Ten Lakes

Montana Wilderness Study Act Area

Final Report & Proposal

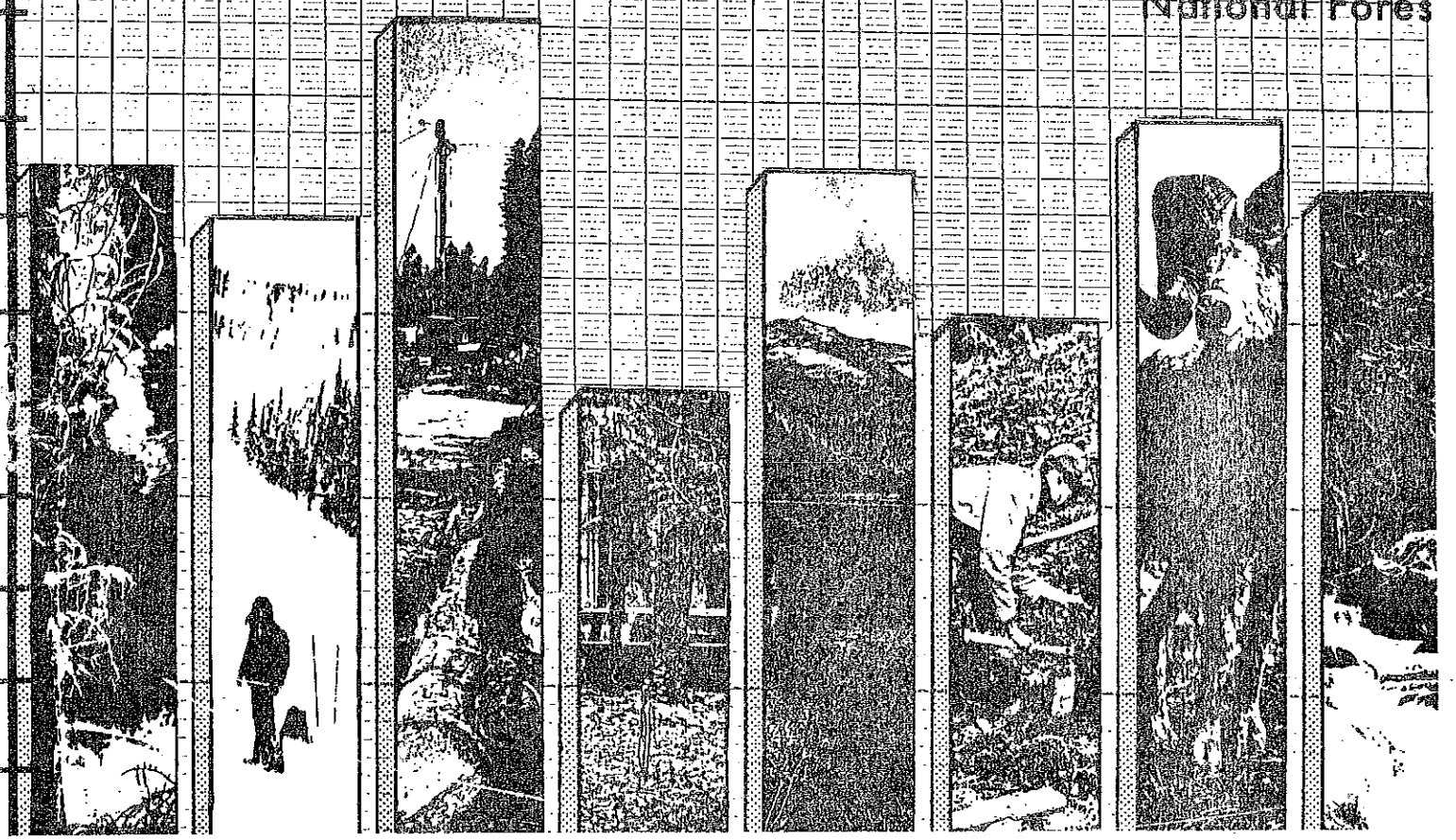
Appendix B - Analysis of Public Comments
Appendix C - Copies of Public Comments

DRAFT

United State
Departmen
of Agricultur

Forest Servic

Kootena
National Fores



Appendix B

This appendix presents the evaluation and analysis of the public comments received in response to the original Ten Lakes MWSA Draft Report and Proposal.

Ten Lakes Public Response Summary

May 16, 1983

Number of Responses (Letters) - 303
Number of Signatures (People) - 391

Who responded?	% of Letters	% of People
Individuals with no stated affiliation ("John Q. Publics").	- 76%	78%
Environmental, Wildlife, & Recreation Groups.	- 11%	13%
Industry & Industry-Related Individuals & Organizations.	- 8%	6%
Civic Organizations, Forest Service Employees, & Government Agencies	- 5%	3%

How did they respond? With -		
Personal Letters	- 70%	60%
Public Hearing Comments (Eureka, Libby, Kalispell)	- 15%	11%
Form Letters (mostly from Lincoln-Helena snowmobilers)	- 13%	12%
Petitions	- 1%	15%
Oral Comments	- 1%	2%

Where were the publics from?		
From locations immediately adjacent to the Forest boundary as defined by a line running from Kalispell, Missoula, Spokane.	- 37%	33%
From locations within the Forest boundary (primarily Eureka area).	- 31%	37%
From other Montana locations.	- 26%	22%
From other parts of the U.S.	- 5%	5%

What did people say about the Proposed Action is terms of approval or disapproval?		
Those who disapproved of the Proposed Action.	- 56%	48%
Those who approved (or approved with "conditions").	- 41%	42%
Those who expressed no opinion.	- 3%	10%

Of those who disapproved of the Proposed Action, which alternative was preferred?		
Alternative C	- 86%	87%
No Preference	- 6%	4%
Any wilderness alternative	- 3%	1%
Alternative B	- 2%	1%
Alternatives A, D, Current Direction, & "Lloyd West" Alternative - each about 1%		

About 590 comments were recorded from the public's responses. The comments concerned many of the identified public issues plus other issues of concern to the public. What were the public review issues, as determined by the number of times the issue came up?

	% of comments	% of people
Protect the wildlife values by making Ten Lakes wilderness.	- 15%	25%
Leave area open for snowmobiling.	- 10%	21%
Timber values are low and scanty to make area nonwilderness.	- 7%	12%
Area has scenic & wild qualities;	- 7%	10%
preservation outweighs management.	- 7%	5%
Snowmobilers have enough areas to recreate; make area wilderness.	- 5%	8%
Wilderness would protect area from oil & gas activities.	- 4%	7%
Forest does not need area to meet RPA timber goals.	- 3%	5%
There is a shortage of wilderness in Montana	- 3%	4%
Scenic Area designation would not necessarily protect the area.	- 2%	3%
Timber values outweigh wilderness; area should be managed.	- 2%	3%
Other issues (cumulative)	- 35%	1/

1/ This column is not additive because people generally spoke to more than one issue.

Effect of Petitions & Form Letters

on the Ten Lakes Public Response Analysis

1. Letters & People

The difference between the number of letters (303) and the number of signatures (391) reflects multiple signatures on letters and petitions. There were three (3) petitions totaling 59 signatures.

2. Form of Response

The effect of the petitions is also shown in the number of people versus the form of response. Although petitions only totaled 1% of the letters, they totaled 15% of the people.

3. Geographic Origins

The geographic location information shows that the petitions originated from locations within the Forest. 31% of the letters came from within the Forest representing 37% of this segment of the public.

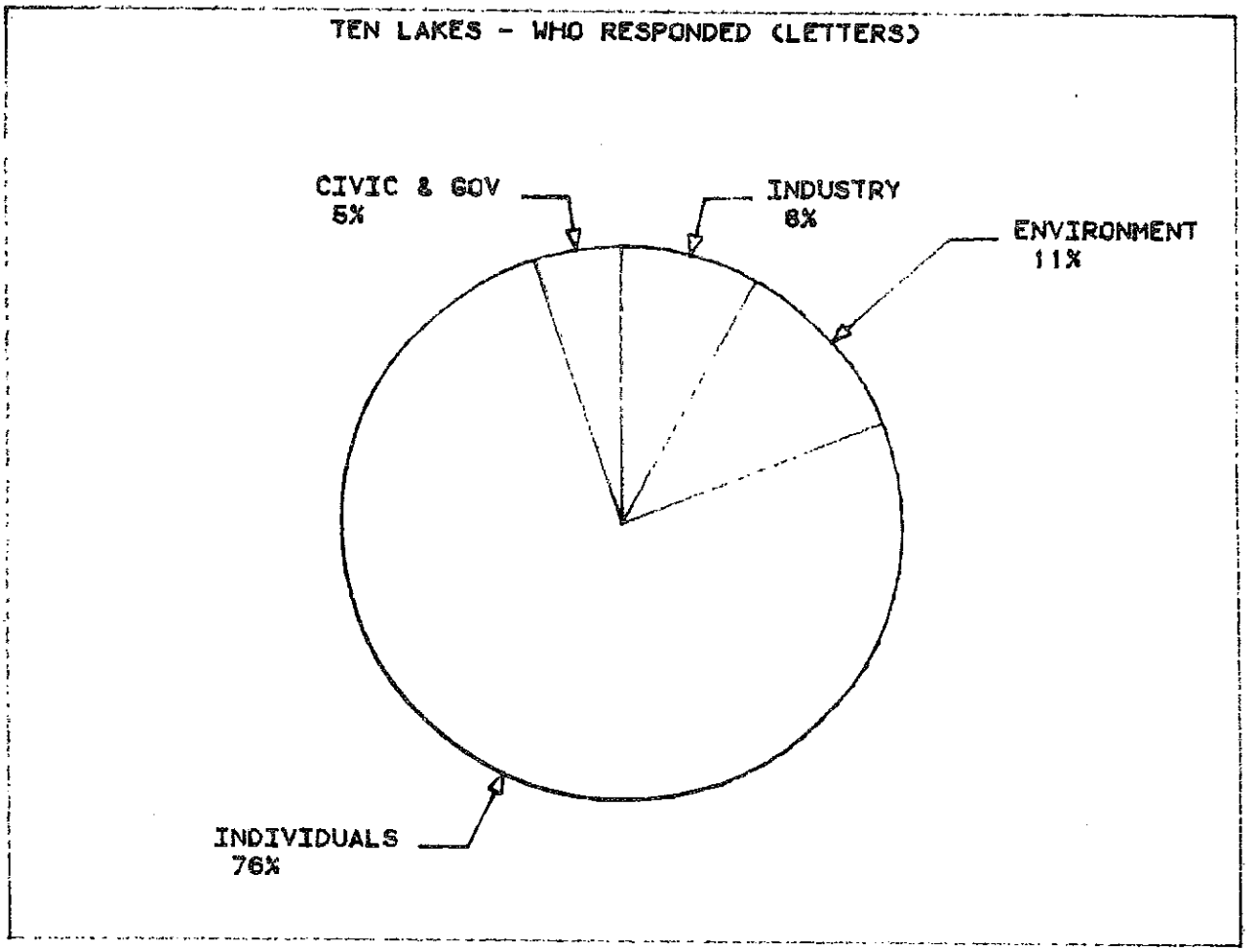
4. Reaction to the Proposed Action

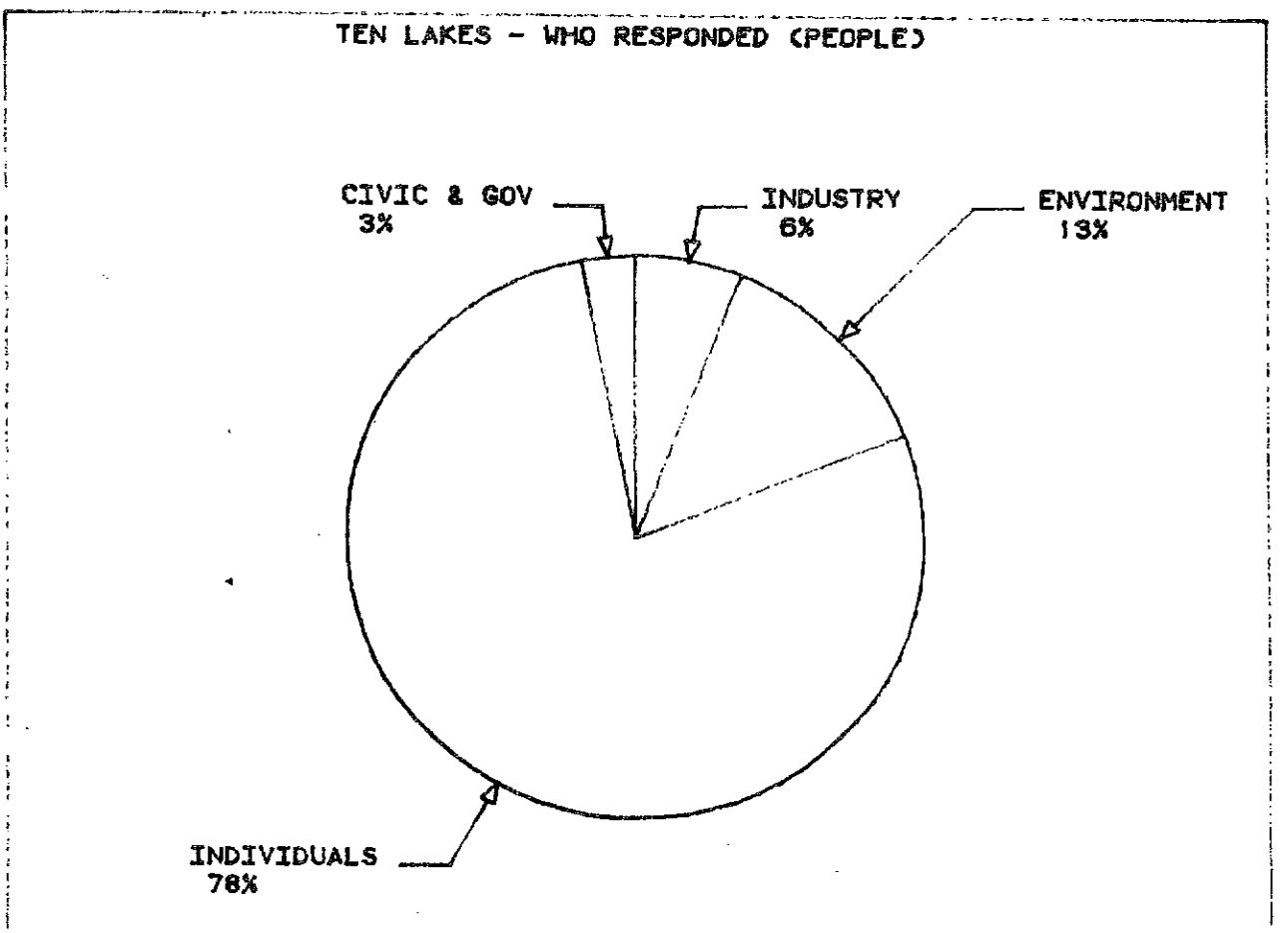
Reaction to the Proposed Action shows that although "no opinions" represented only 3% of the total letters, they totaled about 10% of the people. This reflects a petition signed by 29 people who were voicing opposition to the alternative prepared by the Tobacco Valley Citizen's Committee, rather than in support or opposition to a Forest alternative. It was classed as a "no opinion" response. The effect of this is to create more difference between the number of letters disapproving and the number of people disapproving.

5. Effects on Issues

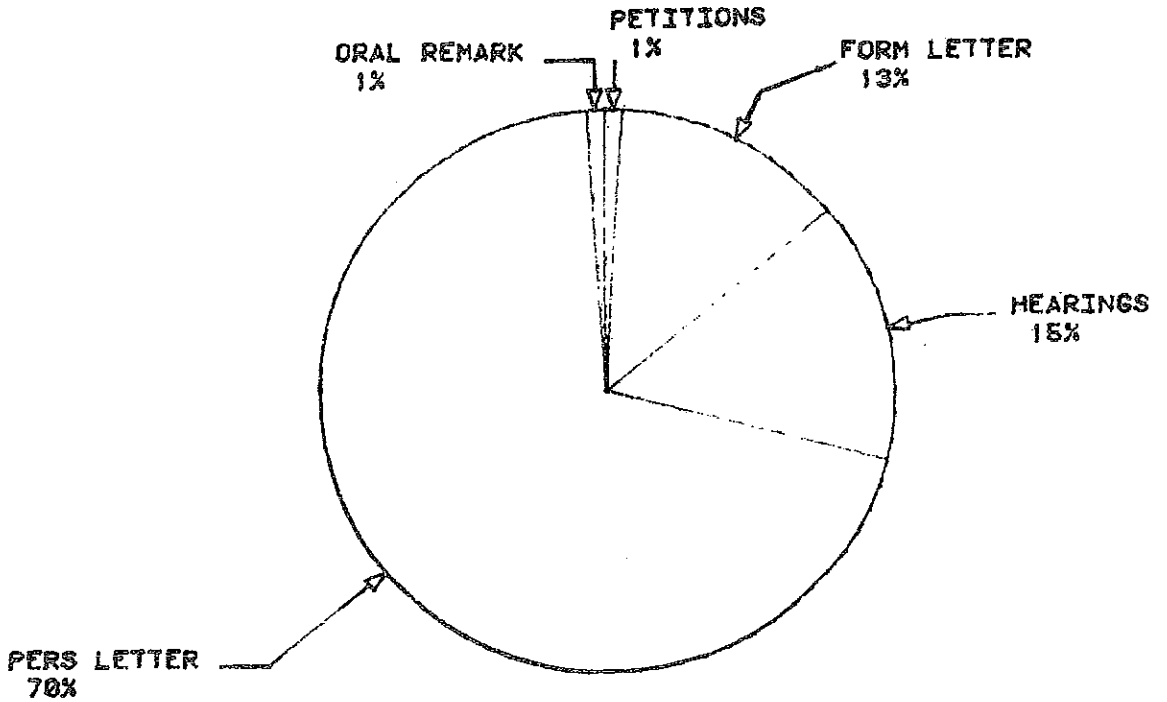
The effect of form letters is most noticeable in the number of times issues were raised, particularly the snowmobile issue. 34 form letters were received in support of continued snowmobile use in Ten Lakes, representing 42 people. The remainder of the people wrote in the form of personal letters or public hearing comments (30 letters and 46 people). 26 of the form letters came from the east side snowmobile clubs, representing 27 people.

In summary, 53% of the support for snowmobiling came in the form of form letters, representing 47% of those people in support of snowmobiling. Of the form letters, 76% came from the east side, representing 31% of the people supporting snowmobiling. The effect of the form letters enabled support of the proposed action because of continued snowmobiling to emerge as a significant public review issue.

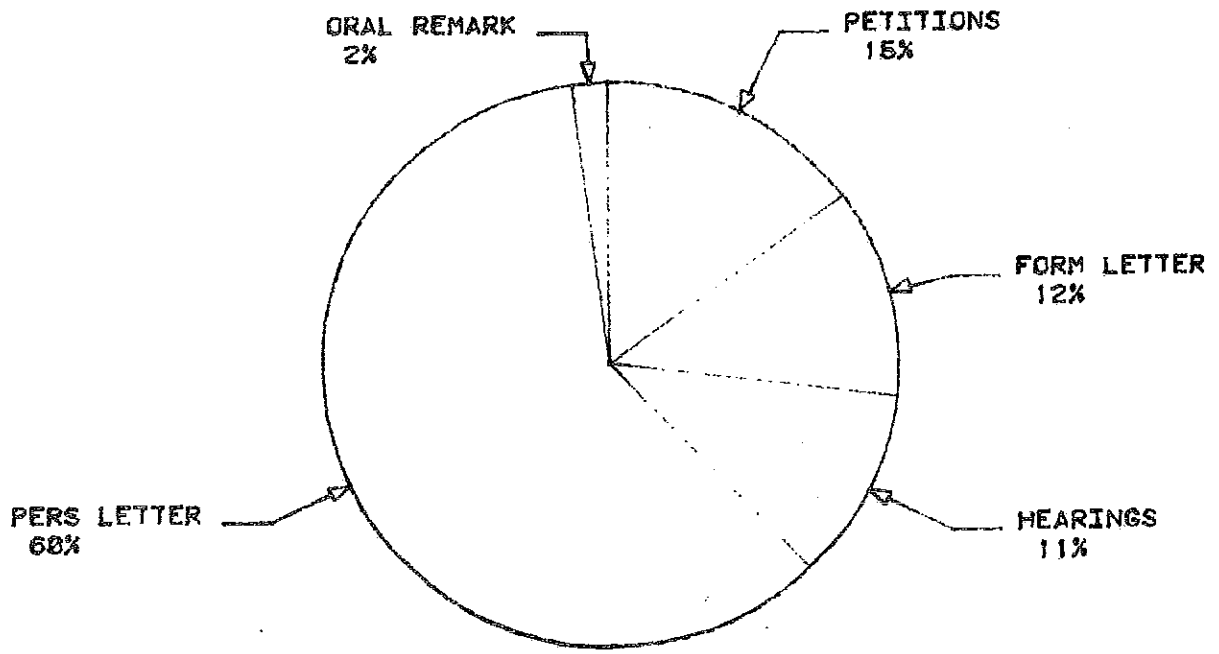

TEN LAKES - WHO RESPONDED (LETTERS)
CIVIC & GOV
5%
INDUSTRY
8%
ENVIRONMENT
11%
INDIVIDUALS
76%


TEN LAKES - WHO RESPONDED (PEOPLE)
CIVIC & GOV
3%
INDUSTRY
6%
ENVIRONMENT
13%
INDIVIDUALS
78%

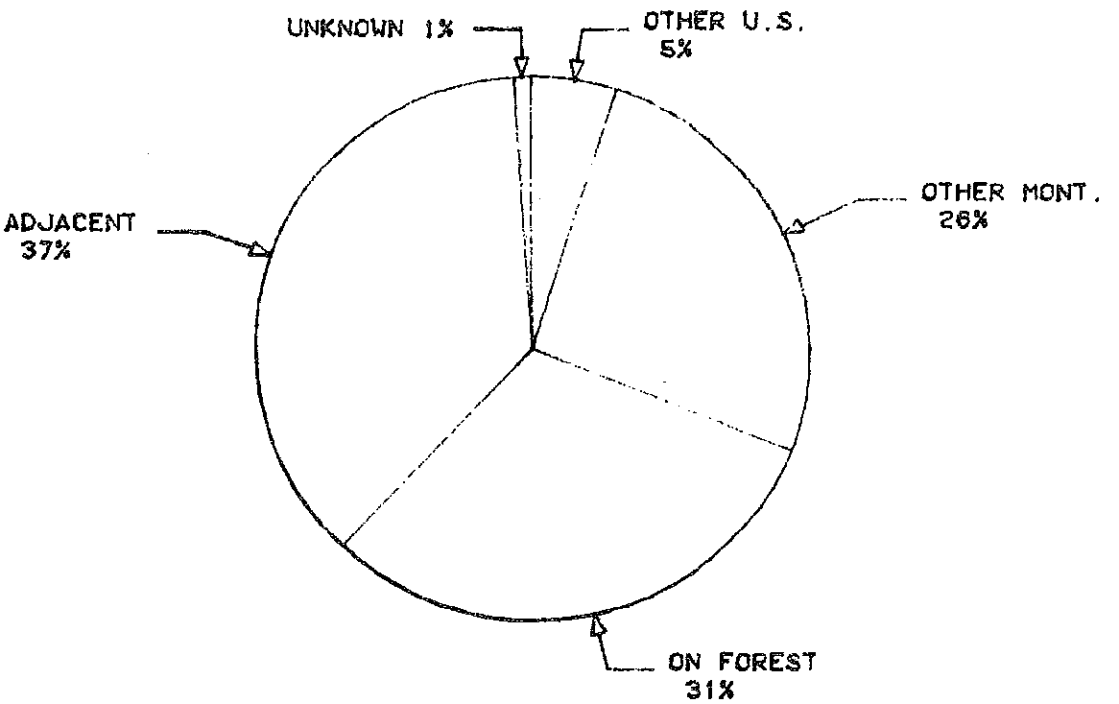
TEN LAKES - HOW DID THEY RESPOND (LETTERS)



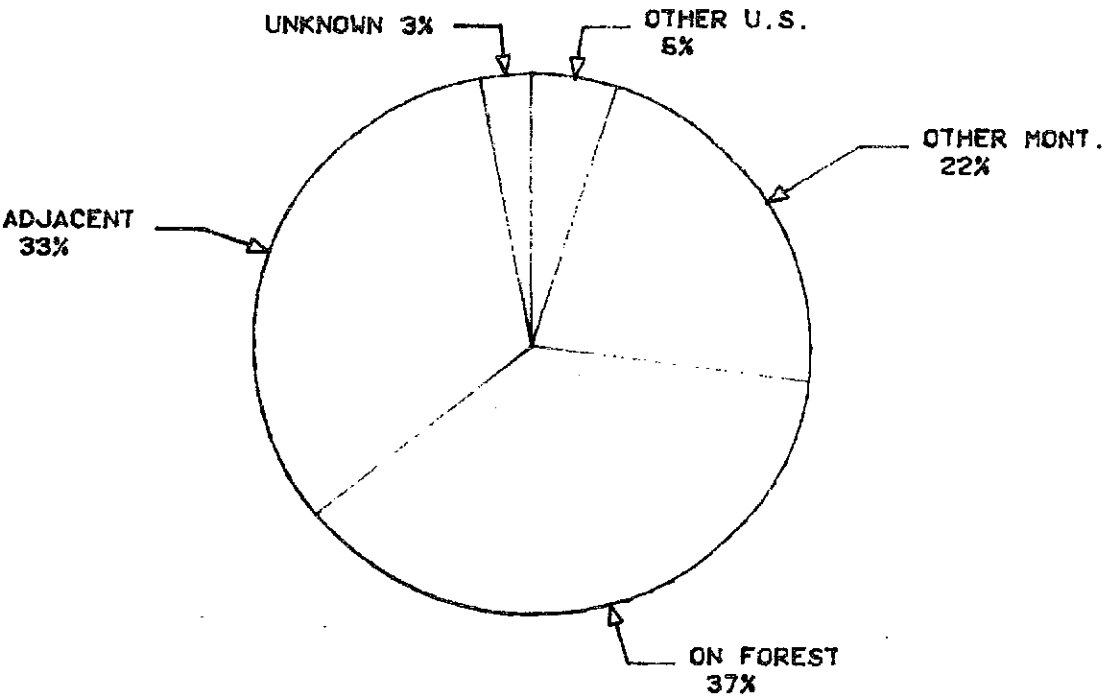
TEN LAKES - HOW DID THEY RESPOND (PEOPLE)



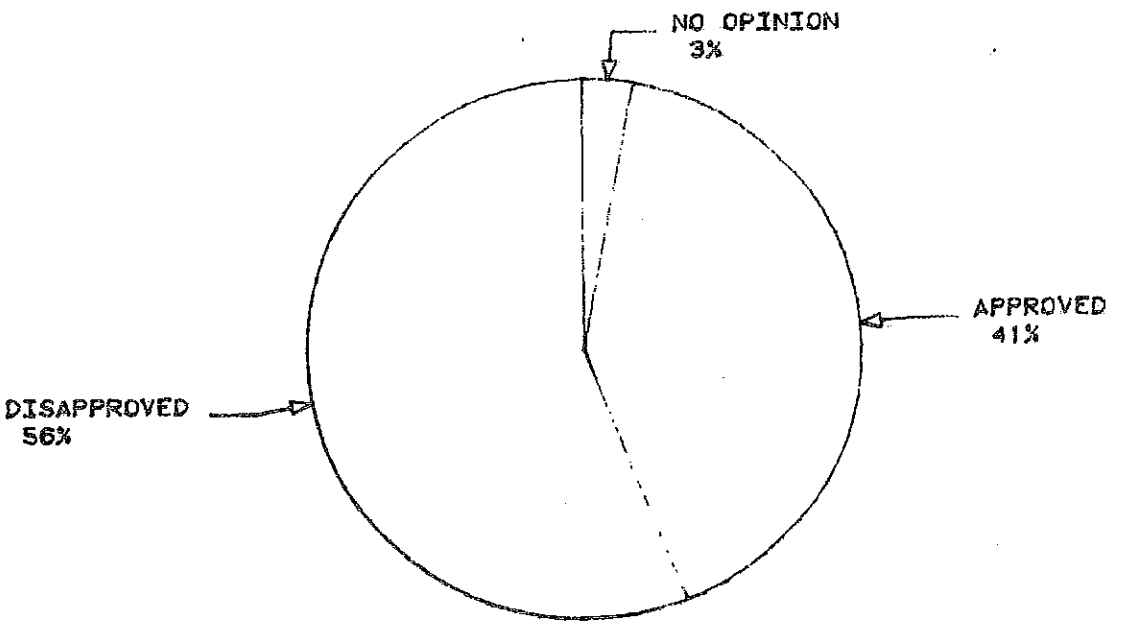
TEN LAKES - WHERE FROM (LETTERS)



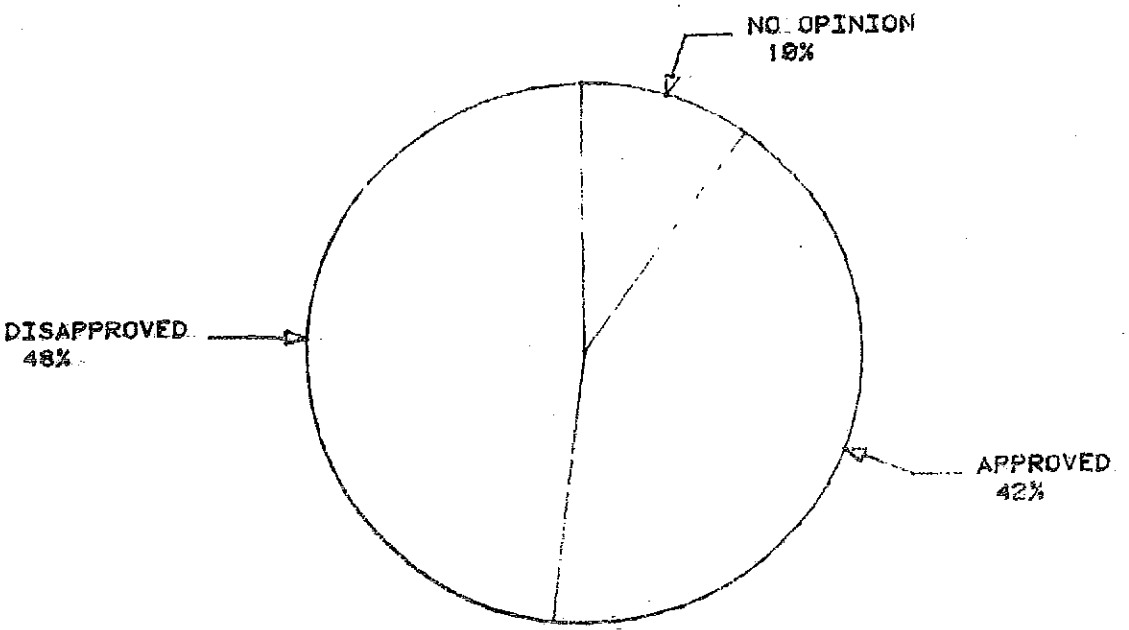
TEN LAKES - WHERE FROM (PEOPLE)



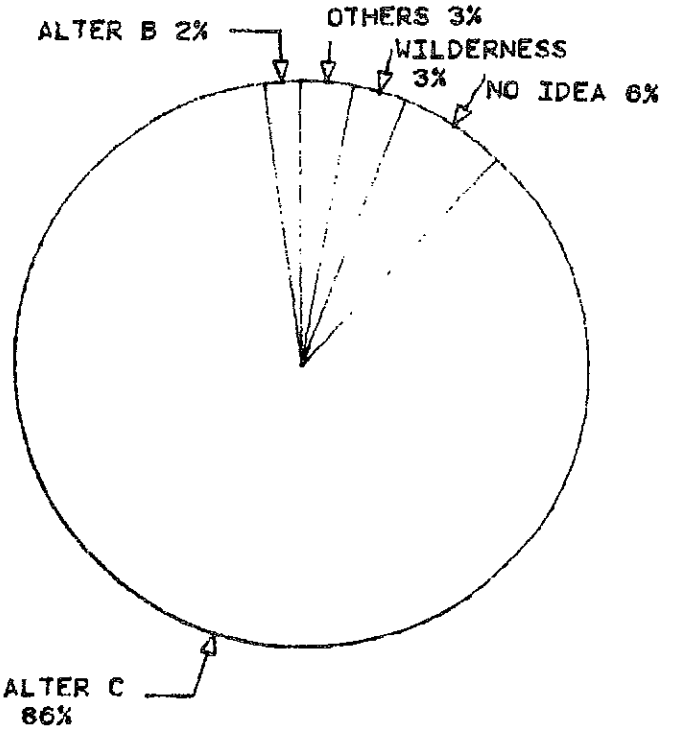
TEN LAKES - APPROVE VS DISAPPROVE (LETTERS)



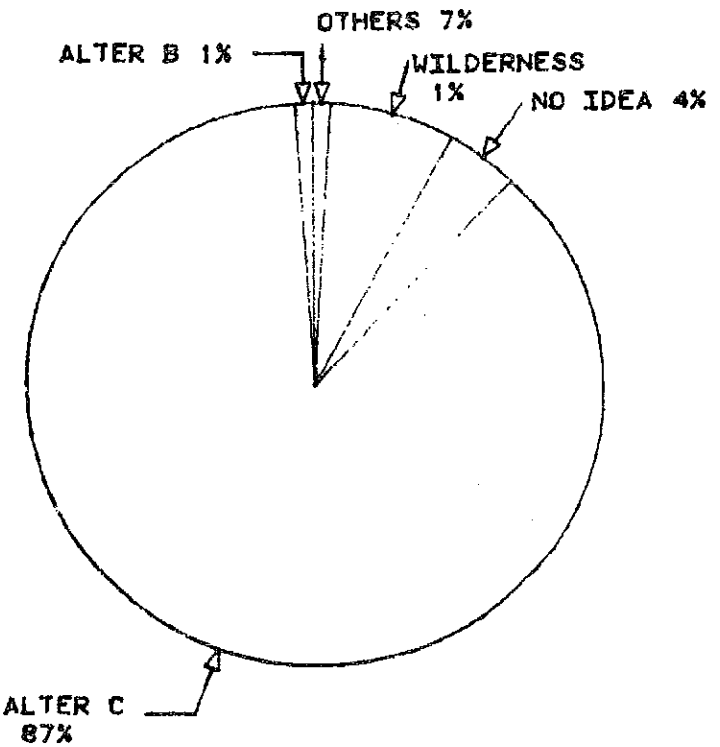
TEN LAKES - APPROVE VS DISAPPROVE (PEOPLE)



