

BOARD OF COUNTY COMMISSIONERS

LINCOLN COUNTY

STATE OF MONTANA

ANTHONY J. BERGET, Commissioner
DISTRICT NO. 1, LIBBY

RON DOWNEY, Commissioner
DISTRICT NO. 2, TROY

MIKE COLE, Commissioner
DISTRICT NO. 3, EUREKA

TAMMY D. LAUER
CLERK OF THE BOARD AND COUNTY RECORDER

Date: November 6, 2013

To: USDA Forest Service, Objection Reviewing Officer.

From: Lincoln County Montana Commissioners

Subject: Objections to the Kootenai National Forest 2013 Forest Plan Revision, Environmental Impact Statement, Appendices, and Record of Decision, being submitted by the Lincoln County Montana Commissioners, representing the citizens of Lincoln County Montana.

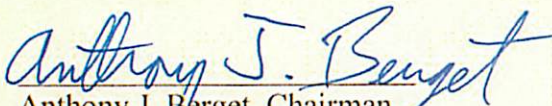
Sir/Ms.,

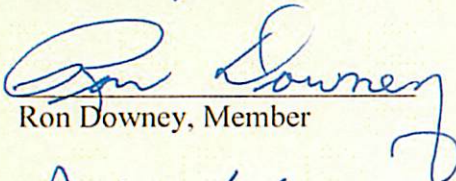
Attached to this letter are the objections to the above referenced documents that have been formulated by the Lincoln County Commissioners. We would ask that you carefully consider both the contents of these objections, and the solutions proposed, when reviewing our objections.

We sincerely hope that the objection review process will recognize the validity of our objections, and recommend alterations to the land management proposals identified in those objections.

Respectfully,

Board of County Commissioners, Lincoln County, Montana


Anthony J. Berget, Chairman


Ron Downey, Member


Mike Cole, Member

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14-13-00-0021

**Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision
Objection #1**

Objectors Name: Lincoln County Commissioners
Address: 512 California Avenue, Libby MT 59923
Phone # or E-mail address: (406) 283-2319
Name of lead objector (if more than one): All Commissioners are equal objectors

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

We believe that the plan inadequately considers the economic impacts that the management policies proposed in Alternative B modified will have on the residents of Lincoln County Montana.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are:

1. The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for recreation on the KNF. There is absolutely no way that these economic outputs can be met when the KNF is proposing to further restrict recreational access to 333,800 acres (15%) of the KNF.
2. The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for timber outputs on the KNF. Paragraph #1 on page 21 of the ROD states that the average volume sold over the KNF over the last five years was 44.9 MMBF/year. Paragraph 2 states that the revised plan provides for a predicted annual volume sold of 47.5 MMBF/year. Given these numbers, which we believe to be relatively accurate, how does the KNF explain how the predicted output levels for sawtimber on the KNF (page 48, Table 21 of the FEIS Appendices) will increase from the current level of 34,005 CCF to the predicted level of 87,137 CCF? This analysis is obviously flawed and inaccurate.
3. The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for wildlife and fish on the KNF. The largest portion of these outputs is generated from big game hunting activities. Given the fact that the habitat productivity, with respect to big game species, has steadily declined on the majority of KNF lands over the last decade, it is not surprising that big game population numbers have followed this trend. (We believe that the lack of forest management has been the primary reason for these habitat declines). Give the fact that big game populations are the primary driver for Wildlife and Fish economic outputs, and the fact that both big

game habitat, and population numbers are currently on a downward trend, how can the KNF possibly forecast increased future economic for Wildlife and Fish on the KNF, without first having a solid plan in place that will reverse those trends. We do not believe such a plan is reflected in the 2013 KNF Land Management Plan.

4. Page 8 of the KNF FEIS states: "The management direction in the 1987 Forest Plan emphasized the production of timber, with the majority of MAs allowing or promoting timber management. In the 1990s, the Forest Service began to focus on ecosystem management and ecological sustainability. This change in policy and direction resulted in a decreased emphasis on commercial timber production and an increased emphasis on timber harvest as a tool to restore vegetation or as a means to address other resource requirements or needs. There is a need to reanalyze timber harvest levels and revise them."

We would like to see the economic analysis which was done on the impacts to rural economies as a result of this "change in policy", before the policy was implemented. Is such an analysis not a requirement of NEPA? We believe that this "change in policy", is in direct violation of the Multiple Use Sustained Yield Act of 1960.

