

**Date:** Nov 25, 2013

**To:** USDA Forest Service  
Objection Reviewing Officer  
EMC, RPC - 6<sup>th</sup> Floor  
Attn: Judicial and Administrative Reviews  
1601 N. Kent St  
Arlington, VA 22209

**Subject Line:** Objection to 2012 Draft & 2013 Final Kootenai National Forest & Idaho Panhandle National Forest Land Management Plans, FEIS, Appendices, and Draft ROD's.

**Responsible Official:** Faye Krueger, Regional Forester

**Objection Submitted by:**

Senator Jennifer Fielder  
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**Pages:** 11 pages plus 5 attachments

**Statement of Issues:** My objections to the KNF & IPNF plans are based on improper public notice; failure to acknowledge or meaningfully respond to all comments submitted; failure to use best scientific information; improper inventory, analysis and designations of IRA, Proposed Wilderness, & Back Country; biased focus on closing roads and trails despite law and facts; inadequate socio-economic analysis; prohibition of multiple uses and economic production in areas where multiple uses and economic production are compatible; lack of jurisdiction; planned conditions leading to severe, adverse impacts on forest health, environment, economy, and human health, safety and welfare; unjust prohibitions on motorized access, timber production, multiple use access, and resource management flexibility; timber production far below actual sustained yield capability; failure to follow applicable laws in planning protocols and public information process; incorrect presumption of broad public support; negligence; errors and omissions; and concealed, misleading, and false Information issued by USFS Officials which manipulated plan outcome, discouraged the local public's understanding of plan implications, and dissuaded pertinent public involvement and submittal of comments.

Local citizens did not have a fair or reasonable opportunity to become aware of the access amendment or draft plan, understand related implications, or comment on the documents prior to comment deadlines. Public notice was not advertised in the newspapers within the counties which contain the bulk of subject NFS lands.

Sanders Natural Resource Council (SNRC), a local citizens NGO that has been highly engaged in the forest planning process, received CD's of the KNF plan from the USFS April 5, 2012 at a Coordination meeting. There was not a reasonable amount of time for unpaid, volunteer citizens to review the 1,100 plus page document, receive answers to their questions, comprehend the plan's content and implications, and submit meaningful comments by the May 7 deadline. SNRC's request for an extension of the comment period was denied.

Upon release of the draft plan, the USFS failed to provide notice of the review and comment period to citizens within affected communities. The agency did not hold informational meetings, acknowledge adverse impacts the plan would have on access and production, or afford interested local citizens a realistic opportunity to review the extensive planning documents or have questions accurately answered prior to closure of the comment period. After widespread public concern surfaced, the USFS held a public meeting in Thompson Falls several weeks after the comment period had closed, but refused to accept further public comments for consideration in the planning process. At that meeting agency staff said they would remedy the deficiency of local notice by advertising in local newspapers in the future. But the agency again failed to do so when the final plan was released Sept 2013.

When SNRC and local citizens held local Town Hall meetings between May and August, 2012 to publicly discuss concerns about the plan's access and use restrictions, over 500 people attended the meetings. Of those attending, only a very small percentage had heard about the Bear Management Units, Access Amendment, or Draft Plans prior to closure of the comment periods. Still the USFS refused to effectively inform the community of the plan's impacts, or re-open the comment period. (audio & video from public meetings confirms the nearly universal lack of public awareness about the comment period or content of the plan).

The USFS actively deterred substantive public comments and attendance at SNRC citizens' meetings when acting District Ranger Randy Hojem distributed an open letter stating SNRC and other citizens' concerns about reduced access and use, and ESA related restrictions, were "untrue" or "misperceptions". This letter was picked up in local media with headlines stating citizens' concerns were "false". In regards to BMU core areas, Ranger Hojem's letter stated "The Amendment and Draft Forest Plan will not close these areas to the public and will not limit recreational activities by the public." This letter was distributed just prior to the comment deadline. (Attachment 2 – Ranger Hojem Letter to Community, May 4, 2012. Also see Sanders County Ledger May 9, 2012).

