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May 2, 2012

Mr. Paul Bradford
Kootenai National Forest Supervisor
31374 US Hwy 2
Libby, MT 59923

FAX: 406-283-7709

Email: KNFplanrevision@fs.fed.us

RE: Kootenai National Forest Draft Land Management Plan Revision and Associated DEIS

Dear Supervisor Bradford:

First of all, Paul, we want to express our appreciation of your efforts and willingness to keep us up to date on the Revision process and for providing this opportunity for input. As well, the efforts of your staff to respond so efficiently to our questions and requests for clarifications have been noteworthy and all should be commended. We have been engaged in this long and arduous process (although a great learning experience!) since its inception, and we are optimistic that all the delays were for justifiable reasons, and that the final results will have been worth the time and effort.

As the chief elected officials of Lincoln County, which encompasses the majority of the KNF (and vice-versa), no one is more cognizant than we of how hugely dependent our customs and culture, our social structure, our economic vitality, and the stability of our communities are on how this Plan and its ensuing labels, projects, and management activities affect and satisfy the needs and desires of our constituency, and, at the same time, the needs of the forest itself. And we know and appreciate how heavily this responsibility weighs on you, both personally and professionally. Further, our responsibility for governance throughout **all** lands within our boundaries gives us hope that we are not to be considered merely as a "stakeholder" or simply another "special interest group". This being said, and kept in mind, we respectfully offer the following comments.

Overall, we have concluded that we support the direction provided by Alternative D over any of the others, including the agency preferred Alternative B, for a number of reasons, some of which we will attempt to explain as follows:

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➤ **Most Acres of General Forest (MA 6-75.5%)**

Since this is the part of the Forest that allows for the greatest multiple use, provides the areas most used by the majority of forest recreational visitors, and from which virtually all the commodities and industry raw materials are harvested, where the majority of economic opportunities will be available, and where the most active and adaptive management can occur, it should encompass the greatest area of the Forest, and limited-use and single-use areas the least.

➤ **Access and Recreation:**

- Alt. D** – greatest % where roads and trails may be designated for wheeled motor vehicle use.
- greatest % where over-snow vehicle use is allowed.
 - greatest % of semi-primitive motorized winter and summer opportunities (ROS).

Those who historically have depended on the road infrastructure to access areas within the KNF (the majority of users) have, over the last twenty years or so, noted a pervasive trend toward limitation or denial of that access due to gates or obliteration. We hope that road improvement efforts and stream-side BMPs will negate this trend.

We also place high importance on the provision of opportunities for non-motorized recreation. There are currently hundreds of thousands of acres on the KNF that are unroaded and accessible only by non-motorized means. This acreage has been growing over the last couple of decades, and this trend of 'more for fewer' should stop.

Basically, we support the minimum areas required for single-use or restricted-use designations, and the maximum areas excluded from these designations.

Further, we would have the Plan explicitly iterate that road closures and obliterations will not occur where there might be possible RS 2477 rights-of-way, without meaningful coordination and concurrence between Lincoln County and the Agency.

➤ **Timber Management:**

Alternative D – fewest acres limited by other resources that might preclude timber as an objective.

- most acres suitable and available for timber production.
- highest Predicted Volume Sold.
- highest Allowable Sale Quantity.
- highest Long-Term Sustained Yield

Early on, when our National Forests were created, they were created through laws that were compacts with the people of rural United States that explicitly mandated management that would result in perpetual provision of products that would sustain the needs of the dependent populations. These compacts have been broken. This abrogation, particularly over the last couple of decades, has caused the near collapse of the USFS Timber Program, which has contributed to severe economic and social hardships in Lincoln County's forest dependent communities.

In a Forest with an estimated annual growth in excess of 490 MMBF and an estimated annual mortality of around 300 MMBF, it seems to us your volume targets and ASQ are artificially low.

artificially low. Budget constraints aside (goals should be based on capabilities, not budgets – budgets should be another ‘goal’), we have some difficulty understanding why the ASQ of 86.3 MMBF is ten years out – what difference is a mere ten years going to make? Why not initiate the Plan with the 86.3 MMBF, and make that your target from the outset? Particularly when you estimate a huge loss of Lodgepole and Douglas-fir to insects by 2020. And you have a policy of attempting utilization before value is lost.

Just as a side note: According to recent scientific poll commissioned by the Montana Chamber of Commerce, with a margin of error of 4.1%, 83% of Montana voters encouraged increased timber harvests on public lands.

➤ **Recommended Wilderness:**

Although Alternative D includes the least number of acres of recommended Wilderness, we must except even this from our endorsement of Alt. D. The majority of our constituency does not support any additional Wilderness in Lincoln County. We know that you are mandated to examine the attributes of areas with wilderness character in this process, but are you required to actually make the recommendations? We are confident that the preponderance of commenters requesting significant additional recommended Wilderness does not emanate from a base of permanent residents of Lincoln County.

We believe that Wilderness designations from Congress will be a long time forthcoming, as our current Delegation is united in their position that no Wilderness shall be designated unless it has a broad base of support from the surrounding local communities, and that agency creation of ‘de-facto’ Wilderness by its recommendations is not acceptable. Senator Tester thinks he has found that support for the areas included in his Forest Jobs and Recreation Act; however, we remain unconvinced. This is not to say that many, perhaps most, of the areas proposed as MA 1b in Alt. B are not worthy of ‘wildlands protection’, but rather, that we would prefer this protection occur by other means, particularly through MA 5 designations. Primitive and semi-primitive areas and wilderness opportunities can be, and should be, perpetuated without the rigid inflexibility of ‘recommended Wilderness’ designation which requires Congressional action to culminate (and Congressional inaction is to be expected) and potentially precludes some future management activities that might become acceptable or desirable given the inevitable unforeseen and ever-changing needs in our physical and social environment. We are reminded that Thomas Jefferson once said that “... one generation has no more right to rule the next as it has to rule another country.”