Proposed Solution

1. The KNF should review the management area proposals for MA1b - Recommended Wilderness and MA5a - Backcountry non-motorized Year-round. The acres recommended under these management classifications should be re-evaluated and with the consideration that further restrictions to recreational access on KNF lands, will have negative economic implications for Lincoln County Montana. In order to accomplish this, the KNF will need to re-evaluate the Inventoried Roadless Areas which lie within the areas recommended for the above referenced Management Areas, and remove all acres with those IRA's which currently have roads within them, regardless of whether or not those roads are currently recognized in the KNF's road data base or travel map.

2. The KNF should seek funding, and strive to achieve at a minimum timber outputs equal to the ASQ of 80.2MMBF/year which is outlined in paragraph 2 on page 21 of the ROD. It is our belief that the revenues generated from this level of harvest would more than cover the budget shortfalls that the KNF currently claims are preventing the KNF from achieving this higher ASQ output.

3. The KNF needs to develop and implement vegetation management strategies which are designed to improve big game habitat productivity.

Statement demonstrating the link between the objection and prior formal

comments: Our comments, (#351), specifically addressed our concerns on this matter.

Signature: Anthony J. Baggett

Signature: Don Danner

Signature: Mike Cole

**Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision
Objection #2.**

Objectors Name: Lincoln County Commissioners
Address: 512 California Avenue, Libby MT 59923
Phone # or E-mail address: (406) 283-2319
Name of lead objector (if more than one): All Commissioners are equal objectors

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

We object to the amount of timber harvest volume that the KNF Forest Plan forecasts to offer as a stated objective, (47.5 MMBF/year), over the first decade of the plan. We believe that this volume should be much higher, and that the KNF is easily capable of both producing, and harvesting timber at a much higher level than what has been forecast in this plan.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are:

1. Page 21, paragraph 1 of the ROD states that the established allowable sale quantity (ASQ) in the 1987 Forest Plan was 227 MMBF/year. This paragraph also states that this ASQ was adjusted in 1995 to 150 MMBF/year in response to a Forest Plan appeal. Despite having an adjusted ASQ of 150 MMBF/year, the KNF has only produced an average of 44.9 MMBF/year over the last 5 years. There is little doubt that the KNF is more than capable of producing well over 100 MMBF/year at a sustainable rate over a long period of time, without compromising any of the other resource values present on the KNF, including water quality, and fish and wildlife. Given these facts, harvesting timber at a rate of less than 1/3 the ASQ over this period of time is simple unacceptable to both the overall health of the KNF, and the economy of Lincoln County Montana.
2. Page 21, Paragraph 2 of the ROD states that: "The revised Plan outlines the ASQ as 80.2 MMBF/year over the first decade. The revised Plan also provides a predicted annual volume sold of 47.5 MMBF/year. This number, 47.5 MMBF/year, is also listed as the objective for annual estimated predicted volume sold, on page 38 of the revised Plan. It is stated in the ROD that this number is based on current budget levels. There is simply no excuse for the KNF to have a stated objective for timber harvest that is only 60% of the stated ASQ for the Forest. The timber receipts that would be collected by increasing harvest levels from 47.5 MMBF/year to a level closer to the stated ASQ of 80.2 MMBF/year would more than cover the current budget shortfall which the KNF claims is dictating the lower harvest levels. In addition, there would be numerous other benefits to the economies of Lincoln County Montana, the State of Montana, and the United States as a whole, from the KNF harvesting timber at higher levels.

3. Page 8 of the KNF FEIS states: “The management direction in the 1987 Forest Plan emphasized the production of timber, with the majority of MAs allowing or promoting timber management. In the 1990s, the Forest Service began to focus on ecosystem management and ecological sustainability. This change in policy and direction resulted in a decreased emphasis on commercial timber production and an increased emphasis on timber harvest as a tool to restore vegetation or as a means to address other resource requirements or needs. There is a need to reanalyze timber harvest levels and revise them.

We believe it can be assumed that this “re-analysis” is what was used to determine the annual ASQ of 80.2 MMBF. Given these facts, there is absolutely no reason that the KNF should not have the 80.2 MMBF as their stated objective for annual timber harvest. The above paragraph also states that the Forest Service is now focusing on ecosystem management and ecological sustainability. To our knowledge there is no credible science currently in existence that proves that these higher levels of timber harvest on the KNF are not ecologically sustainable. The paragraph quoted above also states that there is an “increased emphasis on timber harvest as a tool to restore vegetation”. If this is truly the case, there is currently no shortage of acres on the KNF which could use some vegetation restoration. In addition, given the history of fire suppression on the KNF, there are currently thousands of acres on the KNF that if not treated with mechanical vegetation management strategies sometime in the near future, will likely be burnt up by wildfires. Judging from the paragraph quoted above, it appears that allowing large scale, high intensity wildfires to decimate thousands of acres on the KNF, would be the exact opposite of what the KNF has states as the “new direction” for timber management.

