

OBJECTION FOR REVIEW AND RESOLUTION
BY THE CHIEF OF THE U.S. FOREST SERVICE

YAAK VALLEY FOREST COUNCIL)	
)	
OBJECTORS)	In Re: Objection of Kootenai
)	National Forest 2013 Revised
v.)	Land Management Plan, Draft
)	Record of Decision, and Final
FAYE KRUEGER, REGIONAL FORESTER)	Environmental Impact
NORTHERN REGION (R1))	Statement
)	
RESPONSIBLE OFFICIAL)	

DATED THIS 22nd DAY OF NOVEMBER, 2013

TO: USDA Forest Service, Objection Reviewing Officer, EMC, RPC-6th Floor, Attn: Judicial and Administrative Reviews, 1601 N. Kent Street, Arlington, VA 22209

I. NOTICE OF OBJECTION

On August 28th, 2013, the Northern Regional Forester, Faye Krueger, signed the Draft Record of Decision (DROD) for the Kootenai National Forest (KNF) 2013 Revised Land Management Plan (Forest Plan), selecting Alternative B Modified from the Final Environmental Impact Statement (FEIS). The revised Forest Plan will guide all resource management activities on the KNF for the next 10 to 15 years.

Notice is hereby given during this pre-decisional administrative review process, pursuant to Subpart B of 36 CFR 219, the Yaak Valley Forest Council (YVFC) objects to several issues and/or parts of the Forest Plan (see Statement of Issues) and seeks review by the Chief of the U.S. Forest Service for resolution of these issues.

This objection is based upon issues documented in substantive formal comments submitted by the objectors during the comment period for the Draft KNF Land Management Plan and associated EIS. Some of the objector's concerns and issues were also formally raised at multiple public Geographic Area meetings hosted by the KNF during the scoping period for the Draft KNF Forest Plan from 2002-2006.

With this objection, the objectors submit indubitable evidence that demonstrates a lack of appropriate analysis, selective use of the collaborative process, and a disregard and misrepresentation of public comments by the U.S. Forest Service (KNF). The objectors seek to resolve these concerns along with the factual inaccuracies found within the KNF Forest Plan DROD and FEIS through relief, remand, and/or reversal of portions of said draft decision (see suggested resolutions).

II. STATEMENT OF POSITION

The YVFC formed in 1997 because local residents were concerned with the health and management of the forest lands in which we reside. All of our members utilize the Kootenai National Forest for a

variety of uses, including hunting, gathering, employment, and a variety of recreational uses. Prior to the YVFC's conception there had never been a lasting, organized effort of area residents (Yaak Valley based) to advocate and implement conservation and restoration programs focused specifically upon the valley's critical wildlife habitat for the myriad sensitive, threatened, and endangered species inhabiting the valley's landscape. Our work focuses on permanent protection of wild areas, habitat restoration, connectivity, education, and community development. We share a commitment to the landscape that moves toward a local model based on stewardship principles of forestry, including habitat conservation and restoration.

The YVFC has only appealed two KNF management activities in the past. We would much prefer to work with the agency and collaborate with our fellow Kootenai stakeholders to come to mutual agreement on management activities prior to an administrative review process. With those avenues for resolution now exhausted, we are left to file this pre-decisional administrative action to provide relief from the DROD. We have found within the Forest Plan FEIS and DROD far too many inadequacies that preclude us from lending our support to the draft decision.

With this objection, the objectors seek to ensure that Management Areas (MA) on the KNF reflect an ecosystem based management approach where a balance is placed on the ecologic, social, and economic needs of the forest. As allocated and mapped in the Forest Plan, the proposed MA designations listed in this objection would adversely impact and irreparably harm the natural qualities of the KNF and would further degrade wildlife habitat. If implemented, they would also have a detrimental impact on our members who use the Forest. We find portions of the KNF justification and determined mechanisms proposed in order to achieve a balanced and fair use of the Forest unwarranted.

The YVFC's objection to the KNF Forest Plan DROD and FEIS will show that Forest officials inadequately addressed important comments and feasible management alternatives provided by interested members of the public during the National Environmental Policy Act (NEPA) process. Furthermore, the objection will also show that the KNF failed in meeting NEPA requirements to provide high quality, accurate information by omitting critical information while providing and relying upon incorrect statements.

