

Subject: Cover Letter for 2013 KNF Forest Plan Revision Objections

If you will, please try to imagine how the average resident of Lincoln County Montana feels about this plan. Timber industry jobs have been slowly stripped away, unemployment is currently at 20% (probably closer to 30% in true figures), and the Forest Service is proposing management alternatives for the KNF forest plan that will further disable the local economy and reduce recreation, tourism and industry related employment opportunities for the average resident. Talk about kicking a man in the gut while he is lying on the ground. I would like to put all of Kootenai National Forest permanent employees, with their secure government jobs, out in the general work force of Lincoln County for a year, and then ask them what they think about this plan. The most frustrating part is that the only reason the plan provides so many alternatives that further restrict management is that the Forest Service is only listening to a small, vocal, and well financed group of people who advocate this type of management. What the Forest Service is not doing, is listening to the majority of KNF users who reside in Lincoln, Sanders, and Flathead counties. If they were listening to these users, there would be a proposed alternative that provides the recreational opportunities and forest management options that these people would support. These people do not advocate forest management that would clearcut the forest, or otherwise negatively impact the wildlife and other natural resources that exist on the forest. All these people want is a management alternative that preserves their access to the national forest, and the recreational opportunities, and forest management options that currently exist.

In closing, I would request that the Forest Service consider three critical themes when finalizing a forest management plan for the KNF:

1. Base forest management policies on the best available science. (Versus implementing management policies that are not fully supported by the best available science, based on the lobbying efforts of a minority group of users).
2. Take local and regional economics into account when implementing management policies. (If diversified recreational activities in certain areas of the forest are creating jobs in a local economy, the Forest Service should make every effort to maintain and expand those opportunities now, and in the future).
3. Provide recreational and forest management opportunities that are supported by the majority of forest users. (If the residents of Lincoln, and Sanders counties are the dominant users of the KNF, the Forest Service should make every attempt to implement science based management policies that are supported by the residents of Lincoln and Sanders counties).

Sincerely,

McKinley Raines

2013 Kootenai Forest Plan Revision Objection #1

Objectors Name: Mckinley Raines.
Address: P.O Box 398 Trego, MT 59934.
Phone # or E-mail address: mraines1957@gmail.com.

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 fact that the KNF provided no alternatives to the forest plan revision which offered less restrictive forest management policies with respect to forest access, recreation, and vegetation management.

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

There were four provided alternatives of the Plan; Alternative A, B, C & D. After reviewing the maps, and document, it is clear that three of the four alternatives, (B, C, & D), would implement more restrictive forest management. By more restrictive, I am referring to the fact that these alternatives would provide for less flexibility in forest management, and would most likely reduce the options the public has for accessing KNF lands. This would almost surely be the case if more lands were placed into management areas; 1b - Recommended Wilderness, 2 - Wild and Scenic Rivers, 3 – Special Areas, 4 – Research Natural Areas, and 5a - backcountry non-motorized. One alternative – A, provides for continued management and access according to the 1987 KNF Forest Plan. However, no alternatives provide for less restrictive forest management, by placing more lands in less restrictive management areas such as; 6 - General Forest, 5b - Backcountry Motorized, 5c - Backcountry Winter Motorized, and 7 – Primary Recreation Area. **Why is this? Why would the Forest Service assume that the citizens of this country only want to see a management plan that provides either the status quo, or more restrictive management options?** It appears the architects of this land management plan within the Forest Service, have been influenced by a small group of people who advocate more restrictive forest management. **Why does the Forest Service even allow this influence to occur?**

After reviewing the “**Analysis of Public Comment Report**” that was published by the KNF, it is obvious that although there are a lot of comments that support more restrictive forest management policies, there were an equal number of comments that support less restrictive forest management policies. **Given the fact that the KNF was supposed to utilize the comments in this report to shape the current DFMP alternatives, why is it that three of the four alternatives provide for more restrictive forest management policies, and none of the alternatives provide less restrictive forest management policies?**

Proposed Solution

The KNF should revise the preferred alternative to include less restrictive forest management policies with respect to forest access, motorized recreation, and vegetation management.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.

