

## 2013 Kootenai Forest Plan Revision Objection

**Objectors Name:** Mike Powers.

**Address:** 313 California Ave.

**Phone # or E-mail address:** 406-293-6771

**Name of lead objector:** Mike Powers

**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 the Roderick, Scotchman's Peak, and lands adjacent to the existing Cabinet Mountain Wilderness Area as MA 1B – Recommended Wilderness.

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

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

1. The process of evaluating and designating the "Inventoried Roadless Areas" that these Recommended Wilderness Areas are contained in was flawed. When you evaluate 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 of the acres within these areas should not have been considered for "Roadless" evaluation.

2. The process of evaluating the Inventoried Roadless Areas for wilderness character 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 show that the imprint of man's work is quite noticeable in the form of logging roads, and old timber harvest units. This area 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. I 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. Paragraph 5 on page 449 of the FEIS states; "For example, Northwest Peaks IRA rated high in all suitability categories, but was determined not to be suitable based on comments from the public and elected officials."


The same can be said for all of the areas currently proposed as recommended wilderness on the KNF. The KNF appears to be using a double standard here. Was there some political horse trading done relative to the Northwest Peaks IRA that the public was not made aware of?

**Proposed Solution**

The plan should re-evaluate all the acres within these areas which currently have roads in them, regardless of whether or not those roads have been removed from the KNF Travel map, and/or road data base. The plan should then be altered to manage all acres outside of true "Roadless Areas" as Management Areas 5b – Backcountry winter motorized or MA6 – General Forest. These management designations would allow a maximum of winter recreation opportunities within these areas which will have a positive impact on local economies. These management designations would also allow for more flexibility both fire and vegetation management activities which could be utilized to both the prevent damage to, and enhance grizzly bear habitat conditions in these areas. The acres remaining inside true "Roadless Areas" should then be re-evaluated for wilderness character, but not managed as "Recommended Wilderness".


**Statement demonstrating the link between the objection and prior formal**

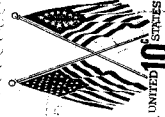
**comments:** My comments on the Draft Kootenai National Forest Plan addressed the proposed management policies for these areas.

Signature: *Mike Powers* 

**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)

  
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ATTN: ~~Administrative~~ Administrative