III. STATEMENT OF ISSUES

A.) Factual inaccuracies within the Forest Plan

The following two issues illustrate the failure of the U.S. Forest Service to meet NEPA requirements by neglecting to provide accurate information and adequately address important comments and feasible management alternatives provided by the public throughout the NEPA process.

1.) Misrepresentation of the Forest Jobs and Recreation Act (FJRA)

The FJRA is a bill in Congress that was introduced by Senator Jon Tester and is pending legislation. The YVFC is part of a local diverse group comprised of timber representatives, conservationists, and the motorized recreation community that developed the Three Rivers Challenge, which was incorporated into the FJRA in 2009.

In response to Public Comment 97, the Forest Plan states:

The special management areas in the Three Rivers Challenge do not allow any timber harvest. (FEIS, Appendix G, 380)

The above statement is clearly erroneous. There has always been a provision in the FJRA, since it was first introduced, that permits timber harvest within special management areas.

FIRE, INSECTS, & DISEASES -Timber harvesting may be permitted in an area designated by subsection (a) to the extent consistent with protecting and preserving the purposes of the areas designated by subsection (a) for purposes relating to the necessary control of fire, insects, and diseases. (FJRA, 44)

Beyond the above statement, in August 2013, Jon Tester's staff introduced new language into the FJRA that allows for harvest within the suitable timber base for the purposes of wildlife habitat enhancement and to improve forest structure and/or composition:

TIMBER HARVEST -Timber harvest shall be authorized within the Three Rivers Special Management Area and the Roderick Special Management Area only on suitable timber base of the Forest Service— (i) to improve habitat for wildlife; or (ii) to maintain or restore forest resiliency, composition, or structure. (FJRA, 50)

The YVFC understands that due to the KNF's deadline to get the Forest Plan out to the public, the latest timber language addition to the FJRA could not be analyzed. However, the provision that permits timber harvest in order to control fire, insect, and disease has been included in the FJRA since its inception. So, for the KNF to claim that the FJRA does not allow for any harvest is completely false and only perpetuates myths that surround the FJRA - a Bill that is intended to help the agency achieve its own objectives.

2.) Misrepresentation of public comment & lack of appropriate analysis - Zulu IRA

The YVFC made the following recommendation in their written comments for the Draft KNF Revised Forest Plan and DEIS:

Our organization is not satisfied with the MA designation in any of the proposed alternatives for the Zulu IRA. During the Yaak GA collaborative workgroup meetings that occurred about 5-6 years ago, a diverse group of participants discussed and tentatively agreed that this IRA would be *managed as Backcountry (5a) on the Three Rivers District and as Backcountry (5c) on both the Libby and Rexford Districts*. They made clear at those meetings that the east side of this IRA is popular among the winter-motorized community, while almost no winter motorized activity occurs on the west side. We would like the Forest Service to honor this arrangement in the Forest Plan. (YVFC comment letter on Draft Forest Plan, 4-5). [Emphasis added]

In the Forest Plan FEIS, the KNF framed the YVFC comment this way:

The Forest Service should consider the following recommendations regarding the allocation of the backcountry non-motorized summer and winter MA (MA5a): (J) Designating the Zulu IRA to MA5a since during the Yaak GA collaborative workgroup meetings that occurred about 5-6 years ago, a diverse group of participants discussed and tentatively agreed that this IRA would *be managed as backcountry MA5a*. (FEIS, Appendix G, 420). [Emphasis added]

Managing the entirety of Zulu IRA, as Backcountry MA5a is not what the YVFC had

requested the KNF to consider and analyze for, yet this is how it's documented in the Forest Plan. This is a clearly erroneous summation of the YVFC's request.

Beyond the YVFC written comments, Robyn King and Matt Bowser had a meeting with Ellen Frament (KNF Forest Planner) and Kirsten Kaiser (Three Rivers District Ranger) on November 29th, 2012 regarding their request for the split allocation of Zulu IRA. As a result of YVFC comments on the Draft and the subsequent meeting, the KNF should have been absolutely clear on the request before them for analysis and consideration.

The Starting Option map for the Forest Plan designated the Zulu IRA as Backcountry MA5c on the Rexford District portion and as MA5a on both the Libby and Three Rivers Districts (**see attachment**). During the Yaak GA workgroup meetings that occurred around 2003-5, it was discovered that snowmobilers used the Libby portion of Zulu as well, but not the Three Rivers' side. As a result, a tentative compromise was struck between the motorized and non-motorized communities to manage both the Rexford and Libby portions as MA5c but to leave the Three Rivers portion as MA5a.