In the open letter to the community, Ranger Hojem presented the plan as a positive step toward "establishing appropriate motorized access to encourage recovery of grizzly bear populations while still allowing for human use in the area." However, the Plan, with the grizzly bear Access Amendment incorporated into it sets standards to establish closure of motorized routes and high use trails to minimize human activity and preclude popular forms of access for a minimum of 10 years in core areas. The Access Amendment says this about Core Area: "By definition secure habitat is an area or space outside or beyond the influence of high levels of human activity. Open roads, vegetation and fuel projects, and high-use recreational areas such as trails or campgrounds are examples of activities that reduce the amount of secure habitat that is available and may result in displacement of bears." (Page 2,

Record of Decision, Forest Plan Amendments - Motorized Access Management Within the Selkirk & Cabinet/Yaak Grizzly Bear Recovery Zone, 2011). The final plan reads, *“Once route closures to create core areas are established and effective, these core areas should remain in place for at least 10 years... newly created core area shall not be entered for at least 10 years...”* (Land Management Plan, page 150-151).

The USFS letter also downplayed closures by stating only *“18-54 miles of roads currently open may be gated or barriered”*. The final plan sets an objective to *“decommission or place into intermittent stored service 150-350 miles of road”*. (Land Management Plan, page 35).

Despite growing and widespread public concern over the Plan’s adverse effects, USFS personnel acted as if these concerns were based solely on citizens’ misunderstandings. Yet they refused to attend the next Coordination meeting with SNRC, May 15, 2012 to discuss issues deemed by USFS as key “misperceptions”. (email records, audio of the meeting, and witnesses who were present can attest to USFS’s very notable absence from this scheduled meeting).

USFS official’s public statements were misleading in regards to the plan’s many adverse impacts. Roads converted to an impassable state as required by the standards set forth in this plan will preclude access by a large segment of the public and will limit recreational activities by the public as well as inhibit commercial production. Physical barriers required by the Access Amendment are specifically designed to close routes, not establish motorized use as the Ranger stated.

Citizens who tried to obtain hard copy or disks of the final plan, or ask questions about the final plan and new objection process, could not do so during the Oct 2013 government shutdown. This diminished the public review and objection period by approximately 16 days, or 25%.

The Land Management Plan Map depicting management area types does not reveal BMU or BORZ management areas. Existing NFS roads and trails were also omitted from the Land Management Plan map. Because of omissions like this, citizens and public officials could not see where the BMU and BORZ are located in relation to other management areas, existing roads, private properties, or reasonably assess what implications the plan and designations would pose on the corresponding public and private lands and access routes.

The access amendment portion of the plan zones private and other non-NFS lands into federal Bear Management Units (BMU’s) and bears Outside Recovery Zone (BORZ) without land owner notice or consent (attachment 3). This overlap of BMU and BORZ onto non NFS lands is not disclosed on the Land Management map, nor is it within the jurisdiction of the federal government to apply land use zoning. Sanders County citizens have rejected land use planning & zoning by voter referendum, thereby making no planning and zoning the policy of Sanders County. The BMU & BORZ zoning have adversely impacted real estate values.

In April 2012, when asked why BMU maps imposed zoning on private and other non-NFS lands, KNF Supervisor Paul Bradford indicated it was simply because it would be too difficult to separate out the private properties. Ranger Hojem’s May 4, 2012 letter stated, *“Road density and core areas apply only to federal lands within the recovery zones.”* Despite pointed questions asked on the record of USFS personnel prior to the comment deadline, they refused to disclose that roads and driveways on non-NFS lands would be inventoried and included into NFS road density calculations and counted against the miles of roads allowed on nearby NFS lands. This will trigger public access restrictions in areas of closest

proximity to roaded non-NFS lands, and allow actions on private land to trigger closures on public lands. This fact was not admitted by staff until well after the comment period had expired. (SNRC audio and video tapes).

Failure to place BORZ & BMU designations on the planning map was also misleading. The absence of these designations makes the plan appear to support more general forest and motorized use areas than will be allowed under the BMU & BORZ restrictions. BORZ and BMU management areas carry significant access restrictions due to Access Amendment Road Density Standards meant to minimize human activity and prohibit motorized travel routes and high use trails on significant acreages of NFS lands. Road density standards disallow construction of new roads in core areas and require existing NFS roads to be converted to a non-functional state. This will limit public use, access, important sustenance activities, and recreation on acreages totaling in excess of 500,000.