4. Page 133 of the revised plan, under Timber states:

“Timber management is used to move vegetation towards desired condition and to reduce fuels. Activities for timber management may include the following:

- Intermediate timber harvest (commercial thinning, improvement cutting, etc.);
- Regeneration harvest with treatments that are even-age in nature (clearcut, or two-age regeneration), or uneven-age (group selection or single tree selection); and
- Salvage of dead or dying timber.

The predicted volume sold (under current budget levels) is 47.5 MMBF/year. It is anticipated that an average of 5,700 acres per year would be harvested to achieve this timber volume and move vegetation towards desired conditions.”

At this harvest level, given a 100 year harvest rotation schedule, (likely longer than needed on the majority of the KNF), 570,000 acres or (25.6%) of the KNF, would be managed for timber production. Given the fact that these lands can easily be simultaneously managed for the benefit of both fish and wildlife, and water quality, as well as many other resources, it is unacceptable that the other 74.4% of the KNF would essentially be managed with fire as the primary vegetation management tool. Wildfire not only has a high potential to damage the fish, wildlife, and water resources present on

the KNF, but emissions from those fires will unnecessarily contribute large amounts of carbon to the earth's atmosphere.

Proposed Solution

1. The KNF needs to redefine their objective for the annual timber volume offered in the plan to a level closer to the stated 80.2 MMBF ASQ, and increase budget levels devoted to timber harvest to whatever is necessary to meet that objective.

Statement demonstrating the link between the objection and prior formal

comments: Our comments, (#351), specifically addressed our concerns on this matter.

Signature: Anthony J. Berget

Signature: Don Dorney

Signature: Mike Gb

**Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision
Objection #3.**

Objectors Name: Lincoln County Commissioners
Address: 512 California Avenue, Libby MT 59923
Phone # or E-mail address: (406) 283-2319
Name of lead objector (if more than one): All Commissioners are equal objectors

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

We object to the fact that the KNF did not consider all county plans as the planning process developed, and did not sufficiently consider the input provided by Lincoln County when formulating the KNF Revised Plan.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are:

Page 12 of the KNF FEIS under County Governments states; “Beginning with initiation of the planning process, local government officials from the counties within the KNF lands were invited to participate in Forest Plan development. All county plans were considered as the planning process developed.”

Although the Commissioners will not deny the fact that Lincoln County officials were invited to participate in Forest Plan development, were allowed to provide comments on the Draft KNF Forest Plan, and met with KNF Forest Supervisor Paul Bradford on several occasions to discuss the contents of the plan, Lincoln County commissioners do not believe that their input regarding the KNF plan was sufficiently considered by KNF officials when formulating the Final KNF Plan Revision.

Despite the fact that the input provided by the Lincoln County Commissioners represents the residents of Lincoln County Montana, (76% of which is contained within the KNF), who will be more significantly impacted by the forest management policies implemented by the plan than any other citizens of the United States of America, (other than the residents of Sanders County who will be equally impacted), KNF officials failed to incorporate the vast majority of that input into the Final KNF Plan Revision. The voices of those citizens of this county who will be most impacted by this Plan seemed to make no difference to the KNF officials responsible for formulating the plan. The fact that Lincoln County was “invited to participate”, and “allowed to comment”, means absolutely nothing when we examine the fact that our “participation”, and comments were virtually ignored by the KNF officials responsible for formulating the plan.

Proposed Solution

The KNF needs carefully review all of the objections offered by the Lincoln County Commissioners (representing the citizens of Lincoln County Montana), as well as input previously supplied by the Commissioners in meetings with the KNF Forest Supervisor, and as comments to the Draft Plan. After reviewing both the objections, and previous input, KNF officials need to incorporate those inputs into the Final Plan based on the many FACTS which have been provided in the objections.

Statement demonstrating the link between the objection and prior formal

comments: This is a new issue which could not be identified until the Final KNF Plan Revision was released.

Signature: Anthony J. Basset

Signature: Ben Bauney

Signature: Mike GGG

**Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision
Objection #4.**

Objectors Name: Lincoln County Commissioners.
Address: 512 California Avenue, Libby MT 59923.
Phone # or E-mail address: (406) 283-2319.
Name of lead objector (if more than one): All Commissioners are equal objectors.