In alternative B modified, the Responsible Official selected the management designation of Backcountry MA5c (winter motorized) for the entirety of the Zulu IRA. The YVFC disputes the USFS justification for this MA designation; given that:

- a.) The YVFC was told when the Starting Option map was released, by then KNF Supervisor (Bob Castenada), that the only way it would change is if collaborative input was received by the agency.
- b.) The stated purpose by the KNF for holding GA work group meetings was to, "collaboratively discuss and develop desired conditions for each of the revision topics within the workgroup's GA... discuss Starting Option maps and potential changes to suggest to the Forest Service" (DROD, 3). If this was truly the purpose for holding the meetings, then why was the collaborative approach to Zulu not honored by the KNF in the Forest Plan?
- c.) The YVFC and YVFC supporters provided the only site-specific public comments on the DEIS of the Forest Plan that addressed the management designation of Zulu. All of which supported the collaborative approach of managing Zulu as MA5a on the Three Rivers side and as MA5c on both the Rexford and Libby portions.
- d.) The YVFC understanding is that the winter-motorized community does not use the Three Rivers portion.
- e.) There have been documented grizzly bear denning sites within Zulu IRA.
- f.) 87% of the KNF is open to over-snow vehicle use (FEIS, 420), while only 2-3% of recreation visits to the Forest are for snowmobiling (FEIS, 411). These figures more-than-suggest that opportunities for winter-motorized recreation greatly outweigh the percentage of people who visit the Forest to snowmobile.

B.) Forest Plan fails to honor collaborative agreements and applies selective use of the collaborative process

The KNF cites an investment in collaboration, yet the agency misinterpreted agreements that resulted from collaboration and also used collaboration as justification for some decisions and not others. The KNF inadequately addressed important comments and feasible management alternatives provided by interested members of the public during the NEPA process.

The YVFC and forty-five other public comments submitted on the draft Forest Plan requested that the KNF honor all of the land-use designations and boundaries that resulted from the Three Rivers Challenge (TRC) (FEIS, Appendix G, 379). Yet the agency chose to honor only one piece of that landmark collaborative agreement - recommending Roderick as wilderness (of which the agency then subtracted 6,939 acres from that IRA for recommended status). **It is arbitrary and capricious for the agency to selectively parse out aspects of a collaborative agreement, while (at the same time) citing that same collaborative process as justification for a decision.**

The Forest Plan states:

"The Roderick area was added as recommended wilderness in Alternative B Modified because interest in this area was supportive from a local collaborative group." (DROD, 10)

The Rationale listed for Roderick as recommended wilderness:

"Support from Lincoln County Coalition as Wilderness." (FEIS, Appendix C, 190)

These statements refer to the TRC collaborative - which was included in the FJRA. If supportive collaborative agreement is being cited as reasoning for recommending Roderick as wilderness, then why did the KNF not honor the other agreements that came out of the same collaborative effort?

The Forest Plan also states:

"Support from Lincoln County Coalition for recreation uses," when determining the suitability of the Northwest Peaks IRA (FEIS, Appendix C, 140).

"This area [Northwest Peaks] is part of the Three Rivers Challenge project supported by the Lincoln County Coalition, and is included in proposed legislation (U.S. Sen. Jon Tester Forest Jobs and Recreation Act 2012) as both motorized and non-motorized special recreation management areas" (FEIS, Appendix C, 185).

"The northern part of this area [Buckhorn IRA] is part of the Three Rivers Challenge project supported by the Lincoln County Coalition, and is included in proposed legislation (U.S. Sen. Jon Tester Forest Jobs and Recreation Act 2012) as both motorized and non-motorized special recreation management areas" (FEIS, Appendix C, 154).

With these statements, the KNF is acknowledging that the local motorized and non-motorized groups support multiple use designations in the Northwest Peaks and Buckhorn IRAs, yet the agency does not honor these collaboratively-agreed-to boundaries in the Forest Plan. Nor is their any specific explanation given as to *why* the boundaries were not honored.