2013 Kootenai Forest Plan Revision Objection #2

Objectors Name: Mckinley Raines.

Address: P.O Box 398 Trego, MT 59934.

Phone # or E-mail address: mraines1957@gmail.com.

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 KNF forest plan revision on the basis that the economic analysis was inadequate in its assessment of the economic impacts the management policies proposed in the preferred alternative will have on the rural communities in Lincoln and Sanders counties. In addition, I object to the KNF plan revision because I believe that the management policies proposed in the plan are in direct violation of Executive Order #13575.

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

I believe it is of critical importance to consider the economic impacts of implementing any Forest Management Plan. The Kootenai National Forest, (KNF), is primarily contained in two Montana counties - Lincoln, and Sanders. The economies of these counties will be significantly impacted by any forest management plan the KNF adopts. These counties are currently two of the most economically depressed counties in the entire state of Montana, and possibly the nation. Over the last ten years, the reduction in employment in response to the decline of the timber industry has had a devastating affect on the small local economies that exist in these counties. Those jobs are gone, and I believe it is quite clear that they are not coming back. One positive trend in these economies has been an increase in employment related to the tourism and recreation industries. These jobs are important to these small economies. It is quite obvious that more restrictive forest management will result in fewer recreation opportunities on the KNF. Fewer recreation opportunities will result in fewer people utilizing the KNF for recreation purposes. Fewer people utilizing the KNF for recreation, means fewer dollars being spent in the local economies of Lincoln and Sanders counties. Fewer recreation related dollars being spend in these local economies means FEWER JOBS. Fewer jobs means HIGHER UNEMPLOYMENT RATES. Now you have to ask yourself; is that what we want to accomplish with the new KNF Forest Plan? Why would we?

I also believe that these proposals are in direct violation of Executive Order #13575. Executive Order #13575 created a rural economic council which is chaired by the Secretary of Agriculture. The mission and function of that council are stated below.

Sec. 4. Mission and Function of the Council. The Council shall work across executive departments, agencies, and offices to **coordinate development of policy**

recommendations to promote economic prosperity and quality of life in rural America, and shall coordinate my Administration's engagement with rural communities. The Council shall:

(d) identify and facilitate rural economic opportunities associated with energy development, outdoor recreation, and other conservation related activities.

Forest management proposals contained in the final KNF plan for MA1b, MA5a, and timber management DO NOT “promote economic prosperity and quality of life” in the portion of rural America contained within Lincoln and Sanders Counties Montana.

Forest management proposals contained in the final KNF plan for MA1b, and MA5a, DO NOT “identify and facilitate rural economic opportunities associated with outdoor recreation.”

The forest management proposals contained in the final KNF plan for MA1b, MA5a, and timber management are in clearly violate the provisions of EO#13575 as stated above.

Proposed Solution

The KNF needs re-asses the economic impacts the forest management proposals contained in the plan will have on the communities in Lincoln and Sanders counties. During this assessment, the KNF should consider all proposals which will reduce recreational opportunities on KNF lands, limit vegetation management options. The plan should be altered to remove those management area proposals which are in violation of Executive Order #13575.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.

2013 Kootenai Forest Plan Revision Objection #3

Objectors Name: Mckinley Raines.
Address: P.O Box 398 Trego, MT 59934.
Phone # or E-mail address: mraines1957@gmail.com.

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 KNF forest plan revision proposals to manage lands as MA1b – Recommended Wilderness and MA5a – Backcountry non-motorized year long.

