/2021

22 6-12 16.12b refers to "Tragics 15, Unit 09". There is no region 15, so this error needs to be corrected.

Decline

Region 15 and 16, 08 refers to an accounting region structure account where national and regional funds are maintained.

None JMM 03/02/2021

This is the 3rd edition of the guidelines, which were first issued in 1964. The guidelines are developed and published by the National Forest Management Association (NFMA) and the Society of American Foresters (SAF). The guidelines provide a framework for the development of forest management plans, and they are intended to ensure that forest management activities are conducted in a way that is consistent with the principles of sustainable forest management. The guidelines cover a wide range of topics, including forest inventory, forest health, forest fire management, and timber harvesting. The guidelines are regularly updated to reflect new scientific knowledge and changing environmental conditions. The guidelines are used by forest managers, researchers, and policy makers as a basis for making informed decisions about forest management. The guidelines are available for free download from the website of the National Forest Management Association. The guidelines are widely used in the United States, and they are also used in other countries around the world.
23 13-30 16.2 We recommend adding the last sentence in the 4th paragraph as follows: “...or in the CWKV collections activities or projects outside the sale area.” Partially accepted Added the wording “for use” to be more consistent with the intent. JM 03/01/2021

24 13-31 16.2 Line 21 – we recommend changing “Deposits” to “Collections.” Accept JM - Could be changed on the form, but not sure if is priority or changes the intent. JM - use consistent language. Group – section as written is clear. None JMM 03/02/2021

25 13-33 16.24 We recommend adding the 3rd and 4th sentences along the lines of the following: “...and that timber sales, including activities associated with another sale. But if all the KV money collected on national forest unit is in one pool, it might be impossible to ensure that KV funds are not transferred between sales to receive a positive balance in the regional KV account. (The last sentence is prohibited by sec. 17.2.) We recommend that units be required to track KV collections and expenditures for each sale.JM - The last already covers this. None JMM 03/01/2021

26 13-29 16.21 16.21 - Form FS-2405-0050A – We recommend adding the following sentence to the end of the 2nd paragraph “Include desired CWKV collections for use outside of the sale area.” Accepted Good point to clarify this detail. None JMM 03/01/2021

27 13-32 16.24 16.24 - Use of Base Rates – We recommend adding the last sentence in the 4th paragraph as follows - “...or sales with high development costs, selling harvesting timber at base rates that include all reforestation costs may reduce a sale’s profitability to potential timber purchasers...”. Provide clarification None JMM 03/01/2021

28 6-10 17.1 Section 17.1 allows use of a CWKV pool as an accounting process for each [proclaimed national forest], established for ease of accounting so that individual expenditures need not be tracked separately on a sale-by-sale basis. However, further discussion in this section prohibits the use of KV money collected on a sale to be spent on activities associated with another sale. But if all the KV money collected on national forest units is in one pool, it might be impossible to ensure that KV money isn’t transferred between sales to receive a positive balance in the regional KV account. The last sentence is prohibited by sec. 17.2. We recommend that units be required to track KV collections and expenditures for each sale. JM - The text already covers this. None JMM 03/01/2021

29 13-34 17.1 17.1 - CWKV Final and Tracking of CWKV Funds – We recommend adding the last sentence in the 1st paragraph as follows: “...The CWKV pool... Do not collect CWKV funds on one sale with the intention of using them on another sale. That is the CWKV fund collected on one sale must be used to fund work on that turf and not on a different area. However, CWKV funds can be collected on one sale with the intention of use outside of the sale area... other non-CWKV funds.” The proposed paragraph would define the main purpose of expanding the use of KV, which is to allow the FS to collect more KV funds than they need for any individual sale in order to fund additional priority work on the Forest. This is now Stewardship-related receipts are often used and we don’t see why KV, from timber sales, cannot be used the same way. None JMM 03/01/2021

30 13-35 17.2 17.2 - Annual Review and Report of the CWKV Balance - We recommend adding the following new paragraph, right after the paragraph ending in “March 15 of the following year.” “... The Regional Office Forest Management staff, with assistance from the budget staff, would designate up to a portion of excess CWKV (new CWK2) to each Forest that will be returned to that Forest for use locally.” This is a regional forest decision. In some regions the region may choose to manage all of the CWKV collected for use outside the sale area and converted to CWK2. In other regions the forests may manage these funds. In the regions where the forests are allowed to manage, it would not just be a portion of the excess, it would be all of the excess. The handbook language outlines the process. JM - the text already covers this. None JMM 03/01/2021

31 Transportation 10.2 11.21 and 11.22 are sections on range management and recreation management, respectively. Currently there is no section dedicated to “engineering activities,” should there be a section for engineering activities or should reference to engineering activities be removed? Decline Group – could ask engineering what they would want to add/ Email on 03/21 - no response to request for language None JMM 04/02/2021

32 Transportation definitions 10.2 Road Maintenance - I think the actual reference is Part 212.16. Accepted Reference was incorrect and has been corrected. None JMM 03/02/2021