Regarding the Ten Lakes Area in the northeast corner of the Forest, which is near and dear to the hearts and souls of so many, we would like to see the Scenic Area expanded to include more of the appropriate areas of the WSA, and to be reclassified as either a National Recreational Area or, even more appropriately, a Special Interest Area which is described as generally “... **managed to protect or enhance, and where appropriate, foster public use and enjoyment of areas with scenic, historical, geological, botanical, zoological, paleontological, or other valuable and unique resources**”, and “... **are of special interest due to the presence of important ... recreational, traditional, cultural, or heritage attributes which require protection or special management ...** “. These are all interests representative of the Ten Lakes Area. Further, this classification allows the creation of local advisory committees to assist in developing and overseeing management plans specific to the area. As well, our Congressional

delegation has taken some interest in this, and they have indicated that, with this sort of plan in place, they would assist in a formal effort to remove the MWSA designation from the Ten Lakes Area.

➤ **Wild, Scenic, and Recreational Rivers:**

While we realize the planning process mandates you to consider the potential of wild and scenic rivers potential, we feel the results are overstated. Even though your evaluation was limited to eligibility and did not determine suitability, we are concerned that this eligibility determination, though seemingly benign in that past and current uses appear to be protected, it nevertheless may have an effect on adaptive management capabilities on significant "buffer" areas that are not only suitable for timber harvest, but needs to be treated to stave off future wildfires that could obliterate that which you deem to 'save'.

We believe you have included far too many small creeks and tributaries in your recommendations, some of which nearly disappear in dry years. We suggest considering only those listed in the 1987 Plan, and discourage any further action until Lincoln County has further reviewed these recommendations in relation to the impacts on natural resource based industries, the economics of the County, and on our customs and culture.

Relative to Grave Creek, its protection provided by critical bull trout habitat designation provides it with all the safeguards it needs. Future classification under the WSRRA would serve to merely give it a higher public profile, something to which local anglers and users are adverse. In addition, before any re-classification can occur, the Glen Lake Irrigation District and the Town of Eureka **must** be assured that such their dependence on this watershed will not be adversely affected.

➤ **Non-native Invasive Plants:**

We fail to see in the various alternatives a strong commitment to a noxious weed remediation program. We seem to recall that the 2006 version planned to treat 75,000 to 94,000 acres over the life of the Plan. We pointed out that with an estimated increase of 13,300 acres per year infested with spotted knapweed alone, the Agency would fail in even treating the estimated increase. Are we going to do better under this Plan?

➤ **Wildland-Urban-Interface:**

We appreciate the increased priority in the action Alternatives for treatment of hazardous fuels in the WUI and an increased direction toward lowering fire-risk and increasing protection of communities, particularly since the WUI includes 30% of the Forest adjacent to where private values are the greatest.

➤ **Economics:**

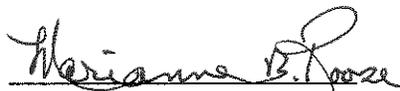
We believe that Alternative D provides the greatest economic opportunities for the people of Lincoln County, from both an industry perspective and a recreation perspective. However, these opportunities are still deficient in their ability to support a strong forest industry in Lincoln County. Chief Tidwell very recently said that "The Forest Service recognizes the need for a strong forest industry to help accomplish forest restoration work" That means the USFS has to provide the kind of wood the industry needs in order to maintain the infrastructure

necessary to restoration activities and to provide the revenue necessary to pay the way. The hope of biomass utilization helping in this regard currently remains futile; as Chuck Rody of Stoltze Land and Lumber puts it, "...biomass ... doesn't pay its own way out of the woods." Increased sawlogs are required. Which is what we thought we might get when we heard Undersecretary Sherman encouragingly say "the Forest Service wants to see a 20% increase in forest products coming out of the woods", and most of that would be lumber. The KNF, as (arguably) the most productive Forest in the Inland Northwest, should be expected to provide its appropriate share of the additional 300 MMBF expected from Region 1 by 2014.

Of huge relevance to us, of course, are the revenues that flow to the County due to the presence of the KNF. An expanded timber and commodities program would help assure continued financial solvency for Lincoln County. The potential loss of SRS funding, which provides approximately 35% of total County revenues, and a return to sharing 25% of forest revenues, under today's diminished timber program, would be devastating, particularly for our education and transportation infrastructures. A tax increase large enough to replace this loss would be impossible.

Once again, Paul, thank you for this opportunity and for considering our thoughts and comments. A special thanks, as well, to Ellen, Janette, Cami, and all the others who were so helpful and responsive, including all of your District Rangers.

Sincerely, Lincoln County Commissioners


Marianne B. Roose, Chairman


Anthony J. Berget, Member


Ron Downey, Member

"The preservation of our forests for future generations does not mean closing them to the current generation."

"... humans must exploit the environment in order to live." Jack Ward Thomas, former USFS Chief and noted conservationist (July 2006).

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