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

The Cabinet Mountain Wilderness Areas on Kootenai National Forest contains some of the most pristine, high elevation lands that exist in northwest Montana. This is a truly unique and beautiful landscape and I for one am glad that this area will be protected for future generations. The KNF plan revision preferred alternative recommends that thousands of acres of land adjacent to the Cabinet Mountain Wilderness Area be designated as Management Area 1b – “Recommended Wilderness”. **Why?** In the past, many of these areas were harvested for timber. Many of these areas do not currently meet the definition of “wilderness”, and will not meet this definition at any time in the near future. These areas are already remote, rugged, and difficult to access. There is absolutely nothing to be gained by designating these areas as “Recommended Wilderness”. The only definitive result of designating these areas as “recommended Wilderness” will be a LOSS OF MANAGEMENT OPTIONS. **Why would the Forest Service want to reduce their management options?** At this time, I am not certain that this is what the Forest Service wants, but I am absolutely positive that this is exactly what wilderness advocates, and many environmental groups want. There are absolutely no science based reason for putting thousands of acres of forest lands into management area designations of 1b and 1c. The only reason that the KNF forest managers are proposing these designations is that they are being constantly lobbied by wilderness advocates to make these designations. This lobbying is an attempt to restrict public access to national forest lands, and reduce future management options for national forest lands.

I am an educated natural resource professional with over 20 years of experience managing forest and range lands in western Montana and Idaho. I am thankful every day for the efforts of men like John Muir, Theodore Roosevelt, and Aldo Leopold, who championed wilderness, conservation, and land ethic when it was unpopular to do so. If not for the efforts of men like this, we probably would not preserved many of the wild places that are so unique to this country. I believe we are fortunate in western Montana to have places like Glacier National Park, the Bob Marshall Wilderness, and the Cabinet Mountain Wilderness, where a person can experience a pristine, un-managed

forest ecosystem. Our country needs these places, and I visit these places as often as possible. However, I also like to recreate in other areas as well. Areas that might not be as pristine, but are still wild and beautiful if their own right. Our country also needs managed forests that produce timber, minerals, and recreational opportunities that are essential to our economy. Three of the four alternatives in the KNF Draft Forest Management Plan propose to increase the land managed as “Recommended Wilderness” and “Backcountry Non-motorized”, and “Wild and Scenic Rivers”. **Why?** Most of the areas that are being proposed for this type of management are relatively remote and difficult to access areas that are adjacent to other remote and difficult to access areas, some of which are already wilderness. Labeling a bunch of land around the Cabinet Mountain Wilderness Area as “Recommended Wilderness”, or the Ten Lakes Area Wilderness Study Area as “Recommended Wilderness”, is not going to improve the quality or management of that land in any way shape or form. The only thing this labeling is going to accomplish, is to reduce management options, reduce public access, and move these areas one step further toward and official designation as Wilderness. **We should all understand that an official designation of wilderness is not going to just DECREASE management options, but ELIMINATE OPTIONS altogether!**

One last wilderness related point to ponder. I have been told by Forest Service personnel that Wilderness is a social issue – 100%. I know for a fact that the people that are advocating more wilderness designations are the same people who are suing the Forest Service over management issues related to threatened and endangered species. As a biologist, I understand that forest managers have the capability of improving wildlife habitat through vegetation management. However, wilderness designations severely reduce forest management options. **So, why should we create more wilderness in order to solve this “social” issue, at the expense of threatened and endangered species habitats?** The point is that a Grizzly Bear can have all the room in the world to move around, and if there is nothing to eat, the bear is still going to starve to death. As another example, a 200,000 acre wilderness area might only be able to support 40 Lynx because of habitat limitations on snowshoe hare populations, while a 100,000 acre area of properly managed forest land might be able to support 80 Lynx because vegetation management allows for the improvement of snowshoe hare habitat, effectively maximizing the food available for Lynx. If you question my logic, look it up. The science supports these statements. The managed portions of the KNF have threatened and endangered species population densities that are comparable to Glacier National Park, and the Bob Marshall Wilderness (Lynx densities may actually be higher in some managed forests). So, ultimately the question is this: Should we create more wilderness, solving our social issue at the expense of T & E Species? I say NO, we should not.