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

I object to the proposal to manage Big Creek, Little North Fork Big Creek, Good Creek, North Fork Big Creek, Copeland Creek, Drop Creek, South Fork Big Creek, East Branch of South Fork Big Creek, West Branch of South Fork Big Creek, Yaak River, West Fork Yaak River, Vinal Creek, Bull River, North Fork Bull River, Middle Fork Bull River, Bighorn Creek, East Fork Bull River, and Vermillion River as Management Area 2 – Eligible Wild, Scenic and Recreational Rivers.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are this:

1. The Wild and Scenic Rivers Act of 1968 states that streams proposed for designation under the W&S rivers act must “possess an outstandingly remarkable river related value that is a unique, rare, or exemplary feature that is significant at a comparative regional or national scale”. We do not believe that the KNF has adequately demonstrated that the streams listed above “possess an outstandingly remarkable river related value that is a unique, rare, or exemplary feature that is significant at a comparative regional or national scale”.
2. The KNF has not given priority to the rivers evaluated for Wild and Scenic River designation in the manner that was specified for in the Wild and Scenic Rivers Act. Page 4 of the Wild and Scenic Rivers Act of 1968 states:
“Such studies shall be completed and such reports shall be made to the Congress with respect to all rivers named in subparagraphs 5(a) (1) through (27) of this Act no later than October 2, 1978. In conducting these studies the Secretary of the Interior and the Secretary of Agriculture shall give priority to those rivers
(i) with respect to which there is the greatest likelihood of developments which, if undertaken, would render the rivers unsuitable for inclusion in the national wild and scenic rivers system, and
(ii) which possess the greatest proportion of private lands within their areas. Every such study and plan shall be coordinated with any water resources planning involving the same river which is being conducted pursuant to the Water Resources Planning Act (79 Stat. 244; 42 U.S.C. 1962 et seq.). Each report, including maps and illustrations, shall show among other things the area included within the report; the characteristics which do or

do not make the area a worthy addition to the system; the current status of land ownership and use in the area; the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area were included in the national wild and scenic rivers system; the Federal agency (which in the case of a river which is wholly or substantially within a national forest, shall be the Department of Agriculture) by which it is proposed the area, should it be added to the system, be administered; the extent to which it is proposed that such administration, including the costs thereof, be shared by State and local agencies; and the estimated cost to the United States of acquiring necessary lands and interests in land and of administering the area, should it be added to the system. Each such report shall be printed as a Senate or House document.”

3. The majority of the water bodies being proposed for Wild and Scenic RIVER designation in the KNF Forest Plan are not RIVERS, and therefore should not be considered as eligible for Wild, Scenic or Recreational RIVER designation.

The following RIVERS are the original eight rivers that were designated as Wild, Scenic, or Recreational under the Wild and Scenic Rivers Act of 1968.

Clearwater River, Middle Fork, Idaho.

Eleven Point River, Missouri,

Feather River, Middle Fork, California

Rio Grande River, New Mexico

Rogue River, Oregon

St. Croix River, Minnesota and Wisconsin

Salmon River, Middle Fork Idaho

Wolf River Wisconsin

Since these original eight RIVERS were designated as Wild, Scenic or Recreational under the Wild and Scenic RIVERS Act, numerous other RIVERS have been added to this list. The vast majority of water bodies being proposed for Wild, Scenic and Recreational RIVER designation within the KNF Forest Plan are small streams and creeks. When you evaluate the streams and creeks being proposed by the Kootenai National Forest relative to those RIVERS currently designated as Wild, Scenic, or Recreational under the Wild and Scenic Rivers Act, it is clear that the KNF evaluation process for Wild, Scenic and Recreational river eligibility DOES NOT conform with the original intent and spirit of the Wild and Scenic Rivers Act. Given this FACT, these streams and creeks should not be eligible for Wild, Scenic, or Recreational River designation.

4. The evaluation process utilized by the KNF to determine eligibility for inclusion of a water body into the Wild and Scenic River system is conflicting and fundamentally flawed.

Pages 323 & 324 of the KNF Draft EIS, Table 71, shows the Big Creek System segments 1 thru 7 as having “Scenery & Recreation” as the “outstandingly remarkable” value.