33 Transportation definitions 10.8 Road Maintenance - From CFR 212.1 Definitions: Maintenance. The upkeep of the entire forest transportation facility including surface and shoulders, parking and service areas, structures, and such traffic-control devices as we necessary for safe and efficient utilization. Accepted Removed “development” to make definition in handbook match the definition of road maintenance found in CFR 212.1 None JMM 03/02/2021

34 Transportation 10.8 Does FSM 7700 Travel Management need to be added? Is only building and other structures referenced? Accepted Added references to FSM 7700 and FSH 7709.59 as suggested None JMM 03/02/2021
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<tr>
<td>35</td>
<td>Transportation 10.6</td>
<td>concur. Also maybe FSH 7708.59 - Road System Operations and Maintenance?</td>
<td>Accepted</td>
<td>Added references to FSH 7706 and FSH 7708.59 as suggested. None</td>
</tr>
<tr>
<td>36</td>
<td>Transportation 11.21</td>
<td>See comment above. Should there be a section for engineering activities?</td>
<td>Decline</td>
<td>There could be if language was supplied. No response to request for language. None</td>
</tr>
<tr>
<td>37</td>
<td>Transportation 13</td>
<td>Ensure not insure.</td>
<td>Accepted</td>
<td>Grammatical</td>
</tr>
<tr>
<td>38</td>
<td>Transportation 13 – Exhibit 02</td>
<td>Buildings/facilities are mentioned, but not included here in examples - is there reason why it has been excluded? It would be helpful to see an example from each of these in the examples at the end.</td>
<td>Decline</td>
<td>DHMV Decision Tree demonstrates how to determine appropriateness of activities such as facilities. Road System Operations and Maintenance is a list of examples but it does not list all inclusive.</td>
</tr>
<tr>
<td>39</td>
<td>Transportation 13 – Exhibit 02</td>
<td>Road Maintenance Structures - should this identify whether it’s appropriate for maintenance, construction, reconstruction or all?</td>
<td>Decline</td>
<td>Maintenance is the only item specifically listed in the law. The purpose needs to relate back to improvement or maintenance of a renewable resource.</td>
</tr>
<tr>
<td>40</td>
<td>Transportation 13.6</td>
<td>Please check. Facilities PM has seen has had chance to comment on facilities/buildings.</td>
<td>Decline</td>
<td>Opportunities have been available to comment to date. None</td>
</tr>
<tr>
<td>41</td>
<td>Transportation 13.6</td>
<td>Facilities are mentioned frequently, only listed at roads/transportation.</td>
<td>Decline</td>
<td>Opportunities have been available to comment to date. None</td>
</tr>
<tr>
<td>42</td>
<td>Transportation 13.6</td>
<td>concur. Also dams mentioned in a couple places.</td>
<td>Decline</td>
<td>Opportunities have been available to comment to date. None</td>
</tr>
<tr>
<td>43</td>
<td>Transportation 13.61</td>
<td>From Dams PM: It appears the author was meeting the definition of a barrier referred to in [Public Law 92-367], but may have unintentionally left out the following [blue]: (ii) a barrier described in subparagraph (A) that—(I) is 6 feet or less in height regardless of storage capacity; or (II) has a storage capacity at the maximum water storage elevation that is 15 acre-feet or less regardless of height; unless the barrier, because of the location of the barrier or another physical characteristic of the barrier, is likely to pose a significant threat to human life or property if the barrier fails (as determined by the Administrator).</td>
<td>Accepted</td>
<td>Inserted language None</td>
</tr>
<tr>
<td>44</td>
<td>Transportation 14</td>
<td>Would a temp road be designated as &quot;remain open&quot; on a TA? From a travel management standpoint, temp roads are typically not to be &quot;remain open&quot; long-term unless converted to NFSR which is documented in a decision which the TA feeds (the TA is not a travel management decision). If a road is needed for long-term management then it should be converted to a NFSR ML1 - closed except when needed then converted to ML2 admin access when it is in use.</td>
<td>Decline</td>
<td>ST6.631 – Temporary Roads to Remain Open – To maintain short term access to portions of Sale Area for oil and gas treatments and other purposes after a Temporary Road has served the purchaser’s purpose.</td>
</tr>
<tr>
<td>45</td>
<td>Transportation 14</td>
<td>Any road to remain open or decom should follow this decision. Consider simplifying and removing reference to &quot;Temporary&quot;.</td>
<td>Decline</td>
<td>See previous response</td>
</tr>
<tr>
<td>46</td>
<td>Transportation 14</td>
<td>concur.</td>
<td>Decline</td>
<td>See Previous response</td>
</tr>
<tr>
<td>47</td>
<td>Transportation 17.22</td>
<td>There is an Exhibit 01 and Exhibit 02 below this text and above this text which is conflicting.</td>
<td>Accepted</td>
<td>Added 17.22 to the Exhibit reference in the text. None</td>
</tr>
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</table>