Despite USFS denials, there is still unresolved concern that this plan will result in USFS and/or USFWS restrictions on human activities to meet Core Area, BORZ, or other standards on all lands zoned as such by the federal government, including non-NFS lands.

Timber Suitability maps were not included on the Draft Plan disks released by the USFS. It does not appear that any substantive alternatives favoring Timber Production were considered within Clark GA on the NE side of the Clark Fork River. A map of Suitable Timber lands and economic production related to the original 1987 plan compared with the new plan would have allowed citizens to surmise the true difference between the old (original 1987) forest plan and the new. Comparing economic productivity of the new plan to the depressed 3 year period 2007-09 did not provide a clear view of the planned productivity versus that which is possible.

The definition of “standard” concerning the Grizzly Bear Access Amendment that is referred to on Page 5 of the Land Management Plan was omitted from page 10. Apparently page 10 has been omitted in its entirety, so there is no way to review or comment on its content.

Sanders County (Clark GA MA) is reduced to only 42.4% General Forest, and a substantial amount of this will be restricted under the BMU & BORZ classifications. The proximity of this GA to the populated areas of Sanders County and its communities, including the county seat at Thompson Falls, will have direct bearing on local citizens, businesses, and land owners. The Draft ROD fails to recognize Thompson Falls as a community that has social, economic, and historic ties to the KNF. (Draft Record of Decision Kootenai National Forest, Page 1-2. Aug 2013).

With only 36% of the KNF to be managed for timber productivity, the plan fails to fulfill Forest Service mission “to sustain the health, diversity, and productivity of the nation’s forests and grasslands to meet the needs of present and future generations.”

Back Country Motorized Year Round use, Timber Production, and wildlife habitat enhancements are compatible. To manage for concurrent goals and uses would minimize risk of catastrophic wildfire and deadfall while increasing wildlife habitat, protecting water sheds and air quality, allowing desirable multi use access, and generating economic benefits to local communities, the state of Montana, and the United States of America. Motorized and non-motorized access can be compatible too. A rotational basis could be employed in high use areas. The acreages allotted to motorized and non-motorized uses are not equitable or reflective of user demographics.

Timber production is also compatible with many other management objectives. Selective logging enhances wildlife habitat, reduces risk of catastrophic wildfire, and provides for construction of roads that are used for multiple uses including resource management, commercial extraction, emergency access, multiple use recreation, sustenance activities, and accessibility for the elderly and persons with disabilities. The acreages allotted to timber production in Sanders County are not equitable with local needs and desires.

This plan further restricts the public's motorized access to their forest by creating both large wilderness areas, increased "Roadless areas" (Backcountry land classification), and far too many "Wild and Scenic River" designations. All of these areas involve further restrictions to the public land and most importantly, *discriminate against those that must use motorized access to use and enjoy their national forests*. In addition, many of the new backcountry areas are far from being "Roadless", since they contain numerous old mine and timber harvest roads, skid trails and undeveloped trail systems from the past.

Reduction in existing roads is an example of the violation of US Federal Regulations involving fraud, waste and abuse of taxpayer funds or assets. Each public road in the Forest, represents very expensive permanent infrastructure, bought and paid for by public resources. The elimination of any roads is the reduction of access for fire suppression, research study, forest products collection, or future mineral or timber harvest for the public good. The elimination of roads, or their abandonment, destroys permanent public infrastructure without compensation to the public, thus it represents waste of public assets, without the consideration of future economic yield those areas and roads could provide.

The creation of wilderness areas, non-motorized areas and wild and scenic rivers designation completely ignores known and proven mineral values that could dramatically impact both the State of Montana and the nation as a whole. In fact, the strategic withdrawal of mineral laden lands owned by the public weakens the ability of the United States to provide those resources for industry, tax base and national defense in a time of emergency. One proven area is the East slope and central parts of the Cabinet Mountain Range. In addition, to known metal reserves of the Troy, Rock Creek and Montanore mines, the entire east slope of the Cabinet range has proven ore reserves of copper, silver and gold which have been mined for well over 100 years. The inclusion of numerous patented lands into "Roadless, Backcountry or Wilderness lands precludes their year round access by their owners or future owners of those patented lands. No detailed geological/mineral survey or economic impact study has been performed by the USFS prior to the proposed inclusion of these and other lands into restrictive land use categories. Neither has there been a study of the negative impact on private property owners who may own land within these new land designations.

