Ltr# 0336

From: Frament, Ellen -FS : Williams, Jim [mailto:jiwilliams@mt.gov]
To: FS-KNFplanrevision
Subject: TO BE INCLUDED IN COMMENTS...FW: FWP Forest Plan Comments
Date: Thursday, May 10, 2012 1:28:31 PM
Attachments: js050-12 USFS-Proposed Forest Plan Comments.pdf

Ellen Frament
Forest Planner
Kootenai National Forest
406-283-7660
31374 US Highway 2
Libby, MT 59923

From: Turk, Janette L -FS **On Behalf Of** Bradford, Paul -FS
Sent: Thursday, May 10, 2012 1:27 PM
To: Frament, Ellen -FS
Subject: FW: FWP Forest Plan Comments

Janette Turk
Assistant to the Forest Supervisor
Kootenai National Forest
406-293-6211
406-283-7764
406-291-3486 cell

From: Williams, Jim [mailto:jiwilliams@mt.gov]
Sent: Wednesday, May 09, 2012 5:26 PM
To: Bradford, Paul -FS
Subject: FWP Forest Plan Comments

Just got back Paul.

Here is FWP's comments. Overall it looks like a thorough and well done forest plan.

JW

From: Abbrescia, Martha
Sent: Wednesday, May 09, 2012 9:17 AM
To: Chilton, Tonya; Hensler, Mike; Thier, Tim; Sterling, Bruce
Cc: Williams, Jim; Vashro, Jim
Subject: Proposed Forest Plan Comments

The attached has been mailed hardcopy to Paul Bradford. Keep for your record.

-M

Ltr# 0336

Montana Fish, Wildlife & Parks

MEMORANDUM

TO: Paul Bradford, USFS

FROM: Jim Satterfield, MFWP Regional Supervisor JS

DATE: May 8, 2012

RE: Comments to USFS Proposed Forest Plan

Thank you for this opportunity to comment on the USFS Draft Land Management Plan for the Kootenai National Forest (KNF). We note that the proposed Plan is an ambitious plan, creating positive change for the KNF.

DEIS

The USFS is in a difficult place, being directed to meet the needs of timber management, wildlife (including native ungulates) and their habitat, as well as recreation, on the KNF. Page 197 of the DEIS states that, "Many areas have limited access for snowmobiling because of terrain and tree densities." Caution should be used with general statements such as this, particularly relative to such contentious topics as recreation/snowmobiling and wildlife on a national forest. For example, there is a mountain known as Savage Peak in the southwest corner of the KNF that, despite precipitous elevations and forested areas, shows snowmobile tracks nearly to the top of the 6900' peak into March of most years. Despite steep terrain and high tree lines, snowmobilers continue to make advancements into sensitive terrain, areas particularly important to mountain goats such as that on Savage Peak. Because of this, MFWP sees many of the wilderness recommendations, including increased wilderness and backcountry areas presented in Alt. B (with the exception of the concern below), as positive.

Proposed Forest Plan

It is of concern that little emphasis, or even mention, was made in the proposed Forest Plan about wildlife winter range for native ungulates. The perception is given that it is abundant and there is little need to worry about it, when in fact the opposite is true. Native ungulates need large stands of mature trees at low to mid elevations to minimize thermal energy loss during deep snow periods, and also to minimize predation from predators. Quite often, this critical habitat requirement conflicts with other resource objectives such as minimizing fire risk to private lands or maximizing the production of western larch. Rather than addressing this issue head-on, it is sidestepped completely in the Forest Plan.

Most ungulates, especially white-tailed deer, are reliant upon these types of stands. These stands are typically dominated by mature Douglas-fir, which not only intercepts large amounts of snow, but also provides their #1 source of food (Douglas-fir needles) during the winter months. Increasingly, these stands are disappearing as extensive thinning operations are conducted by

the Forest Service up to 2 miles from the nearest private land in the name of wildfire protection. At the same time, private homeowners are strongly encouraged to thin their private properties and are given financial incentives. Corporate timberlands have done very little to maintain large blocks of winter range, and DNRC is under a legislative mandate to produce at least 55 MM board feet annually. If the Forest Service doesn't strive to maintain adequate winter range for ungulates, who will?