Proposed Solution

The KNF needs re-evaluate all lands proposed for MA1b and MA5b, and provide greater consideration to factors such as; endangered species, water quality, recreation, and economics, in their assessment of these proposals.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines

2013 Kootenai Forest Plan Revision Objection #4

Objectors Name: Mckinley Raines.
Address: P.O Box 398 Trego, MT 59934.
Phone # or E-mail address: mraines1957@gmail.com.

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 KNF forest plan revision proposals to reduce recreational access and limit vegetation management options in the name of fish and wildlife species currently listed as threatened or endangered under the Endangered Species Act.

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

The KNF currently has four threatened and endangered species residing within its borders, and being affected by its management policies. These species include grizzly bears, gray wolves, Canada lynx, and bull trout. If you objectively examine the most recent scientific data concerning these species, this is what you will find:

Grizzly Bear population numbers in the Northern Continental Divide Ecosystem (the east half of the KNF is located in the NCDE), are at an all time high since the species was listed under the Endangered Species Act (A FACT that was proven by recent bear DNA research). In addition, most experts believe that the population is increasing annually, and believe that current population trends support delisting. Grizzly Bears in the Cabinet-Yaak ecosystem, are somewhat more fragile due to the smaller size of this ecosystem, and small population numbers. However, this population is also believed to be stable and/or increasing, and most experts believe that this population is also benefiting from bear “spillover” from the NCDE. Federal and state agencies continue efforts to augment this population with young female grizzlies from the NCDE.

In case you have been on another planet for the last ten years, **Gray Wolves** are doing very well in northwestern Montana. Wolf numbers expanded almost exponentially for several years, and continue to increase annually, despite recent efforts to manage population’s numbers through hunting. Wolves are doing so well on the KNF that a couple of years ago federal biologist dealing with wolf issues had three separate packs to choose from when deciding which wolves were responsible for livestock depredations in a particular area. Wolf populations are expanding so fast in this area that many biologists fear that unless these populations are reduced in the near future, wolf depredation on Moose, and could reduce the Moose population to an all time low since game management began in the 1920’s.

Canada Lynx. Page 196 of the Draft Environmental Impact Statement that supports the Draft Forest Management Plan which is the subject of these comments contains the following statements:

“There are inadequate methods available to develop lynx population estimates”

“Exact lynx population numbers are unknown to the Forest, although relative density is fairly high”.

“Controlling and/or managing access improves Canada lynx use by reducing the risk of displacement and poaching”

So, from these statements, we can determine effectively that KNF managers have no idea how many lynx are present on their lands, but they believe that the population numbers are relatively high. I don't understand how the third statement fits in.

Who determined that controlling/managing access improves Canada Lynx use?

Where is the science that shows increased displacement and poaching in relation to forest access?

Why would be need to further control or manage access if we currently have relatively high population density?

How do we know that habitat carrying capacity is not already being met under current management policies?

The point here is that there is no credible science that supports the notion that more restrictive forest management has a positive impact on lynx populations. In fact, most competent biologists believe that lynx populations are cyclical in nature relative to the population of their main food source – snowshoe hares, in a classic predator-prey relationship. When conditions are favorable, (weather conditions affecting survival of young being the most important single “condition”), the hare population increases. When hare populations increase, lynx populations increase. When lynx numbers overwhelm the food source, or weather conditions are less favorable for young survival, the hare populations decrease, resulting in a decrease in the lynx population. Again, there is no credible science that forest management significantly affects lynx populations. **In the absence of this science, why are KNF forest managers advocating more restrictive forest management in the name of lynx conservation?** The only reasonable explanation is that they are being lobbied by a small group of people who advocate more restrictive management, and utilize false claims of endangered species conservation to support those management goals.