Most of the restrictive land use decisions being proposed are also not based on impartial, scientific, published, or independent peer reviewed documentation. Many of the studies cited for these restrictive land use plans use wildlife as a tactical tool to restrict land and have no scientific, practical or economic considerations as evidence.

The previous examples have not been adequately addressed in the Forest Plan thus rendering an inadequate or non-existent consideration of present and future economic benefits of the public's rights to their land. In addition, the lack of consideration, in detail, of the above points shows that due diligence has not been performed for the Forest Plan, Alternative B Modified, that is being proposed.

The Healthy Forests Act, Public Law 93-378, *to improve the capacity of the Secretary of Agriculture and the Secretary of the Interior to conduct hazardous fuels reduction projects on National Forest System lands and Bureau of Land Management lands aimed at protecting communities, watersheds, and certain other at-risk lands from catastrophic wildfire, to enhance watersheds, and certain other at-risk lands from catastrophic wildfire, to enhance efforts to protect watersheds and address threats to forest and rangeland health including catastrophic wildfire, across the landscape and for other purposes.*

The Forest and Rangeland Renewable Resources Planning Act of 1974, *provides for the Forest Service, to protect, develop and enhance the productivity and other values of certain of the Nation's lands and resources, and for other purposes.*

Lincoln, Sanders, Flathead, and Mineral County's responses to SJ15 Montana State of Survey of County Commissioners concerning federally managed lands within their counties reveal numerous and significant shortcomings which will be perpetuated by the new plan. (see Attachment 4 - SJ15 county survey results 2013), including:

- a. Current wildfire conditions on federal lands pose a significant threat to Public Health and Safety, Public Property, and Private Property;
- b. Fire hazard on federally managed lands should be reduced to protect public health and safety;
- c. Motorized access to public lands for sustenance activities such as gathering wood, picking berries, and harvesting wild game is very important to the people;
- d. Regarding multiple-use recreational access routes on federal lands, none of the counties approve of reducing multiple use access.
- e. Federal land management actions are not consistent with the counties' objectives.
- f. Conflicts exist with federal ownership or jurisdictional responsibilities.
- g. Changes in federal land management are necessary to increase economy, employment opportunities, or tax base.
- h. Federal policies for Threatened or Endangered Species are adversely impacting private land owners, businesses, industries, or citizens.
- i. Federal land management has resulted in adverse impacts to the county's economy
- j. Current fuel loads on federal lands could result in severe, uncontrollable, or catastrophic wildfires.
- k. A high intensity wildfire on federal lands is likely to cause a loss of important fish & wildlife habitat or harm Threatened or Endangered Species.
- l. PILT & SRS payments are not commensurate with taxable value or economic production capabilities.

The above responses of County Commissioners current and conditions of the Kootenai National Forest are proof that the current Forest management continues to lose economic value for the citizens of this country and are a Health, Safety and Welfare Risk to the citizens and communities in and near the lands managed by the Forest Service. There are thousands of acres of dead and dying trees that are highly susceptible to wildfire. The lack of management allows the continuation of the spread of the diseases and insect infestations, endangerment to our wildlife including Endangered Species from uncontrollable wildfires and loss of economic viability for our communities. Increasing wilderness, wilderness study areas, Roadless (backcountry), Wildlife Connectivity areas reduces management flexibility, adversely impacts forest health and economic productivity, and endangers citizens and wildlife.

