

KNF Forest Plan [Objections—chief@fs.fed.us](mailto:chief@fs.fed.us)

Kootenai National Forest Management 2013 Revision

**Responsible Official: Faye L. Krueger—Regional Forester Northern
Region**

2012 KNF Comment on Draft Management Plan

From Rep. Mike Cuffe,

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To Kootenai National Forest Planners:

OK. Here we go again. Part of this response includes references to or quotes from my original comments. I am frustrated by the processes that are required. I also believe that agency folks are well meaning although misdirected at times from top down or court directions. It is appropriate at times for you, as experts at managing KNF, to manage upwards in your organization to bring it back to what the U.S. Forest Service was originally designed to do.

I appreciate that your draft has dropped “Wild and Scenic Rivers” proposals from Quartz and Grave Creeks, but I suggest that original inclusion of those proposals on the Kootenai indicate a basic bias. Similarly, I question the validity of using that label for other streams on the Kootenai. I don’t believe these are valid proposals, and they carry the stigma of an over reaching desire to move streams and land areas of the Kootenai out of the range of commercial use and into much more restrictive type designation.

I appreciate that USFS recognizes that Indian tribes are not co-managers of KNF.

In regard to category 1638 on woodland caribou, it seems to me that would be an additional management activity that didn’t exist in 1977. The same can be said for the existence of rare plants, although I address that below.

I am a lifelong resident of Lincoln County with family roots in the area going back to the early 1880s, and I have a definite prejudice to use the forest without spoiling it, in fact to keep it healthy through management practices. For generations KNF was known as a working forest with a multiple use base, and it was a healthy forest. We have lost that, and we have ignored original understandings and legal descriptions of “Wilderness.”

During my campaigns for state legislature, I made a lot of door to door visits, and I listened to the folks. Their most frequent concerns are jobs, government regulations, environmental limitations, economic impacts, as well as how those things all fit together with the U.S. Constitution and the Bill of Rights.

It appears there is a real bias in the USFS favoring hands off management policy, which really means little or no management and practically no encroachment by man. We should base our decisions on good solid data that will stand up in court challenges. We should not be exporting our young families away to work, then importing municipal fire departments and special fire crews to mop up after what “should be timber harvest” has burned.

I see no need to create additional Wilderness Area, especially when proposed areas don't meet established criteria based on size, prior usage, description and location. The people of Lincoln County voted against creating additional Wilderness Area. There is no justification for turning logged or mined areas into wilderness areas or wilderness study areas or to continue them as wilderness study areas. Today's proposed management plan seems to be taking a sizeable leap away from factual scientific analysis or even common sense reflection.

A couple specific examples:

>>> First, the extensively logged area on Round Mountain located within sight of Eureka, MT. I worked there in the mid-sixties, and records show many years of timber sale harvest by Holder Brothers Lumber Co. I helped skid and process logs pulled by a Caterpillar tractor to the portable mills, and I saw logs hauled to mills at other locations. I saw railroad ties sawed from logs, and I saw cants destined for stud mills to become 2x4 framing lumber. These were hauled away from the various saw mill landings on the same road I travelled on to and from work. No question can exist on whether there were roads and lengthy and rugged logging activity. No question this site reflected an important part of our culture and economy. By 1977 this logging job was in a regrowth period, and by 2013 former KNF managers would have sold at least one pre-commercial thinning contract and perhaps one or more commercial thinning jobs. So how can intelligent scientists and professionals continue to study this as a roadless or wilderness study area. Was this area carried on the books as a recovering Clearcut at the same time it was listed as Wilderness Study Area? Has anyone in the USFS gone to Congress to request a change, if that is the accepted process? Does anyone remember the story of the child who shouted the obvious answer that the emperor had no clothes on?

>>>Second, How many loads of bug killed spruce were hauled out of Upper Grave Creek in the early 1950's? They were used as power poles to hold up the wires that electrified rural America. Ron Bradshaw, who later loaded green lumber into the dry kilns at the big mill in Libby, told me he had earned a living as a young man helping to harvest those poles.

>>>Third, fly over this mountainous Upper Grave Creek area with snow on the ground, perhaps even without the snow. Even a greenhorn can read the signs of mans' extensive commercial and mechanical activity. It doesn't fit with Roadless, Wilderness or Wilderness Study.

>>>Fourth, Let me list general concerns about wilderness designation for places involving municipal watersheds, especially with potential raging wildfires. I believe this must be a priority concern.

>>>Fifth, please let me specifically list objections to Roderick, Scotchman's Peak, and other places adjacent to the Cabinet Mountain Wilderness. They have been considered in the past and rejected. I object to the listing of the area ranging south and east from Williams Creek to the KNF boundary as MA-5, Back Country non-motorized year around; again this is essentially managed as wilderness with the potential catastrophic wildfire leaving severe consequences. Inclusion of the Thompson-Seton Inventoried Roadless Area on the northern portion of the Whitefish Divide as recommended wilderness is another listing I object to, for reasons listed previously in this response.