Bull Trout. Bull Trout are listed as a threatened species under the ESA, and are population numbers are declining in much of their historic range. There are a number of factors influencing this decline in Bull Trout populations, including habitat loss, and competition from non-native species. In recent years there has been such a massive effort in Bull Trout habitat conservation and restoration, I believe that most biologists currently view competitive from exotic species as the single biggest threat to this species. On the KNF however, Bull Trout populations are doing very well. So well in fact that on Lake Koochanusa, (the reservoir that bisects the KNF from north to south), anglers can target Bull Trout 365 days per year, and have been able to harvest up to two Bull Trout per year. To add some perspective to this statement, lake Koochanusa is one of three water bodies in the United States where the harvest of Bull Trout is permitted, and the only water body allowing two fish to be harvested. Given these facts, I think it is safe to say that both state and federal biologists feel that Bull Trout population numbers on the KNF are either stable or increasing.

So, after examining the **FACTS** about the four threatened and endangered species residing on the KNF, we have determined that three of the four species have population

numbers that are stable or increasing under current forest management policies, and the fourth species has “high relative population densities” on the forest.

Given these facts, why is it that KNF forest managers are advocating more restrictive forest management policies in the name of threatened and endangered species conservation?

Could it be that they are being lobbied by a small group of people advocating more restrictive management?

If this is true, why are these managers allowing this group to influence management policies without the support of credible science?

Proposed Solution

The KNF needs re-evaluate all land management proposals which would implement more restrictive forest management policies with respect to forest access, and vegetation management in the name of threatened and endangered species habitat protection. These proposals need to be recinded until such time as KNF managers can provide credible accepted science that supports the assertion that these proposed policies will actually help threatened and endangered species populations.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.

2013 Kootenai Forest Plan Revision Objection #5

Objectors Name: Mckinley Raines.

Address: P.O Box 398 Trego, MT 59934.

Phone # or E-mail address: mraines1957@gmail.com.

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 KNF forest plan revision proposals to reduce recreational access and limit vegetation management options in the name of fish and wildlife species currently listed as threatened or endangered under the Endangered Species Act.

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

Looking at the maps of the proposed management plan alternatives, there are numerous rivers and creeks which the KNF would like to designate as wild, scenic or recreational rivers. Considering what constitutes a wild, scenic and/or recreational river (see the Wild and Scenic River Act), some of these designations probably make a lot of sense. I believe a case could be made for one of these designations on; the Kootenai River, the Vermillion River, parts of the Bull River, and parts of the Yaak River. But Vinal Creek, and Big Creek – are you kidding? **Why?** I am sure some people are arguing that placing these designations on these water bodies would afford them “more protection”. **Protection from what? I would like to know exactly how each of these designations will affect long term management in these drainages? More restrictive? Why is this science based need for more restrictive management in those areas?** After reviewing the “Wild and Scenic Rivers Act”, it is quite obvious that these designations would open up a Pandora’s box of management issues and potential conflicts. Also, the language in the “Act”, would provide environmental groups with the necessary leverage to file lawsuits against the Forest Service for almost any proposed future management in those areas. If the result of these designations would be more restrictive forest management, and fewer management options, then I must say that I am 100% opposed to these designations. After reviewing the streams proposed for Wild, Scenic, and Recreational river designation, it is quite obvious that KNF forest managers need to become much more familiar with the Wild and Scenic River act, and utilize the knowledge gained in this process to recommend rivers that ACTUALLY DESERVE consideration for Wild, Scenic, and Recreational designation.

Proposed Solution

The KNF needs re-evaluate all of the streams currently proposed for Wild, Scenic and Recreational river designation, and remove all the CREEKS which are not RIVERS, and remove all of the other water bodies which do not meet the requirements of a Wild, Scenic or Recreational river as defined in the Wild and Scenic Rivers Act.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.