In direct conflict to this, the KNF Wild and Scenic Rivers - Initial Assessment for Eligibility (3/9/2005), states:

- * Big Creek South Fork as a NO for Recreation Value.**
- * Big Creek South Fork East Branch and West Branch, as a NO for Scenery Value.**
- * Copeland Creek as a NO for both Scenery & Recreation Values.**
- * East Fork Lookout Creek as a NO for Recreation Values, and does not evaluate the Unnamed tributary to Lookout Creek.**

In direct conflict with previous statements, the KNF Final EIS, page 476, Table 122, shows the Big Creek System segments 1 thru 7 as having "Recreation" as the "outstandingly remarkable" value.

Pg 477 of the KNF Final EIS, Table 123, shows the North Fork of the East Fork Bull River segments 1&2, as having "Scenery" as the "outstandingly remarkable" value.

In direct conflict to this the KNF Wild and Scenic Rivers - Initial Assessment for Eligibility (3/9/2005), shows the Bull River NFEF as a NO for both Scenery & Recreation Values.

Pg 325 of the KNF Draft EIS, Table 72, shows the Quartz Creek System segments 1 thru 3, as having "Scenery" as the "outstandingly remarkable" value.

In direct conflict to this The KNF Wild and Scenic Rivers - Initial Assessment for Eligibility (3/9/2005), shows the Quartz Creek and the West Fork Quartz Creek (Quartz Creek Segments 2 & 3 in the evaluation), as a NO for Scenery Value.

In direct conflict with previous statements, the KNF Final EIS, page 477, Table 123, states that "Fisheries and Botany" are the "outstandingly remarkable" values found in all segments of Quartz Creek.

Pg 325 of the KNF Draft EIS, Table 72, shows the West Fork Yaak River, segments 1 & 2, as having "Scenery & Recreation" as the "outstandingly remarkable" values.

In direct conflict to this, The KNF Wild and Scenic Rivers - Initial Assessment for Eligibility (3/9/2005), shows the West Fork of the Yaak River as a NO for both Scenery & Recreation Values.

In direct conflict with previous statements, the KNF Final EIS, Page 478, Table 123 states that "Scenery and History" are the "outstandingly remarkable values found in all segments of the West Fork Yaak River

Pg 324 of the Draft EIS, Table 72, shows the Grave Creek System segments 1 thru 4 (including Stahl Creek, Clarence Creek & Blue Sky Creek), as having "Scenery and History" as the "outstandingly remarkable" values.

In direct conflict to this the KNF Wild and Scenic Rivers - Initial Assessment for Eligibility (3/9/2005), states that:

- * Grave Creek as a NO for both Scenery & History Values.**
- * Stahl Creek as a NO for both Scenery & History Values.**
- * Clarence Creek as a NO for both Scenery & History Values.**
- * Blue Sky Creek as a NO for both Scenery & History Values.**

In direct conflict previous statements, the KNF Final EIS, Page 477, Table 123 states that "Fisheries" are the "outstandingly remarkable" values found in all segments of Grave Creek.

Questions:

How is it possible that the "outstandingly remarkable" values of so many stream segments could have changed so drastically in the short period of time between the Initial Assessment for Eligibility and the writing of the KNF Draft EIS?

How is it possible that the "outstandingly remarkable" values of so many stream segments could have changed so drastically in the short period of time between the KNF Draft EIS and KNF Final EIS?

5. The public was not given the opportunity to properly review the KNF study reports as is required by section 4(b) of the Wild and Scenic Rivers Act.

Taken From "National Wild and Scenic River, Final Revised Guidelines for Eligibility, Classification, and Management of River Areas. Federal Register, Tuesday September 7, 1982.

Pg 4 – The Study Process

"The purpose of a wild and scenic river study is to provide information upon which the President can base his recommendations and Congress can make a decision.

The Study Report

"Each river study report will be a concise presentation of the information required in sections 4(a) and 5(c) of the Act."

"Study reports will be reviewed by other Federal agencies, states, and the public as required by section 4(b) of the W&SRA."

Proposed Solution:

The final KNF plan should be altered to remove all streams listed above for Wild, Scenic and Recreational river consideration until such time as the KNF can provide an adequate explanation of the conflicts and questions identified above, and can provide a precise description of each stream segment's "outstandingly remarkable" value, as well the evaluation process that determined such value, and definitive evidence of why that value is "a unique, rare, or exemplary feature that is significant at a comparative regional or national scale".

Statement demonstrating the link between the objection and prior formal

comments: Our comments (#351), on the KNF Draft Plan specifically addressed these issues.

Signature: Anthony J. Basset

Signature: Sam Dawson

Signature: Mike G.C.

**Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision
Objection #5.**

Objectors Name: Lincoln County Commissioners.
Address: 512 California Avenue, Libby MT 59923.
Phone # or E-mail address: (406) 283-2319.
Name of lead objector (if more than one): All Commissioners are equal objectors.

