

Ltr #0091

From: [Stewart, Robert](#) Stewart, Robert <Robert_Stewart@ios.doi.gov>
To: [FS-KNFplanrevision](#)
Cc: [Frament, Ellen -FS](#)
Subject: KNF Plan Revision/DEIS - DOI Comments
Date: Monday, March 12, 2012 7:42:09 AM
Attachments: [KNF Plan Revision - DOI Comments.pdf](#)

PLEASE ACKNOWLEDGE RECEIPT BY REPLY TO THIS MESSAGE

The Department of the Interior's comments on the subject document are attached.

If you require paper-copy or word-processor version, please so advise.

Robert F. Stewart
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March 13, 2012

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ER 12/011

Vicki Christiansen, Acting Regional Forester
200 E. Broadway P.O. Box 7669
Missoula, MT 59807-7669

Dear Ms. Christiansen:

The Department of the Interior has reviewed the Draft Environmental Impact Statement and Revised Land and Resource Management Plan, Kootenai National Forest, Lincoln, Sanders, Flathead Counties, MT and Bonner and Boundary Counties, ID.

The U.S. Fish and Wildlife Service has no comments on these documents and advises that their concerns will be addressed through the Section 7 consultation process. We offer the following comments provided by the National Park Service for your consideration

Since August 2006, when we last submitted comments on the Land and Resource Management Plan, the State of Montana and the Province of British Columbia signed a landmark *Memorandum of Understanding and Cooperation* in 2010 that recognized the environmental significance of the transboundary Flathead River Basin, that lies within the Crown of the Continent Ecosystem and is adjacent to the Elk River Basin within Kootenai National Forest. Notably the Agreement commits the State and Province to work together on environmental protection, including removing mining, oil and gas and coal development in the Flathead, addressing climate change, and renewable and low carbon energy.

The Kootenai National Forest lies partially within the transboundary Crown of the Continent ecosystem which is one of North America's most ecologically diverse ecosystems. Encompassing the shared Rocky Mountain region of Montana, British Columbia and Alberta, this 16,000 square miles ecological complex spreads across two nations; across one state and two provinces; and across numerous aboriginal lands, municipal authorities, public land blocks, private properties, and working and protected landscapes. While only a small part of the Kootenai National Forest is within the Crown ecosystem, the Forest lies immediately adjacent to the Crown and is also an international transboundary area. The DEIS does not reference this as a transboundary area, nor does it disclose and/or analyze the impacts on Forest resources from activities taking place or planned to take place in Canada. While we understand the lack of

control the Forest has over activities taking place or planned north of the border, in accordance with NEPA we believe that they should be disclosed.

Glacier National Park is also concerned about the potential impacts on wildlife habitat and movement corridors from wheeled motorized use that would be permitted under the plan. Protecting wildlife movement corridors and providing habitat connectivity are, at this time, the best tools we, as federal land managers have, to respond to climate change. Furthermore, the National Park Service believes that designating wilderness in some of the selected roadless areas is really the only way to demonstrate a firm commitment to the remaining wildness and conservation of the transboundary area. The “backcountry” category has no legal meaning and is more of a descriptive phrase for a current condition rather than a solid affirmation of a future condition. The National Park Service urges the Kootenai National Forest to reconsider the Wilderness Recommendations in the “proposed action” and include the Ten Lakes Scenic Area that lies just south of the Canadian border. They also urge that the Whitefish Divide Wilderness Area, that is included in the proposed action, be expanded to the amount of acreage described in Alternative C.

Thank you for the opportunity to review and submit comments. If you have any questions regarding these comments, please contact Mary Riddle, Glacier National Park at 406-888-7898.

Sincerely,

A handwritten signature in black ink that reads "Robert F. Stewart". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Robert F. Stewart
Regional Environmental Officer

cc: Ellen Frament, Forest Planner