TEN LAKES - BETTER IDEAS OF DISAPPROVERS (LETTERS)



TEN LAKES - BETTER IDEAS OF DISAPPROVERS (PEOPLE)



Ten Lakes Initial Public Response Analysis

Responses - 303
Signatures - 391

	Letters	People
Who		
Individuals	- 232	305
Recreation Organization	- 15	30
Environmental Organization	- 11	12
Timber Industry	- 8	8
Forest Service Employee	- 7	7
Individuals assoc/w Timber Industry	- 6	6
Individuals assoc/w Environmental Groups	- 5	5
Mining Industry	- 5	5
Other Industry Organizations	- 5	3
Wildlife Organization	- 3	5
Civic Organization	- 2	1
Local Government Agency	- 1	1
Federal Government Agency	- 1	1
State Elected Official	- 1	1
Local Elected Official	- 1	1
Form of Response		
Personal Letter	- 212	236
Public Hearing Comment	- 45	45
Form Letters	- 41	49
Petitions	- 3	59
Oral Comments	- 2	2
Geographic Origin of Responses		
Kalispell, Missoula, Spokane	- 111	132
Montana	- 78	86
Eureka Area	- 53	98
Libby Area	- 26	29
Western U.S.	- 13	14
Fortine/Trego Area	- 8	14
Troy Area	- 6	6
Eastern U.S. (East of Colo.)	- 4	4
Noxon/Heron/Trout Creek	- 1	1
Unknowns	- 3	7
Reaction to Proposed Action		
Disapproved	- 170	190
Approved	- 114	150
Approved Conditionally	- 10	13
No Opinion	- 9	38

Responses to "S.393" Public Issues

	Total*		In Response to the Proposed Action: Those Approving**		Those Disapproving	
	Letters	People	Letters	People	Letters	People
Recreation	117	178	64	97	48	81
Wildlife (Incl. T&E)	102	115	8	8	94	106
Timber	76	116	20	23	54	92
Minerals	37	40	11	11	23	29
Wilderness Suitability	25	26	3	3	22	23
Other Wilderness	22	37	7	20	14	17
Wilderness Quality	22	24	2	2	20	22
RPA (ability to meet)	15	21	1	1	13	20
Community Stability	14	20	8	9	6	11
Protection	6	6	3	3	3	3
Physically Handicapped	1	1	0	0	1	1
Social Situation	0		0		0	
Wilderness Diversity	0		0		0	
Other Issues Identified Through Public Comments						
Issues pertaining to:						
Scenic Area Designation	32	42	16	17	16	23
Socio/Economic	17	20	9	9	8	11
Roads & Trails	15	18	4	6	11	12
Process	12	28	0	0	12	28
Watersheds	3	3	0	0	3	3
Access	2	6	3	3	2	3

* Does not include "No Opinions"
** Includes "Approved Conditionally"

Of Those Who Disapproved

Alternative Preferred	Letters	People
Alt. C	- 147	165
No Alt. Preferred	- 10	7
Any Wilderness Alt.	- 5	4
Alt. B	- 4	4
Alt. A	- 1	1
Alt. D	- 1	1
Current Direction	- 1	1
Own Alt.	- 1	7

Geographic Orgination of Those Disapproving		
Kalispell, Missoula, Spokane	- 77	83
Montana	- 41	46
Eureka Area	- 19	21
Libby Area	- 12	12
Fortine/Trego Area	- 8	14
Western U.S.	- 5	6
Troy Area	- 4	4
Eastern U.S.	- 3	3
Heron/Noxon/Trout Creek	- 1	1

Occurence of Public Issues

Issues Pertaining to:

Wilderness	- 95	107
Wildlife (incl. T&E)	- 94	106
Timber	- 77	92
Recreation	- 67	81
Oil & Gas/Minerals	- 25	29
Scenic Area Designation	- 16	23
Process	- 12	28
Roads/Trails	- 11	12
Socio/Economic	- 8	11
Watershed	- 3	3
Access	- 2	3
Protection	- 1	1

Of those disapproving of the Proposed Action, the following are the most often stated rationale/opinions about the public issues ("Top Ten"):

		Letters	People
1.	Nonwilderness would be detrimental to wildlife; including T&E.	- 91	103
2.	Area does not contribute that much to Forest timber volumes; is not significant to Forest volumes; timber of low value.	- 43	49
3.	Area provides beauty & solitude; last wild remnant of Whitefish Range; meets criteria for wilderness.	- 39	43
4.	Snowmobiles already have enough area to recreate; 10 Lakes not needed; snomos & wilderness don't mix.	- 29	34
5.	Protect area from oil & gas exploration/development.	- 24	27
6.	RPA timber goals will be met regardless of timber in 10 Lakes.	- 19	21
7.	There is a shortage of wilderness in Montana.	- 16	16
	Preservation outweighs need for management flexibility.	- 16	19
8.	Scenic Area designation is no guarantee area will be protected.	- 14	14
9.	Area should not be roaded.	- 10	11
10.	Wilderness needed to help meet demand for roadless recreation.	- 9	16
	Preserve for future generations.	- 9	9

Of Those Who Approved (Including Approved Conditionally)

Geographic Origination of Those Approving

	Letters	People
Montana	- 46	43
Kalispell, Missoula, Spokane	- 30	46
Eureka Area	- 30	47
Libby Area	- 15	16
Western U.S.	- 8	8
Troy Area	- 2	2
Eastern U.S.	- 1	1

Occurence of Public Issues

Issues Pertaining to:

Recreation	- 68	97
Wilderness	- 25	35
Timber	- 21	23
Scenic Area Designation	- 16	17
Oil & Gas/Minerals	- 11	11
Socio/Economic	- 9	9
Wildlife	- 5	8
Protection	- 4	3
Roads/Trails	- 4	6

Of those approving the Proposed Action, the following are the most often stated rationale/opinions about the public issues ("Top Ten"):	Letters	People
1. Leave area open for snowmobiling.	- 61	86
2. Timber is area should be managed; values outweigh wilderness.	- 13	13
3. Area should be available for oil & gas exploration and restrictions lessened.	- 11	11
4. Too much wilderness in Montana.	- 10	23
5. Scenic Area designation better than wilderness; protection plus management options.	- 9	9
6. Wilderness would adversely effect local jobs; wilderness bad for economy.	- 8	8
Area too small for wilderness; would attract too much use; past activites visible.	- 8	8
7. Harvest only from existing roads; helicopter log; emphasize shelterwood over clearcuts.	- 7	9
8. Manage for a variety of recreation; not just wilderness.	- 5	8
Scenic Area should be enlarged to 30,000 acres +.	- 5	6
9. Area should not be roaded.	- 4	6
Need ability to salvage bug-killed lodgepole.	- 4	4

Numbers within the parentheses ( ) are the number of people responding to each comment. "Approve" and "Disapprove" refer to those people approving of the proposed action and disapproving. The total includes those with no opinion.

	Total	Approving	Disapproving
A - WILDLIFE			
Nonwilderness would be detrimental to wildlife/grizzly; caribou - wilderness would protect wildlife and habitat.	93 (106)	2 (4)	91 (1
Regardless of designation, maintain for wildlife.	1 (1)		
Burma Face high in fall/winter/spring range; favored hunting area.	1 (1)	0	
Wildlife better favored by direct management.	3 (3)	2 (2)	1 (1
Wilderness would provide old growth.	1 (1)	0	1 (1
Fisheries treated superficially.	1 (1)	0	1 (1
No sign of caribou.	1 (1)	1 (1)	
E - SOCIO/ECONOMIC			
Decision should not be made on basis of dollars.	2 (2)	0	2 (2
Wilderness would adversely effect local jobs; need to support local economy; wilderness bad for economy.	8 (8)	8 (8)	0
Wilderness would benefit local economy by bringing tourism.	8 (9)	1 (1)	7 (8)
Wilderness will not effect economy one way or another.	1 (1)	0	1 (1)
F - ROADS/TRAILS			
Area should not be roaded; no roads; harmful to wildlife; too much sedimentation; too costly.	14 (17)	4 (6)	10 (1
Trail system should be provided.	1 (1)	0	1 (1)

	Total	Approving	Disapproving
G - ACCESS			
Area should be accessible for older folks.	2 (2)	2 (2)	
Scenic area would allow easier access.	1 (1)	1 (1)	
Wilderness would not keep physically handicapped out--they themselves would.	1 (1)		1 (1)
Would be an easily accessible wilderness.	1 (1)		1 (1)
Easier access would be detrimental to area.	1 (1)		1 (1)
H - WATERSHED			
Watershed should be protected.	3 (3)		3 (3)
O - OIL AND GAS/MINERALS			
Nonwilderness would allow oil and gas exploration adversely effecting the area.	24 (27)	0	24 (27)
Restrictions on oil and gas should be loosened; area open for exploration and development.	12 (12)	11 (11)	1 (1)
Additional mineral data needed.	1 (1)	0	1 (1)

P - PROCESS	Total	Approve	Disapprove
Intent of S. 393 is not being met, area is not being properly evaluated for wilderness; criteria used to evaluate no longer valid.	5(5)		5(5)
Study should not be rehash of RARE I AND II.	1(2)		1(2)
Decisions should not be made until area has been explored for minerals.	1(1)	1(1)	
Study has been adequate.	1(1)		
Documents are inadequate.	3(9)		3(9)
Biased toward timber.	2(8)		2(8)
Decision is a political expedient.	1(1)		1(1)
Support Lloyd West's alternative.	1(1)		1(1)
R - RECREATION			
Keep area open for snowmobiles.	64(88)	61(86)	
Snowmobiles already have enough area to recreate; Ten Lakes not needed; snowmobiles should be excluded altogether; making area wilderness and allowing snowmobiles is not consistent.	29(34)	0	29(34)
Need to address motorcycled ORV use.	1(1)		
Protect the Burma Face as viewed from valley.	9(15)	2(2)	7(13)
Need to include discussion of Pacific NW Trail.	1(1)		
Ten Lakes should be wilderness to help meet demand for roadless rec.	9(9)		9(9)
Area contains a variety of recreation opportunities, <u>not just wilderness</u>, and should be managed for them.	7(10)	5(8)	2(2)

	Tot.	App.	Dis-app.
Allow horse use.	1(1)		1(1)
Forest should strive to meet demand for roadless recreation--a shortage item.	7(7)		7(7)
Area should be managed for wilderness recreation.	10(11)		10(11)
Current acreage is adequate for roadless recreation.	1(1)	1(1)	
Maximize recreation.	3(3)		3(3)
S - COMMENTS SPECIFIC TO SCENIC AREA DESIGNATION			
Scenic area designation would not assure protection of the area (whereas wilderness would).	14(14)		14(14)
Scenic area should be enlarged to 30,000 acres +.	6(13)	5(6)	1(7)
Should create buffers; no developments too close to boundary of scenic area.	1(2)		1(2)
Scenic area would provide more resource options; more management flexibility; need to manage for wildlife and timber; could also maintain facilities such as bridges and trails.	2(2)	2(2)	
Scenic area better than wilderness because still provides protection and options.	10(10)	9(9)	
Scenic area maximizes both timber and recreation dollars.	1(1)		
T - TIMBER			
Area does not contribute that much to Forest volumes; is not significant, timber-speaking; low timber values.	43(49)		43(49)
Some portions of area should be managed for timber; timber values outweigh wilderness.	16(16)	13(13)	3(3)
Harvest should be only from existing roads--no new roads; helicopter log; shelterwood and select harvest; salvage harvest only; protect soils.	12(20)	7(9)	5(11)
Frenchtown mills are dependent on wood from Ten Lakes vicinity.	1(1)		
RPA timber goals will be met regardless of Ten Lakes timber.	20(21)	1(1)	19(20)

	Tot.	App.	Dis-app.
No harvest should be allowed in area.	5(6)		5(6)
Area being exploited for timber.	2(3)		2(3)
W - COMMENTS SPECIFIC TO WILDERNESS			
There is a shortage of wilderness in Montana.	16(16)		16(16)
Cabinets and Scotchman Peaks now being threatened by mineral development, therefore, make Ten Lakes wilderness.	4(4)		4(4)
Development would ruin character of wilderness; preservation outweighs need for flexibility.	17(20)	1(1)	16(19)
Preserve area for future generations.	9(9)		9(9)
Too much wilderness in Montana already.	11(23)	11(23)	
Area provides beauty, solitude; last wild remnant of Whitefish range; is wild oasis in sea of development; provides spiritual solitude; configuration does not preclude wilderness.	39(43)		39(43)
Area should be preserved as a natural ecosystem.	2(2)		2(2)
Area too small to be wilderness; wilderness designation would attract too much use; does not lend itself to solitude; past activities are visible.	10(10)	8(8)	
Wilderness is only for those who can afford it.	1(1)		
If wilderness desired, Alternative D is a good compromise.	1(1)		
Ten Lakes is sacred and spiritual--place for solitude.	1(1)		1(1)
Other 393 areas not being recommended for wilderness.	2(2)		2(2)
Final wilderness boundary should exclude development.	1(2)		1(2)
Wilderness produces overall highest PNB.	1(2)		1(2)

	Total	Approve	Disapprove
Wilderness is a nonrenewable resource; if developed, would ruin it forever.	1(1)		
Ten Lakes as wilderness would only increase wilderness on KNF by 1.6 percent.	1(1)		1(1)
Past support has been for wilderness.	2(2)		1(2)
Outfitters and Guides should be prohibited if made wilderness.	1(1)		1(1)
Wilderness needed to meet KNF RPA target.	1(1)		1(1)
Area already too developed, too touristy.	4(4)	2(2)	2(2)
Fear of domino effect off wilderness.	1(1)	(1)	

X - PROTECTION

Rationale to regulate Burma Face on basis of fuels needs not warranted; Fuels situation light and wildfires easily suppressed; salvage eventually needed but not now.	1(1)		1(1)
Need ability to salvage insect/disease bug-killed trees.	4(4)	4(4)	

This appendix contains all the written comments received by the public during the public review of the November 1982 Ten Lakes Draft Report and Proposal and were used in the anlaysis of public comments. They appear in the order in which they were received and evaluated.

Some letters dealt with both the November 1982 Draft Forest Plan as well as Ten Lakes. If letters included comments about Ten Lakes, they were counted as input to the proposal for Ten Lakes. The following is a list of the respondents to the November 1982 Ten Lakes Draft Report and Proposal. (Letter numers were given to comments as they were received for both the Forest Plan and Ten Lakes; thus some numbers in the following list are missing. Those missing letters dealt solely with the Forest Plan).

Letter No.	Name
2	Joseph Schott
4	Bruce Keene
5	Mitch Taliaferro
6	Glenn Mueller
7	Robert Strickland
8	George Curtis
9	Ned Decker
10	Daniel Casazza
11	Rock Mountain Oil and Gas Assn.
12-12b	John Jeresek
14	Jim Kilroy
15-15b	Alta Smith
16	Bob Seidel
17-17a	Steven Kelly
18	Marilyn Whitman
19-19b	Mr. & Mrs. Robert Schaffer
20	Stan Holder
22	James Bean & Kath Cunningham
24	CONOCO
26	True Oil Company
27-27b	Tobacco Valley Rod and Gun Club
28	Dennis Divoky
29	Montana Magazine
30	John Bush
31	Mac Donofrio
32	Jill Devine
33	Mark Brunson
34	Sean O'Brien
35	Anne Poloson
37	Flathead Snowmobile Assn.
38-39	Jerry Schaub
40	Lloyd West
66b	Plum Creek Lumber Company
72b	Carol Free
78b	Mike Free
81b	James R. Conner
83	Chester & Margaret Murphy
84-84b	Keith & Korin Decker
85	Robert & Darla Teets
86	Larry Barge
87	Lonnie & Laurie Keller
88	Mr. & Mrs. Rick Teets
89	Don & Kathleen Zundel
90	Rodney Larson
92	Form Letter Response
93	Kerby Allers
94	Rosalyn Allers
95	Ron Selden
96	Harry Workman
101	Avis McCollum
102	M.C. McCollum
105	Richard Wilson
108	Mickey Sorensen
109	Wade Sorenson
112	Lois McGlothlin
113	John Gjerde
116&116b	Charles Newton
117	Dorothy Newton
118	Kathy Lewis
119	Ray Masters
121	Nancy Peterson
122	Brenda Nesbitt
124	Joe Hibbetts
125	Thomas Esch
126	Paul Johnson
127	Mr.& Mrs. David Snyder
128	Doug Rhodes
129	Christie Ferruzzi
130	Michael Yelinek
133	Stewart Tepper
134	Steve Lamar
135	Terry Mullins
136	Morey Haggin
137	Mindy Henderson
140	Bitterroot-Mission Sierra Club
141	Lilli Ann Martin
143	Nancy Newcomer
149	Rosalind Yanishevsky
150	Tim Melander

151	Charles Potter
152	Eugene Graf
153	Big Sky Snowriders
154	L.R. Celand Family
155	Randal Shaw
156b	Bonnie Rieshus
157	Maryan Heppell
159	David Hudak
160	Elaine & Martin Reardon
161	Susan Schlosser
162	Mark Engler
163	Dora Mae Dickinson
164	Helen Pilling
165	Wilfried Royer
166	Brad Shepard
167	Janet Tatz
168	William & Elizabeth Bertsche
169	Nancy Searles
170	Dennis Winslow
171	Diane Boyd
173	Lois Sheldon
174	Brian Manning
175	Bruce Walthers von Alten
177	Phyllis Falconer
178	Linda Anderson
179	NEED
180	William & Juliet Moeckel
182	Linda Comola
183	Frank Vitale
184	George Heliker
185	Kathleen Woldtoedt
187	Mrs. W.J. Erickson
188	Gail Miller-Richarson
189	Mark Lusch
191	Paul Richards
192	Charles Woods
193-193b	Coalition for Canyon Preservation
195	Charlene Locke
196	Neil Sauerbier
197	USDI-Office of Environmental Project Review
198	Ellen Horowitz
199	Barbara Rhodes
200	Loren Kreck
201	Tobacco Valley Citizen's Committee
202	Diane Ensign-Caughey
203	Wayne Ryan
204	American Fisheries Society
207b	Pat Kearney
210	Bob Oret
211	Mike Marvel
212	James Phelps
214	Texaco
215	Barbara Slager
216	St. Regis
217	Dale Fredlund
218	Larry Larson
219	Greg Ouellette
224	Malinee Crapsey
225	Ruth & Michael Gardner
229&229b	Robert & Kathryn Lance
230	Jon Heberling
231	Gary Ingman
234	Mr.& Mrs. Bob Piersall
236	Pat Simmons
237	Gail Leonard
238	Jennifer Corrion
239	Mr. & Mrs. John Holder
240	Bert Morris
242	Stu Swenson
243	Craig Hess
246	G. Douglas Follett
249	Allen Wells
254b	Joel Nelson
255	Richard Kuhl
256	Deerlodge Women in Timber
258	Mildred Walter
260	Pam Nickol
261	Robert Wetzel
271	Renee Stapley
272	John Olson
296	Montana Environmental Information Center - Flathead Office
318	John E. Crawford
319	Joe Marvin
320	Tom Sewell
326	Thomas Matila
328	Montana Loggin Assn.
329	Stan Heuscher
509	Mr.& Mrs. Ernest Eggert
515	Jerry Okonsky
522b	Kevin Suzuki
524	Doug Peacock
525	Robert Dello-Russo
529	Bryan Nodins
531	Hugh Zackheim
532	Peter Felt
533	Champion Internation
534	Scott Kronberg
536	George Ochenski
540	Alice & W.A. Blood
541	Quentin Reuer
543	Bill Starkey
544	Bill Martin
545	South Lincoln County League of Women Voters
546	Miss Lynn Kelly

562	Richard Kerr
565	Olga Erickson
566	Northwest Citizens for Wilderness
567	Libby Sno-Kats
568	Inland Forest Resource Council
571	Stan Billheimer
572	Gary Mason
573	Fowlers
574	Thomas Knutson
575	Constance Kay
577	Rob Deyerberg
578	Bob Traina
580	Todd Featherly
583	Karen Anderson
584	Montana Wildlife Federation
586	National Audubon Society
600	Richard Bagley
601	Petition Against Tobacco Valley Citizen's Alternative
602	Lincoln County Board
604	Libby Chamber of Commerce
605	Gary Montgomery
606	Gary Sakahara
607	Elaine Lyndon
608	Ten Lakes Snowmobilers
609	Diane Walsh
610	Jen Follett McCaw
611	William McCaw
614	Thomas Holland
615	Richard Frazier
617	Helen Wylie
618	Richard & Susan Bagley
619	Illegible
620	James Hurst
621	James Biggar
622	Daniel Hodges
623	Sharon Lucks
625	Carmel Cipriano
629	Montana Snowmobile Assn.
630	Last Chance Audubon Society
631	Ray Smith
634	Claudia Schaeffer
635	American Wilderness Alliance
638	Western Forest Industries Assn.
640	Montana Wilderness Association
643	John Reeves
644	Tim & Laura Tayne

2-1

turn address

Joseph & Lauren Schott
1417-D Beech Drive
Grand Forks AFB, ND 58205

is this an address change?

NOV 22
PM
1982

Christmas USA 20c

Thepolar National Gallery of Art

Kootenai National Forest
Supervisor's Office
P.O. Box AS
Libby, MT 59923

E: JOSEPH C. SCHOTT

RESS: 1417 D BEECH DR. GRAND FORKS AFB, ND 58205

ANIZATION OR
LIATION, IF ANY: NONE

2-2

SOME POSSIBLE AREAS TO ADDRESS IN YOUR RESPONSE

1. Issue resolution.

GOOD

2. Effects and impacts from the Environmental Consequences section.

EFFECTS ARE OUTLINED

3. Additional ideas or approaches to solutions. I HAVE NO NEW IDEAS. I GENERALLY SUPP YOUR PROPOSED ACTION. HOWEVER, I THINK THE PROPOSED PLAN SHOULD BE ALTERED SOMEWHAT BEFORE THE FINAL ONE IS MADE. [redacted] FIRST, I THINK ALL POSSIBLE CONSIDERATIONS SHOULD B MADE TO HELP THE GRIZZLY. I FEEL YOU NEED MORE HABITAT FOR GRIZZLIES IN YOUR PLAN. SECOND, ALTHOUGH YOU PLAN TO CLOSE MANY ROADS AFTER USE THIS POLICY SHOULD BE EXPANDED.

4. Factual (technical) errors.

NONE NOTED.

5. Readability and understandability.

VERY READABLE. THE MAPS ARE VERY GOOD

6. Ten Lakes Montana Wilderness Study Area.

I DISAGREE WITH YOUR PROPOSAL. I THINK TEN LAKES SHOULD RECEIVE THE PROTECTIO OUTLINED IN ALT. B – WHERE MOST OF THE STUDY AREA IS DEDICATED TO ROADLESS RECREATION MGT. YOUR PLAN ALLOWS TIMBER HARVEST / ROAD CONSTRUCTION TOO CLOSE TO THE "HEART" OF THIS AREA. (I THINK ALT. B SHOULD BE CHANGED FROM RECOMMENDI THEC AREA BE WILDERNESS TO A ROADLESS STAGORY IF T MAKES SENSE). MY MAIN POINT IS. YOUR PLAN DOES NOT SAFEGUARD THE AREA TO THE EXTENT I WOUL LIKE IT.

7. Other.

YOUR PLANNED LAND EXCHANGES DEFINATELY MEET WITH MY APPROVAL.

Please remember to provide your name and address on the other side, if you wish to receive the final documents. THANK YOU for your time!

NOV 24

Bruce Keene

4

SOME POSSIBLE AREAS TO ADDRESS IN YOUR RESPONSE

1. Issue resolution. Under item 4 (fire mgt.) of Issues Identified in Planning Process in the "Reviewer's Aid" the next to last sentence says that "... unplanned fires could be allowed to burn...". This is a poorly worded statement because it is incomplete in stating why and how. What is the reason for letting these fires burn uncontrolled over 336,000 acres? What are the management objectives of the land?

2. Effects and impacts from the Environmental Consequences section. There is a conflict between identified prescriptions/allocations for resource mgt. along the Koocanusa Reservoir. Almost all of this area is designated as wildlife or view which Fire Mgt. Area classification #2, however, this area has been delineated as FMA 5. Similar resource/FMA conflicts exist throughout the forest.

3. Additional ideas or approaches to solutions. In regards to the comment in #1 → explain that fires will be managed within a rigid set of prescriptions to enhance the management of the resource affected. Make reference to the Kootenai Fire Mgt. Action Plan for more detail.

4. Factual (technical) errors. Page 19, item C6, of the DEIS states that "under FMA 2 ... all fires are actively suppressed." This seems to in direct conflict with statements throughout the DEIS which state that in "FMA 2... planned ignitions may be used to achieve land management objectives and unplanned ignitions will receive appropriate suppression action." which is correct and what is "appropriate suppression action"?

5. Readability and understandability. Although fire protection and fire management areas are discussed extensively throughout the DEIS, Forest Plan, and Reviewer's Guide; the reader told what "Fire Management Areas are or how they relate to Resource Mgt. until page II-37 of the DEIS and there is no explanation of FMA 1. There should at least be a reference to the Fire Mgt. Action Plan. Protection descriptions under resource allocation prescriptions are redundant throughout both the DEIS and Forest Plan.

6. Ten Lakes Montana Wilderness Study Area. I feel that Alternative D is a much better approach to the management of the resources in this area and that snowmobiles, along with other motorized vehicles, not be allowed in the area at ~~any~~ time of the year.

7. Other. The "Reviewer's Aid" is an excellent idea and gives a good overview of the DEIS, and proposed actions on the forest.

Please remember to provide your name and address on the other side, if you wish to receive the final documents. THANK YOU for your time!

5

Return address
P.O. Box 1092
Idabel, OK
74745

☐ is this an address change?

place
Ralph Bunche

IDABEL, OK
DEC 6
PM
1982
74745

Kootenai National Forest
Supervisor's Office
P.O. Box AS
Libby, MT 59923

NAME: Mitch Taliaferro

ADDRESS: P.O. Box 1092 Idabel, OK 74745

ORGANIZATION OR
AFFILIATION, IF ANY:

SOME POSSIBLE AREAS TO ADDRESS IN YOUR RESPONSE

1. Issue resolution.

2. Effects and impacts from the Environmental Consequences section.

3. Additional ideas or approaches to solutions.

4. Factual (technical) errors.

5. Readability and understandability.

6. Ten Lakes Montana Wilderness Study Area.
I agree with the decision as stands

7. Other.

Please remember to provide your name and address on the other side, if you wish to receive the final documents. THANK YOU for your time!

FOREST PLAN RESPONSE FILE 6

DAL
12/13/8

FOREST PLAN & DEIS RESPONSE

GLENN MUELLER STOPPED IN THIS MORNING TO STATE THAT HE IS IN BASIC AGREEMENT WITH THE PROPOSED FOREST PLAN AND THE ALLOCATIONS MADE.

HE STATED THAT HE THOUGHT THAT THE EMPLOYMENT FIGURES SHOWN IN THE DEIS WERE OPTIMISTIC IN THE FIRST DECADE BECAUSE OF THE INCREASING AUTOMATION THAT IS OCCURRING IN THE WOOD PRODUCTS MANUFACTURING SECTOR

HE ALSO STATED THAT A WILDERNESS DECISION IN THE TEN LAKES CORE AREA IS A WORKABLE COMPROMISE, IF NEEDED.

7

206/525-3591

Dec. 23, 1982

Mr. William E. Morden, Supervisor
P.O. Box AS
Kootenai National Forest
Libby, MT 59923

DEC 27 1982
RECEIVED
KOOTENAI

Dear Mr. Morden:

We have read your "Ten Lakes Montana Wilderness Study Act Area" and "Kootenai National Forest Plan" documents very carefully.

The Pacific Northwest National Scenic Trail goes through that area from the junction of the Lewis Creek and Grave Creek roads, directly west up the ridgg 3.5 miles to Mount Wam, along the Highline Trail No. 339, and along Trail No. 88 down St. Clair Creek.

Because the PNWT is one of America's major national recreation resources we urge you to consider its need for wilderness management of the Ten Lakes area in your planning process.

In fact, we cannot find even a single mention of the nationally-known Pacific Northwest Trail in any of your documents. Please remedy this serious oversight.

Merry Christmas,

Ronald G. Strickland, Ph.D.
Director

8-1

RCVD
JAN - 6 1983
Kootenai National Forest
Libby, Mont.

Return address

place stamp here

☐ is this an address change?

Kootenai National Forest
Supervisor's Office
P.O. Box AS
Libby, MT 59923

NAME: George Curtis

ADDRESS: Box 666

ORGANIZATION OR AFFILIATION, IF ANY: Rexford District U.S.F.S.

SOME POSSIBLE AREAS TO ADDRESS IN YOUR RESPONSE

1. Issue resolution.
PUBLIC ISSUES AND MGT. CONCERNS WERE ADDRESSED O.K. BUT I SEE POTENTIAL PROBLEMS IN RECREATION AND FIRE MGT. SEE ATTACHED COMMENTS.

2. Effects and impacts from the Environmental Consequences section.
I CAN'T AGREE THAT WE PLACE SO MUCH EMPHASIS ON TIMBER THAT WE ARE WILLING TO SACRIFICE ROADLESS RECREATION OPPORTUNITIES. RECREATION WILL CONTINUE TO INCREASE ON THE KOOTENAI SO LETS NOT REDUCE IT AT THIS TIME.

3. ~~Additional ideas or approaches to solutions.~~
IT MAY BE POSSIBLE TO CUT THE PREDICTED TIMBER AMOUNT IN THE 5TH DECADE BUT ONLY WITH VERY INTENSIVE MGT. WILL FUNDS BE AVAILABLE TO MAKE THIS HAPPEN.

4. Factual (technical) errors.
SOME CHARTS SEEM QUESTIONABLE
THERE ARE QUESTIONABLE STATEMENTS I HAVE ATTEMPTED TO ADDRESS SOME OF THESE IN MY ATTACHED COMMENTS.

5. Readability and understandability.
NOT BAD FOR A F.S. DOCUMENT
STATEMENTS LIKE "ALLOWED TO BURN" MAY NOT BE RIGHT SHOULD SAY "CONTINUED TO BURN UNDER PRESCRIPTION"

6. Ten Lakes Montana Wilderness Study Area.
AT THIS TIME I PREFER THE CURRENT DIRECTION OVER THE PROPOSED DIRECTION (SEE ATTACHED NOTES) I REALLY DON'T BELIEVE THE GENERAL PUBLIC WANTS TO SEE THE EUREKA FACE IN A REGULATED TIMBER ALLOCATION.

7. Other.
ROADS IT APPEARS THAT MOST OF THE ALTERNATIVES COME UP WITH A SURPLUS OF ROADS, I SINCERELY FEEL WE COULD GET BY WITH ABOUT 25% LESS MILES OF ROAD AND BETTER PROTECT OUR RESOURCES, THIS WOULD RESULT IN A CONSIDERABLE SAVINGS IN NEEDED $ FOR OTHER PROJECTS.

Please remember to provide your name and address on the other side, if you wish to receive the final documents. THANK YOU for your time!

GENERALLY A GOOD DOCUMENTS WITH LOTS OF HARD WORK, GENERAL GUIDANCE IS BROAD WHICH GIVES THE LAND MANAGER A CHANCE TO STILL BE CREATIVE. DISTRICTS HAD INPUTS AT VARIOUS TIMES BUT PROBABLY INADEQUATE TO GET THE BEST PRODUCT POSSIBLE.

KOOTENAI NAT. FOREST DRAFT E.I.S.

COMMENTS & ADDITIONS

Page 19 – 6. Protection
States that in F.M.A.-2 all fires are actively suppressed.

Page II-37 – 3. Protection, Fire Mgt. Areas.
States that in F.M.A-2 that unplanned ignitions will receive the appropriate suppression action. (This appears to be a conflict)

Following is what Fire Mgt. and Wildlife wanted in F.M.A-2.

Both planned and unplanned Prescription fires are permitted and all fires will receive the appropriate suppression action.

See Decision flow charts # 1 & 2 in the Kootenai Forest Fire Mgt. Action Plan

Page II-37 F.M.A-5 Special
duration of etc. add overstepped slope and key wildlife areas adjacent to Lake Koocanusa.

Page II - 37 Concern for increased fire suppression costs in F.M.A.-3

add. the fire season of 1981 showed that - Prescription fires in F.M.A.-3 were monitored and suppression dollars were saved in R-1 Forests. This was due to Fire Management Classification and Planning.

Page II - 37 Acres of F.M.A-3

Acres may change due to boundaries of mgt. area allocations as shown on the map for alternative 4a. It appears that there will be less acres in F.M.A-3.

This same conflict is apparent in most of the F.M.A between the Fire Mgt. Action Plan and the Forest Plan.

The question is will the Forest Fire Plan F.M.A. fire boundaries have to agree with the final allocation map for the proposed alternative 4 a.?

Kootenai Forest Plan Proposed Altern
4a

This alternative is certainly workable but I have a few comments to help it better protect all the resources

1. This alternative should protect more of the existing roadless areas as recreational needs on the Kootenai will increase. It states that this alternative falls short of the projected diagnosed recreation needs and this problem should be resolved.

2. It also appears that the Forest Service has over emphasized the needs for roads on the Kootenai. I am sure the projected 12000 miles could be reduced by 25% and better protect all the resources. The savings in dollars is real and that dollars are needed for other high priority projects.

3. Planning and Fire Mgt. will have to get together to help resolve the conflict between the Mgt. area map and the F.M.A. boundaries in the Forest Fire Action Plan. I think one overall statement could resolve this to make the F.M.A. fire boundaries defensible. This potential conflict should be resolved.

Comments on the Ten Lakes Area

Most people agree this shouldn't be designated as a Wilderness area but I feel the proposed direction is also not what the general public needs or wants.

Following are a few comments concerning this area I have observed on the ground and by talking to local residents and recreationists passing through the Eureka area.

1. Viewing – Most of the general public want this near natural looking area to stay as it is. They want it preserved for viewing and wildlife needs. The Proposed Direction is to put the timber in a regulated category and I don't think this is in the best interest of the general public. The Current Direction does protect the area better and allows for needed salvage logging. I realize that it may not be economical to salvage log this area in the near future but it doesn't need logging at this time anyway. Most the the Eureka Fire burned over in 1889 and downed fuels are light to moderate in the area.
Page 10 of the Ten Lakes Montana Wilderness Study Act says the fuel hazard is moderate

to high which is not the case. Wildfire can be easily suppressed in this area due to light fuels on the ground. Salvage type logg and prescription fires will enhance the area in the future and provide for quality forage for big game and bird habitat.