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

We object to proposal within the KNF Forest Plan Revision to designate Roderick, Whitefish Divide, Scotchman's Peak, and attachments to the existing Cabinet Mountain Wilderness as "Recommended Wilderness". We also object to the proposal to manage the southern portion of the Whitefish Divide area as MA5a - Backcountry non-motorized year round.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are:

1. The process of evaluating and designating the "Inventoried Roadless Areas" that these Recommended Wilderness Areas are contained in was flawed. When you examine historic aerial photographs you can clearly see both roads and past management activities, (including numerous timber harvest units), in all of these area. Considering this FACT, regardless of whether or not the Forest Service has taken these roads out of their data base, and off the map, they still exist. Therefore, many acres within these areas should not have been considered for "Roadless" evaluation.
2. The process of evaluating the Inventoried Roadless Areas for wilderness characteristics was flawed as these areas do not meet the definition of Wilderness as described in The Wilderness Act of 1964. These areas DO NOT "generally appear to have been affected primarily be the forces of nature with the imprint of man's work substantially unnoticeable". Examination of aerial photographs of these areas shows that the imprint of man's work is quite noticeable in the form of logging roads, and old timber harvest units. These areas DO NOT "have outstanding opportunities for solitude or a primitive and unconfined type of recreation". These areas are relatively small and do not have either the size or characteristics to offer the opportunities as defined. (Reference – The Wilderness Act of 1964)
3. We have been told that the current Region 1 management policy for Recommended Wilderness Areas is to manage those areas in exactly the same fashion as if they were congressionally designated Wilderness. We believe that this management policy is unlawful because it illegally circumvents the power of the Congress of the United States, and the laws regarding wilderness management as they are currently written.

4. If the lands adjacent to the existing Cabinet Mountains Wilderness Area, truly possessed the wilderness characteristics as defined in the Wilderness Act, why were they not included in the original designation of Wilderness for that area. Considering the FACT that these lands were not included in the original designation one can only conclude that these areas DO NOT possess the wilderness characteristics as defined in the Wilderness Act.

5. The Record of Decision for the 2013 Kootenai Forest Plan Revision stated that the Roderick Area's proposal for Recommended Wilderness management had the support of a local stakeholder group. This is not true. Several members of the above referenced stakeholder group, including Lincoln County and F.H. Stolze Lumber Company, do not support this proposal.

6. Recommended Wilderness management for these areas would be detrimental to local economies. The rural economies in these areas benefit from the diversity of both summer and winter recreational opportunities currently offered on these lands. Managing these lands under Recommended Wilderness management policies would significantly decrease the diversity of both summer and winter recreational opportunities available in these areas, thereby negatively impacting local economies. We believe that the economic analysis performed by the KNF in relation to the impacts of managing these areas as "Recommended Wilderness", was inadequate.

7. This management policy for these areas has the potential to have negative impacts on Grizzly Bear habitat. The Grizzly Bear is currently listed as a threatened species under the Endangered Species Act. The Cabinet-Yaak grizzly bear population is considered a distinct population segment by the USDI Fish and Wildlife Service. This population is considered particularly sensitive by the FWS considering the fact the number of bears contained within this population has not increased in the same manner as populations throughout the rest of the Northern Continental Divide Ecosystem since the listing of the Grizzly Bear under the ESA. Given these FACTS, management of these areas with the standard "let it burn" policy given to the management of wild fires in wilderness areas, has a high potential to damage critical grizzly bear habitat in such a way as to significantly decrease both the quality and availability of grizzly bear habitat in these areas. In addition, it has been proven that mechanical vegetation management strategies can be effectively utilized to improve grizzly bear habitat conditions, and therefore increase the carrying capacity of grizzly bears for a given area. Management of these areas as "Recommended Wilderness" would effectively restrict the Forest Services ability to manage vegetation to improve grizzly bear habitat.

8. The southern portion of the Whitefish Divide area is contained within the towns of both Eureka's and Fortine's municipal watershed. Given this fact, vegetation management options necessary to mitigate the potential impacts on these watersheds need to be considered. In addition, this area is important for winter motorized recreation including trapping and snowmobiling. Restricting motorized use in these areas would force more motorized use into adjacent lands including the Ten Lakes Wilderness Study

Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision Objection #6.