The land-use designations in TRC were not simply about wilderness. The winter-motorized and non-motorized boundaries in TRC were drawn by local folks that actually use the areas - a process that involved meeting together every week for a year to reach consensus- that's hard work. The agreements that resulted out of the TRC reduced user conflict and found the middle ground. According to the agency's own definition of collaboration, "Collaboration is a process to try to achieve consensus and agreement... Consensus or agreement can often be reached in some areas and not others. Where there is no consensus, the decision maker must make the decision" (FEIS, Appendix G, 380). If this is the case, then why did the KNF not honor the management designations and boundaries found within the TRC?

Given that a diverse group of local motorized and non-motorized users painstakingly drew out the lines on a map as to where their individual recreational activities actually occur on the Forest, *why* would the KNF not honor their agreements? This is the underlying question the agency failed to address in their analysis, while being quick to hold up the same collaborative agreement as justification for other decisions.

The agency responded to the YVFC and the other forty-five comments that requested the agency to adopt the multi-use designations that resulted from the TRC by stating, "The draft Forest Plan is consistent with the Three Rivers Challenge and contains many of the proposals features." (FEIS, Appendix G, 379) The YVFC argues that the Forest Plan does not contain "many" of the TRC features (**please see attached map of the TRC**). Specifically, the feasible management alternatives in the TRC that were excluded from the Forest Plan include:

1.) Buckhorn IRA

The Portion of this IRA from intersection with trail# 262 running south and east of main Buckhorn Ridge (Murphy Mountain Backcountry Ski Area) should be managed as Backcountry MA5a (non-motorized).

- a.) This management designation was collaboratively agreed to in the TRC.
- b.) The winter-motorized community does not use the area for snowmobiling.
- c.) Buckhorn IRA is one of the few IRAs that ranks HIGH in all three categories of suitability for recommended wilderness (FEIS, Appendix C, 139). Clearly this area merits a MA5a classification.
- d.) This issue was specifically addressed in YVFC comments.

2.) Mt. Henry IRA

The portion of this IRA that lies on the southeast side of the Purcell Summit (the Eureka District) should be managed as Backcountry MA5c (winter-motorized).

- a.) This management designation was collaboratively agreed to in the TRC.
- b.) This designation appeared in Alternative C of the draft Forest Plan. The analysis provided in the Forest Plan does not explain how the values expressed by forty-six separate comments that supported this designation were weighed by the Responsible Official - given the fact that there were no other comments that specifically addressed the Mt. Henry management designation.
- c.) This issue was specifically addressed in YVFC comments.

3.) Recommended Roderick Wilderness - missing acres

The recommended Wilderness designation for Roderick should include the entirety of the Roderick IRA.

- a.) This management designation was collaboratively agreed to in the TRC.
- b.) 6,939 acres of Roderick IRA were dropped from the recommended wilderness designation in the Forest Plan. The agency justification for removing 23.4% of the total IRA acres from recommended Wilderness status was, "The boundary for Roderick was drawn to be identifiable on the ground and manageable. The boundary for the IRA met the criteria for IRAs, but not for recommended wilderness" (FEIS, Appendix G, 407). With this justification, the YVFC would like to know:
 - i.) Why Burnt and Vivian Creeks are not "identifiable" features?
 - ii.) What "identifiable" features were used to differentiate Geographic Area boundaries in the southeastern section of this IRA but not recommended wilderness boundaries?
 - iii.) What "identifiable" features were used to set the recommended wilderness boundaries on the southwest side of Roderick IRA? Google

earth reveals no stand-out features on this side and it appears the agency arbitrarily shifted the boundary upslope.

iv.) How is an existing logging road not an "identifiable" feature?

c.) This issue was specifically addressed in YVFC comments.

4.) Roderick Special Management Area

The area on the attached TRC map labeled "Roderick Backcountry Area," that is located above the northern "horseshoe" created by Roderick wilderness and is bordered by Burnt Creek to the north should be managed as Backcountry MA5a.

a.) This management designation was collaboratively agreed to in the TRC.

b.) This area is critical for grizzly bear connectivity on the Forest.

c.) The small amount of suitable timber base that occurs within this area could still be managed and harvested.

d.) This issue was specifically addressed in YVFC comments.

5.) Northwest Peaks Scenic Area and IRA

The areas on the attached TRC map that include Northwest Peaks Scenic Area and IRA, as well as the Northwest Peaks Permanent Snowmobile Area should be managed for their respected non-motorized and winter-motorized boundaries.

a.) This management designation was collaboratively agreed to in the TRC.

b.) Several discrepancies exist between the TRC and Forest Plan with regard to management area designations in the Northwest Peaks Scenic Area and IRA. In fact, so many that it's difficult to capture a description in words - it's best to reference the attached TRC map in order to view the differences.