Due to steep slopes and viewing restriction their is no way of building roads on the Eureka Face without serious economic problems. Some type of helicopter logging may be feasible in the future when timber is larger and the economy is better.

2. Recreation

The present Forest Plan falls short of meeting the roadless recreation needs therefore the Eureka Face could be designated as Non-Motorized Dispersed recreation to help resolve this problem. This added buffer strip would only improve the recreation potential of this area

On page 21 shouldn't the total 16,400 acres fall in Non-Motorized Dispersed recreation. From the chart it appears that the proposed action will have less RVD; why is this if the roadless area would increase to 18,800 acres.

I think its great if we can allow snow-

mobile use in the area. Let's assume that snowmobile use is not allowed on the existing big-game winter range.

9

JAN 17, 1983

Ned L. Decker
Box 9
Rexford MT. 59930

Ten Lakes Wilderness Study

The wilderness Areas of Montana are overdone by the few to the detriment o the general public.

The U.S. can't afford to let good saw timber go to waste - it don't support the working people who are the large contributors to gov't + small business.

At the present population we can no longer afford to let any raw material lay idle to be consumed by bugs + worms

Multiple use is still the best plan for such small areas.

Ten Lakes maximum area should be limited to the 18,000 acres as shown on the proposed plan

TEN LAKES

10

1/17/83

Daniel J. Casazza
Representing Tobacco Valley Stockgrowers - Pres.

On behalf of Tobacco Valley Stockgrowers which is the Lincoln County chapter of the Montana Stockgrowers Assoc. would like it to go on record that we are against the Ten Lakes Area being put into Wilderness Area.

Daniel J. Casazza
RT. 1 BOX 112
EUREKA, MT. 59917

11-1

Rocky Mountain Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261

JAN 17 1983
RECEIVED
KOOTENAI

January 14, 1983

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Dear Mr. Morden:

I am writing on behalf of the Rocky Mountain Oil and Gas Association (RMOGA), a trade association of 800 individuals and companies involved in all aspects of oil and gas exploration, production, transportation, and marketing activities throughout the Rocky Mountain West. We appreciate this opportunity to comment on the Draft Wilderness Study Report for the Ten Lakes Area of the Kootenai National Forest. We support a nonwilderness designation recommendation for this study area, however, we are concerned with the emphasis the Forest Service has placed on visual resources and roadless recreation. As a result of such emphasis, the Forest Service anticipates utilizing additional special leasing stipulations should any leases ever be issued within the Ten Lakes Area.

The Study Report indicates that Ten Lakes falls within the Overthrust Belt, which is an area with great potential for oil and gas reserves. It is further stated that "detailed surface geologic mapping, seismic profiling, and wildcat drilling will be necessary in order to test the existence, or nonexistence, of oil and gas-bearing formations at depth". Yet, the Forest Service intends on limiting access to special locations and applying special conditions to any activities which may take place in the roadless area. These additional constraints would create a sizeable economic burden on those operators who choose to explore the Ten Lakes Area.

We urge the Forest Service to revise its proposal by recognizing that energy and mineral activities can occur with reasonable (and in most cases standard) protection measures and that new road construction will be allowed

FS
I S
HO
AS
B-R
P-A
C P
M-L
W-S
TS
S-S
P-L
RS
W-F
H-S
ES
O-G
F-C
T
AFS
F-D
LMRS
L-R
M-C
R-G
PS
T P
E-C
W-T
R-X
DRS
ZES

11-2

to facilitate energy and mineral exploration. The Forest Service's proposed action should provide the maximum opportunities for access to the area for energy and mineral exploration and possible development through a necessary tradeoff analysis of resource values. It is possible that the potential for energy or mineral resources may outweigh other values.

Sincerely,

Alice I. Frell

Alice I. Frell
Lands Director

AIF/dar

Bill [illegible] Forest Supervisor
[illegible] National Forest
[illegible]
Libby, Montana 59923

18 June, 1983

Dear Bill

I support a wilderness designation for the Ten Lakes Wilderness Study Area. The area offers a unique opportunity within the Wilderness Preservation System. This area is not dominated by the "ice and rock" conditions which characterize many wilderness areas. Rather the opportunity exists to include low, moderate and high productivity timberlands within a wilderness! The notion that an area will produce board feet should not be our justification for excluding areas from wilderness designation. Wilderness preservationists seek a variety of experiences and levels of solitude. We recognize that some people desire daytripping or semi-primitive experiences while others seek out pristine areas for solitude. Likewise we should recognize that not all wilderness enthusiasts seek out isolated conditions but rather can find joy in a stand of timber.

I am concerned with wilderness integrity as it relates to the study area shape. The study area's shape presently has been delineated due to existing roads and previous timber harvest. A "blocky" shape is preferred administratively, but any shape is acceptable for such a rare resource as wilderness. Roads and timber harvest are present in many designated wilderness. Ten Lakes is not unique in this regard.

The precedent of commercial logging in the Ten Lakes area

is a recent situation, since 1976. Management options within and [illegible] of [illegible] designation do exist. [illegible] use to [illegible] would not be unique to Ten Lakes. Snowmobile use could be allowed to continue in parts of the MWSA and excluded from others.

Again, I support a wilderness area designation - [illegible] attuned to Alternative C, to coincide with the MWSA boundary. Thank you for this opportunity

Sincerely

Jon Jeresek
RR2 - Box 53[illegible]
LIBBY, MT. 59923

William E. Morden
Forest Supervisor
Kootenai National Forest

12B-1

April 13, 1983

Dear Bill

Thank you for the opportunity to comment on the Ten Lakes Montana Wilderness Study Area (MWSA). I have reviewed the Forest Service documents for this MWSA. I wish to go on record as preferring Alternative C, that is wilderness designation for the study area of 35,900 acres. However, I could support Alternative B as a compromise from my conservative view point. I also believe it important to relay to you my thoughts about the rationale contained in these documents.

The Montana Wilderness Study Act included nine of the 182 non-selected RARE I areas. The Act mandates an in depth study of the wilderness resources for the Ten Lakes area. The study prepa treats individual environmental components from a non-wilderness viewpoint. I am aware of the emphasis put on quantification and economics in FS decision making, but feel that repeating RARE I and II ratings is not adequate study to satisfy the intent of MWSA. As an alternative to the above methods, could not a narrative been prepared which spoke to the qualities and recreation experience levels in each of the drainages? Based on the contents of this document, I don't know how a decision-maker could be aware of the trades-offs being made as related to the wilderness resource.

Various aspects of the study area are forwarded as a rationale for non-wilderness designation. First, the timber resources of this MWSA are an insignificant part of the KNF timber base to meet RPA

goals. Overall site quality for the Forest's timber base is significantly higher than for the Ten Lakes study area. Second, sights and sounds of civilization are not valid reasons for exclusion from wilderness designation. Definitions set by Congress in the Wilderness Act of 1964 and Congressional hearing reports since then should lay this issue to rest. Signs of man's activity are not automatic exclusionary principles. There could be no Wilderness Preservation System, save for Alaska, if this were the case.

The Montana Wilderness Study Act mandates that agencies not jeopardize the potential of an area's inclusion into the Wilderness Preservation System. I view the creation of snowmobile facilities on the Study Area boundary and encouraging such activity within the Area as direct conflict to the spirit and letter of that legislation. (Establishing a snowmobile trailhead on key big game winter range habitat shows a serious lack of fore thought and/or coordination as well.) Snowmobiling now emerges as a major issue resulting in a non-wilderness designation proposal. The Eureka - Fortine area has abundant opportunities for snowmobiling in developmental areas without jeopardizing wilderness values. However, the Kootenai has very little wilderness and few significant opportunities for its designation.

At the public hearings, testimony was split rather evenly between wilderness designation (predominantly Alternative C) and seeing no change come to the area. It was obvious from comments supporting the proposed action that many individuals had not read the report and proposal. If they had, they would have realized that the preferred alternative

clearly proposes changes to the area. These are: 1) moving from reactive, salvage timber sales to scheduled timber outputs from sites not well suited to regulated yields; 2) construction of 69 miles of road and a reduction in trail miles; 3) oil and gas leasing with intense exploration probable; and 4) reduced numbers of elk and grizzly bear as access is created or improved. Ironically, Alternative B comes closer to no change in management direction for the area than any of the alternatives.

Wilderness designation would retain a high quality primitive recreation area to meet a rapidly growing demand for a rapidly diminishing resource. Wilderness is a legitimate component of multiple use management and we should be seeking opportunities for designation especially as it relates to a diverse Wilderness Preservation System. Wilderness excludes no one, only requires acceptance on its own terms rather than man's. Simply, it is land for which we have the highest level of respect.

Again, I greatly appreciate the opportunity to comment and exchange ideas in an unconstrained atmosphere. Thank you.

Sincerely

Jon Jeresek
RR2 - Box 538.
Libby, Mt. 59923

14

☆ U.S. Government Printing Office: 1981—351-522

U.S. DEPARTMENT OF AGRICULTURE

SPEED MEMO

PART NUMBER	DATE
1	January 19, 1983

TO

Tim Gorman

SUBJECT

Re: Ten Lakes Alternatives

FROM

Jim Kilroy D-1

JAN 21 1983
Kootenai National Forest
Libby, Montana

MESSAGE (WRITE CONCISE MESSAGE SIGN AND FORWARD PARTS 1 AND 2 TO ADDRESSEE RETAIN PART 2.)

I think cutting the west slope of the 10 Lakes Area would decidedly damage the visual quality of the surrounding country side. The mountains as they are now greatly enhance the beauty of our town. Considering the visual impact that would be created by one inappropriately placed cutting unit; it makes me wonder if the value of the timber is worth the loss of the scenic beauty.

Logging the slope would be expensive. The following should be looked at, soil stability, frequency of roads to accomodate cable logging systems, regeneration costs on this questionable site.

Is the value of the timber worth it? It is hard for me to put a price on asthetics.

Whatever the final decision is on the slope, I will conform to it as an employee of the Forest Service. And I hope my thoughts can be of some help.

SIGNATURE James D. Kilroy

REPLY (USE THIS SPACE FOR REPLY, SIGN AND DATE. RETURN PART 3 TO SENDER. RETAIN PART 1.)

SIGNATURE

DATE

15

Supervisor
U.S. Forest Service
W. Hwy 2
Libby, Mt.

1/11/83

Dear Supervisor;

Regarding the Ten Lakes Montana Wilderness Study. Let us look into the future, say ten, twenty or thirty years from now, will we be able to say, "Aren't we glad we saved this beautiful country for all to enjoy?"

I am for whatever can be done to save as much of the beauty of nature as possible and if that means to make Ten Lakes area a Wilderness then I am for it.

Thank you for your time and work on this issue.

Very truly yours,

Alta Smith

Alta Smith
Rt#1 Box 40 B
Eureka, Mt.

JAN 14 1983
RECEIVED
KOOTENAI
FS
DFS
PIO
AS
B-R
P-A
C-P
M-L
W-S
TS
S-S
P-L
RS
W-F
H-S
ES
O-G
F-C
T
AFS
F-D
LMRS
L-R
M-S
R-G
PS 1-20
T-B 1-21
E-C
W-T
R-X
DRS
ZES
DE

Tim O'G

15 #B

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

2/1/83

Dear Mr. Morden;

This letter is to reconfirm my vote by letter 1/11/83. After studying further into the matter of the Ten Lakes Wilderness, I definitely believe that Ten Lakes Alternative C is the best plan, so far.

Thank you for your work on this issue.

Peace be with you,

Alta Smith

Alta Smith
Rt#1 Box 40B
Eureka, Mt. 59917

1/18/83

16-1

To: Forest Supervisor

After reviewing the proposed Forest Plan and the Ten Lakes Proposal I have some concerns on the direction the Forest is taking in the preferred alternative for the "Burma Face". The area I'm referring to is the west aspect of the Whitefish Range from Grave's Creek north to the Canadian line.

I see the priority resources on this face as bein

1. Viewing - obvious sensitive visual qualities due to steep slopes facing into the Tobacco Valley and Highway 93, a major tourist route to Canada

2. Wildlife - high use fall-winter-spring range for mule deer and elk and favored hunting area for these species

3. Watershed - generates a number of 1st and 2nd order streams that enter the Tobacco Valley and are used for domestic and irrigation purposes.

4. Timber - tree species and habitat types that can be managed to meet the long term objectives for the other resources, through selection, group selection, and shelterwood systems. Harvesting could be programed to produce a reduced, but sustained yield.

5. Recreation - a system of trails accessing the Ten Lakes area, plus the hunting opportunities previously mentioned.

All of these resources can be managed successfully if roads are not a part of the management scheme. Roads on these slopes are very difficult, if not impossible, to screen from the viewing public. No one has ever said a kind word about roads in conjunction with managing big game populations. Roads are the greatest source of sedimentation for streams, which is especially critical when domestic water supplies are involved. Recreationists have mixed feelings about the value of roads and timber management can be accomplished with or without roads, although the costs go up

I propose a road system at the base of the slope - much of it is already in place - that will accomodate aerial logging systems. A long term management plan - including detailed prescriptions - can then be written for manipulating the vegetation on these slopes to provide for the 5 resources mentioned.

This is not the most economical alternative for management of the "Burma Face", but it will meet the major resource needs better than those that are now being considered in the Ten Lakes E.I.S.

Bob Seidel
Rexford R.D.

Dear Forest Supervisor,

I am writing to support the idea of creating a 35,000± acre wilderness area in what is referred to as 10 lakes.

The Kootenai forest is lacking in wilderness, yet has many acres with quality wild lands. If this area could be designated wilderness I am sure future generations of people and wildlife would benefit. If there is not room in your 2 million acre forest to preserve this area without restricting other values, I would gladly hear your comments.

Gas & Oil development can only be restricted in wilderness areas at present, and even these remaining sanctuaries are now threatened daily. I feel it is the only solution to preserving the integrity of this area for the benefit of all.

Please consider this plea.

Sincerely

Steven Kelly
530 Edgewood Dr. #3
Whitefish, Mt.
59937

P.S. I have many fishing friends who have similar views and wish to fish in the area as it now is, not as an oil field or clearcut.

Thank you!

Dear Tom Costin,

I am writing in support of alternative C in the Kootenai Forest Plan for the "ten lakes" area.

This is the only way we can presently maintain the areas integrity with so many new demands for that area. Wilderness is the only remaining protective device when gas & oil interests threaten wild areas such as this.

I do not want to see this area roaded for oil, timber or any other commercial use and therefore can support alternative C only.

Future generations will have many opportunities to experience clearcuts and oil wells. How about wilderness? Kootenai Forest presently offers very little wilderness for such a large forest (million acres). This is a pinhead in this large roaded forest. Spare it. Be thankful now & later. Sincerely,

Steve Kelly

530 Edgewood Pl. #3
Whitefish, MT 59937

17A

18

January 21, 1983
Box 955
Columbia Falls,
Mont 59912

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

Dear Mr. Morden,

I would like to go on record of being in favor of the Proposed Action for TEN LAKES.

I have read the summary and feel that the Proposed Action would be best for everyone.

I am very much against any more wilderness in Mt. as I feel we have enough.

Sincerely,
Marilyn Whitman

19-1

Mr. & Mrs. Robert W. Schaffer
P.O. Box 4
Magic Springs, ID 83845
January 21, 198.

Supervisor's Office
Kootenai Nat'l Forest
Box A5
Libby, MT. 59923

Dear Sirs,

We feel that the In Lakes area in northwest Montana should be designated a wilderness area and left as it is. We have back packed in this area for several years and found it to be a beautiful, relatively undisturbed place to go with our children to enjoy the solitude of the forests.

Wilderness designation at this time need "lock up" the forest forever, as the decision may be reviewed in the future; it only protects our dwindling wilderness areas for now.

We also strongly object to snowmobiles using this area because of disturbing the animals which live there. We own more

~~more~~ strongly object to the Forest Service's violation of the MWA by helping to establish a snowmobile staging area, as reported in The Western News, Jan. 20, 1983. People can snowmobile in many places but animals have a very limited habitat which should not be allowed to be disturbed. The entire wilderness area with its ecosystems is a resource, too, which may someday be more valuable than the wood in the forests.

Yours truly,
Mr. and Mrs. Robert W. Schoff

Mr. and Mrs. R.W. Schaffer
P.O. Box 4
Moyie Springs, ID. 83845

19B

April 13,1983

W. E. Morden
Supervisor's Office
P.O. Box AS
Libby, MT. 59923

Dear Sir,

Thank you for letting us know in your letter of February 15, 1983, of the extended deadline for comments on the proposed action for the Ten Lakes Wilderness Study Area.

I would like to take this opportunity to say that we are even more in favor of the wilderness designation for this area since it has been discovered that a herd of caribou has been using the area. In fact, it is questionable whether there will be any alternative now. These animals are so rare in the lower 48 states that every effort should be made to protect them while studies of their behavior are made. We certainly appreciate the cooperation the Forest Service shows to the Dept. of Fish and Game in Montana in protecting critical habitat for many animals. It is our hope that this cooperation will continue with the caribou.

Personally, I would like to see more consideration shown the Grizzly Bear habitat, too, both in the Cabinet Wilderness Area and the Ten Lakes Area.

Thank you again for the additional time for comments. We feel it is important to participate.

Yours truly,

Mr and Mrs Robert W. Schaffer

20-1

This letter is to qualify my statement made at the public hearing in Eureka on January 17.

I was born in Eureka, Montana in 1951, and have lived here my entire life. I am employed at a local mill and have a wife and two children.

I have been hiking, fishing, or hunting in the Ten Lakes and immediately surrounding areas since I was six years old. In each of the last ten years, from July to November, I sincerely doubt there has been a two week span where I haven't been somewhere in the Ten Lakes or Graves Creek Drainage.

I believe that the Ten Lakes should not be made a wilderness area.

One reason I believe this is that it is too small an area. Simply by designating it a wilderness area would attract more tourists, hikers, campers, outfitters, etc., and I think that eventually the Ten Lakes would suffer from overuse in the summer and fall seasons.

Another reason I am against the wilderness proposal is that it would eliminate snowmobiling from the area. Although I do not snowmobile in this area, I have

very friends who do and they enjoy it very much. By eliminating snowmobiling many people, who otherwise could never make the trek into Ten Lakes via snowshoes or cross country skies, could not witness the beauty of this area in the winter.

My proposal is;

① Expand the Ten Lakes Scenic area to the boundaries proposed in the ~~Study~~ Wilderness Proposal (Alternative). This would make it over 30,000 acres.

② Allow logging only from areas accessable by existing roads, with two exceptions; by helicopter or horse logging and this should only be allowed on the West face of Burma-Kasmka-Gibralter range. Under no circumstances should clear-cutting be permitted.

③ Do not create any new roads in this area

④ Snowmobiling should be permitted during the dates already established.

If these logging guarantees could not be made then I would otherwise be in favor of making the area wilderness.

Sincerely

Stan Holder
BOX 30
Eureka, Mt. 59917

21

Dear Mr. Morden,

As a taxpayer and lover of wildlife and roadless forested areas I am writing to support the wilderness designation for the Ten Lakes Study Area. I believe this is alternative C in your choices for the future of this prime Elk and Grizzly habitat. Fishing will also benefit the C alternative choice, and as an occasional user of this sacred area, I cannot imagine the devestation that would result from roading this area, either for logging development or even worse gas or oil development.

There are few remaining areas that in my mind have the natural scenic beauty this area holds. As I understand, of the 2 million acres in your forest, very little has been protected with wilderness status; A shame I think, considering the vast clearcut areas of E. Pinkham Cr. area and Yaak area.

Generations to follow may never know the solitude and perfection of an untouched area such as 10 lakes if wilderness is not given a chance to stay wild. Certainly you have many other areas to log and road. How about leaving this one the way it is. I will thank you, and the children who voted to have the Grizzly Bear our state animal will thank you. Perhaps a few Caribou will thank you. Alternative C is our choice, how about you?

Sincerely Yours,
Alan Robt. Kelly

Dear Kootenai National Forest People,

I support alternative "C" in the ten lakes study area.

With gas and oil interests threatening to develop this area, I feel we have only one reasonable alternati and that is to establish wilderness designation for this area.

I have fished & hunted this area for years, and would be very disappointed if the area were to be roaded and roped with out of state oil compan

Certainly in your large forest there is room for this small 35000 acre wilderness without reducin your quota for logs. Except for some lower elevation trees, this area as I know it would offer very litt commercial timber v.s. cost of extraction. to road this extremely high quality wilderness area for a marginal or deficit timber sale would be an insult to wildlife and the taxpayer. I, for one, am tired of subsidizing Plum Creek and other huge timber interests with my tax dollar.

Wilderness is more my idea of a dollar well spe for the Ten lakes area. I support Alternative "C".

Sincerely,

James Gan & Kathy Cunningham
Whitefish, Mont.

24

E. Fred Birdsall
Director Administration and Personnel

Conoco Inc.
555 17th Street
Denver, CO 80202
(303) 575-6123

January 24, 1983

William E. Morden, Supervisor
Kootenai National Forest
P. O. Box AS
Libby, Montana 59923

Dear Mr. Morden:

The Ten Lakes Montana Wilderness Study Area of the Kootenai should without question be designated non-wilderness. The presence of nearby designated Wilderness in generous quantity and the fragile and depressed state of the economy in the Eureka/Libby area are reason enough to adopt a pro-development alternative.

While we recognize the visual attributes of much of the Ten Lakes, we are uncomfortable that special constraints should be applied to petroleum exploration. The effects of exploration are minimal, temporary, and eminently reparable as has been proved in many other wilderness-like locations. Even in the fortunate event of production, proper safeguards can handle inoffensive development plus permit the country to be rehabilitated into high visual acceptability after drainage. The paramount possibility that the existence of petroleum could temporarily outweigh other values is largely ignored; the decision simply cannot be made now, absent evidence of crude reserves, that roadless recreation and visual values are the highest and best use of that land.

We urge you to review your proposal in terms of reasonable protection measures, including necessary roadwork, to permit exploration, including exploratory drilling. Obviously that would have to anticipate the remote but real possibility of development.

Helicoptered seismic begs the issue and is at least on order of magnitude more than truck. Helicoptered drilling rigs are economically impossible. We can, however, coexist with wilderness-like scenic values and wildlife and urge you to recognize that.

Yours very truly,

E Fred Birdsall

E. Fred Birdsall

jil

26

TRUE OIL COMPANY

RIVER CROSS ROAD

CASPER, WYOMING
P. O. DRAWER 2360
PHONE 237-9301
82602

January 24, 1983

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P. O. Box AS
Libby, MT 59923

Dear Mr. Morden:

RE: TEN LAKES WSA

We support a non-wilderness designation recommendation for the Ten Lakes Montana Wilderness Study Area in the Kootenai National Forest. However, we are concerned with the emphasis the Forest Service has placed on visual resources and roadless recreation. As a result of such emphasis, the Forest Service anticipates utilizing additional special leasing stipulations should any leases ever be issued within the Ten Lakes Area.

The Study Report indicates that Ten Lakes falls within the Overthrust Belt, which is an area with great potential for oil and gas reserves. It is further stated that "detailed surface geologic mapping, seismic profiling, and wildcat drilling will be necessary in order to test the existence, or nonexistence, of oil and gas-bearing formations at depth." Yet, the Forest Service intends to limit access to special locations and to apply special conditions to any activities which may take place in the roadless area. These additional constraints would create a sizeable economic burden on those operators who choose to explore the Ten Lakes area.

We urge the Forest Service to review its proposal by recognizing that energy and mineral activities can occur with reasonable (and, in most cases, standard) protection measures and that new road construction will be allowed to facilitate energy and mineral exploration. The Forest Service's proposed action should provide the maximum opportunities for access to the area for energy and mineral exploration and possible development through a necessary tradeoff analysis of resource values. It is possible that the potential for energy or mineral resources may outweigh other values.

We appreciate this opportunity to provide the Forest Service with our comments regarding the Draft Study Report and Proposal for the Ten Lakes Montana WSA.

Sincerely yours,

R O Byron

Robert O. Byron
Administrative Assistant
to H. A. True, Jr.

27

January 24, 1983

TEN LAKES SCENIC AREA

U.S.D.A. FOREST SERVICE

In response to the Ten Lakes Scenic Area, The Tobacco Valley Rod & Gun Club Recommends the Area remain a scenic area and enlarged to the orignal 30,000 acres proposed. Also absolutely no more roads built in the area and we agree to salvage logging from existing road systems only. Maintain the area strictly for scenic, wildlife, and recreation. We feel this area is of absolute necessity to the grizzlies future in North Lincoln County. This area is also important Bighorn Sheep Summer Range and possibly a caribou area.

PRESIDENT : Arlie T. Peck

V. President : Nick Covey

Secretary : Barbara Pearson

Rt 1 Box 37

Eureka, MT 59917

April 9, 1983 27B

Eureka Rod and Gun Club
c/o Arlie Burk
Eureka, Mont.
59917

Dear Mr. Morden:

Our main concern in regards to the Ten Lakes Study Area is, of course, to provide good big game hunting. We believe that the numbers of elk found in the study area during the fall has steadily increased over the last decade, and that this increase is directly related to the road closure policy implimented by the Forest Service in the middle and late 60's. One reason for this, of course, is that the road closures lessened hunting pressure in these drainages (Camp Creek, Divide Creek, South Stahl, etc.) that before were accessable to motor vehicles.

However, we contend that the major reason for the increase is that more and more elk are moving into the region to escape hunting pressure from other areas. Since British Columbia's general hunting begins at least a month before ours does, a substantial number of elk are pushed into the Ten Lakes from Canada, and since only bow season is going on at that time in the Ten Lakes they tend to remain there until the hunting pressure of our general season forces them back to Canada. We believe that the areas that were closed off by the road closure policy have provided a greater habitat area and thus those elk that are being pushed in from Canada are coming in larger numbers and are staying for longer periods of time before they are being driven to Canada. Add to this, the fact that Canada's hunting season lasts on through most of November as does ours, the elk may come across the boundary 2 or 3 more times. We think this is an advantageous situation for U.S. hunters.

The Rod and Gun Club believes that the alternate plan submitted by our local committee will best perpetuate these hunting conditions.

We also contend that many of the higher basins and ridges in the Ten Lakes Study Area are very vital Grizzly Bear habitat. We believe that logging, especialy at the old growth in these areas should be prohibited.

Finally we believe that the west boundary of the Study Area (Burma-Independence Peak-Ksanka-Gibralter Ridge) is a vital habitat for mule deer. According to the Forest Service's "proposed action" this face could be logged clean to the top of the mountains if deemed necessary to provide wildlife benefits."

We strongly disagree. We are absolutely against any logging of any area over 5000-5500 feet. We believe that mule deer use the higher, brushier areas such as "dog-hair" as escape cover during hunting season. In the future, as the hunting pressure in this face will increase, we believe these cover areas will be even more important.

We are not adverse to the logging of the lower parts of this face, especially if done for "wildlife benefits." However we would like to see the road closure policy applied here too after the logging is finished. Other than this the Rod and Gun Club is against the construction of any new roads in the Study Area.

The Rod and Gun Club is not against using existing roads (Stahl, Rich Creek, etc.) that are adjoining or adjacent to the Study Area. We think they should be reopened at times for salvage logging. However we believe they should be closed to the public during hunting season. We believe also that the roads should be reclosed after the timber is taken and of the six plans submitted by the Forest Service, we favored the Current Direction as the best.

The Rod and Gun Club is against the wilderness designation because we believe that wilderness would lead to overuse because it attracts more vistors. The Rod and Gun Club is admantly against the issuing of any special use permits during hunting season in the Study Area. Especially to outfitters.

Finally the Rod and Gun Club favors the alternative submitted by the Tobacco Valley Citizens Committee over the Current Direction.

One reson is that we feel the "Scenic" desgnation has more "clout" than the term "roadless" or "lands not capable of being managed"----without going to the extremes of wilderness. Secondly we feel that their proposal established a more distinguished boundary. Added to this is that by having the boundary at 5500 feet some areas are being added to the Study Area that we consider very favorable, such as South Stahl and Blacktail Basin.

Sincerely,

Robert Brock

28-1

Return address

Dennis Divoky

#9 Bitterroot Rd

Missoula, MT 59803

☐ is this an address change?

MISSOULA, MT 598
PM
27 JAN
1983

RCVD
JAN 28 1983
Kootenai National Forest
Libby, Montana
59

Kootenai National Forest
Supervisor's Office
P.O. Box AS
Libby, MT 59923

NAME: _____

ADDRESS: _____

ORGANIZATION OR
AFFILIATION, IF ANY: _____

28-2

SOME POSSIBLE AREAS TO ADDRESS IN YOUR RESPONSE

1. Issue resolution.

Off road motorcycle issue not addressed. There must should be given an area to enjoy their recreation.

2. Effects and impacts from the Environmental Consequences section.

3. Additional ideas or approaches to solutions.

4. Factual (technical) errors.

Page 20, first line. Wilderness is a resource as defined by Congress and Forest Service Policy; The proposed action most certainly irreversibly commits resources. Timber retrieval and roads will forever foreclose wilderness.

5. Readability and understandability. MWSA - Ten Lakes

Page 21; RVD ?; also under facilities, is that miles of road? if so how come columns don't add up to bottom figure?

6. Ten Lakes Montana Wilderness Study Area.

I support alternative A as a way to resolve issue. The only difference between 'proposed' and 'A' is the snowmobile issue, which will be a problem that the Forest Service caused themselves by allowing it in the first place. It can be resolved in time, especially if other areas can be opened up to snowmobiles.

7. ~~Other~~

Please remember to provide your name and address on the other side, if you wish to receive the final documents. THANK YOU for your time!

29

MONTANA
MAGAZINE

P.O. Box 5630 • 2220 N. COOKE, HELENA, MT 59604 • Phone 406/443-2842

January 13, 1983

Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

JAN 14 1983
RECEIVED
KOOTENAI
FS
DFS
PIO
AS
B-R
P-A
C-P
M-L
W-S
TS
S-S
P-L
RS
W-F
H-S
ES
O-G
F-G
T
AFS
F-D
LMRS
L-R
M-G
R-G
PS
T-P
E-C
W-T
R-X
DRS
ZES
GS

Dear Bill,

I'm sorry I couldn't make your meeting in Helena last night. I had hoped to get there because I'm quite concerned at what I've seen of the Kootenai Forest Plan.

While I understand it is necessary to get the forest industries on their feet again, is it necessary to sacrifice many of Montana's beautiful roadless areas in doing so? It would seem that the future hope for Montana lies in the visitor industries and it is our forests and wilderness areas that tend to bring people here rather than large clear-cuts and thousands of miles of logging roads. Why weren't you able to strike some balance between all-out development and non-development? Finally, why aren't you recommending the Ten Lakes area for wilderness? I heard one consideration was that snowmobiles use it, but I can hardly see that as a valid reason. There are many areas closer to the population centers snowmobiles can use, and in fact, they have far more terrain available to them than those seeking non-motorized recreation, even though there are less people taking part in that activity than non-motorized.

I'd appreciate hearing from you.

Sincerely,

Rick Graetz

Rick Graetz
Publisher

RG/pr

30

Jan 22, 1983

Jon Bush
RT. 2 Whitefish, MT

dear sir:

as a woodsworking individual representing no particular group or interest, i urgently recomend wilderness designation (Alternative C) for the Ten lakes Area for the following reasons:

1) in an area larger than Glacier National Park, the kootenai N.F, it would be beneficial to have at least one area totally roadless forever and basically locked up to mans industrial intervention. the Cabinets and Scothmans area are already sufficently encroached upon by oil and gas and what have you interests to nullify their pristine status.

2) if the proper objectives and goals of the Kootenai Nat. Forest management plans can be accomplished without including the Ten lakes (35,000 acres) area in oil and gas and roads and snowmobiling and salvage logging, then why not make this one concession to the outdoor fanatics and those who appreciate untouched ecosystems!

3) being an avid snowmobiler, i still can't see why the folks in Eureka can't tour the many other areas of the kootenai during the winter. i.e the Yaak, Pinkam MT, Whitefish divide, Canadian Rockies etc.

thanks for your time, sincerely

J. Bush

WC

January 28, 1983

31

Dear Mr. Morden,

This letter regards the Ten Lakes area of Kootenai National Forest. I am in favor of alternative C, establishing a 35,900 acre TEN LAKES WILDERNESS AREA.

The Forest Service wants to leave the area open to logging and snowmobiling. Snowmobilers in N.W. Mt. have access to literally millions of acres outside the Ten Lakes area, which is obviously enough. Increased logging plans in the Kootenai Forest aim at 1.5 million acres, of which only 16,500 lie within the proposed wilderness. This fraction of acreage within the Ten Lakes area is a drop in the bucket for the timber industry, yet to log the area would ruin the wilderness environment.

We need to establish the Ten Lakes as wilderness because (1) the area is critical elk, grizzlybear, and wolf habitat. (2) there is a shortage of protected wilderness in N.W.Mt.; only the Cabinet Mountain wilderness is set aside yet it is being degraded by damaging mineral exploration.

Once again please vote for alternative C.

Sincerely,

Mac Donald

410 S. 5th W.
Missoula, MT 59801

Dear Mr. Morden,

Concerning the Kootenai National Forest, I am in favor of establishing the Ten Lakes area as the Ten Lakes Wilderness Area, a 35,900 acre wilderness made possible by alternative C.

There is hardly any wilderness in this part of the state, and what wilderness we have there (part of the Cabinet Mountains) is degraded by mineral exploration.

There are plenty of places for snowmobiling, motorcycling etc. in N.W. Montana without having to invade the Ten Lakes area. Ten Lakes is needed by all for its wilderness values, needed by people, grizzly bears, wolves, elk, etc.

With the planned road building increases in the Kootenai National Forest, it is extra important to have Ten Lakes established as wilderness.

The Ten Lakes area timber would only make a small percentage of the total timber planned for harvest in the Kootenai Forest. I'm sure our economy can get along without this Ten Lakes timber.

Sincerely, Jill Devine

520 S. 2d W.
Missoula Mt 59801

33-1

2279 Montana 206
Columbia Falls, MT 59912
January 27, 1983

Supervisor and planning staff
Kootenai National Forest
Libby, MT 59923

Dear Sirs:

In the course of my work as a newspaper reporter I have studied and restudied the alternatives offered in the Ten Lakes wilderness study. I have heard the lion's share of testimony offered in public hearings and have spoken with numerous others who offered no spoken testimony. I would now like to take an opportunity to offer my own testimony as a private citizen and outdoor recreation enthusiast, based on what I have seen and heard.

During the past several weeks I have heard many statements in favor and in opposition to the forest's preferred alternative. Some of those statements are well taken; others are difficult to defend.