The process utilized to designate Inventory Roadless Areas (IRA's) and evaluation process for wilderness characteristics applied to the IRA's currently designated on the KNF & IPHNF in Region 1 of the Forest Service are not consistent with law. 36 CFR 219.27(b): Special Designations - (b) Wilderness Area Reviews states: 'Unless federal statute directs otherwise, all undeveloped areas that are of sufficient size as to make practicable their preservation and use in an unimpaired condition must be evaluated for recommended wilderness designation during the Plan revision process. (page 443, FEIS). Historic aerial photographs for the Inventoried Roadless Areas show the existence of forest roads, and in many cases, timber harvest units. Forest roads and timber harvest units are considered development and impairment as relates to wilderness characteristics, thus disqualifying these areas from designation.

2001 Roadless Area Conservation Rule (36 CFR 294 Subpart B): The 2001 Roadless Rule establishes prohibitions on road construction, road reconstruction, and timber harvesting on inventoried roadless areas on NFS lands. If these areas were truly roadless, road reconstruction would not have been considered. When revising forest plans, national forests are required to evaluate roadless areas, consider their wilderness characteristics, and to make recommendations to Congress regarding areas suitable for inclusion into the National Wilderness Preservation System. Many of the areas currently designated as Inventoried Roadless Areas are not "roadless".

The first step in the evaluation of potential wilderness is to identify and inventory all roadless areas within NFS lands that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act. Criteria for determining whether an area of NFS land qualifies as an IRA are provided in Forest Service Handbook 1909.12 (71.1), which states: "Areas qualify for placement on the potential wilderness inventory if they meet the statutory definition of wilderness. Include areas that meet either criteria 1 and 3, or criteria 2 and 3 below. Evaluation Criteria #3 states: Areas do not contain forest roads (36 CFR 212.1) or other permanently authorized roads, except as permitted in areas east of the 100th meridian." Note the emphasis shown on the word "roadless", and the "do not contain forest roads" requirement for evaluation criteria #3. Areas which contain forest roads, and timber harvest units clearly do not meet the definition of wilderness found in section 2(c) of the 1964 Wilderness Act.

The old plan as amended and new plan as proposed are clearly not consistent with state, federal, and local law, including FLPMA's requirement for local planning, multiple use, and sustained yield. Executive Order 13575 was violated in the case of coordinating with SNRC. Significant information and adverse impacts of the plan were concealed in violation of 18USC1001. Best science and factual evidence were ignored. Very poor, outdated, and biased data was used instead.

Public notice and information presented to local citizens and land owners was not reasonable or forthright. By leaving significant features and designations off the land management map, inappropriately classifying IRA and Proposed Wilderness, failing to fully answer pertinent questions, and publicly decrying citizens' expressed concerns as "misperceptions", the public was deterred from understanding the true reasoning and impacts, meaningfully participating in draft comments, and effecting outcomes that could have resulted in a plan which properly balances public interests with responsible resource management.

For these reasons, as well as the comments and objections submitted by Paul C. Fielder, Sen Greg Hinkle, and SNRC, I object to the public process and all portions of the plan which unnecessarily restrict public access, multiple use, and beneficial management of these lands and the natural resources they hold. Much like the copiously amended 1987 plan, the direction of this plan will cause further economic hardship in our local communities while exacerbating decline in forest health, dangerous wildfires, pest

epidemics, and significant adverse impacts to our environment, including water, air, and Endangered species.

## **Suggestion for Improvement:**

Ideas to resolve the objections to these plans begin with stopping all activities which further diminish public access, multiple use, the ability to reduce risk of catastrophic pests, wildfire, drought, and prohibition of economic productivity in areas where sustained yield and viable production are physically possible -- until and unless the necessity to diminish these beneficial activities is proven absolutely necessary. Instead of managing our natural resources to please neo-environmentalists and avoid threats of their frivolous lawsuits, follow the law fully and stand strong in favor of managing to fulfill your agency's mission and purpose for being. This is not "restoration". It is "to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." (USFS Mission Statement). Letting the forest rot and burn is not responsible stewardship and does not fulfill this mission.

Second, remove socio-economic references and analysis based on the recent and short 3-year period and instead compare the degree of multiple use access, economic productivity, and socio-economic impact analysis to the original 1980-era plan. Using the 1987 plan as amended some 80 something times to reflect the current state of affairs, and then saying there's little change between the new plan and the old plan (as amended) is deceiving. Also identify projected revenues associated with lands where economic production is prohibited under the new plans despite the land being physically capable of sustaining economic production as it was under the original 1987 plan.