The boundaries mapped in the TRC within this area are especially significant because they represent the middle-ground in a traditionally disputed and high user-conflict area. Snowmobiling is exceptionally popular in Northwest Peaks, along with backcountry skiing. Both of these values are represented fairly within this area under the TRC. But more important, the boundaries were established by the local users themselves - they have been placed where the activities actually occur. Why would the agency not honor what the people themselves have agreed to and where the recreation indeed takes place, as opposed to arbitrarily mapping out designations that do not match the recreational patterns?

The YVFC understands that, "The identification of winter-motorized areas within the TRC can be used in subsequent site-specific travel management planning" (FEIS, Appendix G, 380). This is all well and good for the Northwest Peaks Scenic Area, however it is critical to establish the other multiple management designations that exist within the Northwest Peaks IRA during this Planning opportunity.

c.) This issue was specifically addressed in YVFC comments.

C.) Lack of Recommended Wilderness in the Forest Plan

When the *draft* KNF Forest Plan was released to the public, both the KNF Supervisor and Forest Planner informed the YVFC that although the Forest Plan was developed using the 1982 Planning Rule regulations, the Forest Plan would be in full compliance with the new 2012 Planning Rule (published in the Federal Register on April 9, 2012). The 2012 Planning Rule requires Forest Plans to provide for "management of areas recommended for wilderness designation to *protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation*" (Final Sec. 219.10(b)(1)(iv)). [Emphasis added] The agency failed to properly incorporate ecological and social characteristics as the basis for recommended wilderness suitability determination, as required by the 2012 Planning Rule.

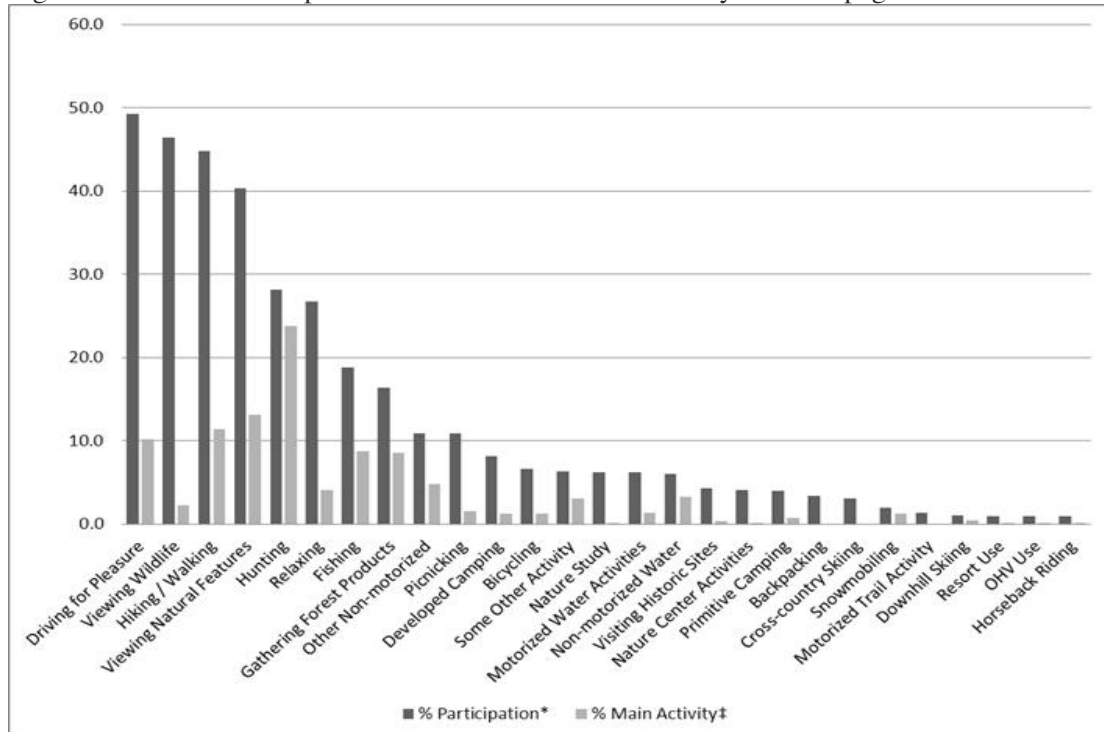
Also, the agency failed to meet NEPA requirements by neglecting to provide accurate information and adequately address important comments and feasible management alternatives provided by the public throughout the NEPA process.