One statement which nearly everyone has made is that they would like to see the present Ten Lakes Scenic Area and some of the contiguous roadless area preserved for roadless recreation opportunities. It is unfortunate that no alternative exists which allows concrete, virtually irreversible protection while protecting the interests of both wilderness advocates who use the backcountry in summer and snowmobilers who use it in winter.

But none does exist. In its absence, I feel that the need to preserve this remnant of the primeval Whitefish Range forest in its original state outweighs the need for flexibility offered by the "scenic" designation.

I'm confident that no one now connected with the region wants to see Ten Lakes clearcut or criss-crossed by roads. But there remains the risk of reversal--a very real risk under the relatively meager protection offered by the scenic area classification.

As long as a scenic designation can be wiped out with a flick of a regional forester's pen, a stronger classification is needed. That classification must be wilderness.

Wilderness classification prevents the other pitfalls of the scenic designation. Oil and gas exploration, whether it's seismic study using explosive charges or an 18,000-foot stratigraphic test, is not compatible with roadless backcountry recreation. Only wilderness can prevent that.

A Federal Energy Regulatory Commission installation is not compatible with roadless backcountry recreation. Only wilderness can prevent that.

Even salvage operations are not compatible with the true preservation of a primitive recreation area. Painful as it may be to those whose business it is to harvest timber, a beetle kill is part of nature's delicate balance. To establish natural biological succession, the natural recycling of resources, a climax community must suffer from disease or infestation. To preserve that natural recycling of resources, wilderness is needed.

Nor is the argument valid that the Ten Lakes study area does not offer the opportunity for solitude. Few places on the Kootenai National Forest (or in northwest Montana, for that matter) offer the opportunity for solitude which is available at places such as the head of Sinclair Creek at the top of Trail 89, or the tiny lakes near Mount Wam.

However, the Forest Service is quite correct in its contention that the entire Ten Lakes Montana Wilderness Study Area is not and should not be classified as wilderness. The area along the Rich Creek road, the portion west of Blacktail Creek, the segment south of Mount Gibralter--none of these merit wilderness protection as much as they offer a valuable timber resource. These should not be included in a Ten Lakes Wilderness.

Therefore I offer a compromise, one which is not truly included in any of the five alternatives examined in the study.

My suggestion is a sort of amalgam of Alternatives A and B with an unusual twist.

First, that portion of the study area which is recommended for roadless management in the preferred alternative should instead be recommended for wilderness classification. I would make one change: Trail 77 east of Mount Wam should be entirely excluded. This would allow snowmobile use while reducing the cost of marking boundaries on a trail which winds in and out of wilderness.

This is similar to Alternative A, to which wilderness advocates have objected because they feel it would concentrate roadless users. I'm not convinced of that--many smaller wildernesses have received their support--but I think there's a way to ease their concerns.

It's hardly necessary to manage the entire region outside the boundaries of the proposed wilderness for regulated timber yields. In fact, I find it difficult to believe that any portion of the study area above 6,000 feet will ever produce such yields. I've been told that the ridgeline was chosen as a boundary between roadless and timber management because it is easily marked. I agree that the ridgeline makes a perfect wilderness boundary. However, there is no reason why a boundary needs to be marked in situ between roadless and timber management areas as long as the forest officials defining sale boundaries know where they are.

Therefore, I suggest managing all areas above 6,000 feet for roadless recreation. This would give a buffer zone to the wilderness while opening the doors to salvage operations, which is the only likely timber operation at that elevation anyway.

So far I have offered a means to protect the area as wilderness while affording reasonable timber harvest opportunities. The snowmobilers have a stake in this, too, however, and that's where I would propose an innovation

which may never have been considered before in a study such as this.

Snowmobilers say they like to be able to ride into the Ten Lakes Scenic Area and spend the night at Wolverine Cabin. I can see the attraction in this and think there may be a way they can continue to do so.

Assuming the attraction in such an outing is the opportunity to take an overnight trip which offers the scenery of the Ten Lakes region, it seems possible that this can be enjoyed without snowmobiles actually intruding on the proposed wilderness. The way they could do this is if the cabin itself were moved to a spot on the boundary of the wilderness which offered a scenic view of the Ten Lakes basins.

The cost of this move should be borne by the wilderness proponents. For one thing, moving the cabin would remove an aspect of civilization from the wilderness. Second, if they cannot finance the operation, it would seem there isn't enough commitment to preserving the wilderness as it is, and perhaps snowmobiles should be allowed to enter.

What I propose is that a deadline be set by which time arrangements for moving the cabin should be made. If the deadline is not met, a slice should be cut into the wilderness which allows snowmobile access to the cabin.

I'm not sure of all the legal ramifications of this proposal. If it proves to be impossible from a legal standpoint, I would have to recommend with regret that the boundaries of a wilderness should stand as I first proposed. And if I must choose from one of the five alternatives in the study, I would like to go on record as supporting Alternative B.

Yours,

Mark Brunson

Mark Brunson

1/30/83 34

Supervisor Morden,

This letter is to urge you to make Ten Lakes a Ten Lakes Wilderness Area, (i.e. to support alternative C, providing for a 35,900 acre protected Wilderness).

It is my understanding that the Forest Service has recommended that the Ten Lakes region of Kootenai National Forest not be designated as a wilderness area for the following reasons: 1) to create a recreation area for snowmobilers and other orv's. 2) to allow logging in the area.

This recommendation is both shortsighted and irresponsible. Snowmobilers have access to millions of acres in N.W. Mt. and surely this is sufficient (if not excessive) acreage for such recreation. The timber industry which would be granted more than 1.5 million acres for increased logging in the Kootenai Forest would benefit relatively little from the 16,500 acres that Ten Lakes would entail. The additional timber revenue is insignificant when weighed against the loss of a critical wilderness area.

Again I urge your vote for Alternative C.

Sincerely,
Sean O'Brien

Sean O'Brien
410 S. 5th W.
Missoula, MT 59801

Mr William Madden
P.O. Box A3
Libby Mt 59923

Columbia Falls Mt
234 Circle Dr.
Jan. 30, 1983

Dear Sir:

I want to go on record for being against tax Sales for Wilderness. It should be left as it is for the people to hog, mine, fish and anything else they can do. There is already too much land tied up that only a very few can enjoy. People should come first the rest will take care of itself as it as always done

Thank you
Sincerely
Ann E Polzon
234 Circle Drive
Columbia Falls, MT 59912

37

Flathead SNOWMOBILE Association

2464 Mission Tr.
Kalispell, MT 59901

Friday, Jan. 28, 1983

Murphy Lake Ranger District

John Pritchard

Dear Mr. Pritchard

Our board of directors of the Flathead Snowmobile Association would like to inform you that our one hundred ninety members are against your proposed wilderness plan. We want to retain the Terriault Lakes, Graves Creek, and Wolverine Area as a Scenic use area, we do not want any of this area put in to Wilderness. We feel enough wilderness areas already exist here in Northwest Montana and we would like to keep this area useable.

Sincerely, The Flathead Snowmobile Assoc.

Board of Directors.

CC: Ron Holliday

Louise Keller secretary

Don Zundel, Treasurer

Kathleen Zundel, club Reporter

Robert J. Teets

Larry Barge President

Rick W. Teets

M.O. Larson

Lonnie Keller

Kerby Allers

Paul Konopatzke Vice. Pres.

Dave Seyfert - Mont Snowmobile ass. Dist. #1 Director

Dennis D. Lockhart — Director Flathead Snowmobile assoc.

Feb 2, 1983 38

Box 277

TREGO, MONT 59934

Gentlemen:

I believe the Ten Lake Scenic Area should be made into a Wilderness Area. Originally I thought the area was to be 24,000 acres. I think we should try to preserve as much of that area as possible. There seems to be plenty of timber for boggles, but not enough preserved for future generations of Americans.

I hope you will make every effort to preserve the Ten Lake area. I would like to have this letter incorporated in the comments due March 1, 1983. Thank you

Very sincerely,

Jerry E. Schaub

Box 277
Trego, Mt. 59934
February 2, 1983

Dear Sir:

I am writing in regard to the Ten Lakes Wilderness Study area. Please add my comments to the record of the public hearings.

I favor wilderness status for the area. The abundant wildlife should receive the maximum protection during all seasons of the year. I oppose road construction and logging in the area. Instead, it should be preserved as it is for future generations to enjoy.

Also, regarding another decision pertaining to the Kootenai National Forest, I oppose oil and gas leasing on land identified as grizzly bear habitat.

Sincerely,

Joyce Schaub

Eureka, Montana
Feb. 14, 1983

Tom Coston
Regional Forester, USDA Forest Service
Federal Building, Missoula, Mt. 59925

William E. Morden
Forest Supervisor, Kootenai National Forest
P.O. Box AS, Libby, Montana 59923

Re: The Kootenai National Forest Ten Lakes Study Act Area (PL-150 & 5393)
Individual comments and input at special meetings at Eureka, Libby and Kalispell

Dear Sirs:

At the meeting in Eureka I was the first on the list to testify. I stated that I had not read your summary report and proposal. I did say that I didn't really care if it were put into wilderness or remained as a scenic area. However, since that meeting I have taken the time and effort to read your summary very carefully. I have tried to decipher, decode and analyze the material you have put before the public for their review and comment. The following are my findings:

1. You have failed to address the real purpose of the Congress of the United States when they passed the legislation called The Montana Wilderness Study Act. The question is: Does the Ten Lakes Scenic Area have the proper criteria, as to remoteness, beauty, solitude and historic significance, to be declared wilderness and to be protected as wilderness from the trespass and encroachment of civilization in any permanent form? You have failed in your summary to show that this area <u>does indeed</u> fulfill the criteria for true wilderness.

2. I find discrepancies and untruths in your context and also in your graph illustrations.

3. I find that your summary was fabricated from hypothetical figures, by unqualified people as to knowledge of the area's history, present or future.

4. I find that you have failed even to explain the difference between a scenic area designation and a wilderness designation.

5. I find that the context of your study is pointed at the potential harvest of timber at the expense of losing forever the wilderness character.

40A-2

6. I find that you succumbed to the will of pressure groups, and have deviated from the regulations that govern both scenic and wilderness areas; you have used your own mistakes in administration and policy to discriminate as to use.

In my opinion, your study is biased, both in context and presentation, in favor of the dollar, dollars from forest products not needed now or in the forseeable future, either by the government, the loggers, mills or consumers.

I believe that the only logical choice, based on this study, is a vote in favor of wilderness, as designated in "Alternative O".

Yours truly,

M. L. West
Rt. 1 Box 65A
Eureka, MT 59917

Copies:
Senator Metcalf
Senator Melcher
Senator Max Baucus
Peter Kirby
The Wilderness Society
Rep. Pat Williams

RECEIVED
FEB 10 1983

66 B

PLUM CREEK LUMBER COMPANY
COLUMBIA FALLS, MONTANA 59912
(406) 892-2141

February 17, 1983

William Morden, Forest Supervisor
Kootenai National Forest
Libby, Montana 59923

SUBJECT: KOOTENAI NATIONAL FOREST PLAN RESPONSE

This response is directed at the Rexford and Yaak Districts. St. Regis Lumber Company and Stoltze Lumber Company will respond to the remaining districts. Please consider St. Regis and Stoltze response as part of ours.

Our response is keyed to the Kootenai National Forest Proposed Management Area map. The area in question will be designated by letter and number.

The management areas in question are as follows:

1. Management Area 2, A-3: Move boundry to coincide with the scenic area boundry. Change the deleted areas to Management area 3i.

2. Management Area 2, C-D-5: Change to Management area 16.

3. Management Area 2, B-C-6: Change to Management Area 16.

4. Management Area 2, encompassing sections 14, 15 - D-9: Change to Management area 16.

5. We recommend that you continue to manage the Big Game animals at the current level of 4,700.

Sincerely,

John Marceau

John Marceau
Contract Logging Manager

C.C.: Larry Blasing - IFRC
John McGuire - St. Regis
Ron Buentemeier - Stoltze

Box 28
Fortine, MT 59918

FEB 22

KO
FS
DFS
PIO
AS
B-R
P-A
C-P
M-L
W-S
TS
S-S
P-L
RS
W-F
H-S
ES
O-G
F-C
T
AFS
F-D
LMRS
L-R
M-C
R-G
PS 2-21
T P
E-C
W-T
R-X
DRS
ZES
cc

2196 Mission Trail
Kalispell, Mt. 59901
April 13, 1983

William Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Mt 59923

72B-1

Dear Mr. Morden,

I am writing to you in support of the "proposed alternative" for the Ten Lakes Scenic Area. Our family has camped at Little Therriault Lake and enjoyed hiking into the Ten Lakes area for several years. I favor the proposed action alternative because it protects the core area of the Scenic Area in the roadless category, yet maintains vehicle access to the Therriault Lakes. I think the Forest Service has done a good job of providing a needed family centered recreational area. When our children were little we chose to limit our activities to their capabilities instead of shipping them off to Grandma's while we adults enjoyed a wilderness experience. It was then we discovered Therriault Lakes. We could drive there, camp in our van, and still be in the high country we love. A hike to Blue bird Basin was an all day excursion, but our enjoyment wasn't measured in miles covered. It was time well spent bonging us closer together. Our kids are teen agers now, but still consider Therriault Lakes one of their favorite places. Now I is my

72B-2

knee problem which limits how far we hike. It is surprising how few areas in the Wilderness Lands lend themselves to use on a limited basis, whether that limit be age, young or old, or physical disability. The beauty of the Ten Lakes Area is there for us because of its accessibility.

If the Ten Lakes area received formal Wilderness designation, the road access would be incompatible with Wilderness protection. For this main reason, I favor the continuation of current management policies which keep the Scenic Area roadless, but accessible. I believe the Forest Service is capable of managing this area carefully to preserve its wild nature and disallow oil or gas exploration or timber harvest pressure.

I have one other reason to support the non-wilderness designation. This area lies on the Canadian border. I don't believe the management constraints placed on formal Wilderness Areas are compatible with lands on an international border, especially if no special notice has been taken of that border status. Were that international border with any other country in our hemisphere, the border status would take precedence over any other management proposals.

I hope to enjoy Therriault Lakes and the Ten Lakes Scenic Area for many more years.

Yours truly,
Carol Free

2196 Mission Trail
Kalispell, MT 59901
April 12, 1983

#37 78B -1

William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Dear Mr. Morden:

I am a concerned citizen writing my views to the Kootenai National Forest on the Ten Lakes Senic Area proposals. My name is Mike Free and I am 15 years old. This letter is constructed and written totally by myself with no parental or other means of assistance. It is in my own words and in no manner a school or related assignment; but, a letter written from a concerned citizen who has a view on what I feel should be done with the Ten Lakes Senic Area, part of the Kootenai National Forest and my public lands.

Our family has used the Ten Lakes Senic Area quite extensively, mainly Little Therriault Lake and the surrounding hiking area; such as the hiking trails to Paradise Lake and Bluebird Lake.

I am concerned about many things. Access is one of my main concerns which encompasses many other concerns of mine.

If this area were turned into a wilderness area, I feel it would be more closed to the people than open to the people. It would be open to a minority; that being back-country hikers who can make the long, 25 mile hike into the Therriault Lakes'.

Like most of the campers, we drive into the area. This last summer, our family met some people from Illinois staying for a week at Little Therriault Lake. Also, a family from Connecticut, staying at the near-by Crystal Lakes Resort drove up to Little Therriault Lake. Although I know the Therriault Lakes' area access may not be cut off immediately if at all, this type of access would not be usable. And sooner or later I believe the people fighting for this area to become a wilderness area will ask to have any fringes or small areas of land that are bordering this new wilderness area, if it becomes one, to have those areas designated wilderness area. One such 'fringe' of land would be the road or parts of it, into the Therriault Lakes' area. Access, in my opinion, would be reduced to a minority of people and users of such areas.

78B-2

Another thing which disturbs me is how wilderness advocates can say the Ten Lakes Senic Area, if turned into a wilderness area, will be totally natural; then they start to dictate what will happen inside the wilderness area borders. What I'm trying to say is, you have two 'groups' wanting control of this area; presently, the Kootenai National Forest 'group', and possibly later the wilderness 'group'. The wilderness 'group' claims the Kootenai National Forest 'group' is placing too much control over the area. But then the wilderness 'group' turns right around and says they will have to destroy almost all wooden structures, such as outhouses, block all roads, and possibly transplant some animals into the area. The wilderness 'group' would be placing more control over the area with these and such actions. All this work is more than the Kootenai National Forest 'group' does. This work places many limits on the area. An example is: they say anyone can go into the area but then they would destroy the accesses, thus limiting who will want to and will go into the area.

What the wilderness area 'group' does, in my opinion, is place more limits on the area than the Kootenai National Forest 'group' does. That is, of course, if the area is changed into a wilderness area. So, I think the Kootenai National Forest 'group' keeps this area more open to the people and places fewer limitations on the area as compared to what the wilderness 'group' proposes to do; even though the wilderness area 'group' claims it is the other way around.

In conclusion, I am for the Kootenai National Forest to run and control the Ten Lakes Senic Area as they have in the past few years. I am <u>against</u> having the area made into a wilderness area.

A concerned citizen

Mike Free

Mike Free

81 B -1

14 April 1983

William E. Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

RE: Ten Lakes

Dear Mr. Morden:

Please find below my official, written comments concerning the Ten Lakes study area. Because I testified at length at the hearing in Kalispell, I shall be brief.

I support Alternative C, wilderness designation for the entire study area.

First, Ten Lakes meets the criteria for wilderness designation that are set forth in the Wilderness Act of 1964. It is undisturbed, roadless land, of manageable size, more than 5000 acres in extent, and provides outstanding opportunities for solitude and primitive recreation.

Second, it provides valuable wildlife habitat, grizzly habitat in particular, and may contain remnants of mountain caribou herds. Sightings of tracks have been made in the area from time to time, and until at least a decade passes without any sign of caribou, prudent men will suppose that some of these elusive animals may still roam Ten Lakes. This animal is near extinction in the 48 contiguous states, and it is incumbent upon all of us, legally and morally, to provide for its survival.

The gray wolf, an endangered species, ranges in this area, and provision for maintaining its habitat can best be accomplished through wilderness designation.

Third, Northwestern Montana has very few wilderness areas. Indeed, both the Ten Lakes study document and the documents accompanying the draft forest plan, conclude that without Ten Lakes, the KNF cannot meet its RPA goals for wilderness recreation. Yet, the KNF can have a Ten Lakes Wilderness and still meet its RPA goals for timber and for motorized recreation. Surely, given this, wilderness designation for Ten Lakes makes a great deal of sense.

Ten Lakes is not needed for snowmobiling, nor does it receive significant snowmobile use. No data to substantiate significant snowmobile use in Ten Lakes have been made public. In fact, no Ten Lakes specific data on snowmobile use have been made public, and one must conclude that no such data exist. Common sense, however, suggests that Ten Lakes, a high and remote area, is not prime snowmobile country. Furthermore, a great many other snowmobile areas may be found in the Whitefish Range. The Montana Department of Fish, Wildlife and Parks grooms roads and trails and maintains parking areas in scenic, but non-wilderness, locations throughout the Whitefish Range.

81B-2

Fourth, Ten Lakes is not needed for timber production. Approximately 16,500 acres of Ten Lakes are allocated to timber management in the proposed alternative. That is approximately one percent of the acreage in the commercial timber base. This is not high quality timber, however. Ten Lakes will not make a significant contribution to timber production on the KNF.

Fifth, the addition of roads will contribute to the decline of quality elk hunting.

Ten Lakes ranks high in wilderness values, low in commodity values, and should be added to the National Wilderness Preservation System.

Sincerely,

James R. Conner

James R. Conner

78 Konley Drive
Kalispell, MT 59901
755-8925

From the desk of

Chet

February 10, 1983

83

William E. Morden, Supervisor
Kootenai National Forest
P. O. Box AS
Libby Montana 59923

Dear Mr Morden:

We want to express our APPROVAL of the Forest Service recommendation that the Ten Lakes area be designated a NON-WILDERNESS area.

It seems a shame and pure selfishness, that the wilderness groups continue to eat away at the few good non-wilderness areas, still left for total enjoyment.

Ten Lakes area is an ESTABLISHED snowmobile and non-wilderness area, with increased use over the years. Please don't fence us out of any more of Beautiful Montana.

We thank you for this opportunity to express ourselves.

Very sincerely,

Chester M and Margaret Murphy
305 Rimrock Way
Missoula, Montana 59803

RCVD
Kootenai National Forest
Libby, Montana
59923

84

RCVD
FEB 14 1983
Kalispell, Montana National Forest
Supervisor

Dear Mr. Morden,

I am against the Wilderness designation for the Ten Lakes Area.

I often use this area for snowmobiling and I feel this is a beautiful area to use in the winter

It should be kept open for this use.

Sincerely,

Ruth Becker
Kara Becker
110 East Evergreen #56
Kalispell, Mont.
59901

#48

February 11, 1983

Keith Decker
110 E. Evergreen
Kalispell, Mt. 59901

Mr. Morden,

I am opposed to the proposed wilderness area of the Ten Lakes area near Eureka.

This is one of the best snowmobiling areas in this part of the country and I feel snowmobilers should be able to continue their enjoyment of this area.

Snowmobiling has been a historic use in this 39,500-acre Ten Lakes Wilderness study area; it has also been the only permitted motorized use in the 6,500-acre Ten Lakes Scenic Area portion of the study area since 1976; and wilderness designation would close all these areas to snowmobiling.

It is easily accessible with its parking area trail grooming and several trail heads have been established.

Thank you for your time.

Yours truly,

Keith D. Decker

85

Dear
William E. Morden

I Would like keep the Ten Lakes Wilderness Study Area open to snowcatting.
The Area is a beauty and the only way for me to enjoy it is by snowcatting.
I know that the snowcatting does not harm the land.

thanks - you
Robert A. Leets
Darla Leets
Kalispell, Mt.

86

To William E. Marden

As a member of the Haldeal Snowmobile Ass, We do not want the 10 lake area a wilderness -

Snowmobile use in the area has increased, parking area & trail heads have been established & grooming of trails

Leave it as it is!

Larry I Barg
Imediate Past President Haldeal
Snowbile Ass. Kal.

William E Morden
Kootenai National Forest
P.O Box AS
Libby, MT. 59923

Dear Mr. Morden,

We do not want Ten Lakes Area closed Snowmobile use in the area is increasing; parking area and trail heads have been established with grooming of trails

Sincerely,
Lonnie Keller
Louise Keller
Flathead Snowmobile Association members
Kalispell, MT

88

Dear Mr. William D. Mordan,

We would like to keep the Ten Lakes area open for snowmobiling.

Mr. & Mrs. Rick Teets
Kalispell, MT

2-11-83

Dear MR. MORDEN

I would like to be listed as against the Wilderness designation for the Ten Lakes Area.

I use this area for snowmobiling several times a year and feel it is a beautiful area to use in the winter time.

It should be kept open for this use.

Sincerely,

Don Zundel
2464 MISSION TRAIL
Kalispell, MT 59901

& Kathleen Zundel

Dear William E. Morden,

Keep the Ten Lake open to snow cats.

this is one of the best snowmobiling areas in that part of the country and snowmobilers should be able to continue their enjoyment of the area.

Rodney Larson

Kalispell, MT.

Mr William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

11 February1983

Dear Sir,

The Ten Lakes area is one of the best snowmobiling areas in that area of the State of Montana. I feel that we should be able to continue to use this area for riding. I support the Forest service proposal to not make this a wilderness area.

JOHN W. STEIN JR
850 Sierra Road West
Helena, MT 59601

Form Letter Received from the following:

Name	Letter Number	Town
Earl and Sandra LaRogue	97-98	Lincoln, MT
Merle Louis	99	Lincoln, MT
Ray Maberry	100	Lincoln, MT
Robert and Viola Tullock	103-104	Lincoln, MT
Richard and Shirley Wilson	106	Denton, MT
Kenneth Bushnell	107	Helena, MT
Marvin and Judith Hagen	110-111	Lincoln, MT
Gene and Patricia Starcher	114-115	Lincoln, MT
Chris Castagne	120	Lincoln, MT
Victor Peterson	123	Lincoln, MT
John and Faye Roberts	131	Helena, MT
Robert and Evelyn Didrickson	132	Lincoln, MT
August and Pat Habets	138-139	Lincoln, MT
Marvin and Kathryn Reeve	146-147	Great Falls, MT

93

February 11, 1983

Kerby Allers
565 Maple Rd.
Kalispell, Mt. 59901

Mr. Morden,

In regards to the proposed wilderness area in the Ten Lakes area near Eureka, I would like to air my views as an avid snowmobiler. Thank you for your time.

I really would hate to see this area closed to snowmobiling as parking area and trail heads have been established and trail grooming is being done. This is one of the best snowmobile trails in this part of the country and easily accessible by our senior citizens.

Please don't take this area from us so our kids and our grandkids never have a chance to sample some of this excellent snowmobiling.

Sincerely,

Kerby Allers

February 11, 1983

Rosalyn Allers
565 Maple Rd.
Kalispell, Mt. 59901

Mr. Morden,

Please do not close the Ten Lakes area to snowmobiling. This is one of the finest snowmobiling areas in this part of the country.

Snowmobile use in this area is increasing; parking area and trail heads have been established with grooming of trails.

Please save some of the the Big Sky for people who know how to have fun.

Thank you,

Rosalyn Allers

Feb. 12, 1983 95

William Morden
Forest Supervisor
Kootenai Nat'l Forest
Libby, MT 59923

Dear Mr. Morden:

I would like to comment on the Ten Lakes Wilderness Study Area.

I support ALTERNATIVE "C" for management of the area because I believe there is a critical shortage of protected wilderness in Northwest Montana.

Due to your forest's intensive timber management plans, I feel that asking for an island of wilderness in the sea of clearcuts is not asking much from your agency. With the continuing degradation of the Cabinet Mountains Wilderness and your agency's apparent unwillingness to adequately protect grizzly habitat without conservation groups threatening you with lawsuits, I would strongly suggest that the Ten Lakes area receive the protection it deserves---that of wilderness.

I do not feel that the area will be properly managed as a "roadless area." What guarantee is there that the "scenic area" will actually be expanded to the 18,000 acres proposed for roadless management?

Also, your agency's arguement over the needs of snowmobilers is full of deception. After adding the six thousand miles of new logging roads proposed for your forest, snowmobilers will have the run of the forest. Who's fooling who on the Kootenai?

Ron Selden
PO Box 877

BUCKHORN RANCH
BOX 164
EUREKA, MONTANA 59917

96-1

Kootenai National Forest
Supervisor's Office
P. O. Box AS
Libby, MT.59923

Gentleman;

Here are a few of my comments and statement on the Ten Lakes Wilderness area and the K. N.F. plan. First of all I am for Alternative "C". For 35,900 acres for the Ten Lakes aera. In the long run(future years, on down the road) Wilderness will produce the hightest net public benefit. Wilderness cannot be replaced, aperson cannot find it just any place.

A non-wilderness would continually endanger the grizzly bear, which man has almost killed off and run out of the lower 48 states. This is one little cornor where we could keep the grizzly for awhile yet, if it is kept as a Wilderness.

Jobs, timber, these are a big issue at present, but they are not of long term value, the app. 16,500 acres in the study area proposed for logging is quite small compared to more then one and a half million acres proposed for logging and roading on the K.N.F. A big issue seems to be made about keeping it non-wilderness for snowmobiling (long with the timber and the roads). Why is this? When there is literally millions of acresof forest lands already open to snowmobiling,and alot closer to cities and towns.

Leases for oil and gas could be let in the wilderness when and if we needed them, but until the time comes that we need it lets keep it out. Just the exploration of gas and oil would have a great adverse effect on wildlife and fish, and also may pollute the waters going in to our neighboring country.

96-2

My big objections to the non-wilderness, is that the area will be over managed. Alittle bit at a time, this area will be cut to bits, it would never be left im Current Direction or any of the Alternatives A,B,D, or proposed. Alternative "C" - Widerness, is the only one our local forest managers (district, forest, and region) won't manage right out of existence.

On the Kootenai National Forest plan , I do not under stand all of it as I am not fimilar with much of the situtions except close to where I live. I am concered with the future of the grazing in your plan, as I raise some livestock (horses & cattle) and have an alotment. I see that as the forest management plan progresses it provides more range for domestic livestock. The range issue is not addressed at much length. Maybe it isnot an issue.

Sincerely;
Harry T. Workman & Elaine L. Workman
Harry T. Workman

Mr William E Horden, Supervisor
Kootenai National Forest
[illegible] Box [illegible]
Libby MT [illegible]

Dear Sir,

I support the continued and expanded use for snowmobiling opportunities in the Ten Lakes Study Area. I support the Forest service proposal on this matter.

Mrs. I. Avis McCollum
Box 458 Lincoln, Mt
Address 59639

As an alternate suggestion let every inverionmentalist make his or her private property a wilderness area. Then let them figure out how to ~~make a~~ live there. Maybe they would begin to understand some of the problems they create for others with so many wilderness areas. We have enough wilderness areas. Leave the rest of our stat for us to try to make a living and enjoy life a little.

102

Mr William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir,

The Ten Lakes area is one of the best snowmobiling areas in that area of the State of Montana. I feel that we should be able to continue to use this area for riding. I support the Forest service proposal to not make this a wilderness area.

McMcCollum
Box 458 Lincoln Mt.
59639

We have enough wilderness areas in the state of Montana, If people would leave them alone and leave them as wilderness areas.

Could this be another environmentalist deversionary action in the ten Lake area so they can pull a fast one in some other area?

This has been know to Happen in the past.

Mr William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir,

The Ten Lakes area is one of the best snowmobiling areas in that area of the State of Montana. I feel that we should be able to continue to use this area for riding. I support the Forest service proposal to not make this a wilderness area.

Richard C. Wilson
Box 426 Denton, Mt.
59430

We have entirely to much wilderness already. As I have outfitted and guided in the Bob Marshal and Scapegoat wilderness for the past 20 years I can attest to the total nothing that comes from having wilderness.

Judith Gap, Mt.
Feb. 21, 1983.
St. Rt. Box 343 59453

Kootenai National Forest.
William E. Morden Supervisor
Box AS.
Libby, Mont. 59923

Dear Sir:

In regard to the issue of snomobiles losing the use of the Ten Lakes Area - under S. 398 Wilderness Study Act.

I agree with the Forest Service. This area should be managed for non-wilderness. This area should be kept for snomobiling.

Snomobiling in this area has increased and trails have been groomed and trail head's established.

I would like this testimony present at the formal hearing.

Yours truly
Mickey Sorenson

109

Wade's Drive Inn

Phone 632-4533
Area Code 406

"Where it's a Treat to Eat"

Harlowton, Montana 59036

2/21/83

Kootenai National Forest
William E. Morden

Sir:

Just a short note about S. 393 Wilderness Study Act on the 35,900 acre Ten Lakes area.

We agree with the Forest Service that the area be managed for non-wilderness. Also we would like to keep the area open to snowmobiling as it has been in the past. Snowmobiling has been increasing and parking areas, trailheads and groomed trails will bring more and more snowmobilers. It is one of the better snowmobiling areas in that part of the country.

I would like for this to be made a part of hearing record on Ten Lakes. Thank you -

Wade P Sorensen
S.R. Box 343
Judith Gap Montana 59453

112

February 21, 1983

Mr. William E. Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden:

Please make this written testimony a part of the hearing record on the Ten Lakes area.

I strongly support the continued use of snowmobiling in the Ten Lakes Study Area as set forth in the Forest Service proposal.

Snowmobile use in the area in increasing and it is one of the best areas in that part of the state.

Sincerely,

Lois A. McGlothlin

Lois A. McGlothlin
3601 5th Avenue North
Great Falls, Montana 59401

113

February 1, 1983
526 S. 4th St. W.
Missoula, Mt. 59801

William Morden
Kootenai Nat'l Forest
Box AS
Libby, Mt. 59923

Dear Sir:

I urge your support of Wilderness designation for the Ten Lakes area east of Libby, i.e., alternative "C".

This area should not be developed because of its pristine nature and because of its value as grizzly bear habitat as well as an area that offers recreational use to the backpacker and trail rider.

The loss of this area to development would be a dis-service to its natural inhabitants as well as to those who would use it recreationally.(non-motorized)

Sincerely,

John K. Gjerde

John K. Gjerde

116

Charles R. Newton

Box 155

Eureka, Montana 59917

Superviaors Office

Box AS

Libby, Montana

Dear Sir,

I am in favor of the Ten Lakes Scenic Area remaining scenic rather than wilderness and I feel that 16-18,000 acres is an adequate amount of acres to preserve in a scenic state.

Sincerely,

Charles R. Newton

Charles R. Newton
Box 155
Eureka, Montana 59917

#116B

Forest Service USDA
Kootenai National Forest

Dear Sirs,

I am a member of the board of directors of the Montana Loggers Association with approximately 400 members.

We support the Forest Service proposed management plan for Ten Lakes Scenic Area in its entirety with no additions of amendments.

Sincerely Yours,
Charles R Newton
Charles R. Newton

117

Dorothy Newton

Box 155

Eureka, Montana 59917

Supervisors Office

Box AS

Libby, Montana

Dear Sir,

I am in favor of the Ten Lakes Scenic Area remaining scenic rather than wilderness and I feel that 16-18,000 acres is an adequate amount of acres to preserve in a scenic state.

Sincerely,

Dorothy Newton

Dorothy Newton

118

FEBRUARY 23, 1983
Box 112
Trego, MT 59934

FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST

DEAR SIR:

AFTER REVIEWING THE TEN LAKES MT. WILDERNESS STUDY AREA REPORT AND PROPOSAL, I HAVE SELECTED THE TEN LAKES ALTERNATIVE C AS THE PREFERRABLE ALTERNATIVE FOR THE FOLLOWING REASONS. THIS ALTERNATIVE HAS A HIGHER VALUE IN PROTECTING THE TEN LAKES AREA FROM DEVELOPMENT BY THE OIL AND GAS INDUSTRY. IT WOULD BEST MAINTAIN AND ENHANCE THE EXISTING SITUATION FOR THE THREATENED AND ENDANGERED SPECIES THAT NOW UTILIZE THE AREA. GRIZZLY BEAR, NORTHERN GREY WOLF AND THE WOODLAND CARIBOU ARE ALL FOUND IN THE AREA OF CONSIDERATION. IN THE ENTIRE UNITED STATES, WOODLAND CARIBOU ARE ONLY FOUND IN ONE AREA OF IDAHO AND IN THE TEN LAKES SCENIC AREA. THIS IS ALSO ONE OF THE FEW REMAINING AREAS TO FIND THE GRIZZLY BEAR IN ITS NATURAL STATE. THE SAME IS TRUE FOR THE NORTHERN GREY WOLF.