Objectors Name: Lincoln County Commissioners
Address: 512 California Avenue, Libby MT 59923
Phone # or E-mail address: (406) 283-2319
Name of lead objector (if more than one): All Commissioners are equal objectors

Name of the plan revision being objected to and the responsible official:
Kootenai National Forest Land Management Plan 2013 Revision.
Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:
We object to the KNF's proposal to manage portions of the town of Eureka's municipal watershed as MA1b – Recommended Wilderness. We also believe that this proposed management policy is a violation of the Clean Water Act.

Statement explaining the objection and how the proposed plan should be altered:
The Whitefish Divide recommended wilderness management proposal in the current KNF forest plan lies within the town of Eureka's municipal watershed. When considering the potential impacts on the water quality within that watershed in the event of a catastrophic fire event, this proposed management policy is simply unacceptable for this area. As documentation of those potential impacts, we have attached to this objection excerpts from numerous scientific studies which discuss in detail the effects of fire on water quality. Please note that many of these studies were conducted by experts employed by the USDA Forest Service. Considering that a local fire ecology expert employed by the Forest Service has publicly stated that "this portion of the Whitefish Range is overdue for a large scale and severe fire event", the KNF needs to realize that a catastrophic fire event in this areas is not just a possibility, but a probability, and manage those lands which supply drinking water to the citizens who live near the KNF in a manner which best protects the long-term quality and quantity of that water.

In addition:

Page 15 paragraph 4 of the Draft ROD states; **"Forest Service Handbook direction includes the requirement to protect water quality and abate or mitigate adverse water quality impacts while meeting other resource goals and objectives (FSH 2509.22)."**

Considering the significant risk that a large scale and severe fire event poses to the water quality within the Whitefish Divide area, we do not believe that the forest management proposals for the town of Eureka's municipal watershed adhere to the "requirement" stated above.

Page 24, paragraph 1 of the Draft ROD under Environmentally Preferable Alternative states; "National Environmental Policy Act (NEPA) regulations require agencies to specify the alternative or alternatives which were considered to be environmentally preferable (40 CFR 1505.2(b)). Forest Service policy (FSH 1909.15) defines environmentally preferable as: "An alternative that best meets the goals of Section 101 of NEPA. ... Ordinarily this is **the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources.**"

Area. For the KNF to manage adjacent lands in such a way as to encourage increased use in the TLWSA, would be a violation of the Montana Wilderness Study Act.

Proposed Solution

The KNF needs re-evaluate all existing inventoried roadless areas, and remove all acres within those areas which currently have roads in them, regardless of whether or not those roads have been removed from the KNF Travel Map, and/or KNF database. The fact that roads exist within those areas, should be definition, disqualify those areas from being designated as "Inventoried Roadless". The Plan should then be altered to manage all lands outside of true "Roadless Areas", as MA5b – Backcountry winter motorized. Those acres found to be within true "Roadless Areas", should be re-evaluated for wilderness character, and managed MA5b – Backcountry non-motorized year round. The management recommendation for the southern portion of the Whitefish Divide area should be changed to MA6.

Statement demonstrating the link between the objection and prior formal

comments: Our comments (#351) on the KNF Draft Plan specifically addressed this issue.

Signature: Anthony J. Bengt

Signature: Ben Danner

Signature: Mike G6

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

Send electronic objections to: objections-chief@fs.fed.us

Reason #2:

In addition to not being subject to the required NEPA analysis, the “white paper” referenced above was neither referenced or not supplied in the KNF Draft Land Management Plan, Draft EIS, or Appendices. The fact that the document, which provides the basis for land management policies for certain management areas proposed in the KNF Plan, was neither referenced and supplied in any of the draft documents, is a clear violation of Forest Service policy.

Reason #3

Paragraph 4 on page 462 of the FEIS states; “The KNF manages areas recommended as additions to the national wilderness preservation system. Once the decision is made to recommend an area as wilderness, management actions and decisions affecting these areas should be consistent in protecting and preserving the wilderness character (R1 Consistency Paper).”

This is the first reference to this “Consistency Paper” that we are aware of. In addition, we could not find a copy of this paper in the FEIS, FEIS appendices, or any of the draft documents. If the Region is basing management policies for recommended wilderness areas on an “R1 Consistency Paper”, then that paper needs to have been evaluated according to NEPA, providing the public the opportunity to comment on the management policies outlined in the paper.

Proposed Solution

Region 1 of the USDA Forest Service needs to suspend the management policies for Recommended Wilderness Management Areas and Wilderness Study Areas, which are based on the management policy recommendations stated in the “white paper” referenced in the response, until such time as the above referenced white paper directive goes through NEPA as a significant action, and the public has had sufficient opportunity to comment on the management policies outlined in the white paper. In addition, a “programmatic impact analysis” should be completed on this white paper before non-motorized designations and actions are done by guidance of this new, non NEPA analyzed policy.