2013 Kootenai Forest Plan Revision Objection #6

Objectors Name: Mckinley Raines.
Address: P.O Box 398 Trego, MT 59934.
Phone # or E-mail address: mraines1957@gmail.com.

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 KNFs current travel management policies, and forest plan revision proposals which restrict motorized access to national forest lands without sufficiently supporting those restrictions with credible, accepted science.

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

Currently on the KNF, the vast majority of spur roads that eventually dead end at some point, either have gates that seasonally restrict road use, or are permanently closed to motorized access in some other manner. I completely understand that road closures are a necessary and useful management tool. If a particular road surface holds water, and would be severely rutted or eroded if utilized during the spring of the year, I completely understand why this road should have a seasonal closure for “Water Quality Protection”. I also understand, and support the fact that many spur roads are closed in the name of “Big Game Security” during hunting season. These closures totally make sense. If these roads were not closed, lazy slob hunters would be driving up and down them all day during hunting season shooting deer from their pickup windows. Animals need that protection from hunters, and September 1st through December 1st closures make perfect sense on the vast majority of these roads. What I don’t understand is July 1st closures. **Why are the users of the KNF denied access to roads for two months, (July & August), in the name of “Wildlife Security or Water Quality”?** This makes absolutely no sense. **Where is the science that supports placing these closures in effect a full two months before the beginning of hunting season, during the dry season?** Taxpayers built those roads, and users of the KNF should have access to those roads until such time as the closure is justified by science.

Another thing I don’t understand is road obliteration & re-contouring. As I said earlier, I support the vast majority of road closures, and understand the need for restricted access in many areas. I also understand the water quality benefits from some year long closures where the road prism has be allowed to re-vegetate. What I don’t understand is road obliterations. **What kind of a moron would go into an area and tear up a fully compacted and vegetated road prism, (including culvert removals), in the name of water quality?** Talk about doing the exact opposite of what you say you are trying to accomplish. Yes, there are occasional culvert/road bed washouts that end up introducing some additional sediment into the watershed, (most washouts occur in vastly different soil types and hydrologic regimes than those that exist on the majority

of the KNF), but this is an EXTREMELY RARE occurrence in the hydrologic regime of the KNF, especially in situations where the road prism has re-vegetated with shrubs and trees. Not to mention the cost of this work, and the fact that it decreases future management options. Again, there is no science behind obliterating overgrown and compacted road beds, SO PLEASE STOP IT!

One last thing about roads. For some reason, the Forest Service occasionally decides to close a road for no apparent reason. A road might be open since the day it was constructed, and then, all of the sudden it's closed. Not just gated, but bermed or trapped and set up as a permanent closure. As I stated earlier, I completely understand the need for most closures, and I fully support the majority of road closures that exist on the forest. However, I do not believe that the forest service should be able to close whatever roads they want, without justification. Taxpayer dollars built those roads, and the public should be allowed to utilize those roads to access **their NATIONAL** forest lands whenever they choose, as long as this access is not damaging the resource.

Proposed Solution

The KNF needs re-evaluate and revise all current and proposed motorized access restrictions which are not fully supported by credible, accepted science.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines

2013 Kootenai Forest Plan Revision Objection #7

Objectors Name: Mckinley Raines.

Address: P.O Box 398 Trego, MT 59934.

Phone # or E-mail address: mraines1957@gmail.com.

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 lack of forest vegetation management proposed with respect to currently existing timber stands which are in desperate need of either commercial or pre-commercial thinning, especially those stands which exist at over 4000 feet elevation.