The Forest Plan states: "Public opinion regarding recommended wilderness is greatly divided on the Kootenai National Forest. Some of the public would like to see no additional areas recommended as wilderness, while others would like all inventoried roadless areas recommended as wilderness." (DROD, 10) It's fair to say the topic of recommended wilderness on the KNF is *fiercely debated*, but the YVFC would like to know what data the agency used in order quantify the statement that public opinion regarding recommended wilderness is "greatly divided?" Because if one looks at the public comments submitted on the draft Forest Plan regarding recommended wilderness (which should qualify as an appropriate way to gauge public opinion), **a markedly different trend is apparent**. The public comments that specifically address recommended wilderness (MA1b) on pages 396-408 of the FEIS (Appendix C) reveal **232** comments that clearly support recommended wilderness, compared to **40** comments that are clearly against recommended wilderness. These figures are far from a 50/50 split that would indicate a "great divide."

The Forest Plan also states:

"Wilderness is highly valued by many, and represents a multitude of deeply held values and beliefs. Yet, recommendation and potential Congressional designation of lands for wilderness will necessarily result in losses of other opportunities for others such as snowmobilers and mountain bikers. The Revised Forest Plan provides a balance of opportunities in response to the broad range of public values" (DROD, 20).

The YVFC would like to know what data the agency used in order to quantify the above statement to determine that a "balance" of values would be offset with the addition of acres as recommended wilderness? A fair representation of the public's use of the KNF is visible in Figure 34 - Visitor Participation and Main Recreation Activity chart on page 411 of the FEIS:



It is important to also note that, "Over 72 percent of these visits were from people who lived within 100 miles of the Forest...Because of the local nature of the visiting population, frequent visitors are quite common. More than 38 percent of all visits are made by people who visit more than 50 times per year." (FEIS, 410)

Yet, table 106 on page 420 of the FEIS shows that **87%** of the Forest is open to over-snow vehicle use (snowmobiling) and **91%** of the Forest does not restrict mechanized use (mountain bikers). If one compares the data in Figure 34 (which shows 2-3% of visits to the Forest are for snowmobiling and 6-7% of visits are for bicycling) with the amount of the Forest open to these activities in table 106 - **these figures more-than-suggest that opportunities for snowmobiling and mountain biking greatly outweigh the percentage of people who visit the Forest for these activities.** Considering the disproportion between the data sets in figure 34 and table 106, how exactly does the Revised Forest Plan provide a "balance" of opportunities in response to the broad range of public values? And how would the addition of recommended wilderness acres offset this "balance?" Because it appears as though the exact opposite would be true - the addition of recommended wilderness acres would only serve to bring these data sets closer together toward a balance.

The agency's erroneous summation of public opinion, along with an unqualified definition of "balance" reveals an unrealistic *social* representation on the topic of recommended wilderness. **The agency misrepresented public opinion on recommended wilderness and notably misinterpreted public-use data to form the social basis for its decision on the amount of recommended wilderness in the Forest Plan.** This is extremely troubling because the illusion of a "great divide" between those that advocate for and those that oppose more recommended wilderness was then used by the agency to justify this statement in the Forest Plan:

"One of the reasons I selected Alternative B Modified as the revised Plan is that it recommends a similar amount of acres as the 1987 Plan as additions to the National Wilderness Preservation System." (DROD, 9)

The agency's perceived public division as reasoning to keep the same amount of recommended wilderness in the revised Forest Plan as the 1987 Plan is not only unjust, but the statement itself is irrational and backed by no scientific or social explanation. By the same logic, shouldn't the revised Forest Plan incorporate the same 220 mmbf annual ASQ that was listed in the 1987 Plan?

The fundamental reason for Forest Plan revision is to **update** the previous Plan - to reflect new directions in land management and to balance economic, ecologic, and social needs. The agency's reasoning in the revised Forest Plan on recommending acres to wilderness status was invalid, illogical, and outdated - and did not "provide for management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation."