ONE OF THE MOST IMPORTANT ATTRIBUTES OF THE TEN LAKES AREA IS THE HIGH VISUAL QUALITY. ALTERNATIVE C WOULD BEST PROTECT AND MAINTAIN THIS NATIVE BEAUTY FOR PRESENT AND FUTURE GENERATIONS TO ENJOY. THERE ARE PLACES IN THE WORLD WHERE ALL SUCH NATURAL BEAUTY HAS BEEN ELIMINATED AND I THINK IT WOULD BE A TRAGEDY WITH SERIOUS CONSEQUENCES IF WE ALLOWED IT TO HAPPEN IN THE U.S.

ALTHOUGH THE MAIN INDUSTRY IN THE EUREKA AREA IS LOGGING, I WOULD NOT CONSIDER ALTERNATIVE C TO BE A DETRIMENT TO THE ECONOMIC STABILITY OF LINCOLN COUNTY, SINCE WE ALL KNOW THE VALUE OF KNARLED, SCRUB, SUB-ALPINE FIR.

I STRONGLY URGE THE SUPPORT OF ALTERNATIVE C AS THE BEST PROPOSAL FOR MAINTENANCE OF THE TEN LAKES SCENIC AREA AS A WILDERNESS REGION.

SINCERELY,
KATHY LEWIS

119

February 18, 1983

M. Ray Masters
512 7th Ave South
Great Falls, MT 59405

William E. Morden, Supervisor
Kootenai National Forest
P.O. Box A S
Libby, MT 59923

SUBJECT: Ten Lakes Area

Dear Mr. Morden:

I would appreciate this letter being made a part of the record on S393 concerning the 35,900 acres of study identified as the "Ten Lakes" area.

I support the Forest Service recommendation of non-wilderness designation of the Ten Lakes area.

We feel this area can be ably managed for recreational values by the forest service planning process and allow maximum benefit to the public without designating the area as wilderness.

As an interested snowmobiler, we can, and do, use the area in question with no damage to the environment, at a time of year with virtually no animal conflicts. We generally help the economy of the Eureka area and feel the recreational value of snowmobiling is a great release from the pressures of our various employments.

Thank you for the Forest Service recommendation of non-wilderness. We support that decision.

Sincerely,

M. Ray Masters

M. Ray Masters

Member: Great Falls Snowmobiles
Montana Snowmobile Assoc.
Great Falls Snowmobile
Search & Rescue

121

611 S. Sine
Conrad, MT 59425

Mr. William E. Worden, Supervisor
Kootenai National Forest
Box A.S.
Libby, Montana 59923

Dear Sir:

The Ten Lakes area has some of the best snowmobiling in that area of the state of Montana. I feel we should be able to continue to use this area for snowmobiling. I suggest the forest service proposal to not make this a wilderness area.

Sincerely,
Nancylee Peterson

Kootenai National Forest
P.O. Box A5
Libby Montana

2-22-83
122-1

Dear Folks at Libby,

The fate of the ten lakes proposed wilderness area is just about to be determined, and the Forest Services selected alternative is far from what i feel is best for the people and the resource.

By taking the short sited proposal suggested by the Forest Service a definite malfeasance to the wild life utilizing this area will be done. Grizzly Bear, mountain caribou, and northern Rocky Mountain wolf are far from abundant anywhere in the lower 48 states, & not giving total protection to, there possible, if not certain, residents of the Ten Lakes, would be doing ourselves and even more important, our children & their

children a terrible disservice.
I realize that recreation would
~~[illegible]~~
be affected by wilderness
designation. The snowmobilers
would lose the right to
Snowmobile into Wolverine &
Bluebird Basin, a total of
approximately 8 miles one way.
They would still be able to
utilize all of Grave Creek Rd,
Lewis Creek Rd, the Frozen Lake
area, & little + Big Thermault
Lakes. By losing access to
the Ten Lakes, definetly would
not cause a major loss to
individuals snow mobling in
this area.

By having a Wilderness
present in the Fortine Ranger
district & the Eureka area, I feel
that there would be a definite
increase in other forms of
recreational use of the Ten Lakes.
Back packing, cross country sking,

horse back riding & fishing could serve as a calling card to attract tourists, & thus lessen the portion of Lincoln County economic woes. If trends persist, having a wilderness close to Eureka would not only categorize it as one of the few chosen areas with one of the few designated & protected natural areas, but also a very viable business opportunity for its residents.

A few quick closing statements:

① Wilderness does not stop handicapped & elderly people, the people themselves do. The Forest Service proposal will not greatly increase the number of handicapped or elderly people present in the Ten Lakes area. But wilderness designation may actually bring an increase. I have hiked in numerous national parks & wilderness & have bumped into elderly folks in most of them, not just by the easily accessible areas, but back in the sticks.

(2) the timber in Ten Lakes proposed Wilderness area is of marginal quantity & quality. Certainly not enough to make or break Eureka's economy by its loss.

(3) ~~(Gas & oil could be accessed outside the Wilderness area if it were~~

If Gas & or oil was of such quantity and was needed so badly, it could be accessed from outside the wilderness area.

(4) Caribou, grizzly, & wolves are endangered species. We have a federal mandate to protect them.

(5) I fully support Alternative C, wilderness classification for 35,900 acres of the Ten Lakes Wilderness area, & hope that these comments will help to change the Forest Services recommendations on what to do with this area.

Thanks;
Peace,
Brenda Nesbitt
P.O. Box 116
Fortine, Montana

Dear Sir:

I'm writing about the Ten Lakes Wilderness Study area. I'm writing to say that I'm in favor of wilderness. This is a very beautiful area, with its high mountain lakes, and its closeness to the Grizzly bear habitat. These two things alone should make it worth protecting.

Logging in this area will only add to the deterioration of the natural beauty of the area.

We need the peace and solitude that only wilderness can bring. There can never be enough wilderness. It's mostly all gone, and we should save every little piece that we can. Save it for our children, and all the children to come.

We need to protect these areas for the protection of the Grizzly bear,

where he can have a place to live, and survive. The Grizzly has a right to live. We won't make it if we just keep pushing, more and more.

There is plenty of other landfill people to make a living from.

Thank you
Mr. Joe Hibbitts

P.O. Box 776
Eureka, MT 59917

325 West Mulberry
Fort Collins, Colorado
February 19, 1983

Mr. William Morden
Forest Supervisor
Kootenai National Forest
Libby, Montana 59923

Re: TEN LAKES WILDERNESS STUDY AREA

Dear Mr. Morden:

Please accept this comment regarding the Ten Lakes Study Area. I am strongly in favor of preservation of the entire 35,900 acres as wilderness.

My wife, a native of Whitefish, and I have hiked in over sixteen of our nation's Wilderness Areas and numerous National Parks, including the Ten Lakes Area, which we regard as one of our favorite areas.

The entire 35,900 acres is certainly an "area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." 16 U.S.C. Sec. 1131. The Ten Lakes Area should be given the highest wilderness rating, because of its source of rugged solitude, pristine sub-alpine lakes, and unique wildlife habitat, including that of the rare and elusive mountain caribou.

Thank you for your consideration of this comment. Please send us an information booklet on the Study Area and keep us informed as to your decision.

Sincerely,

Thomas J. Esch

Thomas J. Esch
Attorney at Law

126

February 25, 1983

Paul D. Johnson
721 S. 2nd St. W., Apt. A
Missoula, MT 59801

Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Supervisor Morden:

I am writing to strongly urge that you reject the Kootenai National Forest's proposal to give non-wilderness status to the Ten Lakes Scenic Area. This proposal, presented in the Forest's 50-year forest plan, would eliminate the finest remaining area of de facto wilderness on the Kootenai National Forest, and would significantly deprive the public of a prime site for quality roadless recreational opportunity. This rare, pristine area offers outstanding natural beauty, first-rate hunting and fishing, and vital wildlife habitat. It should be left in its wilderness state under Alternative C of the Forest Plan.

A central Forest Service argument in favor of non-wilderness status for Ten Lakes is the use of the area of snowmobilers. It should be first pointed out that this use was established when the Forest Service developed a snowmobile "staging area" immediately adjacent to the Ten Lakes area, contrary to the clear intent of S.393. Snowmobile use is especially inappropriate considering that there are quite literally millions of acres of non-wilderness federal land currently available to snowmobilers. By encouraging such use in the Ten Lakes Wilderness Study Area, the Forest Service is controverting the intent of S.393, which contemplates protection of the wilderness potential of the study area until Congress makes a determination of its ultimate status.

In conclusion, I believe the Ten Lakes Scenic Area is ideally suited to classification as wilderness, and I strongly urge you to adopt Alternative C (protecting the Ten Lakes area as wilderness) instead of the Forest Service's proposed plan for development.

Sincerely,

Paul D. Johnson

Paul D. Johnson

cc: Gov. Ted Schwinden
Sen. Max Baucus
Sen. John Melcher

Dear Mr Morden,

This is in support of Ten Lakes Wilderness, the entire 36,000 acres, alternative C & We must protect this outstanding area by giving it wilderness status.

O ye the representatives of the people in every land.

Take ye counsel together and let your concern be only for that which profiteth mankind and betteth the condition thereof, if ye be of them that scan heedfully.

Sincerely,
Mr & Mrs David Snyder
Box 57
Monon WV
59925

passive sunworks company
126 1st Street
Whitefish, MT 59937
(406) 862-7536

WILLIAM E. MORDEN
FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST
BOX AP
LIBBY, MT. 59923

DEAR MR. MORDEN,

I STRONGLY SUPPORT THE WILDERNESS DESIGNATION FOR THE 'TEN LAKES AREA' EAST OF EUREKA. 'SCENIC' DESIGNATION DOES NOT OFFER ENOUGH PROTECTION FOR GRIZZLY, WOLF, ELK, CARIBOU AND OTHER ENDANGERED SPECIES. I URGE YOU TO SUPPORT 'WILDERNESS' DESIGNATION FOR THIS AREA.

SINCERELY,

129-1

Christie Ferruzzi
P.O. Box 71
Trego, Mt. 59934
Feb. 24, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box A.A.
Libby, Mt. 59923

Dear Mr. Morden:

As a resident of Lincoln County in the Tobacco Valley area, I am against the Ten Lakes Proposed Action. Since there is no wilderness in this part of the Kootenai National Forest, I would like to see the Ten Lakes Wilderness Study Area classified as wilderness.

Alternative B is a reasonable action providing for the utilization of the relatively small percentage of highly productive timberland in the study area while providing as much wilderness experience as possible. According to several reliable sources, most of the study area is not highly productive timberland, anyway. In contrast, the area is highly rated in naturalness and natural integrity crucial to grizzly bear, Northern Rocky Mountain wolf and caribou habitat and important to elk, moose, deer and other wildlife. The sighting of caribou sign by a Forest Service crew in the spring of 1982 and the possibility of their regular inhabitance increases the wilderness value of this area. The Proposed Action's projection of 60 miles of road and the future possibility of mineral and oil and gas explora-

This would both be detrimental to the natural integrity essential to the wildlife in this area. Under wilderness classification, oil/gas exploration and development would at least be restricted.

There would also be some economic value to the service sector of the local community as wilderness draws nonmotorized recreators and hunters. The economic purposes in the report can be applied to the rest of the Kootenai National Forest while retaining the Tom Lake Wilderness Study Area for the wilderness experience.

Sincerely,
Christie Ferruzzi

Supervisor William Morden
Kootenai National Forest
Box AS
Libby Montana 59923

Supervisor Morden

I strongly support a 35,900 acre Wilderness in the 10 Lakes Area

Its time we started conserving our natural resources. Roadless areas are a non-renewable resource that must be saved.

No! Mr Morden to development of roads in the 10 Lake Area

Mike

Michael Yelinek
987 Bailey Dr
Columbia Falls Montana
59912

2/25/8

Dear Mr Morden, and National Forest personel concerning disposition for Ten Lakes Area of NW Montana,

I am writing in support of alternative "C", the wilderness option for Ten Lakes Wilderness Study Area. I am from the Ea and these acres are for me some of the most fabulous irreplaceable wilderness I have seen in Montana in my many trips there. Only the Cabinet MTS are currently protected as wilderness in NW Montana. The Ten Lakes provide important Grizzly and wildlife habitat, poor timber valu and superb primitive, virtually untouched forest and subalpi value.

Most Montanans I met in my many trips, and virtually all conservationists and lovers of the outdoors with whom I have discussed this in the East want Ten Lakes left a Roads + Timber Sales as well as proximity provide easy acce for this area from NW Montana cities + towns, and this is one of the most desireable aspects of declaring this wilderness. After all, ever I have been there.

If the Ten Lakes Report states on page IV-2 that the Forest Constill meet the RPA resource goals for all goals (including timber) if it left Ten Lakes as wilderne then why lose its wilderness? And the Forest wouldn't reach its RPA goals for wilderness if it choose T proposed option! So why not make NW Montanans and Americans happy and fulfill all the goals by choos alternative C, that of wilderness.

Wilderness is why I come to Montana to spend my vacation money and time, not clearcuts or snowmobiling. Please choose alternative C for Ten Lakes Wilderness Study Area and leave the wilderness in its name.

Sincerely yours,

Stewart Tepper MD
28 Flagg St
Cambridge Mass 02138

Dear Sir:

I'm in favor of alternative C: Wilderness protection for the entire 10 Lakes Wild area of 36,000 acres. I don't feel that the Forest Service's proposal for ½ of this area to be managed as multiple use and the other ½ to be managed as a scenic area gives much protection to this unique area. I'm especially concerned with the mountain caribou that may still inhabit this area. I'm also concerned with the Grizzly Bear and possible Grey Wolf recovery. I feel that roads should be kept out of these areas. I would like to see Wilderness status for this area. Thank you for your time.

Yours truly,
Steve Lamar

Box 1077
Conrad, MT 59825

Hello

My name is Terry Mullins, I am a student at The University of Montana in Missoula, I wish to express my support for Alternative 'C' in the Ten lakes ~~management~~ Wilderness

In all of North West Montana, only the West Cabinet mts. are designated as wilderness & even this area is being seriously impacted by ~~wilderness~~ mineral exploration.

The use of snowmobiles will not be hindered by the creation of The Ten lakes wilderness, There are literally millions of acres of federal lands open to snowmobiling in N.W. Montana

This area is habitat for the severly threatened grizzly Bear, & pass for the caribou.

The Timber values of this area are insignificant next to the 1.5 million acres proposed in The Kootenai forest alone.

The Ten lakes area is high in The wilderness attributes of naturness, natural integrity & outstanding opportunity for primitive & unconfined recreation

It is time that we make a stand for our wilderness & for The Animals whose very existance is threatened by our sightless resource & land use

Thanks

Terry Mullins

Terry Mullins
309 S 4th W, Apt 3
Msla, MT 59801

136 -1

SPOKANE AUDUBON SOCIETY

A WASHINGTON CHAPTER OF THE NATIONAL AUDUBON SOCIETY

February 17, 1983

Bill Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden,

Thank you for coming to Spokane and giving us an opportunity to discuss in detail our review of the Kootenai's Forest Plan. It was an extremely enjoyable evening and I believe we both benefited immensely.

As you requested I have the following specific suggestions to the plan:

1) Upper Vermillion Road in the Ice Creek area - The allocation systems seem to be difficult to understand. Two off road vehicle areas (3) next to a limited land use area (24) and a steep slope area (19) unless there is some real significant natural boundries I would suggest this allocation be given some further attention.

2) The 20 Odd Man Creek and Copper Ridge area - This area is of some concern because the road is very narrow and to cut any additional timber there doesn't make alot of sense. I would recommend this whole area be allocated to 18 for the next 40 years and then looked at again.

3) The Seven Point Mt. area should be all the same class probably 2.

4) McKay Creek - The wilderness boundry should be re-arranged to include that portion of private land from the end of the road to the forest boundry. We recommend a land exchange to accomplish this.

5) Ibex Peak - The allocations of 11 - 14 - 2 should be either 11 or 12, with a plan to consider viewing along with wildlife considerations. The boarder of the wilderness area should be treated carefully.

6) Benning Mt. - Should be changed from 3 to 2, we can't imagine off road vehicles to the north of the Rattle Snake Road, especially in light of all the horse use.

7) Calder Mt. - Change 18 - 24 & 8i to 2 over to Star mt. this area provides excellent horse access and really should not be in the timber base. There is really little opportunity for production and the road costs would be prohibitive.

8) Mt. Henery - Area 15 should be changed to 14 in light of the fact that this area does provide grizzly bear habitat.

9) Ten Lakes - Classification of 5i should be changed to 2 and 17 should be changed to 14. This area is of great scenic importance both from a hiking point of view and from a wildlife view. The least amount of harvest in this area in our opinion is the more satisifactory solution.

FEB 22

136-2

10) All the roads are not shown on the map and we have difficulty understanding how the allocation of roadless areas can be in the Leigh, Snowshoe, Big Creek area, also further discussion and a more diffinative discussion needs to be in the area.

11) Change to #17 this area is an extremly important viewing area from the Cedar Creek and Scenery Mt. trail and needs additional thought.

12) Horse Keeping - The upper part of Trail Creek should remain roadless allocation 2.

13) We believe this allocation should be changed from 11 to 10, logging doesn't appear to be feasible in this area.

In conclusion we believe that the Kootenai has done a remarkable job of planning and we hope that our input will be considered positive and be of some help. We are always ready to help and hope we can sit down with you again and discuss the plan prior to final print.

Thank you for the opportunity to respond.

In Care of the Earth.

Sincerely,

Shirley Faggin
Conservation Chair Spokane Audubon Society

Sam Angove
Wilderness Chairman, Northern Rocky Mt.
Chapter Sierra Club
W. 1115 Broadway
Spokane, Washington 99260

NOTE: MAP IS ON file IN S.O. - PLANNING BRANCH

Feb. 24th, 1983

137

Dear Forest Supervisor;

I feel that the ten lakes alternative C that is in the ten lakes mt. wilderness study area report would be much better than the proposed action. This alternative would protect the area from the oil + gas industry from moving in and developing the Ten Lakes area, and alternative C gives the best protection. Alternative C also would give the best protection for the threatened and endangered species that live up in the area. There are grizzly bear, northern grey wolf and woodland caribou that utilize the area. And it is pretty rare to find the grizzly bear and northern grey wolf in this situation where they are living in their natural state. The woodland caribou are really important since the only other place they are found in the U.S. is in one area of Idaho. I feel these animals are very important and should be taken into consideration.

I don't feel Alternative C would hurt the economic stability of Lincoln County even though logging is the main industry of the area. From my experience of being in the Ten Lakes Area there really isn't very much valuable timber, it definately would be no great loss.

The Ten lakes area has a special beauty of its own which alternative C would best protect and maintain as a wilderness region. I am in total support of Alternative C and urge you to support it also.

Sincerely,

Mindy Henderson

Rt 1 Box 110
Eureka, MT 59917

140-1

BITTERROOT-MISSION GROUP
SIERRA CLUB
BOX 7315 MISSOULA, MONTANA 59807

February 27, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Dear Mr. Morden,

The Bitterroot-Mission Group recommends that the entire Ten Lakes Wilderness Study Area remain roadless, preferably to be recommended by the Forest Service for Wilderness designation in its entirety (Alt. C). At the very least we insist on a core area of Wilderness with the remainder to be administratively managed roadless (Alt. not presented). This core Wilderness should be no smaller than the roadless recommendation of the proposed action.

We prefer Wilderness because of the degree of permanance such designation affords roadless areas. Administrative Roadless management albeit more flexible is also more easily and quietly modified in the future. We feel quite certain that in the future, as all resources become more scarce, roadless management would be subject to incremental inroads which would not receive nearly the public input being considered in the present proposal. This problem is accentuated by the inevitable turnover in administrative personnel.

We recommend the entire area remain roadless because:

1. its outstanding wildlife value particularly as essential habitat for the endangered grizzly bear, Rocky Mountain wolf, and also possibly, the woodland caribou;
2. its very high watershed values;
3. it is the last roadless area in the Whitefish range;
4. roadless areas are an ever diminishing resource while demand for the recreational opportunities they afford is steadily increasing; and
5. the vast majority of surrounding lands are roaded and managed for timber.

We believe there is more than adequate opportunity for motorized recreation on the Kootenai without also roading this area. As for timber, we ask you to compare timber values for this area to the Kootenai Forest as a whole and consider the small fraction of the forest's total allowable cut this area could provide. We think you will find that the area's timber values are below average, whereas its wildlife values are well above average, and that the study area's potential contribution to the timber base is so small as to be almost insignificant. Consider also the poor regeneration being experienced on the large Wigwam Creek clearcuts.

The proposed action is totally unacceptable. It calls for too many roads and puts far too much emphasis on motorized recreation, too much emphasis on timber management, and too little consideration of fish and wildlife. It would be a marked step backwards from the current direction. We ask you to reconsider.

In addition, we would like to make the following comments and suggestions regarding the draft EIS itself. In the interest of fairness, if you consider other Wilderness

140-2

(F on page I-2) in evaluating the area's Wilderness suitability, you must also consider other timber and recreational, etc. values when evaluating these resources.

It would seem that allocation of roadless areas to timber management would be irreversible (as defined in section K, page IV-16) rather than irretrievable as stated on page IV-17. Indeed, your rejection of Alternative E for detailed consideration (page II-10) supports loss of roadless areas as irreversible; if such loss is only irretrievable, then Alternative E deserves consideration in detail.

In Figure TLII-3, page II-19a, there is a bias toward market resources because opportunity costs are displayed only for priced benefits and not for non-priced benefits.

Finally, the existing situation or current direction should be the benchmark for comparing alternatives. In most cases, the maximum PNV benchmarks require actions which are unreasonable if not downright illegal, i.e. total harvest of timber as fast as possible; such benchmarks violate the concept of multiple use.

Thank you for considering our input.

Sincerely,

Don A. Essig

Don A. Essig
Chairman
Bitterroot-Mission Group
Sierra Club

March 2, 1983
Box 647
Columbia Falls,
Mt. 59912

141-1

Wm Morden, Forest Supervisor
Kootenai, Nat. For.
P.O. Box 4S
Libby, Mt. 59923

Dear Mr Morden:

I heard Jim Shadle from your planning staff speak to Women in Timber in Kalispell Feb. 19th. He put across the info on the DEIS for your area very well. The presentation was very interesting and showed you all have done a good job putting it together.

I agree with your proposed alternative for the 10 Lakes Area. I used to do a lot of snowmobiling so am glad you consider that important.

I believe most study areas should be considered for non-wilderness — well managed, under multiple-use.

I am against you considering adding 360,000 acres for designated summer

range for elk habitat. This would mean less area open for recreation in the summer when most people are out in the forests and I imagine would also adversely affect the timber industry.

I question the reasoning behind the decision as I heard Mike Aderhold, Public Info. Officer for Fish Wildlife & Parks Dept. speak in July '83. He said they could not study the elk, so they studied the deer by putting transmitters on them and when people or vehicles were nearby, the deer would migrate. I believe that any animal that has been caught and messed with will probably run the next time he sees people. Elk do not run far if they have not experienced mistreatment earlier. They are curious and usually watch us.

I don't think that study should

be used as a reason for assuming elk will migrate too much and thus not reproduce well if an area is not closed.

Also, I feel the Forest Service places too much energy towards the goal of reproducing animals so that the hunter can go in and kill them. Also, so much importance on preservation of the grizzly bear is unnecessary. The dinosaur is extinct and I don't miss it a bit.

All in all, the DEIS is fine with me. Thanks for listening to my gripes.

Sincerely,
Lilli Ann Martin

P.S. I would like to see some of the small, not so fancy, forest campgrounds left open — even if not used much. Some people like to camp away from so many people.

143

Nancy Wilson Newcomer
Route 2, Box 226-C
Libby, MT 59923
March 1, 1983

William F. Morden, Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Dear Mr. Morden,

Thank you for the opportunity to attend the public hearing in Libby on the Ten Lakes Montana Wilderness Study Act Area January 18, 1983. I arrived mid-afternoon. Two other members of the community were present. Only one person testified. We all questioned and discussed Ten Lakes with Paul Leimbach and Gary Morgan. Their presents was greatly appreciated.

I have never been in the Ten Lakes area. I now know I want to spend some time in the area.

I do not have the expertise to comment on the technical aspects of the Wilderness Study. I can only respond at the gut level. I have strong feelings to preserve areas of Wilderness representing different ecosystems for generations to come and enjoy. Ten Lakes has maintained its Wilderness characteristics up to this point in time and ranks high on the Wilderness Rating Systems. I would like to see Ten Lakes designated as a Wilderness Area. As the population grows, there will be more and more pressure to exploit Ten Lakes natural resources. Now is the time to preserve.

Pine beetle and fire should be allowed to run their course. Oil and gas can be obtained in other areas which do not have so much wilderness potential. If snowmobilers did not use the Ten Lakes area maybe enough oil and gas wuold be saves to make expolation nonprofitable.(wishful thinking!)

I feel the grizzly bear should be a top priority. The possibility of a transient caribou herd in Montana should also be a top priority.

Thank you for the opportunity to comment.

Sincerely,

Nancy Wilson Newcomer

Nancy Wilson Newcomer

Moose City Cabin
Polebridge, Mt.59928
2 March, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

Dear Mr Morden;

I am writing to express my strong support for Alternative C--wilderness protection for the 36,000 acre Ten Lakes area. As it is, Ten Lakes offers quality hunting and recreation opportunities. If roaded, leased for oil and gas, and harvested for timber it will loose what it is now. In addition, wildlife would,of couse,benefit the most with wilderness protection.

Tourism is one of Montana's most lucrative industries. People are simply attracted to Montana's "wildness". Please help us preserve what is unique about Montana.

Sincerely,

Rosalind Yanishevsky

Rosalind Yanishevsky, Ph.D.

cc: Rep. Pat Williams
Senator Max Baucus

150

Mar. 1,1983

To:
William E. Morden
Forest Supervisor
Kootenai National Forest

Dear sir,

This letter is sent in connection with the upcoming alternatives to be choosen in connection with the Ten Lakes area. As far as I am concerned there are no alternatives except to bring the entire 36,000 acre region under wilderness protection.

As Forest Supervisor of that area I'm sure you've hiked up in there many times. It is a well used area used by people who wish to leave behind as many signs of civilization as they can. The Forest Service trails are greatly appreciated but roads would not be. This area must remain as untouched as possible.

My first excursion into that area was just last summer. I have been an avid backpacker for the past nine years and I must say the Ten Lakes area struck me as being totally unique from any other place I had ever been. To allow timber and drilling in that area would surely be a sin.

I feel it's time to stop seeing the land only as a usable resource and start seeing it as a legacy that we pass from generation to generation. As a man who works with forested areas day after day and who really cares for those lands I'm sure you can see the point of us who wish to keep the land as it first was as much as possible.

Thank you for your time.

Sincerely,

Timothy J. Melander

Tim Melander
300 Park Hill Dr.
Whitefish MT
59937

MAY. 2, 1983

MR WILLIAM E. MORDEN
FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST

DEAR SIR

I AM WRITING TO EXPRESS MY BELIEF THAT WILDERNESS DESIGNATION IS THE BEST WAY TO PRESERVE THE TRUE MULTIPLE USE CONCEPT IN THE KOOTENAI FOREST IN REGARD TO THE TEN LAKE SCENIC AREA, ALL 36 000 ACRES IN THE STUDY AREA. CERTAINLY THE KOOTENAI FOREST HAS IT SHARE OF MULTIPLE USE CLEARCUTS AND THE WISDOM AND LONG TERM ECONOMIC EFFECTS OF ALL THAT PROPOSED ROADBUILDING IS DUBIOUS AT BEST. I HAVE HIKED, HUNTED, AND CLIMBED IN MUCH OF THIS BEAUTIFUL AREA AND FEEL IS WORTHY OF FAR BETTER TREATMENT THAN A SKINNY CORE WITH CONSTANT THREATS FROM LOGGING AND MINERAL LEASES ALL AROUND. PLEASE CONSIDER OTHER VALUES SUCH AS WILDLIFE, WILDERNESS, OLD GROWTH PLANT COMMUNITIES AND WATER QUALITY AS WELL AS TIMBER AND MINERALS

I AM ALSO IN FAVOR OF THE ROAD CLOSURES BEHIND THE MURPHY LAKE R.S. FOR FALL AND WINTER WILDLIFE RANGE

SINCERELY,

CHARLES J. POTTER JR.
BOX 394
COLUMBIA FALLS MT

152

1085 K-M Road
Whitefish, MT 59937
March 1, 1983

Mr. William Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir:

I am writing to urge you seriously to consider classifying Ten Lakes a Wilderness Area. I have seen the scenic splendor of this mountain area and think it would be a disaster to allow any development on it.

There is already so much of the Kootenai Forest planned for timber cutting, mineral exploration and motorized recreation development that setting it aside would not alter the Forest's chance of meeting its development goals.

Now that evidence exists of the presence of Mountain Caribou in the Ten Lakes region, there is more logic in preserving the old growth environment.

I hope you will conclude that in view of the shrinking defacto wilderness nationwide, it would be desirable to include this small area in the National Wilderness system. It will be sorely needed to meet future needs.

Sincerely yours,

Eugene E. Graf

Eugene E. Graf

153

THE BIG SKY SNOWRIDERS
P. O. BOX 1044 LIVINGSTON, MONTANA 59047

Livingston, Mt. 59047
February 25, 1983

Mr. William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

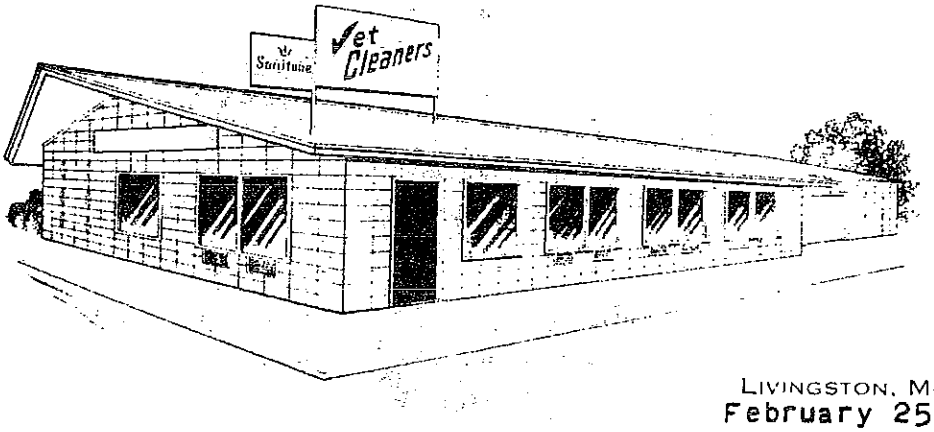
Mr. Morden,

We are a 50 member snowmobile club who would like to voice our support of your recommendation that the 10 Lakes area be managed on a non-wilderness basis. We are most interested in multi-use where ever possible, and since trail-heads and parking lots are already established, continued use is important.

Thank you.

The Big Sky Snowriders
Nina Celander, Secretary
Nina Celander
201 East Clark
Livingston, Mt. 59047

ROBERT AND NINA CELANDER PHONE 222-1742 201 EAST CLARK STREET



154

LIVINGSTON, MONTANA 59047

February 25, 1983

Mr. William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

Mr. Morden,

May we, as 5 member family of snowmobillers, add our support of your management policies for 10 Lakes area. We hope you will continue to provide areas like this as multi-use areas.

Thank You.

L. R. Celander and family
L R Celander
523 North Third
Livingston, Mt. 59047

155

Mr William E. Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir,

The Ten Lakes area is one of the best snowmobiling areas in that area of the State of Montana. I feel that we should be able to continue to use this area for riding. I support the Forest service proposal to not make this a wilderness area.

[illegible]
PO BOX 655 Lincoln MT
(Club). 5963
Ponderosa Snow
Warriors

156 B

Box 114
Noxon, Mt.
Mar. 7, 1983

Mr. Morden,

I strongly support Alternative C: Wilderness Protection for the Entire Ten Lakes Wild Area of 36,000 Acres. I sincerely hope this area will stay wilderness.

Sincerely
Bonnie Reishus

602 Concord Ln
Kalispell, MT 59901
March 5, 1983

Mr. William Morden, Forest Supervisor
Kootenai Ntl. Forest
Libby, MT 59923

Dear Mr. Morden:

I wish to go on record as supporting the need for the Ten Lakes Wilderness Area. Although I have never yet ventured into any of the wilderness areas in Montana myself, I have enjoyed their beauty vicariously and feel that such areas are now scarce and threatened nationwide. What few truly wild remote areas that remain and support habitat for endangered species such as bald eagles, grizzlies or caribou, should be classified as wilderness and left roadless.

After centuries of exploitation of our national treasures, Americans are beginning to realize that not everything has to be judged only by the amount of money it can earn in timber sales, snowmobile trails, pasture or oil & gas leases. The day of realization that areas such as Ten Lakes are truly unique and in the long run will be a drawing card for many who want a wilderness experience. I hope it will be preserved for them.

I mentioned that I have not yet ventured into a wilderness area. It is not for lack of interest but because I have not had a vacation in several years since returning from working overseas. When I eventually do get the time to explore my State (and hopefully my country), I want these areas to still be intact. They will not be if every camper and snowmobiler has road access to them. They will be just like the other Forest Service and Ntl Park campgrounds where the crews have to haul out the rubbish tossed by the hordes of people who pass through. The wildlife will be spooked or reduced in population because of easy access to hunters and the presence of man.

It would be shortsighted indeed let the wilderness qualities that remain in the Ten Lakes area be eroded by logging interests, gas & oil prospecting, grazing leases or snowmobile access. All of the foregoing activities can take place elsewhere. Your multiple use policy can accommodate an area as small as Ten Lakes in wilderness category without threateneing the economic interests of NW Montana. In fact, most States would love to have such a unique area where a lucky hiker has the opportunity to see a wolf or a grizzly.

So hopefully you will take these considerations into account when the fate of Ten Lakes hangs in the balance.

Yours truly,

Maryan Heppell

Maryan Heppell

cc: Gov. Schwinden
Rep. Pat Williams
Sen. John Melcher
Sen. Max Baucus

159

FLATHEAD AUDUBON SOCIETY
BIGFORK, MONTANA 59911

March 10, 1983

Forest Supervisor U.S.F.S.
Kootenai National Forest
Libby, Montana 59923

Dear Sir:

At our February 14th meeting of Flathead Audubon Society we discussed the Proposed Forest Use Plan For Ten Lakes Area, north of Eureka, Montana. After considerable debate, we decided to urge Kootenai National Forest to reconsider the oil and gas lease recommendation for Ten Lakes. Our reasoning is as follows:

1) Substantial evidence indicates a viable population of woodland Caribou use the area and travel from there to adjacent lands in Canada.