Third, show proposed BMU & BORZ management areas on Land Management maps. Remove non-NFS lands from BMU & BORZ zoning and management designations. Confine plans, zones, and inventories to NFS lands and related planning requirements. Do not count non-NFS travel routes against NFS road density standards. Clearly show all roads and trails on Land Management maps, indicate and inventory which roads and trails are subject to closure or removal to meet proposed BMU/BORZ or other management standards. Indicate which roads and trails are guaranteed to remain intact and open. Identify NFS lands physically suitable for timber production that will not be eligible for timber production in relation to BORZ, BMU, and other management driven constraints. Demonstrate mandate for BORZ designation or remove BORZ designations in entirety.

Fourth, ensure USFWS Recovery Goals and Road Density Standards and any other mandates placed on KNF & IPNF reflect best available science instead of promulgating old, outdated, and flawed science which is clearly biased toward implementing access and use restrictions instead of managing for favorable habitat quality and acceptable levels of multiple use. Ensure blind peer review and standard statistical confidence interval of .05, and other scientific standards are followed in accordance with protocols typical of publication in credible scientific journals. In that regard scrutinize methods and conclusions of Wakkinem-Kasworm (1997) report, particularly the use of substandard .10 statistical confidence interval, ignorance of food/habitat preferences, and related conclusions which used by IGBC to promote bias toward road closures in the face of contrary evidence per Waller (2005). Adjusts OMRD, TMRD, and Core Area based on credible, best science, including Waller (2005) and USGS DNA study. Do not authorize any further obliteration of access routes, reductions in management flexibility, or prohibition of economic production unless best science or observable evidence proves the absolute necessity. Leave roads intact wherever possible so they remain available for cost-effective access serving

emergency use, resource management, future resource utilization, and appropriate public uses, including walking, carts, and bicycling in non-motorized areas.

Fifth re-evaluate all areas on the KNF & IPNF currently classified as Inventoried Roadless, Back County Non-Motorized, and proposed Wilderness in accordance with actual law. Remove all acres within IRA and Proposed Wilderness which physically contain roads. Once this process has been completed, adjust boundaries and acreage figures to honestly reflect actual “roadless” areas. A Wilderness suitability assessment can then be completed on the actual Inventoried Roadless areas which are truly roadless.

Sixth, acknowledge errors in Ranger Hojem’s May 4, 2012 letter and render a correction accordingly. Clearly summarize and communicate to the local public the areas subject to restricted use and access types, prohibited economic productivity, and limitations on management flexibility. Concisely compare the restrictions of use, productivity, and access types of new plan to original 1980’s era plan. Hold public Town Hall style meetings in affected rural communities to fully explain the differences between the new plan and the original 1980’s plan, and answer questions. Accept public comment from local residents for up to 90 days after the public meeting. Provide notice of plan status/informational updates, comment periods, and public meetings in *local* newspapers, community calendars, bulletin boards, and mail/email notice to interested persons and local persons who live or own land within 20 miles of the subject forest.

Seventh, prove ownership and jurisdiction related to affected lands, management designation types, and all actions associated with developing and implementing the plans and enforcing restrictions.

Finally, coordinate plan content with local counties and elected officials to make plans consistent with the objectives of local government. Adhere to all constitutional laws, and develop a plan that effectively meets the Forest Service mission “to sustain the health, diversity, and productivity of the nation’s forests and grasslands to meet the needs of present and future generations.”

## **Link between prior substantive comments and current objections:**

I was assigned comment #330 on the KNF Plan. My comments were not recognized on the IPHNF Plan, although the subject line of my comment letter referenced the Draft Kootenai and Idaho Panhandle National Forest Plans, Environmental Impact Statements, Cabinet-Yaak Grizzly Bear Recovery Zones and ROD. The following excerpts are the primary points made in my comment submittal, dated May 7, 2012 (Attachment 5):

The public involvement process failed to clearly inform the public of the looming restrictions on public and private lands and the resulting reduction in citizens’ ability to access, harvest, and use natural resources on our public lands.