As stated in the YVFC comments on the draft Forest Plan:

"Regional topography reveals two pronounced long-range migratory corridors that cross through the Yaak. Very few of these avenues (along which wide-ranging animals can travel) exist in our region and the Kootenai is fortunate to have two on our forest. One begins in the Northwest Peaks and continues down Buckhorn Ridge, the other runs from Robinson Mountain down the ridge that separates the Libby and Three Rivers Districts. These corridors cross paths at what is referred to as the Roderick Complex (consisting of

Roderick, Saddle, Grizzly and Zulu IRAs). The Kootenai National Forest has the responsibility and obligation to maintain and restore the connectivity of these corridors and that includes designating Saddle and Grizzly IRAs as recommended Wilderness." (YVFC comment letter on the draft Plan, 2)

The ecological importance of the Saddle and Grizzly IRAs as a part of the larger Roderick Complex and the request for them to be managed as recommended wilderness was not given appropriate analysis in the Forest Plan. Instead Saddle and Grizzly were lumped into the agency's generalized response to Public Comment # 138 (FEIS, Appendix G, 396).

The YVFC comment letter on the draft Forest Plan also stated:

"The Gold Hill West IRA is a spectacular keystone for elk, native trout and furbearers. While included for recommend Wilderness in Alternative C, 1b management for Gold Hill West is absent from the preferred alternative. YVFC urges the Forest Service to designate this unique IRA as recommended Wilderness. The important elk habitat available in this area is highlighted in Montana Fish, Wildlife, and Park's 2005 Elk Management Plan, which recommends maintaining "about 90,000 acres of roadless elk security areas in the Northwest Peaks, Buckhorn Ridge, Grizzly Peak, Roderick Mountain, and Gold Hill areas, which also provide roadless elk hunting recreation." (YVFC comment letter on the draft Plan, 2)

The request for Gold Hill West IRA to be managed as recommended wilderness, due to its unique ecological contribution to the area, was not adequately addressed by the agency in their response. In fact, there was no justification given by the agency to move from a recommended wilderness designation in Alternative C, all the way to a Backcountry MA5c (winter-motorized) allocation.

1.) Saddle IRA

The entirety of this IRA should be managed as recommended wilderness MA1b.

- a.) Saddle IRA was listed as recommended wilderness MA 1b in the starting option.
- b.) It's close proximity to the recommended Roderick wilderness would provide permanent security for the struggling Cabinet/Yaak grizzly bear population.

2.) Grizzly IRA

The entirety of this IRA should be managed as recommended wilderness MA1b.

- a.) Grizzly IRA is a critical piece of the overall "Roderick Complex" and needs to be recognized for its potential to provide permanent security and connectivity for the struggling Cabinet/Yaak grizzly bear population.

3.) Gold Hill West IRA

The entirety of this IRA should be managed as recommended wilderness MA1b.

- a.) Several public comments in the draft Forest Plan specifically addressed support for the Gold Hill West IRA as recommended wilderness, while there were zero comments that specifically stated any sort of issue against a recommended status in Gold Hill West. How does the agency justify their decision based on these dramatically varying levels of public comment?
- b.) The agency's own IRA evaluation for winter-motorized recreation in Gold Hill West IRA does not support their decision made to manage the IRA as Backcountry MA5c (winter-motorized). The capability assessment for Gold Hill

West IRA has a HIGH rating for both Snowmobiling Terrain and Use Restrictions - meaning, "the terrain is steep or vegetation too dense that cross-country travel is too difficult," as well as, "rarely used"(FEIS, Appendix C, 107). When these capability rankings are compared to all of the HIGH ratings in Gold Hill West IRA for variety and abundance of wildlife (FEIS, Appendix C, 107), how does the agency justify their decision to manage this IRA for winter-motorized?

c.) Beyond the YVFC comments that spoke to the unique wildlife in Gold Hill West IRA, this area is in extreme proximity to Garden Ridge, which is the epicenter of one of the healthiest populations of lynx in the lower 48 states. With the known presence of an endangered species actually showing signs of thriving within this IRA and immediate vicinity, how does the agency justify their decision to manage this IRA for winter-motorized?

The management designation of recommended wilderness MA1b in the above three IRAs would begin to restore a "balance" of opportunities in response to the broad range of public values by the agency. Because as it stands now, a great disparity exists between user activity on the Forest and opportunities available on the Forest for those activities and values. Alternative B Modified recommends 4.78% of the Forest for wilderness designation. The addition of Saddle, Grizzly, and Gold Hill West IRAs would bring the total percentage of recommended wilderness on the KNF in Alternative B Modified up to 6.47%. Although the number crunching results in only a 1.75% increase, the difference would be hugely significant for several species of wildlife and permanent protection for their habitat.