2) Rugged nature of the terrain will make drilling very difficult and expensive; we feel substantial damage to the landscape may result.

Given the above conditions we feel a Wilderness or Hiking Area designation for this land would be a more appropriate usage.

Thank you for the opportunity to comment on this vital issue!

Sincerely,
David Hudak
David Hudak, President F.A.S.
by BAB, Sec.

160

William E. Morden, Supervisor
Kootenai National Forest
PO Box AS
Libby, Mt. 59923

Mar 13, 1983
74650 Gallatin Rd.
Gallatin Gateway Mt.
59730

Dear Supervisor Morden,

We feel that the Lee Lakes area is one of the best snowmobiling areas in that part of the country and snowmobilers should be able to continue their enjoyment of the area.
We therefore support the continued and expanded snowmobile opportunities in the Lee Lakes Study Area as set forth in the Forest Service proposal.

Sincerely,
Elaine + Martin Reardon

Dear Mr Morden, March 14

I am writing because I am concerned about the Ten Lakes area east of Eureka. I urge you to support Alternative C: Wilderness Protection for the entire Ten Lakes Wild Area of 36,000 acres.

It is an important habitat for the grizzly, grey wolf, elk & now, caribou.

Please keep it a "wilderness" designation.

I have also voiced my support to our governor & congressional representatives.

Thank you,

Sincerely

Susan Schlosser

Box 542

Whitefish, MT 59937

I would also like to comment on the Kootenai's plan for the Ten Lakes Scenic Area.

I feel this scenic area should be designated as a wilderness area.

My reasons are as follows:

Elk herds will diminish as with the quality of hunting as more roads are constructed in the area. More important to have this area wilderness status is for the protection of the grizzly and grey wolf! Also the possible herd of caribou in that area, are existing on old growth - their habitat are ~~to~~ lichens that are found on trees over 200 years old.

I feel the K.N.F. can meet or exceed the targets for timber and motorized recreation and still be able to classify Ten Lakes as wilderness - Only the Kootenai will not be able to meet its RPA goal for wilderness.

As the valley people of the Tobacco say they want it to stay "just like it is".

Only wilderness designation will protect ten lakes "just like it is

I support alternative C: Wilderness protection for the Ten Lakes wild area of 36,000 acres.

Thank-you for listening and I hope my thoughts will have some affect on the K.N.F.'s 50 year plan and the Ten Lakes Area

Yours Truly,

Mr. Mark A. Engler - Forest Technician - K.N.F.

163

Mar. 13, 1983
Plains, Mont.
Box 699

William E. Morden
Forest Sup.
Kootenai Nat'l. Forest
Box AS, Libby Mt.

Dear Sir:

I wish to express my concerns about areas I'm familiar with, one being the Ten Lakes area east of Eureka, Mont.; I think it should be made a "Wilderness" area, and that means the entire 36000 acres for the entire Ten Lakes wild area. I used to live in the Whitefish, Mt. in the 1960's so am interested in the protection of the area. I support Alternative C.

Also of concern is what I've read of increasing the road systems in Kootenai National Forest - I think this should not be done. It causes so much erosion and water quality loss and such a loss of timber. I understand there is a lot of older growth timber that will be laid waste or for logging. There is something very magnificent, just to look at & enjoy the beauty of such growth. Please don't destroy this growth of old timber!

Thank you,
Mrs Dora Mae Dickinson

164

POCONO LAKE PRESERVE

PENNSYLVANIA 18348

March 14th

Fellow William Worden,

I would like to express my concern that the Ten lakes area of Kootenai National forest be placed under Wilderness protection ~ alternative C ~ for the now protected wild area.

My concern is to save the wildlife, those endangered & threatened to extinction. I also worry that accessability will greatly increase the danger of losing an important extensive ecosystem. Its balance is natural, but needs wilderness protection to survive.

Thank you,

Helen Pilling

P.O. Box 52A
Kila, MT 59920

165

WILFRIED L. ROYER
ATTORNEY AT LAW
P.O. BOX 355
WHITEFISH, MONTANA 59937
(406) 862-5172

March 15, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

RE: Ten Lakes Study Area

Dear Mr. Morden:

It is with some concern that I read reports concerning the Ten Lakes Study Area east of Eureka.

Having grown up in Northwestern Montana, and having had the opportunity to explore the Graves Creek Drainage in the 1950s when the logging industry was just cutting roads into that area, I feel fortunate that I was able to experience the wildness of this country. It is a small heritage that we can pass to our children, bits and pieces of that wildness, preserved in wilderness status throughout this country.

My position has always been that it is better to classify something as a wilderness area, because you can always develop it later if the need arises, as it can never be returned to its wilderness status.

During the past few years, I have recommended the Ten Lakes area to several of my friends from out of state, and they have come back with absolute fascination as to the characteristics of the area.

I feel that the entire 36,000 acres should receive wilderness protection at this time, to preserve this area for others to enjoy.

Please consider my opinion as I am sure it is shared by many, many others, that the entire 36,000 acres of the Ten Lakes Wild Area should receive wilderness protection.

Sincerely,

Wilfried L. Royer

Wilfried L. Royer
Attorney at Law

WLR/ss
cc: Representative Pat Williams
Senator Max Baucus
Senator John Melcher
Governor Ted Schwinden

166-1

March 15, 1993

WILLIAM E. Morden
Forest Supervisor
Kootenai National Forest
P. O. Box AS
Libby, Montana 59923

Dear Sir,

Enclosed are my comments and concerns regarding your Draft Forest plan. I have organized my comments under five broad headings:

1. General
2. Fish and Wildlife
3. Timber
4. Roads
5. Recreation.

Abbreviations in parentheses refer to page and paragraph numbers in the Draft Environmental Impact Statement (p. = page, para = paragraph).

General

As a member of the public, I do not feel your Forest Plan provides the highest net benefit. I question the FORPLAN Modeling effort. What were used as constraints and what were used as goals in modeling? How were noncommodity values entered in the program? It seems you ignored value returned to the community through tourist dollars (p. 18, para 1) in your modeling. I also question the lack of preservation values for unique resources such as grizzly bears, mountain caribou, and roadless areas which are going to become increasing more valuable as present roadless areas are roaded. I want that made very clear in your final document.

I want to address the Ten Lakes Scenic area in this portion of my comments because I feel strongly that this area is an area worthy of protection under wilderness designation. I do not consider managing half of the original acres (18,400) as roadless recreation and taking the other 11,600 acres and roading and logging this land to be wise (p. III-5, para 2). Letting snowmobilers dictate this type of policy seems like paying off a blackmailer (p. 18, para 2). I would demand a separate EIS on this proposal. I believe the Ten Lakes area is being sacrificed for no worthwhile reason. Please send me a copy of your "cop out" EIS, the Ten Lakes Report and Proposal.

166-2

Fish and Wildlife

I will comment briefly on the wildlife portion of your plan. I don't believe that you are providing enough cover for big game with your plan. The road densities you are proposing are ridiculous. I also doubt that elk are a good indicator species for whitetail deer. How were elk populations estimated (p. II-5, para 6) and what are the confidence intervals associated with the estimates? ~~Lastly, you keep talking about a state goal of a certain number of elk needed. Where did this value come from? Has the Fish and Game stated a fixed number of elk are needed from the Kootenai National Forest?~~

~~I would like to know where the estimate of 30 grizzly bears came from and what type of precision is associated with that estimate? I would also like to find out what level a population must decline to until it is no longer considered viable, four, two or none. At least when there are none left that population~~

para 6) and what are the confidence intervals associated with the estimates? Lastly, you keep talking about a state goal of a certain number of elk needed. Where did this value come from? Has the Fish and Game stated a fixed number of elk are needed from the Kootenai National Forest?

I would like to know where the estimate of 30 grizzly bears came from and what type of precision is associated with that estimate? I would also like to find out what level a population must decline to until it is no longer considered viable, four, two or none. At least when there are none left that population no longer constitutes a constraint to your model and logging can proceed full speed ahead. It seems unwise, at best, to manage a population at the lowest numbers required to maintain itself. To me that is why the grizzly bear and land management agencies are in the prediciment they presently find themselves. Who determined that 30 bears constitutes a viable population? Lets manage for healthy populations of each species that occur on the forest and not attempt to drive each species to extinction.

I spent three years in Libby, from 1976 to 1979. During that time I fished the Kootenai River and many other areas extensively. I have yet to find fishing that rivals the fishing opportunity available in Lincoln County. That is why I find your plan wholly inadequate at protecting the needs of fish. Not only that, it appears you are attempting to mislead the public by making statements like (p. 15, para 5), "No significant change in fisheries is expected from timber management activities except those associated with road construction", and "Coordination between timber harvest and wildlife habitat needs can maintain and enhance ... fisheries." You had best admit that timber harvest practices are often detrimental to fish populations. There are a wealth of studies which found that timber harvest reduced fish numbers. At this point you should also mention that migratory fish populations are expected to decline by at least 20 percent. That is totally unacceptable. I demand that this portion be reworded to present the true picture. You fail to mention mountain whitefish (p.III-8, para 4) in your presentation of fish species. Where can I find a copy of what the state Fish and Game goals for fish production are (p. IV-13, para 5)?

I would like to inspect the data used to estimate fish populations of catchable trout (p.II-49). Are these catchable trout migratory, resident or both? Are lake and reservoir populations included in these estimates? What are the confidence intervals associated with these estimates? If lake and reservoir fish are included in this estimate, are these fish which are not influenced by forest management considered as part of the forest's fish base? Lastly, do you and your "professionals" realize that migratory fish produced in streams adjacent to your managed land eventually become adults in the river and provide much more recreation opportunity (not to mention biomass) than the resident populations you are so proud of enhancing. Who on your staff is willing to defend these preposterous figures?

I will now discuss sedimentation and water yield as they affect fish and a watershed. First, why are you willing to allow the fisheries to decline by increasing the sedimentation rates (p. III-8, para 7)? This is an unacceptable practice and not in accord with multiple-use management objectives. I do not understand how you can increase resident fish and decrease migratory fish populations when they both utilize the same stream gravels for reproduction. Do your professionals realize that by creating pool structures using large debris they will be effectively trapping fine sediment in the gravels upstream from these pool forming structures and essentially making a bad problem worse. The increased water yields you project (p. 16, para 3) will probably damage stream channels no matter how well intentioned your standards and guidelines may be. Some evidence suggests that logging may reduce flood frequencies, causing 100 year flood events to occur every 50 years, for example. This type of condition could cause significant problems to your stream channels. What about downstream cummulative effects on the Fisher, Kootenai, Tobbacco and Yaak rivers, both from increased water yield and sedimentation. How are you going to fund all these grandious habitat improvement plans? More importantly, how are funds going to be made available to monitor these activities so that changes can be made when you find out you were wrong? I could not support your present plan unless you guarantee a comprehensive monitoring program would be undertaken.

Timber

Where did your figure of 20 ft.^{3}/ac./yr. (p.II-6, para 5). Your entire timber harvest program depends quite heavily on very intensive timber management. The past record of regeneration on the Kootenai Forest leads me to believe you are headed for a time when no cutting will be allowed because of no sawmill sized trees. I think that any long-term community stability which you may be trying to provide depends upon the concept of sustained yield from the Forest. I, for one, have seen cutover areas that have failed to regenerate regardless of the money spent on site prep and hand planting and hand shading young seedlings. Your south facing slopes just get too hot to grow seedlings. Can you guarantee that funds will be available to manage these areas as intensively as they will need to be managed to produce timber (p. III-1). During the time I lived in Libby, your annual harvest averaged 187 MMBF. The plan states you want to harvest 248 to 388 MMBF annually under the preferred alternative. I believe that is an overharvest and will not produce a sustained yield. I discussed the 1970's harvest with professional foresters in the area at the time and they informed me that the harvest at that time was approaching the maximum and even that was dependent upon good regeneration success. In conclusion, I feel you are setting a course for overharvest and that you are relying on nonexistent site prep monies and more luck than any one agency deserves. The concern expressed by local residents regarding the potential overharvest of the forest was passed off too lightly (p. IV-55, para 5).

Where does "crisis management" to handle insect and disease problems (the scourge of the bugs) fit into your planning process? You need to be clear on how timber harvest volumes would be affected by special case salvage harvest. I take exception to the phrase "users of the timber resource" (p. 15, para 3). Let's be frank and say the timber industry. I would also like to know the identity of the "others" mentioned (p. 15, para 3) "increased utilization among others." I don't believe scheduling difficulties associated with timber harvesting in grizzly bear habitat should be identified as an irretrievable commitment (p. 19, para 3). Scheduling conflicts are an administrative problem.

Roads

The amount of roading called for in your proposed alternative is way too high. This many miles of road will have a harmful effect upon big game security, allow road hunters easier access and support their lazy life-style (preliminary surveys in the Flathead have shown hunters would prefer less roads), decrease migratory fish populations, and remove 54,000 acres from productivity (approximately 3 percent of your total timber base). Show me a study that shows "motorized forms of recreation are favored" as overwhelmingly as you present it by local residents (p. 21, para 7).

Increased sedimentation from roads is not "unavoidable" (p. 23, Section K, 1.) and should be avoided by better road location and design and fewer roads. To make a statement like the above makes me question the ethics and commitment the Kootenai National Forest has to the multiple-use resource management concept. The routing of roads through "tougher" country (p. III-2, para 4) sends fear into my heart because I realize that means steeper, less stable areas which have much greater erosion potential. You will soon reach the point where it may be wiser to stay out of some areas that are hard to reach because not to will mean disastrous results, but perhaps you are willing to sacrifice entire drainages. If so, you are a terrible land management agency and are certainly not protecting the public's best interest. I question how your sedimentation rates were computed for these roads into "tough" country. Did you use rates from roads in "easy" country. If so, your predicted sediment increases are probably an order of magnitude off and your impacts will be much worse than you predicted.

One way to reduce the conflict between wildlife which uses snag habitat and firewood gatherers would be to reduce the number (density) of roads so that some snags will remain inaccessible to firewood gatherers. Figure IV-15b misrepresents the true road density condition between alternatives. By using only the "acres managed for timber" you show that alternative 5 has the highest density of roads when in fact this alternative has the fewest miles of roads. Cheap trick! You should show all road densities

166-b

as the miles of road per 1000 acres of potential timber managed area.

Recreation

I cannot accept the alternative that does not meet RPA recommended roadless recreation demand (p. 17, para 2). Roadless recreation will be so much more valuable in future years that I refuse to accept an alternative that does not meet the demand. I also question the statement that current drilling in the Cabinet Mountain Wilderness is presently "compatible" with the "wilderness experience" one seeks by climbing Chicago Peak. To say that mineral exploration and development may be "incompatible" with roadless recreation experience is a gross understatement (p. 17, para 4). Wilderness areas, particularly relatively small wilderness areas such as the Cabinet Mountain Wilderness, need buffer zones on their borders to insure a "wilderness experience" when one enters the area to protect their wild character. Please, no more roads to the wilderness boundary (p. 21, para 6). I'll gladly walk the extra miles. Overall, the proposed alternative does not emphasize roadless recreation nearly enough.

When reading past planning efforts, I was always amazed at how ridiculous the amenity value alternative was presented when compared to the proposed alternative. In this plan, the only rationale choice appears to be the amenity alternative (5). Did you do that on purpose? Did you also present the philosophy of alternative 5 in Appendix B from a tourists point of view so that no one could take it seriously. As I read through your document I was often shocked at the development oriented slant that all presented information was given. I feel you have already made up your "small and narrow" minds and are just going through a tedious excercise when trying to involve the public. My only hope is that the winds of politics will change before you can impliment this disastrous plan and reasonable steward-type men can be found to manage the land. Otherwise we will be facing a very hard job of rebuilding or letting nature rebuild the consequences of your actions. I hope you can look your children's children in the face in 50 years and say I planned the future of the Kootenai Forest.

Thank you for your time!

Remember, the only way to measure your success or failure is to provide money for monitoring at a realistic level. If monitoring does not receive funding, I can only surmise that you know that the direction you are going negatively impacts many valuable resources and that you just don't care.

Sincerely,

Brad Shepard
[illegible] Road Kalispell, MT [illegible]

167-1

Janet I. Tatz
P. O. Box 779, Boulder, Montana 59632 3-17-83

Dear Mr. Morden,

I am writing you today to express my concern over the recent no Wilderness recommendation that the Kootenai Nat'l Forest Service made for the Ten Lakes area. Ten Lakes is more than just a scenic and recreational area, and needs to be designated as such, by law. I would not want to see this area opened up to oil and/or gas leasing. The

adverse of salvage timber sales, which the FS's proposed management plan would allow, would have negative effects on the wildlife of that region.

With these considerations in mind, I propose that the entire 36,000 acre Ten Lakes Area be given Wilderness designation. Many rare and endangered species, including the woodland caribou, grizzly bear and grey wolf, inhabit the Ten Lakes area and depend on a "Wilderness" designation of that land for their very survival. Already the heavily cut Kootenai Forest has made life difficult for the forest-dependent caribou.

167-3

②

Janet I. Tatz
P. O. Box 779, Boulder, Montana 59632

I believe that the Kootenai National Forest can meet 60% of its timber harvest goals without cutting into the Ten Lakes area. In contrast, roadless areas and wildlands are in short supply in that forest.

I urge you to reconsider the future of the Ten Lakes area. Do not compromise its biological & ecological import. no less than full recognition of the entire 360,000 acre area of Ten Lakes as a Wilderness Area will help achieve that goal. I will keep my

167-4

eyes and ears to the news media in hopes of hearing of the redesignation of Ten Sleep as a Wilderness Area. Please do your part to insure that this hope becomes a reality.

Sincerely,

Janet Tately

3-17-83 168

Dear Sir:

We urge your support for a complete 36,000 acre Ten Lakes Wilderness area. This badly needed.

Sincerely,

Wm. H. Bertsche
Elizabeth Bertsche
1917 4th Ave. N.
Great Falls, Mont 59401

169-1

Nancy Searles
Rte 1, Box 111,
Eureka, Mt 59917
March 17, 1985

Dear Mr. Mordan,

I am writing due to my concern over the Ten Lakes Area. We need to keep this beautiful area wilderness for a couple of reasons.

This area is easily accessible to the people of Lincoln County for camping, fishing and enjoying the outdoors. There are enough other areas open to logging that we feel this area should be left as wilderness. We have enjoyed this area many times and would like our children to be able to benefit from it, in years to come.

Another consideration is that of the wildlife. There have been sightings of caribou in the area. As there are only approximately

forty caribou in the whole forty-eight states, this in itself should be enough to stop any logging or oil development in this region. There are also two other endangered species inhabiting this area - the grey wolf and the grizzly bear. All three of these animals need large areas of untracked wilderness to live without endangering their existance.

Please consider these opinions and leave Ten Lakes Area a wilderness area.

Thank you.

Sincerely,

Nancy Searles

170

montana state university

114 South 8th ave.
Bozeman, Montana 59715
March 18, 1983

Mr. William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Sir:

I support the designation of the Ten Lakes Scenic Area as a wilderness area. Rare and endangered species such as the woodland caribou, grizzly bear, and grey wolf reside in this area. The caribou are especially vulnerable because they depend upon the old growth forests of Ten Lakes. Also the Kootenai National Forest has sufficient timber outside the Ten Lakes area to meet its goals for timber cutting. For these reasons among others, Ten Lakes need the protection of being a wilderness area.

Sincerely,
Dennis Winslow

173

3-19-83

DEAR WILLIAM MORDEN:

I SUPPORT A COMPLETE 36,000 ACRE TEN LAKES WILDERNESS AREA FOR THE FOLLOWING REASONS:

- PROTECTION OF ENDANGERED SPECIES SUCH AS WOODLAND CARIBOU, GRIZZLY BEAR & GREY WOLF.
- KOOTENAI NAT'L FOREST CAN MEET GOALS FOR TIMBER HARVEST WITHOUT CUTTING TEN LAKES.

I URGE YOU TO SUPPORT A CHANGE OF THE NON-WILDERNESS RECOMMENDATION

SINCERELY Lois Shelden

Box 626
LEWISTOWN, MT
59457

171

Diane Boyd
Moose City Cabin
Polebridge, Montana 59928

15 March 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Mr. Morden,

I am greatly concerned about proposed changes in the management of the Ten Lakes Wilderness Study Area. I don't want to see this relatively untouched wilderness, utilized by the last remaining population of the endangered mountain caribou in the entire U.S., become just another area of consumption. Logging, mineral exploration, motorized recreation, and the creation of roads, are all consumptive uses with little concern for habitat destruction and stream sediment loads.

I realize that in this day and age of expanding human populations and industrialization, there are high demands on National Forests everywhere for timber, recreation, oil and gas exploration, etc. However, these acts of development have created another need--the need for non-development, wilderness; areas where animals can exist unharassed, and where humans can go to escape the commotion of civilization, free of the rumble and whine of engines and the scars of machines. A place where one can go and walk for miles without crossing bulldozed paths. I support Alternative "C" for a 35,900 acre Ten Lakes Wilderness. At a later time, a wilderness can be re-designated to include resource extraction; but once the wilderness is gone, it is gone forever.

I cannot accurately talk about the laws and legislation that govern wilderness designation and management. I'll leave that up to the lawyers and their litigation that will surely follow a declassification of the Ten Lakes area. However, as a wildlife biologist, I can speak out against ecologically unsound management; and to remove the Ten Lakes area from wilderness protection is ecologically unsound. Your Ten Lakes study document admits that 1) elk herds will diminish with more roads as proposed, 2) the grizzly and grey wolf would fare best with wilderness protection, and 3) the Kootenai Forest plan predicts the Forest will face an acute shortage of wilderness and primitive lands in the future. Discovery of mountain caribou use of this area creates another important reason to grant wilderness protection to the <u>entire</u> Ten Lakes Wilderness Study Area. Jasper Carlton, mountain caribou researcher, stated that Ten Lakes is the first area in the U.S. outside the Selkirks to support a group of caribou. He estimated that there are only 13-19 mountain caribou left, but with proper protection and management, their numbers could be increased. For their sustenance, mountain caribou depend upon arboreal lichens growing in 100-200 year old spruce-fir stands. If you harvest these mature trees, you are sealing the fate of these few caribou; they will die. Unlike their migratory tundra relatives, mountain caribou will move only short distances in search of suitable habitat. Highways, clearcuts, and human activity have reduced their movement corridors, and logging has reduced their suitable habitat to the Selkirks and the Wigwam/Ten Lakes area. Please do what you can to preserve it.

Sincerely,
Diane Boyd

174-1

William E Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Mr Morden,

I am writing this letter to voice my concern for the ten Lakes Area on your (our) forest. I have traveled through this area and used it for bowhunting. The scenery and splendor is every bit as spellbounding as the Park. As a graduate Forester I realize that a person in your position has to make some difficult land use decisions. However, I think that in all honesty the ten Lakes can only remain in it's present state of extreme beauty with wilderness designation. I ask all for multiple use however this area is most valuable in it's present state and will greatly increase in value as future developement of the area increases. The marginal return the public would recieve for harvesting the timber on this site would never be compensation

for the loss of its scenic qualities. Please give this area lots of thought and show that you have a insight to future demands for high quality recreation areas. The ten Lakes should get wilderness designation.

Thank You

Brian Manning
900 Wisconsin Ave #3
Whitefish Mt 59937

175

Bruce Walthers von Alten
513 Power Block P. O. Box 1201
Helena, Montana 59624
Solar Design
Architect (406) 442-4766
Remodeling Specialist

MARCH 21, 1983

MR. WILLIAM MORDEN, FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST
BOX AS
LIBBY, MONTANA 59023

DEAR MR. MORDEN:

I AM WRITING TO EXPRESS MY SUPPORT FOR A COMPLETE 36,000 ACRE TEN LAKES WILDERNESS AREA. OLD GROWTH FORESTS WHICH SUSTAIN SUCH RARE AND ENDANGERED SPECIES AS THE WOODLAND CARIBOU AND GRIZZLY BEAR ARE IN SHORT SUPPLY IN THE KOOTENAI FOREST.

THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

Bruce von Alten

177

March 21, 1983

Forest Supervisor
Kootenai National Forest
Libby, Montana

Re: Kootenai Forest Plan
Ten Lakes Study Area

As a long-time resident and property owner in Trego (17 years), I have hiked, ridden, and driven through as much of the Kootenai Forest as time has permitted. I have observed and studied logging practices on the forest and on my own land.

The Forest Plan increases road building and timber cutting, two practices that are inconsistent with multiple use and sustained yield. The United States is gradually becoming more conservation oriented and as our energy demands are decreasing, so will our timber demands. Selling timber seems to be an excessive priority with the Forest Service, to the detriment of other values. The type of roads built for logging become exorbitantly expensive permanent gravel thoroughfares, unlike the old logging roads that have reverted to grass and trees, a highly useful practice for a forest area.

I would like to see less emphasis on logging and road building, and more emphasis on protecting the natural quality of the forest.

The Ten Lakes Study Area should be preserved intact under Wilderness classification. The Forest Service does not need to "manage" every square mile of its domain. The Kootenai is a large forest area, and the Ten Lakes Area is not needed for logging or other mechanical pursuits.

Sincerely,

Phyllis Falconer

Loon Lake Ranch
Box 187
Trego, Montana 59934

178

917 Waukesha
Helena MT 59601
March 23, 1983

William Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby MT 59923

Dear Mr. Morden:

I am writing this letter to encourage the Forest Service to please change their recommendation for the Ten Lakes Area to WILDERNESS for the full 36, 000 acre area.

Especially important is the need to protect and maintain the habitat of the rare woodland caribou, whose presence has been detected in the Ten Lakes Area. Other species, also endangered and rare, which are dependent upon the area include the grizzly bear and the grey wolf.

Also, it is not necessary to cut timber in Ten Lakes to meet timber harvest goals.

Again, I urge you to reconsider and keep the full 36,000 acre Ten Lakes area designated Wilderness.

Respectfully,

Linda Andersen

Linda Andersen

179

N.E.E.D.

P.O. BOX 1158, LIBBY, MONTANA 59923

March 21, 1983

Kootenai National Forest
P.O. Box AS
Libby, Mont. 59923

Dear Sirs:

It is the opinion and stand of Northwest Energy, Employment & Development, Inc. that the Ten Lakes area not be considered for wilderness designation.

We feel that the Ten Lake area does not meet wilderness requiements for the following reasons:

* There are known mineral deposits and patented claims in the Ten Lakes area. The patented claims should be available for mining and development as well as those that are not patented.
* Valuable timber resources would, under a wilderness designation, be "locked up". Timber resources should be managed and cultivated when stands are mature - to do less would constitute mismanagement. This area has had much logging done in the past so does not meet wilderness designation. Wilderness area should be considered because of special historic value, scientific of scenic grandeur. Ten Lakes area does not meet the above requirements in addition to many visible logged-off areas.
* The resources outweigh the needs for wilderness designation. Isn't it less than 4 % of the nations population that ever experience a wilderness trek? Can we truly afford this extravegance/waste?
* To designate Ten Lakes as wilderness will in turn encourage traffic far in excess of present travel which would further damage some of the fragile eco-system. Why attract attention to a fairly ordinary mountainous area already adjacent to several sizeable park systems?

Basically, a wilderness area designation is a negative and non-productive designation. Wilderness designation is a non-management program - mature timber is not managed, mineral resources lay dormant and undefined or undeveloped.

The Ten Lakes beauty is no greater than much of our Kootenai National forest, but beauty doesn't help feed, clothe or employ people in this depressed economy. Unemployment doesn't seem to carry much impact to those who are comfortable, securely employed.

RARE III - what will another Roadless Area Review plan resolve other than additional delay tactics and untold millions of dollars expended during a time when reduction of additional overhead operations of various agencies is imparitive. Thank you for the opportunity to express our feelings with respect to the Ten Lakes area proposal for wilderness designation.

Sincerely,

Charles F. Woods, Pres

Charles F. Woods, President

180

Dear Mr. Morden,

March 21, 1983

Please reconsider the proposal that the Ten Lakes area be designated a "scenic" area. We support a 36,000 acre Ten Lakes Wilderness area for maximum protection of such endangered species as the grey wolf, grizzly, and caribou and protection against future oil and gas leasing.

We enjoy taking our vacations in Northwestern Montana and hope our children will be able to enjoy the same beauty of wilderness as we have seen - as unmarked by human hands as possible. Please, we need more Wilderness Areas to preserve Montana as we know it!

Sincerely,

Juliet and William Mouckel

Lexley Ave. #35
Helena, MT 59714

182

Ms. Linda S. Comola
1220 Leslie Avenue
Helena, MT 59601

March 26, 1983

Mr. William Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden:

I am personally familiar with the TEN LAKES area, near Eureka, in Lincoln County. I am very dissapointed that you have made a NO WILDERNESS recommendation through the latest Forest Management Plan.

As the Kootenai National Forest has no officially designated wilderness areas, only study areas, it is about time this heavily-cut forest's decision-makers make a wilderness designation for this scenic, unique and beautiful 36,000 acre area called Ten Lakes. I understand Ten Lakes has some very rare and endangered woodland caribou which should be protected. I realize that your emphasis has always been on timber cutting, engineering roads for such activities, and spending the tax-payers money on upkeep of these roads, and wildlife biology has always been secondary--that is too bad.

The Lincoln County area has always been depressed as far as I can remember, whether the loggers are busy or not. Then the Troy Project came along, despoiling great elk and grizzly country along with it and the Scotchman's Peak area was never designated wilderness either. Did the Troy Project help the economy of Lincoln/Sanders County? You know the answer is a definite "NO". Many people who are familiar with the area knew it all along, but we were ignored. Oil and gas leasing isn't going to help the economy either in this area. So, for a change, why doesn't the Kootenai National Forest decision-makers come to their senses and do something positive for posterity--preserve the beautiful Ten Lakes area and give it wilderness designation!

The decision for wilderness designation probably will not stop the despoilers (e.g. Cabinet Wilderness mining exploration fiasco) but it would be nice to know that the public, for once, can have some effective input, and even be right without having to pay for past mistakes. No doubt the Kootenai National Forest can meet all of its goals for timber harvest without the salvage sales planned for Ten Lakes. Recreational opportunities for Americans and Canadians, undisturbed habitat for rare and endangered species, preservation of the little remaining old growth timber, beautiful scenic values, all add up to a more sensible approach in planning for Ten Lakes, a wilderness recommendation.

Thank you.

Sincerely,

Linda Comola

Red Meadow Rd.
Polebridge, MT 59928

183

March 26, 1983

Forest Supervisor William Morden
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir,

I would like to voice my concern over the Ten Lakes Wilderness Study Area. I do not support the Forest Service decision to eliminate the Ten Lakes from possible inclusion into the wilderness system. The Ten Lakes deserves wilderness status for the following reasons:

1. Wilderness classification provides the best habitat protection for the threatened and endangered grizzly bear and gray wolf. Evidence also indicates that the endangered mountain caribou use this high mountain habitat.

2. There are very few areas left in the contiguous U.S. where these wildlife species exist. As Resource Managers you have an obligation to protect and preserve these species and their habitat.

3. The Kootenai N.F. can meet their timber harvest needs while maintaining the 36,000 acres within the Ten Lakes as wilderness.

4. The timber within the Ten Lakes Study Area is of low value and expensive to exploit.

5. According to the Kootenai Forest Plan, only 158,000 acres out of a total of 2,245,800 acres will be in wilderness classification. Adding the Ten Lakes Area will only increase the wilderness land base by 1.6%.

It is in the best interest of wildlife, recreationists and the Forest Service to preserve the integrity of the Ten Lakes in wilderness.

Sincerely, Frank J. Vitale

Frank J. Vitale

184

GEORGE & BETTY HELIKER
Box 100
Big Sky, Montana 59716
(406) 995-4897

March 23, 1983

Mr. William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden

This is in support of the Sierra Club Upper Missouri Group's position relative to the Ten Lakes Wilderness area. Specifically, we support a complete 36,000 acre wilderness area.

We have been using wilderness areas in Montana and the Northwest generally for the past 30 years. With each passing year the need for additional wilderness areas becomes more evident as the usage grows exponentially (at least so it seems to us as users), and alternative wilderness-type recreational areas rapidly disappear into the insatiable maw of the forest-products industry.

Sincerely,

George B. Heliker
Betty Heliker

George B. Heliker
Betty Heliker

24 March 83

Sir,

A "scenic area" designation does not provide adequate protection to the Ten Lakes wilderness area and its wildlife. We urgently need to maintain undisturbed wilderness for some of this nation's rare species; such as woodland caribou, grizzly bears and grey wolf. A non-wilderness designation would open the area up for timber harvest and could lead to destruction of a beautiful area. This is not necessary.

Sincerely,

Kathleen Woldstedt
Box 305
Dillmont MT 59466

187

Box 645
Libby, Mt.
March 27, 199[illegible]

Wm. E. Lorden
Forest Supervisor
Kootenai National Forest
Box A.S., Libby, Mont.

Dear Mr. Lorden:

Thank you for the chance to write our opinions about the functions of our National Forest Service. One of the very satisfying subjects to teach was about President Theodore Roosevelt's and Gifford Pinchot's concept of the National Forests and the preservation of all the wildness therein. So I'm for respecting those early principles, and my many friends and I do not want to gut the forests with roads, to allow the spoilers and noisemakers and shooters have at everything in them. The National Forests were not meant to be tree farms for industry, either.

I have no expertise or technology, which no matter how good, could be used for the wrong puposes; so I am questioning the basic philosophy of more cuts, more roads, more snowmobiles. This philosophy can do nothing but diminish the National Forests, and the restorative qualities in them which can refresh and renew man. And those qualities are silence, natural wildlife. (What a many-dayed splendor to remember seeing a bear or a porcupine, or even the increasingly rare chipmunks!) And clean air.

The National Forest which a group of us teachers were taken to see in France and Germany were sterile, silent stands of trees. This should not be our American heritage. We are younger. We can do better, can't we?

Enough excellent biologists and other scientists have produced enough evidence to convince us that our very survival as humanity depends on our recognizing that there be infinite biotic diversity to maintain a life support system for any animal-- including us. (To breed successfully a tiger would need at minimum a base of 250 for gene pool sufficient to assure a sound genetic blend. From a recent Audubon) The animals in Kootenai are your responsibility to preserve-- for the general public of U.

Of course you know that the noise of helicopters, trucks, cycles, guns frighten the wildlife away from habitat and breeding. Of course, you know that the number of clear-cuts-- whether we see them from the ground or not--is increasing . Don't be hypocritical about it by hiding them- "so that they aren't visible" from town. Many of us see well from the airplanes. And please don't play Watt's game, by"re-designating" the Wilderness areas in the few remaining areas capable of sustaining wild life, by calling them Non-Wilderness. Specifically, keep Ten Lakes a Wilderness complete with FORESTS TOO. We have enough barren, scarred land in the Eastern half of the U.S. This is public land. We do not pay you to give it away to wealthy private industries.

