

## 2013 Kootenai Forest Plan Revision Objection

**Objectors Name:** Marc McCully  
**Address:** \_\_\_\_\_  
**Phone # or E-mail address:** 406-293-9030  
**Name of lead objector:** Marc McCully

**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 process and protocol which were utilized to designate Inventory Roadless Areas (IRA's) in Region 1 of the Forest Service, and on the KNF. We also object to the evaluation process for wilderness characteristics applied to the IRA's currently designated on the KNF.

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

**The reasons for this objection are this:**

Reason #1

**Page 443 of the FEIS States: 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.

Examination of historic aerial photographs for many of the Inventoried Roadless Areas currently present on the KNF will clearly show the existence of forest roads, and in many cases, timber harvest units. Forest roads and timber harvest units should be considered both development and impairment for these areas.

Reason #2

**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.

It should be physically impossible to have considerations made for road reconstruction in a true roadless area.

Reason #3

**Inventory of Roadless Areas for Forest Plan Revision**

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.

Note the emphasis shown on the word “roadless”. Many of the areas currently designated as Inventoried Roadless Areas on the KNF are not “roadless”. (See explanation provided in reason #1).

#### Reason #4

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:

3. 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” in the first paragraph, 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.

#### Reason #5

Paragraph 1 on page 447 of the FEIS states; “The 1987 Plan identified 32 IRAs with a total of 403,300 acres. A review of the 32 IRAs and other unroaded areas was updated as part of the initial Forest Plan revision efforts in 1999. The purpose of the 1999 update was to review unroaded areas for updated criteria, correct mapping errors through application of GIS mapping and adjust the inventory for areas where harvest had occurred, or where planned and did not occur. The criteria for delineation of roadless and other unroaded areas were based on the Regional Roadless Area Inventory protocol (Regional Office, 1996). The updated inventory identified 11 additional areas and 235,870 additional acres for a total of 43 IRAs and 639,100 acres of NFS land (see figure 36). This inventory was included in the 2001 Roadless Area Conservation Rule.”

We are having a hard time understanding how the 32 IRAs totaling 403,300 acres, magically turned into 43 IRAs totaling 639,100 acres with a simple “review of unroaded areas with updated criteria” and “correction of mapping errors through application of GIS mapping”, in only 12 short years. We believe that the Regional Roadless Area Inventory protocol utilized to perform this update violates the regulations for evaluating “roadless” areas as they are defined above. Again, an examination of historic aerial photographs show the existence of forest roads and/or timber harvest units, in many of the “Inventoried Roadless Areas” identified by the KNF. The fact that the KNF may have removed the roads present in these areas from the KNF’s official travel map and/or road data base does not erase the physical existence of these roads on the ground.

#### Reason #6

Paragraph 2 on page 447 of the FEIS states; “For the purposes of this evaluation, the IRAs shown in figure 36 have been determined to qualify as the potential wilderness inventory. They are all areas within NFS lands and satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act, and subsequent policy or direction.”

This is simply not true. Many of the acres contained within several of the areas currently classified as “Inventoried Roadless” by the KNF clearly do not meet the definition of wilderness as found in section 2© of the 1964 Wilderness Act. **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”**. Again, just because the KNF may have removed the roads present in these areas from the KNF’s official travel map and/or road data base does not erase the physical existence of these roads on the ground.

#### Reason #7

Paragraph 2 on page 454 of the FEIS states; “The revised Forest Plan Whitefish Divide recommended wilderness area on the KNF includes areas which are outside of an IRA (cherry stem of closed road systems and associated harvest in Blue Sky and Williams Creek) for manageability. Areas outside of the IRA account for approximately 13 percent of the total acres of recommended wilderness in Alternative B Modified”

This paragraph basically states that through some creative mapping around closed road systems and associated harvest units in the Blue Sky Creek and Williams Creek drainages, the KNF has “manufactured” an inventoried roadless area, which the KNF is now proposing as recommended wilderness. We believe that these “creative mapping techniques” are a violation of the regulations defined for creating inventoried roadless areas, and the regulations provided for evaluating these areas for wilderness characteristics.

The paragraph also states that 13 percent of the total acres of recommended wilderness are contained outside of the IRA. So, not only is the Whitefish Divide recommended wilderness contained within an IRA which has been manufactured with creative mapping techniques, but 13% of the area proposed as recommended wilderness are not even present in the IRA, and therefore likely do not meet any semblance of the definition of wilderness.

#### Proposed Solution

The KNF and Region 1 of the USFS need re-evaluate all areas on the KNF currently classified as Inventoried Roadless, and remove all acres within these areas which have forest roads in them. Once this process has been completed, new boundaries and acreage figures need to be defined for all the true “roadless” areas which have been identified. A Wilderness suitability assessment can then be completed on those re-defined Inventoried Roadless areas, which are truly roadless.

**Statement demonstrating the link between the objection and prior formal comments:** We were listed as commentors on public comment #124, Category #550.

Signature: Marc McCully

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

**Send electronic objections to:** [objections-chief@fs.fed.us](mailto:objections-chief@fs.fed.us)