IV. SUGGESTED RESOLUTIONS

A.) Factual inaccuracies within the Forest Plan

1.) Forest Plan and the Forest Jobs and Recreation Act (FJRA)

This issue can be resolved by the KNF issuing an Errata statement in the Record of Decision for the Forest Plan. It should state that, "The special management areas in the Three Rivers Challenge do not allow any timber harvest," was an erroneous claim on their part in the FEIS. The Errata statement should also state that timber harvest is permitted in special management areas under FJRA for reasons to control fire, insect, and disease; as well as to manage for enhancement of wildlife habitat and/or forest resiliency, structure, and composition issues.

2.) Misrepresentation of public comment & lack of appropriate analysis - Zulu IRA

The resolution of this issue is twofold.

a.) The KNF should issue an Errata statement in the Record of Decision, which states that they inaccurately framed comments that requested split management of the Zulu IRA.

b.) More important, the KNF should re-establish the management designation of Zulu IRA as Backcountry (MA5a) on the Three Rivers District and as Backcountry (MA5c) on both the Libby and Rexford/Eureka District - as it was mapped in the starting option, as it aligns with recognized winter motorized/non-motorized use of the area, and as it was tentatively collaboratively agreed to in the Yaak GA meetings, to reflect a more balanced approach to management.

B.) Forest Plan fails to honor collaborative agreements and applies selective use of the collaborative process

These issues can be resolved by the agency honoring all of the land-use allocations that resulted out of the TRC. Specifically, these include:

1.) Buckhorn IRA

Modify the management designation of the portion of this IRA from intersection with trail# 262 running south and east of main Buckhorn Ridge (Murphy Mountain Backcountry Ski Area) from Backcountry MA5c (winter-motorized) to Backcountry MA5a (non-motorized).

2.) Mt. Henry IRA

Modify the portion of this IRA that lies on the southeast side of the Purcell Summit (the Eureka District) from Backcountry MA5a (non-motorized) to Backcountry MA5c (winter-motorized).

3.) Recommended Roderick Wilderness - missing acres

Modify the recommended Wilderness designation for Roderick to include the entirety of the Roderick IRA (29,658 acres), along with the cherry stem in Clay Creek (753 acres) for a total of 30,411 acres.

4.) Roderick Special Management Area

Modify the Forest Plan to incorporate and manage the area on the attached TRC map labeled "Roderick Backcountry Area," that is located above the northern "horseshoe" created by Roderick wilderness and bordered by Burnt Creek to the north as Backcountry MA5a.

5.) Northwest Peaks Scenic Area and IRA

Modify the Forest Plan and adopt the areas on the attached TRC map that include Northwest Peaks Scenic Area and IRA, as well as the Northwest Peaks Permanent Snowmobile Area and manage them for their respected non-motorized and winter-motorized boundaries.

C.) Lack of Recommended Wilderness in the Forest Plan

These issues can be resolved by the agency recognizing and protecting the ecological and social characteristics in these three IRAs by recommending them for wilderness designation.

1.) Saddle IRA

Modify the Forest Plan and re-establish its recommended wilderness MA1b status.

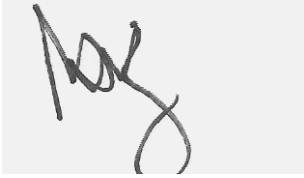
2.) Grizzly IRA

Modify the Forest Plan to shift the designation of this IRA from Backcountry MA5a to recommended wilderness MA1b.

3.) Gold Hill West IRA

Modify the Forest Plan to shift designation of this IRA from Backcountry MA5c to recommended wilderness MA1b *or at the very least* backcountry MA5a.

Signed this 22nd Day of November, 2013



Robyn King
Lead Objector

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Attachments:

- 1.) Forest Jobs and Recreation Act - S37 { 2013-10-31 113th FJRA Text (Revised-#2).pdf}
- 2.) Map of Three Rivers Challenge { 3_rivers_challenge.pdf}
- 3.) Zulu IRA Starting Option Map { StartOptionZuluMtHenry[2].pdf}
- 4.) YVFC comment letter on draft KNF Forest Plan {FP_comments-yvfc.docx}