Thank you for asking and reading,

Mrs. W. J. Erickson

Mrs. W. J. Erickson

188

March 23, 1983

Dear Mr. Morden:

I am writing you concerning the Ten Lakes Scenic Area which has recently been designated a "no wilderness" area, open to leasing + salvage timber sales. This area is so scenic, and being the habitat of the grizzly, woodland caribou and grey wolf, also important to these threatened species. Since you can meet your goals for timber harvest without Ten Lakes, and with roadless areas + wildlands becoming rare in the forest, I would hope you would change your status for Ten Lakes to wilderness.

Undoubtedly you are under heavy pressure from the Reagan administration on the issue of wilderness, but the American people support its concept, and will need more of these wild lands in the future as our population grows and people seek solace in the wilderness and national parks. Please, listen to the people. Thank you for your time.

Sincerely,

Gail Miller-Richardson
Box 1003
W. Yellowstone, MT
59758

1869 Mark Lusch
120 Gem
Helena, Mt 59601
March 27, 1983

William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt 59923

Dear Mr. Morden,

I am writing to show my support for the Ten Lakes Wilderness Area. I know that this area was recently ~~be~~ recommended as a non-wilderness area but I hope you will reconsider. I think the Kootenai Forest is large enough to supply the needed timber without getting into the Ten Lakes area. Besides, a wilderness designation is needed to protect endangered animals that live there. Especially the woodland caribou and the grizzly need the isolation and solitude.

I hope the future Montanans will be able to enjoy this beautiful area as the past Montanans ~~and~~ have and as we can today. Thanks for your consideration.

Sincerely
Mark Lusch

P.O. Box 422
Boulder, Montana 59632
March 28, 1983

William Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Mr. Morden,

I have a friend who spent many years putting roads into the roadless areas of the Kootenai National Forest. He finally quit a couple years ago because he didn't believe the few remaining roadless areas should be violated. The timber to be harvested simply did not justify endangering such scenic beauty and critical wildlife habitat.

I visited this friend while he was up there working. I agree with his contention and respect him very much for his decision to quit. There isn't much left up there - past forest service administrators have made sure of that. And what is left should be protected. That's beautiful country and you have a responsibility to the public to retain some of the original growth timber which makes it so special.

Your responsibilities extend far beyond profits for timber companies. There are wildlife species in your forests that simply can not be matched by the other 48 lower states. And your management decisions can spell the end of these species, in particular the wolf, caribou and grizzley bear. I hope you agree these species deserve protection.

So please, in your management decisions, work to protect old growth forests, wildernesses, and endangered species. In particular, please support a 35,000 to 40,000 acre wilderness in the Ten Lakes Area. This is a pittance compared to the areas which have been developed. It's a good area and deserves protection.

Thank you for your consideration. I hope to hear from you soon.

Sincerely,

Paul Richards

192

United States Forest Service
Mr. Bill Morden, Supervisor
Lootenai National Forest
Libby - Mont

March 29 83
Libby, Montana
Rt. 2, Box 759

Mr. Morden

I would like to go on record as opposing the 10 Lakes areas being considered for wilderness.

* The 10 Lakes area has had activity in logging & mining w/roads which does not meet requirements, I feel, are acceptable for wilderness designation.

* The resources that would be locked up under wilderness designation can no longer be justified. All resources, such as, minerals & timber - also oil, should be properly managed. When a stand of timber is mature it should be harvested, or properly cultivated much like a prudent, successful farmer would manage his farm crops. To let a mature stand remain unmanaged is economically unwise & not economically tolerable at a time when wise use of all resources is impartive.

Minerals, of course, are a non-renewable resource & considerable care & discretion should be used in exploration & development. Exploration & identification is necessary on mineral deposits. Identification of minerals is no differant than the prudent business man having a financial reserve for emergencies or his personal growth.

* Extra traffic will further endanger any area of new wilderness designation due to attention focused on a specific area. Traffic will be increased to further damage an area when the intent appears to be preserve the area.

Thank you for your consideration of the Ten Lakes Area as non-wilderness

Sincerely (Charles F. Woods

ASSOCIATED ORGANIZATION
National Parks & Conservation Association

Coalition for Canyon Preservation

Box 422
Hungry Horse, Montana
59919

193-1

March 31, 1983

William E. Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Re: Comment on draft Forest Plan for Kootenai National Forest/
Need for wilderness designation for the Ten Lakes study area

Dear Mr. Morden,

The CCP respectfully submits the following comments on the above said draft Forest Plan:

1. Elk Management -- The contradiction between the draft's projection of elk population and the "dense-pack" roading scheme must be resolved. The said plan proposes to increase the Kootenai road system from 4800 miles to an incredible 12,000 miles. This means a road density of 6 miles of road per square mile. The consequential impact on elk use has not been adequately analyzed in the draft plan. Studies on elk habitat demonstrate the denser the road systems, the less elk use.

   The draft proposal reduces the Kootenai to a tree farm. The final plan must provide for balanced use. Primitive recreation and wildlife management has been de-emphasized. The proposed total road mileage is unrealistic and should be stopped at or near current levels.

2. Riparian habitat protection -- The draft plan inadequately addresses protection measures for essential riparian habitat along streams. The importance of riparian habitat and the need to mitigate impacts thereon requires full disclosure and consideration in the final forest plan. Wildlife protection measures are inadequate unless comprehensive provisions for riparian protection are provided.

3. Need for old-growth forest habitat conservation -- The Kootenai draft plan inadequately addresses provisions to protect old-growth forest habitat and its dependant diversity of plant and animal species. Substantial remnants of old-growth forest must be conserved.

4. Impact on water quality and fishery -- The draft plan projects a doubling of stream sediment loads. This impact of watershed deterioration on the fisheries has been inadequately considered. Additional mitigation measures are necessary to maintain the integrity of affected watersheds (ie. reduce the projected stream sediment loads to reasonable levels). CCP opposes the draft plan 's proposed reduction in water quality.

5. Need for thorough consideration of wilderness designation for the Ten Lakes study area rather than the "scenic" area proposal. Major conclusions of the Ten Lakes study document should be applied to management decision making in the final forest plan. The Ten Lakes study document demonstrates that endangered and threatened species (grey wolf, grizzly) would fare best with wilderness protection. The Kootenai Forest does not meet its RPA goal for wilderness and the draft plan predicts the Forest will have an acute future shortage of wilderness and primitive lands. This problem can be resolved and/or mitigated by designating the sensitive 36,000 acre Ten Lakes study area as wilderness while meeting the Kootenai Forest RPA targets for timber harvest.

CCP is a 400-member non-profit educational resource and research organization working to promote sound bioregional planning in areas adjacent to and/or included in the Northern Continental Divide Grizzly Bear Ecosystem's upper regions.

Please enter this comment into the administrative and public records of the draft Forest Plan for Kootenai National Forest, and send the CCP a copy of all further public notices and documents regarding this plan. The above (5) significant issues require careful consideration in the draft plan's review process.

Thank you very much.

Sincerely,

Sharlon L. Willows

Sharlon L. Willows, Coordinator

cc Rep. Pat Williams
Gov. Ted Schwinden
Senator Baucus
Senator Melcher

ASSOCIATED ORGANIZATION
National Parks & Conservation Association

193 B-1

Coalition for Canyon Preservation

Box 422
Hungry Horse, Montana
59919

April 11, 1983

Mr. William E. Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Re: Comment on draft Forest Plan for Kootenai National Forest

Dear Mr. Morden,

Please enter the attached Great Falls Tribune article entitled "Grizzlies may feel federal impact" into the public and administrative files for the above said plan. The U.S. Fish and Wildlife Service has issued a Jeopardy Opinion on the proposed Kootenai Forest Plan because none of the alternatives analyzed by the Forest Service would meet the minimum grizzly bear recovery goal of 40 to 70 animals.

The following significant issues require full disclosure and consideration in the final Forest Plan for Kootenai National Forest:

1. A plan for de-listing the threatened Grizzly. The Forest Supervisor's contention that the grizzly habitat on the Forest is inferior is not substantiated. Grizzly Bear Recovery goals apparently have not been met. Remaining roadless habitat in the Kootenai Forest is clearly part of the Cabinet-Yaak Grizzly Bear Ecosystem. CCP supports full recovery in the CYGBE.

2. A plan for reduced roading to mitigate impacts on the threatened Grizzly.
   CCP opposes paving and widening the last unpaved 17-mile section of the Yaak road.

3. A plan for habitat protection to mitigate impacts on the threatened Grizzly.
   CCP supports more roadless recreation and wilderness for protection of grizzly habitat, in particular, Alternative C for a 36,000 acre Ten Lakes Wilderness.
   A viable habitat protection plan should fully consider a management alternative to freeze total road mileage at or near current levels. An area with closed roads is not the same as an unroaded setting as assumed in the draft plan.

4. A substantial plan for preservation of more general forest/riparian areas in the natural state, in particular, plans

113B-2

to preserve Big Creek and lower Trout Creek in the natural state.

CCP is a 400-member non-profit educational resource and research organization working to promote sound bioregional planning in vitally necessary Grizzly bear ecosystems in northwestern Montana. Please enter this comment into the administrative review records for the draft Forest Plan for the Kootenai National Forest.

Thank you very much.

Sincerely,

Sharlon L. Willows

Sharlon L. Willows
Coordinator

enclosure:
"Grizzlies may feel federal impact"/
Great Falls Tribute, April 2, 1983

193B-3

April [illegible]

Grizzlies may feel [illegible] impact

[illegible] PETER JOHNSON
Tribune Staff Writer

Two federal actions started this week could have a major impact on the grizzly bear population and development in northwestern Montana.

The U.S. Fish and Wildlife Service office in Billings issued an opinion that the preferred management alternative outlined in the draft version of the Kootenai National Forest's long-range plan would jeopardize the grizzly population in the Cabinet Mountain-Yaak River area.

Fish and Wildlife officials will meet in two weeks with Kootenai officials to evaluate the information and decide if the plan has to be modified to protect the grizzly, according to Wayne Brewster of Billings, field supervisor for the agency's Endangered Species Program

Kootenai Forest [illegible] Morden said Friday [illegible] plan calls for only a slight increase [illegible] timber harvesting during the [illegible] years, from 247 million board [illegible] 248 million board feet annually [illegible] thinks that proposed [illegible] to be reduced to support [illegible] the grizzly population [illegible] for the timber yield [illegible] million board feet [illegible] planning period, he said.

Brewster said [illegible] Service projections [illegible] ferred management [illegible] with increased timber [illegible] road contruction and [illegible] use — would have a [illegible] fect on the estimated [illegible] the Cabinet-Yaak area.

But modeling [illegible] 800,000-acre portion of [illegible] forest would need some [illegible] grizzlies to sustain a "viable population" for 100 years, Brewster said.

In the meantime, Kootenai Forest officials this week concluded that U.S. Borax's request [illegible] expand its exploratory [illegible] ing in the Cabinet Mountain Wilderness Area "may affect [illegible] population in a 100 square mile area, so they requested a further study by U.S. Fish and Wildlife before issuing a drilling permit.

U.S. Fish and Wildlife Service could take up to 90 days to perform the study, a period which could eat substantially into the short four-month drilling season for U.S. Borax, Morden said. But the agency probably will try to expedite [illegible] added.

This is a critical [illegible] for U.S. Borax [illegible] the deadline for [illegible]

[illegible] areas expires [illegible] each 20 [illegible] company must prove to [illegible] Land Management [illegible] valuable mineral resource that can be obtained in a profitable operation. Claims that don't prove out will be dropped.

U.S. Borax began drilling for silver [illegible] at other claims in the [illegible] portion of the wilderness [illegible] last year, Morden said. [illegible] company's existing claims are [illegible] to claims that another company, ASARCO, has been drilling for three years. Both companies have permits to continue drilling at these claims this summer and both have asked that some of the claims be permanently validated, Morden said.

In addition, U.S. Borax this year has filed claims to drill 12-20 new holes in an area about a mile to the north and half-mile to the south, Morden said.

Kootenai Forest wildlife biologist Al Christensen said his analysis showed that additional drilling by U.S. Borax would reduce the grizzly home range in the area beyond an acceptable limit. In addition, he said, the Forest Service could not identify any more compensating steps it could take in the area to help the grizzlies out, such as shutting off roads.

195

2119 Sourdough Rd.
Bozeman, MT 59715
30 March 1983

Mr. William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden:

I am writing to express my concern and disappointment regarding your recent recommendation of "No Wilderness" for the Ten Lakes Scenic Area. I realize that the Forest Service is proposing an 18,600 acre "scenic area" designation for Ten Lakes, but I do not feel that this is strong enough protection for such an important roadless area. There are basically two reasons why I feel this way:

1. There are only a finite number of truly wild areas left in the U.S., and these are disappearing at an alarming rate. Areas of exceptional scenic beauty, such as Ten Lakes, should be protected - if not for our generation then for generations to follow. The dollar value of wilderness will soon be as important to Montana and the rest of the country as logging and mining are now. As I understand it, the Kootenai National Forest can meet all its goals for timber harvest without cutting Ten Lakes.

2. The Ten Lakes area is a very important wildlife area, including habitat for such rare and endangered species as the grizzly bear, grey wolf, and possibly the woodland caribou. These animals live in the Ten Lakes area because it is and has been undisturbed. It is really important to keep some areas wild for them - please!

I hope that you will reconsider your decision on the Ten Lakes area and that it can remain as wild as it is today. Thank you for your consideration.

Sincerely,

Charlene Locke

Charlene Locke

196

3615 Hwy 2 W.
Kalispell, Mont.
59901
21 Mar 1983

Mr William Morden.
Kootenai Natl Forest
Libby, Mont.

Dear Mr Morden:

Please be advised that I too endorse the inclusion of the Ten Lakes area in the Wilderness concept.

I have visited the Ten Lakes area and I feel it has all the atributes necessary for Wilderness designation.

My chief concern is that every wild, roadless area is in danger of commercial development. As it is now, the best way to protect these areas is to designate them as "Wilderness".

I sincerely hope the "Ten Lakes" area will be included in our wilderness area for the enjoyment of my children's children and their children, and on.

Yours,

Neil Sourbier

197-1

United States Department of the Interior

OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL PROJECT REVIEW
Room 688, Building 67
Denver Federal Center
Denver, Colorado 80225

IN REPLY REFER TO:

APR 01 1983

ER 83/26

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden:

We have reviewed the proposed Forest Plan draft Environmental Impact Statement for the Kootenai National Forest, as well as the draft Ten Lakes Wilderness Study, and offer the following comments.

GENERAL COMMENTS

Unlike those we have reviewed for other National Forests, neither the Kootenai Plan or the EIS makes provision for subsequent environmental assessments and EIS's tiered from these Forest-wide documents. The Kootenai Forest EIS recognizes only the general types of impacts resulting from Plan implementation, not their extent or severity. Depending on location and/or timing, timber harvest or oil/gas development could have significant effects beyond the coverage of this EIS. We recommend that the final EIS explicitly provide for subsequent, site-specific EA's and EIS's, and define those categories of actions which would likely require a subsequent EIS.

SPECIFIC COMMENTS

Threatened and Endangered Species

The draft Plan considers the current estimated number of grizzly bears on the National Forest (approximately 30) to constitute the "minimum viable population" (MVP), and proposes to maintain this level for the duration of the planning period. However, although we recognize that significant steps have been taken to improve the status of the grizzly on the Forest, we must point out that the present population, and that proposed under the Plan, are below MVP levels. In response to the Regional Forester's request, the U.S. Fish and Wildlife Service issued a biological opinion (March 21, 1983) which concluded that the proposed Kootenai National Forest Plan is likely to jeopardize the continuted existence of the grizzly bear.

The current Forest-wide population estimate includes bears from two separate and distinct ecosystems - approximately 15 to 20 in the Cabinet-Yaak ecosystem and 12-15 in the Whitefish Mountains. As noted in the Biological Opinion, MVP levels would be 40-48 bears in the Cabinet-Yaak ecosystem and 12 bears in the Forest's portion of the Northern Continental Divide ecosystem.

197-2

To assure the viability of grizzly populations and habitat, Forest activities must be at a level and conducted in a manner to assure that (1) bears are not adversely impacted, either directly or indirectly; (2) important habitat components are not destroyed or adversely modified; (3) that sufficient space is left undisturbed from detrimental human activities to meet the biological requirements of grizzly bears. The biological opinion sets forth a number of alternatives for your consideration, including allocating areas to grizzly prescription, allocating additional areas to grizzly-supportive activities, or additional road closures. Once resource allocations which provide for minimum viable populations have been developed, they should be included as a component of all Plan alternatives, as has been done for existing and proposed wilderness areas and cultural resource management.

Section 7 consultation should remain open until the Forest Service identifies an alternative that will preclude jeopardy to the grizzly bear and has submitted it to the Fish and Wildlife Service for review. Formal consultation will be completed after FWS review of the alternative and the Forest Service has responded to FWS with written notice stating its final decision on the proposed Forest Plan.

Fish and Wildlife Resources

We are concerned that the proposed Plan does not provide sufficient guidance for the protection of riparian and aquatic habitats. Although the high value of riparian habitat to a wide variety of fish and wildlife and its importance to maintenance of instream water quality is recognized, the general guidance for "resources associated with riparian areas" (page III-57, proposed Kootenai National Forest Plan) defines the riparian areas for special management as those "at least 100 feet from edges of all perennial streams, lakes, and other water bodies." While this statement indicates the protection zone could be larger than 100 feet, it provides no means or criteria for determining how far away from the water edge such a zone should extend.

On many headwater and smaller streams the 100 foot riparian management zone on each side of the stream would probably be adequate. However, on larger streams, and those which meander through meadow situations, a strict 100 foot area would often be inadequate to protect riparian vegetation and prevent stream degradation. Consequently, we suggest that the size of the riparian zone be defined in a manner so that each stream situation could be appraised on its particular riparian characteristics. It would probably be appropriate to leave the 100 foot restriction in place, as a minimum, for all perennial streams, lakes, and other water bodies for the sake of protecting water quality. But we recommend riparian zones be defined on a case-by-case basis according to the extension of "riparian vegetation" inland, away from the water's edge. Thus, a list of riparian vegetation "indicator species" might be used as the best guide to define a particular riparian zone. With such a guide, stream or other riparian areas wider than the 100 foot minimum criteria could be systematically defined for any proposed management actions.

Generally, the Forest Service's proposed action also calls for potentially significant changes in existing wildlife habitats through timber harvest and road building activities. Because of this, we feel that "unique" or especially

valuable wildlife habitats, such as riparian areas and "old growth timber," should be given extra consideration. The Forest Plan and DEIS note the importance or old growth timber to a number of wildlife species, some of which would not be present on the forest if such timber were removed. Consequently, it seems appropriate for a selected action plan to preserve an ample amount of this important forest component, in well-dispersed areas of the forest. We suggest that the proposed action be modified to reflect than an increased acreage of old growth timber will be placed under special management and these additional acreages will be specified for drainages currently designated for "timber optimization."

Mineral Resources

The proposed Plan and EIS should be revised to reflect that the timing and location of exploratory drilling for oil and gas, if it occurs, would be dependent on the results of seismic surveys and other geologic studies. In addition, we suggest the following rewording for page III-10 of the EIS (second paragraph):

> "The oil and gas potential in the Kootenai Forest is poorly known because of the lack of subsurface geological and geophysical data. Seismic surveys are likely to increase in the near future. The timing and location of exploratory drilling would be dependent on the results of the seismic surveys and other oil and gas studies."

Ten Lakes Wilderness Study Report

We note the statement on page III-5 that the wilderness resource "would not be maintained in the Current Direction (No Action) and the Proposed Action." We suggest that the report be revised to reflect interim management required under the Montana Wilderness Study Act until the Congress has acted on the Forest Service's recommendation.

The U.S. Geological Survey has investigated the mineral and oil and gas potential of the study area, and offers the following for inclusion in the study report.

Despite numerous claims and prospects in the area, the metallic and nonmetallic mineral potential for the Ten Lakes Wilderness Study Area is considered to be low. Five mineralized areas were recognized: four vein deposits of lead, zinc, copper, and minor silver and gold, in volcanic and sedimentary rocks of the Belt Supergroup; and one stratabound copper deposit in the Belt rocks. None of the deposits are of ore grade or size. Geophysical studies suggest that the vein deposits may be underlain by concealed plutons, and thereby raise the speculative possibility of additional mineralization at depth.

The oil and gas potential of the area could not be effectively estimated because potentially favorable sites are at great depth and would require extensive geophysical and drilling information for proper evaluation. The area is structurally similar to known areas of production in the nearby Overthrust Belt, and oil companies are currently conducting geophysical studies in the area.

Sincerely yours,

Robert F. Stewart

Robert F. Stewart
Regional Environmental Officer

198

Red Meadow Rd.
Polebridge, MT 59928

April 1, 1983

Forest Supervisor William Morden
Kootenai National Forest
Box AS
Libby, MT 59923

Dear sir,

I am writing in regard to the Ten Lakes Wilderness Study Area. I urge you to place the Ten Lakes under wilderness classification - Alternative "C".

We need to plan for the future now. This includes increasing demands for wilderness areas. Adding 35,900 acres would only increase wilderness classification by 1.6%. ORV's and snowmobiles have literally millions of acres of other federal lands (within NW Montana) to recreate. Timber resources within the Ten Lakes Area are of low value. Why ruin this pristine area for a small amount of low value timber?

We need to protect habitat for threatened and endangered wildlife. How many places in the contiguous 48 states can claim to have grizzly bear, gray wolf and mountain caribou? Protection of habitat for these animals can best be met by wilderness classification.

Management for the future must begin now. The Ten Lakes area must be protected for future generations. Wilderness classification for this area is a start.

Sincerely,

Ellen Horowitz

Ellen Horowitz

cc: Governor Ted Schwinden
Rep. Pat Williams
Senator John Melcher
Senator Max Baucus

199-1

March 29, 1983

Tom Coston, Regional Forester
Northern Region USDA Forest Service
Federal Building
Missoula, Montana 59725

Dear Mr. Coston:

I am responding to the Kootenai National Forest Plan. I am interested to know what recent changes in management guidelines will mean in terms of specifics of the enabling legislation.

The Resources Planning Act as amended by the National Forest Management Act calls upon the Forest Service to exercise its responsibility and opportunity to be a leader in the field of natural resource conservation. Several management issues are of concern to me.

The Act speaks to the use of toxic chemicals in silvacultural and rights of way management. The Secretary shall submit an annual report to the Congress on the amounts, types, and uses of herbicides and pesticides used in the National Forest System, including the beneficial or adverse effects of such uses. This is a practice I want to see stopped, especially the use of the chemical Tordon. I am including a research paper written in response to the Bonneville Power Administration Vegetation Management Program, wherein I discuss the detrimental effects of the components of this toxic. I would like to see a discussion of this issue in depth in your final plan, with recommendations of wildlife biologists concerning this detrimental practice upon wildlife habitat.

The Act specifies that timber will be harvested from National Forest System lands only where soil, slope or other watershed condition will not be irreversibly damaged; there is assurance that such lands can be adequately restocked within five years after harvest; protection is provided for streams, streambanks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperature, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat.

These criteria suggest that harvest should not be taking place on some lands, especially those where steep slopes necessitate high road densities. Where there is more risk of erosion, and where there is an ecological set that has high probability of causing environmental damage.

The transportation system is to be developed in an economical and environmentally sound basis, and unless the necessity for a permanent road is set forth in the forest development road system plan, any road constructed on land of the National Forest System in connection with a timber contract or other permit or lease shall be designed with the goal or reestablishing vegetative cover on the roadway and areas where the vegetative cover has been disturbed by the construction of the road, within ten years after the termination of the contract, permit, or lease either through artificial or natural means. Such action shall be taken unless it is later determined that the road is needed for use as a part of the National Forest Transportation System. Roads constructed on National Forest System lands shall be designed to standards appropriate for the intended uses, considering safety, cost of transportation, and impacts

199-2

on land and resources.

In conversations with planning team members and engineers on the Kootenai Forest I learned that 90% of the transportation system is in place in the forest and that timber harvest is 90% of the reason for the system. In order to access the remainder of the timber base the Kootenai National Forest is proposing a permanent transportation system that will adversely impact watersheds and wildlife habitat. In order to minimize these impacts the enabling legislation mandates that these specialized components of the system be designed and constructed to be temporary. The minimization of the transportation system would conserve capital expenditures that could better be spent in reforestation, in slash removal (this resource is only wasted if it is indeed wasted, adding unwanted particulate matter to the air), in thinning and precommercial thinning, and for the amenities that cannot be afforded on a forest that is spending more than it is bringing in for an unneeded permanent transportation system.

I would like to see a graph to measure the differences that could be expected if 90% of future timber harvest roads were temporary in engineering and construction costs, in the impact on fisheries and wildlife habitat, in sedimentation load, and in watershed runoff. I would also like to see a discussion of these issues by scientific staff and engineers.

I feel that gateclosures on over engineered roads are not an effective method of conserving access to lands considered to be of importance for wildlife or newly opened lands. Rather the building of a more reasonable, contoured system would benefit multiple use values, and be more cost effective.

In light of these points of law I support a conservation alternative that incorporates the minimization of the transportation system with the most conservative approach to development with comfortable margins for visual retention, and old growth management.

For the Ten Lakes Wilderness study area I support a maximum 36,000 acre wilderness designation to preserve prime habitat for several endangered species, and because there is not enough wild land left to jeopardize this pristine set of ridges and lakes.

Thank you again for providing this opportunity to participate in the management of the Kootenai National Forest.

Sincerely,

Barbara Rhoden

Rt. 1, Box 1945
Libby, Mt 59923

copies:
Morden
file

Rt. 1, Box 1945 Libby, Montana 59923
December 6, 1982

199-3

Comments- Bonneville Power Administration-Transmission Facilities-

Vegetation Management Program

Bonneville is an agency supported by the public, enabled by Congress and mandated to provide the least cost, most efficient, and environmentally benign power for the region. In this pursuit the management of rights of way and transmission facilities should serve the public interest.

You identify-public health and environmental hazard in the use of pesticides, especially the use of Picloram and 2,4-D. Your discussion does not cover the scientific literature. In studies D. F. Woodward states that Picloram is highly persistent in the soil, is mobile in soil water, could contaminate ground or run-off water, and could contaminate aquatic habitats for many weeks after application. The persistence of Picloram increases the possibility of continuous aquatic habitat contamination. Woodward says "I was unable to determine an exact no-effect concentration of Picloram because growth was affected at the lowest levels tested." Chronic toxicity of Picloram on early life stages of lake trout is more significant than might be anticipated on the basis of only acute tests with fingerlings. The lowest Picloram concentrations significantly effected Alevin survival, yolk sac absorption time, fry survival, and growth rates. Your E. I. S. says the use of Picloram resulted in detectable soil residues for up to three years, and that runoff waters in treated watersheds have frequently been shown to contain detectable residues. M. D. Reuber has reviewed tissue slides done for registration testing of Picloram and found that these histological sections prove that Picloram is highly carcinogenic in rats and mice, and show other toxic changes including chronic kidney desease, heart desease and atrophy of the testes. M. D. Reuber says "Sufficient documentation is available on qualitative extrapolation of animal data that one must conclude that a finding of carcinogenicity in one mammalian species should be deemed to have relevance for other mammalian species-including man. Due to the long latent

period of many human carginogens this threat may not be manifested for thirty or forty years. Given the state of carcinogenicity testing and knowledge, there can be only one safe tolerance for a carcinogen- an absolute zero tolerance and the only way a substance shown to be carginogenic in test animals will not be a threat to human health (or wildlife) is simply to prevent that substance from entering the environment."

2,4-D induces excessive and aberrant production of nucleic acid which acts in the plant as a tissue proliferant, overtaxing the growth mechanism in the plant whose systems fail under the stress. Emergency action has been taken in Canada to outlaw 2,4-D because various dioxins have been identified in 2,4-D samples. Dioxins appear to be unavoidable contaminants in the manufacture of 2,4-D, and are some of the deadliest poisons known to man. There is evidence to indicate that combustion or photodecomposition, as with sunlight, spontaneously forms dioxin from 2,4-D. Male and female rats ingesting 2,4-D developed increased incidences of malignant neoplasms or cancers (Reuber, 1980).

M. J. Plewa and J.M. Gentile suggest that the present monitoring system used to detect genetic damage by pesticides is inadequate, and L. A. Norris who is generally supportive of the use of herbicides says that he is concerned the danger in the use of these chemicals comes from the changes in habitat for wildlife.

In light of these concerns reported in the literature Bonneville should chose to use manual and mechanical methods of controlling unwanted vegetation, because it is the most environmentally benign and because this investment of management funds would yield the most employment. Bonneville must now act in accordance with the wildlife enhancing provisions of the Northwest Power Planning Act and should therefore not contemplate action to deminish existing habitat by the use of toxics.

HEARING OFFICE - TEN LAKES BASIN. 200-1

I am writing this as testimony in support of the "wilderness alternative "c" as described in the draft for the TEN LAKES BASIN study.

I request the following testimony be entered into the record as a permanent document for any future consideration on this area.

My name is Dr. Loren h. KRECK and I reside in Columbia FALLS-MONTANA. For the last thirty two years I have become familiar with this geographical area by way of many hiking trips, observations, and communications with others having common interest in the Ten Lakes area and especially with MR. Winton Weydemeier who has intimate knowledge of the areas history. Because of my early experiences when ingress into Terriault Lake was served only by trail up Stahl creek trail I have lived long enough to have seen the devastation wrought by the massive clear cutting of the Bluebird Basin

2.
(continued)

the slow regrowth of these clear-cuts being a dismay to everyone ever since I saw the insensitive treatment of Terreault Lake, a perfect gem of a lake of prime wilderness quality, that suffered the indignity of not only a bulldozed road to the lake edge but even a blade-down sub-surface extention for a boat ramp. In only a couple years the quality of the fishing of this lake was reduced to a low level of interest. Trails peripheral to the Ten Lakes Area were blotted out as the cutting units were increased through the years. During this conversion period there was a constant plea from individual citizens as well as the organizations such as the Montana Wilderness Assn, Flathead Wild life and representatives of the Sierra Club to set aside some of the higher alpine zones for the continued productive return they offered by way of an undisturbed wilderness designation.

3.

There were many hikes and meetings on the subject of the designation for protection of this area - the consistent verdict by the related interested groups was for WILDERNESS - NO LESS! During the subsequent study by the Forest Service the area was found to have high wilderness qualities and evidence of grizzly bear activity as well as sighting and verification of several wolves.

In view of the projection of the Kootenai Forest under the new Forest Plan there will be some twelve thousand miles of roads and a sacrifice non sustaining timber yield for this forest it would seem judicious to relegate the acreage outlined in the "C" plan for the only proven protection - that is for WILDERNESS - NO LESS!

Thank you

Loren Kreele

201-1

Tom Coston
Regional Forester, USDA Forest Service
Federal Building, Missoula, Montana 59925

William E. Morden
Forest Supervisor, Kootenai National Forest
P.O. Box AS, Libby, Montana 59923

Re: The Kootenai National Forest Ten Lakes Study Act Area
(PL-150 & 5393)

A Review By

Tobacco Valley Citizen's Committee

201-2

Review of Report and Proposal
Ten Lakes Montana Wilderness Study Act Area

This paper has been prepared and is being submitted to the Forest Service by a committee of Tobacco Valley residents. The committee members are: Tim Manley, Wildlife Biologist; ~~Royal Bits, Timber Cruiser~~; Mike Marvel, Snowmobile Club; Jan Pinson, Women in Timber; Gene Holder, Tobacco Valley Rod and Gun Club; George Shea, Stockmens' Association; Mike Workman, Board of Commerce; Winton Weydemeyer, Wilderness aspects; and Lloyd West, as moderator and chairman of the committee. This group represents over two hundred and fifty years of experience in the study area. The group also understands the different economic resources and independent businesses.

We feel that the Forest Service is perhaps over-representing the importance of timber harvest and bug control in this study area. It is the majority opinion of this committee that the real question of whether or not the study area was suitable for wilderness was set aside in favor of a timber management plan. We feel that the Forest Service failed to provide a suitable, knowledgeable and definable summary and proposal to be presented to the public for their comments and input. It is the majority opinion of this committee that the study plan booklet presented by the Forest Service is inadequate, and does not truthfully or knowledgeably address the question proposed by the Wilderness Study Act.

The majority of this committee is not in favor of the plans submitted: No action, Proposed Action, Alternate A, Alternate B, Alternate C, or Alternate D. After careful consideration and an in-depth review of the proposal affected by the Forest Service, it is recommended by this committee that a more comprehensive study be initiated by the Forest Service. During the review of the Summary and Proposal, submitted by the Forest Service on the Ten Lakes Study Plan, this committee arrived at some conclusions which we would like to bring to the attention of the FS planning staff; we would also like to offer a few suggestions.

1. There is no designated boundary on the so-called "Roadless area" on study area maps. It is the suggestion of this group that the 5500 ft. level be used as a base line. Area boundaries could be altered when necessary, from this base line.

2. We feel that the entire study area should be designated as a continuation and enlargement of the present "Scenic Area" or core, and be designated as "The Greater Ten Lakes Scenic Area."

3. We do not favor the designation "Roadless Area". We suggest that all existing roads which extend above the 5500 ft. level be terminated at that elevation and that the parts and parcels of roads above the 5500 ft. level be "put to sleep".

4. We suggest that no logging be done in Stahl Creek above the 5500 ft.mlevel and that the old clearcuts be allowed to grow back naturally. It was the opinion of this committee that logging the high alpine basins of Stahl Creek in years past constituted poor management and to do so again would be doubly damning.

5. Because of concern expressed by the local people of the Eureka Area, a great deal of attention was given to the west face of the study area. The people in general have an inherent distrust of two of the FS management policies: management for wildlife benefits and management for visual significance. This committee would like to suggest that no management at all be done above the 5500 ft. level. We would also recommend that the area between the private land and the 5500 ft. level be designated as a roadless area, and specifically managed for high visual and wildlife habitat.

This committee further recommends only selective logging, no clearcuts and the slash method for rejuvenating browse instead of the burning method. We feel that burning is too dangerous on the steep slopes of the west face. We feel that the proposed rebuilding of the Burma Road is ill-advised and we recommend that the road should remain in its present form and be closed off at the unloading ramp at the entrance to Blacktail Basin. The majority of this committee is not in favor of any logging in Blacktail Basin, as historically this has been the summer range area of a small herd of woodland caribou. Caribou have been seen many times in the study area commencing in 1935, after the big Wigwam fire. Blacktail Basin is also part of the summer range for at least one family of grizzly bear.