>>Do other proposed areas truly meet "Wilderness" requirements, or are we trying to "manufacture" wilderness by closing roads and ripping out culverts. Are we honest with each other? Are we honest with our selves. Do we ever stand up and say: "This is wrong."

"This is wrong. This is wrong! This is wrong!! *THIS IS WRONG!!!*"
There. I Said it. Should you say it?

Another example, the current management plan makes reference to the possibility of rare plants existing. Originally, I said the suggestion that rare plants might exist could lead to someone deciding to plant some. Now we have located these rare plants, and I wonder if they were always there? Or not? There was a time when we said they didn't exist.

An issue not adequately addressed is motorized access for Homeland Security. Maybe Congress will deal with it legislatively.

I repeat an earlier concern about why one alternative, in the original proposal, appeared to have been written by an interest group outside the KNF management team. Specifically, I refer to Defenders of Wildlife. Again, does that indicate a predisposed bias? I still think it did.

I repeat: Commercial harvest of timber should receive greater emphasis. (Category 1404) Logging should be an acceptable term. Traditionally, it was a customary way of life for folks in this area even preceding formation of the national forest system, and some of those folks were part of my family. The economic needs and traditions should be a serious part of this plan. Call it vegetation management if you must. The limitation to 36 million board feet must be revised upward, perhaps to 270 million board feet. Although various competing management activities may make a larger harvest impossible at this time, giving it a more serious priority in the plan will be important over coming years should some of the other competing activities be reduced. I am a former mill operator and owner, and I can say with certainty that 36 million BF will create few jobs. The likelihood of anyone trying to establish an operation on that volume is extremely slim, at best those logs will continue to be moved outside the county for processing. Traditionally, the ability to use the wealth of the land is what brought and kept people in this area. It is what made this nation great. Now Lincoln County is reduced to begging for money to support schools and care for roads. That is not traditional. It is not the customary way of living. The forest wasn't ruined when it was a working forest, in fact it was healthy.

Waiting for Congress to pass some kind of a bill to trade temporary logging for permanent wilderness is an ill founded desperate move that is no way to manage the Kootenai. Don't be fooled by the rhetoric calling it collaboration.

Under Appendices 1260, page 469, you considered employment-income for a decade or so, but KNF management activities since at least 1987 should be considered for those employment-income impacts. Also, Category 1261 brings a difference of opinion.

In addition, there seems to be, in USFS planning, a predisposition to not just preserve but to restore land to something thought to exist in the days prior to European settlement. I opposed this notion when it first came to light during early 1990s and the one size fits all restoration management for the entire Columbia River basin drainage. I chaired a community committee to study and comment on that plan. I continue to oppose it today. Man, communities, and commercial activity are a legitimate part of life on the Kootenai National Forest. Logging, recreating with motorized units to access national forest lands, mining and grazing are legitimate activities and usages. They should be given more allowance.

I find it more than interesting that I introduced 2013 funding requests from Montana Fish-Wildlife-Parks Dept. for studies to show advantages of logging activities on moose and other wildlife. I also find it ironical that we crowd man out of the forest for grizzly protection at the same time we are removing grizzly from downtown Eureka, Thompson Falls and populated areas of the Flathead Valley. Are grizzlies really bothered by roads, cars and people. Grizzlies do like to rub backs on signs and bridge supports, all man made. Is it possible that many of our neighbors lost jobs and retirements for a theory that was wrong?

In closing, it appears to be manipulative action to achieve a predetermined outcome that the change was made to move the regional population center for Wilderness Assessment for the Thomas-Seton IRA #483. This change was made very late in the game, and it doesn't pass the smell test. Can you understand why those of us who are average citizens trying to scratch out a living in this neck of the country begin to think conspiracy? Rules shouldn't change in the middle of the game. Goal posts shouldn't be moved in the middle of the action. We want our federal government to be fair. When you request comments on a proposal and then make changes like this to suit what appears to be what some players want to happen, it doesn't appear to be fair.

I thank you for this opportunity to participate in this planning process. I hope serious consideration be given to the people of Lincoln County with our traditional customs and lifestyles, employment and future, be included in planning. I hope you can fit "fairness" into this plan. I hope you can put "trust" back into our vocabulary.

I do appreciate your efforts, and I hope you will improve upon the final product in order to avoid potential problems in the future, especially if this stands for 30 years or so like the previous plan.

Sincerely,

Rep. Mike Cuffe,

Montana House District 2

Eureka and rural Lincoln County

Covering most of the Kootenai National Forest