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

No one can deny that the KNF currently has thousands of acres regeneration units on lands which are currently classified as general forestry that are in desperate need of thinning. Many of these stands are presently so dense that it is difficult for both humans and animals to even walk through. These lands are slowly deteriorating into nothing more than a giant fire hazard. Thinning these stands would also tie in well with the discussion about economics. A fair number of jobs could easily be created in this county if the Forest Service were to make a concerted long-term effort to thin these stands. Thinning these stands would not only put people to work today, but would also be a superior investment in future timber production & fire hazard reduction. I would like to know how the new forest plan will deal with this basic need in forest health and sustainability. **How many regeneration unit acres on the KNF are currently in need of thinning? And what is the KNF's long-term strategy for accomplishing this work?** The KNF should be obligated to manage these acres in such a way that maintains the productivity of this land for future generations. This is not happening. Anyone that would like to see the results of consistently ignoring forest management needs only to look at the dead and dying forests that dominate the landscape in much of west-central Montana. These forests are primed for a forest fire "natural" disaster of epic proportions. When these fires eventually occur (it is definitely a matter of when, not if), millions of acres will be destroyed, lives and property will be lost, millions of dollars will have been spent, and forest managers and politicians will be whining about "what could have been done to prevent this disaster". Well, that is a simple answer. Remove the threat through sound, science based forest management practices, before the disaster occurs.

Proposed Solution

The KNF needs revise current and proposed vegetation management policies to include more aggressive commercial and pre-commercial thinning throughout the KNF, particularly in those stands which currently exists at over 4000 feet elevation.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.

2013 Kootenai Forest Plan Revision Objection #8

Objectors Name: Mckinley Raines.
Address: P.O Box 398 Trego, MT 59934.
Phone # or E-mail address: mraines1957@gmail.com.

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 current and proposed KNF forest management with respect to Old Growth.

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

Old growth forest stands are biologically unique areas in the forest landscape that provide critical habitats to many different wildlife and plant species, not to mention insects, fungi, and other living creatures. These areas are extremely important in maintaining biological diversity on the forest, and I fully support the management designations and protection from harvest that TRUE old growth stands have on the KNF. However, there are a couple of things about the current KNF old growth policies that I do not support.

First, is designating areas as “Old Growth” that do not meet the characteristics of old growth. In recent years, in response to the legal activities and lobbying of a small group of very vocal people, the KNF has placed old growth designations on thousands of acres of land that do not currently meet the characteristics of “Old Growth”. These characteristics include; stand age, decadence, snag density, and many other factors. Again, this management action was only taken in an effort to appease the vocal and litigious few, not as a proper management strategy for the majority of Americans.

Why? Does the Forest Service think that they can simple create old growth, and all of the biological diversity that it supports, by simply labeling something as old growth? If that is how they think it works, some KNF forest managers need a serious reality check. It is not difficult to identify “true” old growth. If a stand is truly old growth, manage it as such. If it is not – DON’T. “Labeling” timber lands in an effort to appease radicals is not sound forest management.

The second problem I have with the KNF old growth policies is the on the ground labeling. The KNF has spent thousands of taxpayer dollars printing up signs that say “Old Growth Forest”, and paying someone to walk around the forest and staple them to trees. **Are you kidding me? Does anyone else view this as A TOTAL WASTE OF TAXPAPER DOLLARS, or is it just me? If a timber stand is truly old growth, and you designate it as old growth, and manage it as old growth, isn’t that enough? Why would anyone in their right mind think that it would be necessary to then label it on the ground? Is it because a taxpaying American citizen might come by and cut down a dead tree for firewood?** Now, that would be a crime wouldn’t it.

Proposed Solution

The KNF needs to designate all virgin timber stands currently present in MA1a – Wilderness, MA1c – Wilderness Study Area, MA3 – Special Areas, MA4 – Research natural areas, all MA5a, MA5b, MA5c, and Streamside management zones as Old Growth or potential old growth. The acreage present in these management areas should more than satisfy the KNFs legal requirement to maintain 10% Old growth. The KNF should then recind any management restrictions currently in place on timbers stands outside of these management areas.

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

My comments #353, on the Draft Kootenai National Forest Plan specifically addressed this issue, and were recognized in the Response to Public Comments (Appendix G) under the category representing this issue.

Signature: McKinley Raines_____.