In stark contrast to the paucity of information regarding winter range, is the expressed desire within the plan to increase the amount of acreage dominated by western larch. An aerial view of the Kootenai National Forest and adjoining corporate lands via Google Earth reveals thousands of cutting units that have been created during the last 35 years. It is safe to say that at least 90% of these units were managed to favor western larch. Generally, this involves some type of regeneration harvest and the scarification of soil, followed by selective thinning. Areas dominated by western larch offer little for snow intercept for wintering ungulates and receive little use during critical periods. The KNF plan indicates there is a desire to greatly increase the amount of acreage of western larch and decrease the amount of acreage dominated by Douglas-fir. This represents a winter range canopy concern for deer and elk.

Specific objectives in identifying, preserving and maintaining winter range for wintering ungulates should be developed. These should be monitored on a planning unit basis and should address habitat conditions on adjoining corporate, state and private land. Connectivity between large patches of cover should be insured, and between winter ranges when possible. To highlight this necessity for winter range, we would like to see this added to the list of Desired Conditions (either under the 'Vegetation' or 'Wildlife' subheading).

MFWP also has concerns regarding continued management of bald eagles. Although there is at least one bald eagle nest in the Fisher River drainage, no mention of it is made in the Draft Forest Plan in the Fisher GA Desired Condition (p.86). We would like to see bald eagle nesting habitat maintained, at least mentioned, in the Fisher GA. One option would be to mention "Desired conditions related to sensitive species habitat" (FW-DC-WL-01, 07), or add "protect nest trees/maintaining nest site habitat suitability" (FW-GDL-WL-02, 03, 04).

The East Fork Rock Creek Road into Rock Creek Meadows is currently gated with no motorized access. In the proposed forest plan Preferred Alternative the road category is changed to reflect open to motorized access. The East Fork of Rock Creek is critical winter range for Rocky Mountain Goats that inhabit the southern sections of the Cabinet Mountain Wilderness. Any motorized access will have detrimental effects to these wintering goats and potential serious ramifications to the overall mountain goat population in the southern Cabinet Mountains. In addition, the Rock Creek Meadows is important spring and fall habitat for the threatened Grizzly Bear. Motorized access into the Rock Creek Meadows will place an unnecessary threat to this species. For these reasons, MFWP would like to see the East Fork Rock Creek Road remain closed, yearlong, to all motorized vehicles.

Overall, we agree that Alternative B is the preferred alternative for Wildlife.

There are two documents on which Fisheries will comment, the DEIS and the DRLMP (and appendices).

DRLMP
Chapter 2.
Watershed, Soil, Riparian and Aquatic Resources

In general the goals and desired conditions are admirable and appear to be adequate. It is difficult to determine if the objectives are specific enough or ambitious enough given the time constraint of the life of the document (15 years) to adequately approach the desired conditions, for example, "**FW-OBJ-AQS-01**. Over the life of the plan, improve 5 percent of "Moderate" or "High" rated watersheds that contain populations of sensitive or threatened and endangered species. Improvements in condition ratings may also be accounted for in the trend described in FW-OBJ-WTR-01": Five percent improvement is very specific but what are the population criteria? Un-impacted? Non-introgressed? 1 percent introgression? 10 percent introgressed?

We are concerned that watershed level monitoring might not be effective at measuring project success on a stream level.

An additional objective would be: Where practical, replace non-native fish species with native species.

Appendix A
Watersheds (Water, Soil, and Riparian) and Aquatic Species)
Possible actions
An additional action would include collaborating with MFWP and other agencies and public to reintroduce native fish species to their historic habitat

DEIS
Figure 23 and associated description:
It is difficult to identify drainages without descriptions, but it looks like Upper Libby Creek and Big Cherry Creek are considered conservation watersheds; that might be an overstatement. Why upper Grave Creek is not part of consideration as either a conservation or restoration watershed?

Figure 24 is an overstatement of the current distribution of bull trout. It misleads the reader to believe they are more secure than they are.

Figure 26 is an overstatement of the current distribution of westslope cutthroat trout.

Page 160: distribution of redband trout has been identified through electrophoresis to extend beyond the original distribution identified by Behnke.

Figure 28: Difficult to identify the drainages but redband trout are not native to the Lake Creek drainage.

Pg 172 Conservation and Restoration watershed: The proposal for action on identified watersheds makes good sense <u>if</u> the watersheds are identified and categorized correctly.

Pg 181 Livestock grazing: No Action alternative. Aren't the effects of grazing both historic and <u>current</u>?

DEIS Appendix E

The Salmonid assessment and Conservation /Restoration watersheds appear to contain elements that will help to protect native fisheries in the Kootenai drainage, but opportunities on smaller scale (stream level) shouldn't be limited by larger watershed conditions.

c: Tonya Chilton-Radandt
Tim Thier
Bruce Sterling
Mike Hensler