The federal government did not adequately contact affected citizens and land owners. The limited public notice and meetings were not sufficient to inform the affected citizens of the details of these massive plans which will directly and adversely impact our quality of life, livelihoods, economy, private property, public lands, and ultimately the survival of rural America. For example, I have not met anyone from the general public who knew about the Grizzly Bear Amendment until a citizens group called Sanders Natural Resource Council advertised for a Town Hall Meeting on the subject last week.

CD's did not include all of the relevant material such as the Timber Suitability Maps or all of the referenced alternatives and background reports.

The affected public was given very little time to become aware of the documents, obtain copies, sort through the numerous relevant documents, discuss and debate the content, or begin to understand the consequences of these planning documents. The most imperative information contained in the plans is buried so deep and spread around in such a convoluted format that it will take much more time to unearth and sort out all of the significant information.

Historic economic data must be incorporated, not just a recent 3 year period.

Federal land management plans and decisions fail to analyze or acknowledge the cumulative adverse socio-economic impact these Federal actions have had, are having, and will have on citizens, land owners, and the local, regional, and national economy. Years of federal agency staff time and hundreds of pages of reports are based on the study and analysis of 6 grizzly bears.

Federal intentions to create Grizzly Bear densities higher than Yellowstone National Park in the Kootenai are surprising to say the least. Unlike Yellowstone Park, the Kootenai National Forest and your agency's Grizzly Bear Recovery Zone & BORZ boundaries encompasses homes, farms, ranches, residents, citizens, schools, and entire communities.

The federal opinion that closing Roads and Trails is the most important factor affecting grizzly bear habitat seems to overlook the simple fact that food is the primary driver for where a bear chooses to go. Grizzly Bears are known to go where the food is whether there is a road, trail, or campground there or not. If our forest had more bear food, more grizzly bears would be here. The dense natural forests, small streams, and low elevations found in NW Montana do not afford the abundance of fish, game, carrion, alpine forage, open space, berry patches, and other greenness factors Grizzly Bears prefer. If this abundance was here, more grizzlies would be here – naturally. Your own report states that motorized vehicle trips every other day did not have any effect on grizzly bear distribution in the Flathead, yet your plan's entire focus seems bent on closing roads and trails. If land managers truly wanted to increase Grizzly Bear habitat, wouldn't it make sense to implement forestry practices, such as selective logging, which stimulates forest health and biological diversity including berry patches and meadow forage?

Sixth, the levels of planned OMRD, TMRD, and Core Area restrictions far exceed what the bear study data indicates is necessary. Five of six bears utilized habitat with core area values of less than or equal to 55%, yet you mandate core areas of 55% to 71%. Three of six bears used habitat with TMRD values greater than or equal to 26%, yet you mandate TMRD at less than 26%. Four of six bears used habitat with OMRD values of greater than or equal to 33%, yet you mandate OMRD levels at less than 33%. It seems you err in favor of more closure than necessary rather than adequate closure.

Seventh, closing and obliterating existing roads will not only restrict access and harvest of natural resources, adversely affecting human sustenance, this action will reduce public safety by eliminating emergency access, escape routes, firebreaks, and wildfire fighting capabilities. Many forest roads were built with our tax dollars for these purposes. It will be incredibly wasteful to spend our tax dollars now to obliterate these routes.

Finally, this plan seems to needlessly restrict human activities while doing little to actually improve habitat for endangered species, forest health, other wild animals, or socio-economic conditions. It

appears the agenda of this forest plan is not driven by sound biological principles, or balanced with socio-economic analysis, nor does it allow for meaningful public involvement in the planning process. The planning documents and the staff have not properly considered all alternatives or provided a clear or forthright description of the consequences of the selected management decisions upon affected citizens, economy, public safety, or forest biology. To be acceptable, the planning process must initiate a much more proactive approach to public involvement, sound science, socio-economic analysis, comprehensive land planning principles, and result in clear, concise answers to public concerns. Sifting through 1135 pages and numerous maps covering millions of acres to find the answers is not acceptable.

**OBJECTION SUBMITTED 11/25/13 BY:**

A handwritten signature in black ink that reads "Jennifer Fielder". The signature is written in a cursive, flowing style.

Signature: Jennifer Fielder (all rights reserved)