

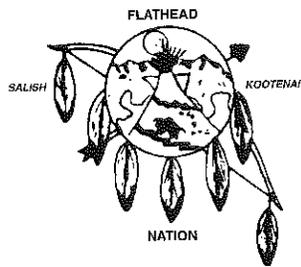
Ltr# 0384

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To: [FS-KNFplanrevision](#)
Subject: Scanned Letter
Date: Monday, June 11, 2012 9:19:57 AM
Attachments: [ConfederatedSalish.pdf](#)
[image001.png](#)

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THE CONFEDERATED SALISH AND KOOTENAI TRIBES OF THE FLATHEAD NATION

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A People of Vision

A Confederation of the Salish,
Pend d' Oreilles
and Kootenai Tribes

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May 29, 2012

Kootenai National Forest Plan Revision
31374 US Highway 2
Libby, Montana 59923

The Confederated Salish and Kootenai Tribes of the Flathead Reservation (CSKT or Tribes) offer the following comments on the Draft Land Management Plan (Draft Plan) for the Kootenai National Forest (KNF). These comments are submitted outside of the formal comment period, as part of the USDA Forest Service's trust obligation to consult with Indian tribes who may be affected by a federal agency's actions. The revision of the Kootenai National Forest Plan is a significant action by the Forest Service, and these comments are submitted as a part of the ongoing government-to-government consultation that has taken place throughout this process. The Tribes appreciate the opportunity to comment on the Draft Plan.

GENERAL COMMENTS

The KNF has developed its Draft Plan based upon the preferred alternative (Alternative B) set out in the Draft Environmental Impact Statement for the Draft Plan (DEIS). Alternative B seems to focus on balancing the ecological, social and economic sustainability of the KNF.

As the planning team is aware, the KNF lies entirely within the aboriginal territory of the CSKT. The Tribes welcome the fact that both documents acknowledge CSKT treaty-based reserved rights throughout the KNF. Moreover, the Tribes hope that the Draft Plan's commitment to working with the CSKT on a government-to-government level in order to facilitate CSKT member treaty-based access to, and use of the KNF will continue. The consultation protocol developed as part of the planning process and referenced in the Draft Plan should serve as a good starting point.

With regard to the selection of Alternative B as the basis for the Draft Plan, the Tribes understand the need to balance the divergent interests that the public has for use of the national forests, coupled with

the fact that there is a congressionally imposed multiple-use mandate that legally requires the Forest Service to consider all uses of the national forests. With that understanding, the Tribes are nonetheless concerned that the Draft Plan potentially overemphasizes the economic values of Alternative B, while subordinating the ecological and social values.

The Draft Plan's focus on extractive industry opportunities could potentially outstrip the values found in an ecologically healthy forest. The Tribes first priority is ensuring that CSKT members have the opportunity to meaningfully exercise their treaty rights for generations to come. That starts with an ecologically sound forest that can sustain a thriving population of game animals and forest products such as huckleberries and traditional medicinal plants.

Further, the social values the Tribes seek to safeguard begin with protection of, and access to, sacred sites and cultural resources located within the KNF. Extractive industrial uses of national forests take a tremendous toll on the integrity of those cultural values.

SPECIFIC COMMENTS

The Draft Plan notes that mining is a critical part of the KNF's role in both the local community and nation as a whole (see, p. 42-43, Minerals; Social and Economic Systems, Draft Plan). Mining has been a significant concern for the CSKT, particularly the ongoing development of the Rock Creek and Montanore mining projects. Both mines would impact the sacred Chicago Peak and degrade the Cabinet Mountain Wilderness, thus disturbing opportunities to exercise treaty hunting and gathering and traditional ceremonial uses of the area. The Draft Plan also notes that these mining projects could potentially require utility rights of way, further disturbing the area (see, Appendix D, Table D-1). The Tribes have long opposed these two mining projects, and hope to limit mineral development throughout the KNF. As written, the Draft Plan does nothing to limit or scale back the development of mineral resources. Rather it notes that a goal of the KNF is "exploration and development opportunities for mineral resources." (see, p. 42-42, Minerals; Social and Economic Systems, Draft Plan).

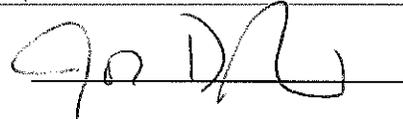
Further, the Draft Plan does not protect a significant enough amount of old-growth forest. The old-growth areas are an important part of maintaining and protecting an ecologically healthy forest. Access to large scale timber harvest on old-growth forest reduces habitat for plants and wildlife that CSKT members rely on.

Mineral and timber extraction fuel road density throughout the KNF, as well as increase human use and presence in otherwise undisturbed areas. This in turn diminishes the opportunities that CSKT members have to harvest game animals and forest products, and damages sacred sites and culturally important use areas.

The Tribes submit that a Revised Draft Plan that implemented a "Modified Alternative B" – one that takes in to account all uses of the KNF but focuses less on extractive uses on such a forest-wide scale – would be a preferred basis for development of a KNF Land Management Plan.

The Tribes thank you for the opportunity to comment and hope to that the KNF will continue to consult with the CSKT on forest planning and management issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Durglo", written over a horizontal line.

Joe Durglo, Tribal Chairman

cc. Paul Bradford, KNF Forest Supervisor
Francis Auld, CSKT Tribal Preservation Office
Becky Timmons, Forest Archaeologist, Kootenai National Forest
Loretta Stevens, Tribal Liaison, Kootenai National Forest/CSKT



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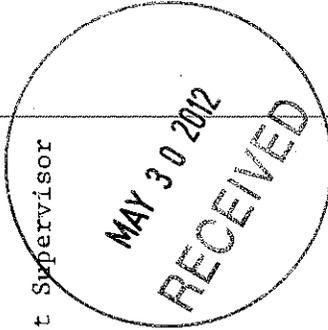
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