As part of this objection, we would like to formally request at this time, under the Freedom of Information Act, a copy of the “white paper” which is referenced in the response on page 371 of the FEIS Appendices quoted above.”

Statement demonstrating the link between the objection and prior formal comments: This is a new issue that has emerged between the release of the KNF DLMP and KNF Final Plan revision. Therefore, no previous comments on this issue should be necessary. However, page 3 of our comments specifically addresses the subject of Recommended Wilderness.

Signature: Anthony J. Bisset

Signature: Sam Downing

Signature: Mike Goe

Lincoln County Commissioners - 2013 Kootenai Forest Plan Revision Objection #7.

Objectors Name: Lincoln County Commissioners.
Address: 512 California Avenue, Libby MT 59923.
Phone # or E-mail address: (406) 283-2319.
Name of lead objector (if more than one): All Commissioners are equal objectors.

Name of the plan revision being objected to and the responsible official:

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

We object to the fact that Kootenai National Forest, under direction from Region 1 of the USDA Forest Service, has adopted a policy for the management of Recommended Wilderness management areas that has not been properly assessed through the National Environmental Policy Act.

Statement explaining the objection and how the proposed plan should be altered:

The reasons for this objection are this:

Page 371 of the Appendices for the KNF FEIS, for the Revised Land Management Plan states: **“A white paper provides consistency for management of Recommended Wilderness and Wilderness Study Areas across the Region 1”.**

In direct contrast to this, we are in possession of a letter addressed to Citizens for Balanced Use president Kerry White, from Region 1 Regional Forester Abigail Kimbell, dated January 24, 2006, which clarifies points discussed in a previous meeting:

The first point requesting clarification states: “1. Restrictions on motorized and mechanized use in Recommended Wilderness Areas are applied at the discretion of individual Forest Supervisors.”

Mrs Kimbell states: **“This statement is true. We have no Regional policy or direction that requires Forest or Grassland Supervisors to prohibit or allow motorized use in areas they recommend for wilderness designation in Forest Plans. Supervisors may use their discretion when determining the management direction for Recommended Wilderness Areas in their Forest Plans. However, they must weigh these decisions very carefully to protect the values that qualify these areas for wilderness consideration”**

Reason #1:

We object to the changing and implementation of forest management policies based a “white paper” that was never properly evaluated according to the National Environmental Protection Act (NEPA). We believe that the adoption of these management policies without performing a NEPA analysis on the implications of the new policy and allowing the public to comment on the proposed change in management policy is a clear violation of NEPA.

It is common knowledge that, generally speaking, the USDA Forest Service has a “let it burn” policy for wildfire in congressionally designated wilderness areas. It is stated in the FEIS that the northern region of the Forest Service management policies for recommended wilderness areas, are the same as they are for congressionally designated wilderness. Given these management policies, we do not believe that managing any municipal watersheds on the KNF with a “let it burn” fire management policy is the management alternative which **“causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources.”**

Page 29 of the Draft ROD under Clean Water Act states;

“The intent of the Act is to restore and maintain the chemical, physical, and biological integrity of the nation’s waters.”

And, “Implementation of the revised Plan is expected to contribute to protecting or restoring the physical, chemical, and biological integrity of waters of the United States in accordance with the Clean Water Act. Therefore, the revised Plan is fully compliant with this act.”

Considering the above statements relative to the Clean Water Act, we do not understand how the KNF’s proposal to manage portions of the town of Eureka’s municipal watershed with a “let it burn” fire management policy, is the best way to “protect or restore the physical, chemical, and biological integrity of these waters”. Therefore we do not believe that the revised Plan is fully compliant with this act.

Proposed Solution

The Whitefish Divide area, and all other drainages on the KNF which supply drinking water to the citizens of Lincoln and Sanders counties, need to be managed in such a way that the KNF retains a maximum number of options for managing those lands in such a way that can mitigate the impacts of large scale and severe fire events on both the water quality and quantity in those drainages.

Statement demonstrating the link between the objection and prior formal comments:

The town of Eureka’s municipal watershed was not discussed in either the Draft Land Management Plan, or Draft EIS. Therefore, management policies proposed for that municipal watershed should be considered a new issue. Our comments did specifically address Recommended Wilderness Management proposals.

Signature: Anthony J. Bisset

Signature: Don Downing

Signature: Mike Coe