This committee also recommends that the FS make an effort to obtain an easment to the FS trail up Indian Creek.

This committee feels that a good portion of the dialogue and most of the graphs in the Summary and Proposal are self-serving and slanted toward the Forest Service's desire to sell timber. We feel that the graphs are lacking in factual information and cannot be correlated. In many cases the graphs are very misleading, and they left our group with a lot of unanswered questions.

This committee is very critical of prescriptions used in determining present net value. We also feel that local economic income from the study area was not

properly or fairly represented as to uses or economic value. We found that, over a five-decade period, recreational uses net by far more revenue to the local area than the harvest of marginal timber left in the study area.

This committee is in favor of salvage logging, and only from existing roads, with no logging done inside the study area boundaries. The study area boundary of 5500 ft. was deviated from at times on the enclosed map to facilitate harvesting some timber that it was felt should be harvested.

In conclusion, our committee found it difficult to evaluate this study area, and the question, "Does the study area meet the requirements of wilderness?" We found ourselves being influenced by the hypothetical figures and biased presentation of the Forest Service Study Plan, which seems to be an excerpt of the total Kootenai Forest Management Plan.

Respectfully Submitted

M. L. West Chairman

Ten Lakes Review committee

Mike Workman
Stanley E Holder
Tim Manly
Winton Weydemeyer
Janice J Pinson
George P Shea
Mike Marvel

201-5

"Scenic Areas are places of outstanding or matchless beauty which require special management to preserve these qualities". (They may be established under 36 CFR 294.1 whenever lands possessing outstanding or unique natural beauty warrant this classification.

Under authority of Regulation U-3 of the Secretary of Agriculture (11 Federal Register 3416, April 2 1946) the scenic area of approximately 6,541 acres lying within boundaries of the Kootenai National Forest in northwestern Montana More particularly described on 2"=1 mile map titled "Ten Lakes Scenic Area, 1963" approved by Regional Forester Neal M Lahm, on May 4, 1964, is hereby designated the "Ten Lakes Scenic Area". It is directed that this area be administered by the Forest Service in conformance with the requirements of Regulation U-3 and in accordance with management guidelines in the attached establishment report and "classification Report and Management Plan for Ten Lakes Scenic Area".

Campgrounds with standard facilities will not be constructed in the scenic area, but toilets, fireplaces, and garbage pits will be provided when necessary to prevent damage to lake. No logging, grazing or motorized vehicles will be permitted.

201-b

Montana Ten Lakes Study Area

Wildlife Bioeconomic Study

This paper was prepared by using statistics on 1981 harvest from the Fish Wildlife and Parks Department; from Forest Service Manual, "Value of Wildlife, Westformat Edition, sent 1982 with 1979 Addendum"; also numbers are used from The Ten Lakes Study Act Area booklet prepared by the Department of Agriculture, the Forest Service, submitted to the public November 19, 1982. Also used are reports of visual sightings of game by people on the ground, both hunters and fishermen and non-hunters and fishermen.

Wildlife Benefits in this paper are based on the methodology of the "Person's Willingness to Pay", and cross-checked by actual costs when possible.

Due to the lack of counts by actual users in the Study Area, and by the lack of information available from the Forest Service and the Fish Wildlife and Parks, it was necessary to use numbers that are state-wide averages and to relate, as closely as possible to what we feel are relative to the wildlife in the Study Area.

Montana Ten Lakes Study Area

Approximately 90 elk in Study Area, 60 females and 30 males

Resident elk license: $8.00
Harvest success ratio: 15%
Average days hunting for elk: 8
Average cost per day: $40.00
Average cost per hunter per year: $340
Average cost per harvested animal:
$6\frac{1}{2}$ x $8.00 = $52.00, license cost $6\frac{1}{2}$ years
$6\frac{1}{2}$ x $340.00 + $52.00 = $2262.00
Average pounds of red meat: 235
Value of red meat @$2.00 per pound: $470.00

Non-resident license (with outfitter) $225.00
Average days hunting: 9
Success ratio: 19%
Average cost per day: $150.00
Average cost per hunter per year: 9 x $150.00 + $225.00 = $1575.00
Average cost per harvested animal: 5 x $1575.00 = $7875.00
Red meat average 235# @ $2.00: $470.00
Cost average on a 6-point trophy bull (5%) : $31,500.00
No compiled figures on number of elk harvested in Study Area by FW&P. Area 101 shows a harvest of 119 animals. NOTE: Average cost to hunter can be translated to economic income for the local area and license money for the FW&P.

For 1983 the 60 female elk should produce 40 young, 20 male and 20 female
30 male elk + 20 male calves = 50 bulls
60 female elk + 20 female calves = 80 females
Allowable harvest 50% of males = 25
Allowable harvest 25% of females = 20
45 elk to be harvested @ $2262.00 each = $101,179.00
First decade elk harvested from base herd by residents, 450 x $2262.00 = $1,017,900.00

201-8

Bioeconomic study wildlife in Ten Lakes Study Area

11 grizzly have been seen in one day in the Study Area: 3 of these bears were sows, with 6 cubs and 2 sub-adults.

Information for year 1981 state-wide

Resident grizzly bear license sold: 625 @ $25.00 = $15,625.00
Average number hunting days per year: 10
Average cost per hunter: $40 per day x 10 = $400.00
1.6% hunters harvested bear: total cost of each bear harvested: $39,360.00
average paid to State for license per harvested bear: $1850.00
8 bear @ $39,360.00 = economic income $314,880.00

First decade: The 3 breeding sows have a projected economic income of 3 x 16. 48 bears in 12 year period : 48 x $39,360.00 = $1,889,280.00
A 5 year old cub-bearing sow grizzly, during the period of 5 to 17 years old, can produce 12 cubs. When the sow is 10, her first female cubs can start to reproduce.

Non-resident grizzly licenses sold: 123 @ $125.00 = $15,375.00
Average number hunting days per year: 10
Average cost per day: $200.00
Average cost of 10-day hunt + $125.00 = $2,125.00
Average success ratio: 1.6%
Total cost for each harvested bear: $209,100.00
License fees @ $125.00 for 74.8 years per bear: $9,250.00
Average number 10-day trips per harvested bear: 74.8
4 bear harvested @ $209,103.00, economic gain per year = $836,412.00

NOTE: The methodology of "the willingness to pay" is well-represented here. 747 hunters were willing to buy a grizzly license, well knowing that only 25 bears could be killed in the entire state, by any means; only 12 hunters harvested a grizzly, or 1.6%.

Estimated by people using the Study Area, 45 bears in Area

Black Bear resident license: $8.00
Average number of days hunting: 5
Average cost per day: $40.00
7% of bear hunters harvested bear
Average cost per hunter: 5 x $40.00 + $8.00 = $208.00
Average cost of bear harvested: $2,790.00
State-wide, 1979, 10,666 hunters harvested 795 bear
@ $208.00 this would total: $165,360.00
9871 hunters harvested no bear
@ $208.00 this would total: $2,053,168.00
10,666 hunters paid $8.00 for state licenses: $85,328.00

Non-resident (with outfitters) Black Bear license $100.00
Average days hunting: 7
Average cost per day: $100.00
Average cost per hunter: 7 x $100.00 + $100.00 = $800.00
25% hunters harvested bear
1067 hunters purchased spring bear licenses: $106,700.00
267 hunters harvested bear @ $800.00 = $213,600.00
800 hunters did not get a bear @ $800.00 = $640,000.00
Total cost to hunters: $853,600.00

Average cost of bear harvested: $3,197.00

Mule deer and whitetail using Study Area for summer range and part-time winter range (annual renewable resource)

May Base Herd : 1500 females 500 males
Allowable Harvest: 375 does (25%) 200 bucks (40%)
Allowable annual harvest: 575 animals
Average net weight per harvested animal: 100 lbs. red meat
Net weight red meat per year: 57,500 lbs.
Value of red meat @ $2.00 per lb.: $115,000.00

Cost of resident license: $7.00
55% license holders harvested deer
Average days hunting: 6
Average days hunting per harvested animal: 10
Average cost per day: $40.00
Average cost of animal harvested: $407.00
Average cost per hunter: $247.00
Potential yearly income: 575 x $407.00 = $234,025.00
First decade: 10 x $234,025.00 income state and local = $2,340,250.00

Cost non-resident (with outfitter) deer license: $100.00
Cost per non-resident hunter day: $100.00
Average number of days hunting: 7
Average cost for hunting: 7 x $100.00 + $100.00 = $800.00
Average number days hunting per harvested deer: 10
Average cost of animal harvested: 10 x $100.00 = $100.00 = $1100.00
Average weight: 125# @ $2.00 = $250.00
Potential yearly income: 575 x $1100.00 = $632,500.00
First decade: 10 x $632,500.00 = $6,325,000.00

It is felt that 5 to 6 cougar regularly use this Study Area at times during the year. It can be expected that cougar will reduce the deer herd by at least 175 animals; 30% of animals killed will be pregnant does. Fifty-two pregnant does means a loss of at least 100 deer for next years crop, at a one doe, one fawn ratio. 70% of deer killed by cats will be bucks and yearlings.

TEN LAKES COMMITTEE MEETING
EUREKA — ROXFORD R.S. 4/4/83

ATTENDENANCE

NAME	REPRESENTING
PAUL LEMBACH	KOOTENAI N.F
Sandy Matheny	" "
Bill Morden	" "
[illegible]	Eureka Mont.
Winton Weydemeyer	Fortine, MT
John Pritchard	
Doug C Heidlauder	Fortine RD.
Tim Manly	Stryker MT.
Nicki Norvel	
Stan Holder	Eureka, Mt.
Dave Poncin	Kootenai D-1
Bill Morden	Kootnia

201-12

(1)

TEN LAKES MEETING NOTES 11/4/82
BEXFORD R.S.

1.) PROPOSING A 'GREATER SCENIC AREA'
- NOT WILDERNESS - APPROX 5500' LEVEL
INCLUDING BLACKTAIL CR -
HIGH CONCERN ON THE WESTERN FACE
VERY LITTLE COMMERCIAL TIMBER ABOVE
5500 FT ELEV.
USE BASE ELEV FROM N. FK of FOUNDATION CR.
AROUND NORTH TO TERMINUS LAKE.
USE 5500' AROUND TERMINUS LAKE
TO WOLVERINE CR.

RE BUILDING THE BUENA RD TO FS
SPECS. IS CONSIDERED UNACCEPTABLE.

STAY OUT of SOUTH STAHL CR
& THE HEAD of STAHL CR
ALSO

CONCERN ABOUT PROJECTED FUTURE STUMPAGE PRICES I.E. $598/MBF

DON'T AGREE W/ THE THE INCREASED MOTORIZED USE BECAUSE OF THE NEED TO CLOSE GATES BECAUSE OF WILDLIFE.

NEED TO PROTECT ALL THE WHITEBARK PINE POSSIBLE.

THEY FEEL THAT THE WILDLIFE & RECREATION IS MORE VALUABLE TO SOCIETY THAN THE TIMBER

THEY'LL MAIL THE MAP AFTER THEY PRESENT IT TO THE LINCOLN CO. PLANNING BOARD

BILL ASKED EACH COMMITTEE MEMBER TO GO BACK TO THEIR RESPECTIVE GROUPS & GET A POSITION STATEMENT RELATING TO THEIR COMMITTEE PROPOSAL.

Paul A. Fischer

From:
Diane Ensign-Caughey
(wife, mother, professional
photographer- commercial &
wildlife & nature)
575 Tamarack Creek Rd.
Whitefish, Mt. 59937

202

March 25, 1983

Dear William Mordan:

It is such a frustrating feeling of helplessness to be just standing by watching as more & more of what little we have left, precious, irreplaceable wilderness areas dissapear Please speak in behalf of my family, friends, & relatives who believe that it is all important that we act right now to preserve as much of our wild lands as we possibly can. Already too much of our natural heritage & natural resources have been lost through very short-sighted actions. There is more to life on earth than using things up right now because we must think ahead for all the future generations to come so that they might have the same chances to enjoy what we have taken for granted...wildlife, natural rivers, streams lakes, forests, plants indiginous to their areas. We all need the chance to be able to have these aspects of our world in their natural state without being changed & cluttered up with mans hampering. Without wildlands, a society has no touchstone with which to measure its progress. Without the spiritual renewal that a wildland personally gives me & so many countless others, we would become a hopeless shambles - casualties of our modern "civilized" world. Where in the world would our great nation be if we had not had great thinkers & conservationists like Theodore Roosevelt who saved Yellowstone Park for us & John Muir who spent most of his life fighting to preserve & to create at least six major parks & monuments and many wilderness areas. Many people of great vision & much hard work have fought the battle against greed & over developement of such great places of wonder & beauty as our National Parks which include Glacier, Rocky Mt., Olympic, Crater Lake, Yosemite, Grand Canyon, Bryce, Zion & others. I have enjoyed myself immensely in each of these places & thank God someone before my time set these places aside for protection for the rest of us to enrich our lives with. The list of wilderness areas that I have spent probably the best hours of my life in goes on & on & so do the memories of all the wondrous beauties of nature I saw in each area & of all the exciting moments I experienced when watching & photographing wild animals & plants & scenes in these Wilderness areas. Nothing has provided my life with more personal fullfillment than my treasured travels in the wilderness. Please protect what we still have left so that these places will not become overcrowded & ruined like so much else already is.

Today you can help mankind & wildlife by protecting a special place for them both to remain & have access to an uncrowded & untouched area. It is very important that we save the TEN LAKES WILDERNESS STUDY AREA IN N.W. MONTANA as a WILDERNESS AREA. There are only 35,900 acres which can be saved as a roadless & unmotorized area. Your help is needed insupport of alternative "C" designating this area as wilderness. Animals & people need room to be away from other people & this area is perfect for protection of our almost extinct WOODLAND CARIBOU & the GREY WOLF which need wilderness protection. Elk herds will diminish if roads are allowed in this area & also the quality of this whole area will suffer overall if roads and noisy snowmobiles are allowed. This area is not needed for snowmobiling as there are literally millions of acres of lands in N.W. Montana already open to snowmobiles but this area IS NEEDED BY SOCIETY NOW & IN THE FUTURE FOR ITS WILDERNESS VALUES & OUTSTANDING OPPORTUNITIES FOR PRIMITIVE & UNCONFINED OUTDOOR RECREATION. The Kootenai National Forest recommends timber production for this area which is known to have low timber value & is 30% less productive than the forest average anyway. The Kootenai National Forest can meet all its requirements for timber & motorized recreation (like snow mobiles) & still CLASSIFY TEN LAKES AS WILDERNESS. Since the Kootenai Forest Plan predicts an extreme shortage of wilderness & primitive lands in the future here now is a chance to use foresight & do things right by DESIGNATING THE ENTIRE TEN LAKES WILDERNESS STUDY AREA IN THE WHITEFISH RANGE AS WILDERNESS & protecting it now & for the future from motorized vehicle noise & air pollution, overcrowding & overuse, timber sales & reduction of vegetation, destruction of wildlife & their habitats & migration patterns & breeding, & oil & gas leasing. Please do your utmost to speak in behalf of all of us who have no power what-so-ever to save the things we hold dear to us except for to write a letter to you as I have done. Thank you very much for taking the time to read my lengthy letter & I hope

Diane Caughey

Dear Mr. Morden — 203

I am a 8yr. resident of Flathead County & am opposed to the proposed "scenic area designation for the TEN LAKES AREA. I support Alternative C i.e., WILDERNESS PROTECTION FOR THE ENTIRE TEN LAKES AREA.

Yours truly,
Wayne H. Ryan

204-1

american fisheries society

MONTANA CHAPTER

March 18,1983

Mr. Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr Morden:

The following comments relate to the Kootenai Proposed Forest Plan and the Draft Environmental Impact Statement. The Montana Chapter of the American Fisheries Society represents approximately 200 professional fisheries scientists in Montana dedicated to the maintenance and enhancement of the fisheries resources of Montana. We offer the following comments and suggestions.

In general, we found the fisheries resources treated lightly or ignored completely throughout the text of all documents. For example, the "reviewer's guide" mentioned fisheries habitat as a subject title, but no statement was made about the resource in the text. This type of omission is common throughout both the Draft Plan and E.I.S. and should be included where missing. We fear these omissions reflect the Forest's interest in this resource; therefore, we also question whether fisheries habitat was adequately considered in the allocation and direction given in the Draft Plan.

The Draft Plan apparently is in conflict with the E.I.S. in respect to Forest Policy 7 (Wildlife and Fish Plan II-4) indicating that maintenance of Forest stream and lake fisheries habitat is a Forest policy and management intent. This is in conflict with the E.I.S. estimated effects (IV-20) which indicates that both catchable and migrant trout will decline in the proposed action. We suggest that your proposed action be modified to provide for at least maintenance levels of fisheries production.

We take issue that sedimentation of fisheries habitat is "inevitable" (IV-51 E.I.S.), leading the reader to believe that a trout decline cannot be prevented. While some sediment can potentially reach fisheries habitat, up to 80-90 percent of sediment occurring from standard road construction could be eliminated by additional mitigation measures. We do not find such measures identified in the Draft Kootenai Plan. Measures could be employed that reduce the sedimentation that is now occurring from existing roads, or roads currently scheduled for construction. Thus an improved road design or rehabilitation measures for existing roads incorporating best management [illegible] control measures could lead to an improvement

in existing fisheries production. Future roads should also employ these measures. Examples of design criteria that should be mandatory, depending on road location and soil type, should include use of slash filter windrows, specific drainage spacing, surfacing, maintenance standards, seeding and fertilizing. Criteria related to road location, particularly in proximity to active channels and streams should be identified as management direction. Stage construction methods can be used, as can closure of roads following management activities for erosion control. Reallocation of particularly erosive lands and delayed construction of roads over a longer time period could be evaluated as to the potential benefit to fisheries. These appear to be particularly viable because they require no additional capital outlay. These actions should be integrated into either overall Forest management policies or as management area guidelines and standards. These appear to be especially appropriate to your proposed alternative, because of the intent to road the majority of the Forest.

The management standards and guidance are very general and it is difficult to foresee how a land manager is guided to provide necessary coordination in the protection of fisheries habitat. We do not believe the omission of specific direction meets the intent of the NFMA. Although these omissions are obvious in all management areas allocated to development, it is particularly obvious in the riparian area guidance (Plan III-58). Because of its importance to the fisheries community, the riparian zone is one habitat that should be given special concern. We do not feel the arbitrary delineation of 100 feet of riparian zone for all orders of streams would sufficiently protect the riparian community of larger streams and rivers.

If a goal of 80 percent of potential fish production is to be obtained (p. 58), the land manager should be provided with coordination actions that will help assure this objective is met. Providing for woody debris recruitment through extended rotations,vegetative filtration strips, control of mechanized equipment, appropriate logging systems and required use of a fisheries biologist in developing timber management prescriptions are examples of appropriate coordination requirements. The proposed plan does not give visible preferential treatment to riparian dependent resources as required by NFMA. Development of fisheries plans will be severely constrained if allocations such as timber or road development are already allocated by the Forest Plan. Foreseeable coordination needs should be included in the plan so that more accurate costs and constraints to other resources can be reflected in allocation, outputs and budgets.

We do not feel it is sound management to manage for one species at the lose of another. This is referring to your Maximum Wildlife Section(pg. V-10) which states fish and their habitat would be lost in maximizing elk by additional

2nd-3

clearcutting. This ignores the importance of the fishery resource to the forest and we recommend managing elk summer range to minimize fishery habitat loss.

The fisheries and aquatic resources in many other areas of the Plan and E.I.S. were treated lightly or ignored to the point that comment is impossible for lack of substance. We sincerely suggest that a second Draft Plan be developed that more adequately addresses fisheries and aquatic resources so that more specific comments could be developed by the public.

Similar lack of specifics is common to the Ten Lakes Wilderness Study Area document. For example, we found no discussion (p. 18) of fisheries effects from proposed roading, although you indicated that road-originated sediment was the major adverse effect to fisheries on the remainder of the Forest.Again, we find there is insufficient substance to the discussions related to fisheries/aquatic habitats to comment constructively.

Thank you for the opportunity to comment.

Sincerely,

Janet Decker-Hess

Janet Decker-Hess
Vice-President

cc:Tom Coston,Regional Forester
Carl Sullivan, Executive Secretary, American Fisheries Society

370 3rd Ave. W.N.
Kalispell, MT 59901

KEARNEY LOGGING & SAW MILL, INC.

207B

PAT KEARNEY
PHONE (406) 296-2428

BOX 485
EUREKA, MONTANA 59917

Gentlemen,

In Regards Ten Lakes Scenic area.

I strongly oppose any wilderness designation for this area.

I feel that the Forest Service Proposal for the area, is a pretty good Plan.

If the area should get put into a wilderness. I feel that all professional outfitters and guides should be barred from making overnight trips into the area.

Thank you

Pat Kearney

4/6/83 210

Dear Mr. Morden,

I am writing to offer my support for Alternative C - Wilderness Protection for the Entire Ten Lakes Wild Area of 36,000 acres.

Your area is in need of wilderness to meet the RPA Targets, and I feel this nation will be in need of wilderness as time passes. Please support the Ten Lakes Area (36,000 acres) for wilderness.

Thank you

Bob Ort
320 Lost Horse Rd
Hamilton, MT.
59840

211

William E. Morden

Forest Supervisor, Kootenai National Forest

P.O. Box AS, Libby, Montana 59923

Snomobile use in Ten Lakes Study Area:

Snomobilers speak adamantly in opposition to giving up use of those areas that fall within the boundaries of the Montana Wilderness Study Act Area (Ten Lakes). We believe snomobile use is on the increase in this area and will continue to rise and offer unlimited recreation for years to come. We strongly support a designation that will allow us the continued use of the area.

Specific popular snomobiling areas include Stahl Peak, upper Clarence Creek drainage, Therriault Pass area, Mount Barnaby, upper Sinclair Creek, upper Foundation Creek and Wam Peak, Bluebird and Wolverine Basins. The above areas are important because they retain their snow cover longer and allow us continued use for a longer period of time. We realize these areas, although important to us, make up the very "heart" of the study area. These lands are primitive and therefore the most vulnerable to damage. We agree snomobiles cause minimal damage and believe we would be making a great sacrifice if we were forced to give them up for any reason.

We support salvage logging from existing roads and skid trails in areas adjacent to the study area to remove bug killed timber. We object to logging in the Stahl Creek drainage above the 5,500 ft. level and are not in favor of reconstructing the Burma Road and removing timber from Blacktail Basin.

We support the boundaries suggested by the Tobacco Valley Citizens Committee for the Ten Lakes Scenic Area and favor management of the "west face" for wildlife enhancement and visual Significance.

In summary we strongly support snomobile use in the study area and recommend a designation that will allow us this continued use.

Mike Marvel
Mike Marvel
Snomobile Club Representative

Tobacco Valley Citizens Committee

Eureka, Montana

212

2110 Bradbrook Court
Billings, Montana 59102

April 7, 1983

W. E. Morden, Supervisor
Kootenai National Forest
Post Office Drawer AS
Libby, MT 59923

Sir:

Please consider this letter as registering my objection to the proposed Forest Service alternative for the "Ten Lakes wilderness study area." I wish to give my opinion in favor of the "Alternative C" for wilderness for this area.

Had you not "helpfully" developed a snowmobile "staging area" immediately adjacent to the study area boundary, in my opinion a violation of what S.393 (the Metcalf proposal) intended, I don't believe you would be getting the snowmobile use you are at this location. The vast majority of federal lands are now open to ORV and snowmobile use without using this one.

Ten Lakes is high in wilderness values, but low in timber. You know yourself the 16,000 plus acres in the study area proposed to be logged is really insignificant in comparison to the 1.5 plus acres proposed for logging on your forest.

As to roads, generally, your Forest plans call for entirely too many roads. Once a road is in, it will be most difficult to ever close it.

You don't have too much wilderness in the northwest part of Montana to begin with. The Cabinet Mountains is so designated, but mineral explorations threaten this.

Very truly yours,

James Phelps

JAMES PHELPS

214-1

TEXACO

PETROLEUM PRODUCTS

PRODUCING DEPARTMENT
WESTERN UNITED STATES
DENVER DIVISION

TEXACO
U.S.A.
A DIVISION OF TEXACO INC
P. O. BOX 2100
DENVER, COLORADO 80201

April 6, 1983

KOOTENAI NATIONAL FOREST
USFS - MONTANA

RE: Ten Lakes WSA

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P. O. Box AS
Libby, MT 59923

Dear Mr. Morden:

We support a nonwilderness designation recommendation for the Ten Lakes Montana Wilderness Study Area in the Kootenai National Forest. However, we are concerned with the emphasis the Forest Service has placed on visual resources and roadless recreation. As a result of such emphasis, the Forest Service anticipates utilizing numerous special leasing stipulations should any leases ever be issued within the Ten Lakes Area, thus undermining the benefits of multiple use.

The Study Report indicates that Ten Lakes falls within the Overthrust Belt, an area with great potential for oil and gas reserves. It is further stated that "detailed surface geologic mapping, seismic profiling, and wildcat drilling will be necessary in order to test the existence, or nonexistence, of oil and gas-bearing formations at depth." Yet, the Forest Service intends on limiting access to special locations and applying special conditions to any activities which may take place in the roadless area. These additional constraints would create a sizeable economic burden on those operators who choose to explore the Ten Lakes area.

We urge the Forest Service to revise its proposal by recognizing that energy and mineral activities can occur with reasonable (and in most cases standard) protection measures and that new road construction will be allowed to facilitate energy and mineral exploration. The Forest Service's proposed action should provide the maximum opportunities for access to the area for energy and mineral exploration and possible development through a necessary tradeoff analysis of resource values. We believe it is wrong to consistently address energy and mineral exploration activity solely

214-2

in terms of mitigation measures. It is possible that the potential for energy or mineral resources may outweigh other values.

We appreciate this opportunity to provide the Forest Service with our comments regarding the Draft Study Report and Proposal for the Ten Lakes Montana WSA.

Very truly yours,

RICHARD W. STANTON
Land Manager

By Lisa K. Woolard
Lisa K. Woolard
Land Representative

LKW:JE

Box 281
Clayton,
Mont. 59914
4/7/83

Forest Supervisor William Morden
Kootenai Nat'l Forest
Box 95
Libby, Mt. 59923

Dear Sir,

This letter is in support of alternative "C" for a 35,900 acres Ten Lake Wilderness.

Sincerely,
Barbara Slager

216-1

4/11/83

ST REGIS PAPER COMPANY LUMBER & PLYWOOD DIVISION P.O. Box V... Montana 59923 Area Code 406 293-4141

Forest plans are easy to nit-pick. There are typographical errors. Disagreement with priorities are usual and varying; interpretations of laws and biological data are common. Tables that are understandable to the originator are often confusing to the outsider. Things are laid out your way, not my way. Finally, it's based on computer simulations which produce material no better than what went in. The problem with the computer is to discover the basis of what went in, to see if the data is true, outdated, conservative, optimistic or whatever. This data is hard to find, exhausting to uncover. Then too, the programs of the computer should be understood to fathom the results. Rarely does or can anybody cover all these fields. I certainly can not.

This means I must look at the results, compare these projections with what I have seen on the ground in 30 years as a forester on the Kootenai and go from there. So first off is a general overall view of the Kootenai Plan and a check on the philosophy of it, as well as looks at national policy and human reaction.

The Kootenai is a productive forest in a region that grows trees. It has an excellent natural timber base, even if it took nature longer to get there than we feel is necessary. It is suited for intensive timber management. Trees can be grown to large size in a reasonable length of time and examples of this are quite available to any skeptic. So this should establish the Kootenai as a place to practice intensive timber management. The usual objector to commercial use and production of timber in Region 1 agrees that timber should be intensively managed "elsewhere, where timber is more productive". The Kootenai is "elsewhere", so let's look at what is proposed to be done.

The National Resources Planning Act produces goals for the nation and then breaks these down for parts of the country. The

Kootenai simultaneously is supposed to figure what it can do and meet, or if possible, exceed those RPA goals for any or all products. A pity these goals aren't displayed in a table in the E.I.S. (see, it's not laid out MY way). Anyway, these are goals and they are met or exceeded in all cases for a number of decades. When one finally falls below, as it does, it is far enough away in time that it's accuracy is suspect. With the constant replanning we are promised, this future downfall isn't that important. If desirable, priorities will be realigned in the future. Of course, there is equal suspicion of the other figures too. Experience with the Forest Service shows their figures tend to be quite conservative. The district workers provide capability figures for the Ranger and leave themselves a little safety margin for possible error. The Ranger passes it to the Supervisor for his District - with another little margin of safety, the S.O. passes it --- need I go on? Everybody is being sure they won't get caught short so the capability, particularly of a commodity that can be measured and sold, is vastly under rated. Understandable enough, but it does not present a true picture. We can do better in tree growth than the Forest Service figures, and St. Regis is doing so. I feel sure the Forest Service is actually doing better than they claim, in more than one field.

One of their figures I suspect is the production of timber. Should more be available? Should more be shown? Since this is a timber growing area where intensive management is possible, should more land be allocated to timber? Should timber receive a higher priority in cases of conflict with other resources? The answer to all of these should be "Yes".

Timber is a resource the nation needs. It is renewable and replaceable; more than can be said for most other resources. The nation is continually losing land that is being dedicated to single or limited uses. Housing, power lines, parking lots, wilderness, national monuments, historic trails, presumably endangered species, watersheds, scenery, wild rivers, administrative sites, natural research areas, ski slopes, mine dumps; all these and many more are continually nibbling away at our ability to produce a product needed for human life; a product that provides employment of adequate income and a stable community. Theses are all reasons

for providing for timber primacy in suitable timber growing areas, as this continued reduction in base is not accounted for in the Plan. Indeed, 76% of the basic employment of Lincoln County is forest dependent (EIS III-11) which shows the overwhelming importance of timber.

Again, the Kootenai is one of these suitable timber areas and there are stands available to show it. Philosophically, timber should be considered first in these areas of good timber growth. This does not preclude other uses at all. Rain falls everywhere and prudent forestry desires a minimum of erosion of our tree growing medium - soil. Minimum erosion benefits fish. Cutting units help provide game food. Tree growth provides cover and shelter. Road restrictions reduce erosion which benefits fish and at the same time, benefits game security. All multiple uses. The question is of priority. Timber should be first. Not in every case, but in those cases where the biological site justifies it, which is in more areas than shown in the Kootenai Plan. For example, areas set aside for viewing are a disturbing waste of productive timber land as cutting methods and schedules are quite available that are not unsightly and are effective. Yields of timber should not be reduced as they are.

Investigation and compilation of Figure III-1 of the proposed plan produces a dismaying set of figures (see attachment). To summarize these very briefly, there is no timber yield allowed at all from about 25% of the Kootenai. Another 26% has greatly restricted yields and may not be available at all now. About 29% of the Kootenai produces timber as a secondary function, according to the plan. In a mere 20% of the land base is timber optimized.

Only 20%, and this in the most productive forest in Montana where 76% of the county income is from timber! Is it any wonder that industry feels this is out of line? The minority of the land should not be supporting the majority of the county. Increase in yield and increase in priority will produce an increase in public benefits which is what Forest Planning should be about. Timber whould be grown and utilized where it does best. So should grizzly bears, as in the Selway Bitteroot Wilderness, If scenic vistas are necessary to benefit your soul, try Glacier

National Park, as it's close and bulging with scenery. As for solitude, I'd recommend breaking an axle at 5 o'clock on a Friday night at the end of the Little Wolf logging road--January is an ideal month.

To add insult to injury we have the acres allotted to Timber Optimization (Intensive). 15i is 1.5% of the Timber Optimization area and a mere .0026 (yes, that is .26 percent) of the Kootenai. This is STILL the most productive forest in Montana and all that can be done is 6,500 acres of intensive timber management? I hope you'll claim a misprint. With like logic, St. Regis would have 300 acres of intensive timber management. Damn it, we've got single reproduced stands bigger than that, and so do you. This is completely unacceptable. You should do better; lots better!

As in all Forest Plans, I am most unsatisfied with some of the basics. The hydrology base is frankly a fright and this affects erosion, siltation, fish production, logging. In fact, much of the land management. The basic information can only be called "weak". Reference to the Guide for Predicting Sediment Yields from Forested Watersheds is not encouraging. The Kootenai admits the basics come from the granitic soils in Idaho (Megahan mostly) adapted by various occult means to the Lolo, then readjusted for the Kootenai. The credibility is very thin by now. Particularly as the Kootenai modifications are quoted as being based on such solid fact as "interpretations as well as conversations between Hydrologists, soil scientists and foresters ....". Crystal balls are not mentioned. O.K., it's the best you've got but it's only an educated guess. If you'd say this loud and clear, I couldn't complain much. If you gave confidence levels and admitted that the common variations in weather matter more than man's activities, I'd feel better. See our recent winter floods and the 1964 flood on the Flathead that came from Glacier Park and the Wilderness Area. To buttress my feelings are the opinions of Dale McGreer who is a Hydrologist and Donald Pott's article on Watershed Management in Western Montana in Management of Second Growth Forests, The State of Knowledge and Research Needs, published in 1983 by the Montana School of Forestry.

So you feel you must address the issue, and I suppose you

must, you should do it much more sensitively. I'm afraid you are locking us into various land use patterns that are improper or unnecessary on the basis of poor information. If you later discover some allocations should be changed, it is often easier not to change them. Face saving or a diminished credibility of the data often leaves us in status quo. Poor information may not be better than none.

I am not at all happy with the buffer strip on the east side of the Cabinets. I don't feel that buffers are appropriate and that this is a very thinly disguised wilderness addition. The whole roadless recreation thing tends to be a fake and unless there is a trail plus a lake or stream with fish, the land is unused. Having tried to hunt elk in this area twice, I will assure you from personal knowledge that very few people do at all and even less do it twice. Those that do hunt it require trails or they couldn't do it at all. You have great trouble going cross country here with a horse. This big blank area fills your statistic columns, but is mostly unused for recreation. Let it be used for timber where appropriate. In fact, I think you have precommercially thinned part of this area around Deep Creek.

As the Ten Lakes Area is part of the Forest Plan, it deserves comment. The action proposed by the Forest Service is more than adequate to preserve the amenity values of the area. The roadless proposal allows for public use better than a Wilderness allocation. The proposed boundaries permit the appropriate use of commercial timberlands.

So now on to general recommendations to give a direction to the Plan, if not specific figures.

1. Abolish viewing areas as such. In all former viewing areas with appropriate possible forest yields, cutting practices should be sensitive to view, but not dictated by view. Do what is necessary for forestry in the best esthetic way possible. Affects Prescription 5 & 17.
2. Limit the primitive and semi primitive recreation areas to those parts of the forest that have a low potential for timber or where regeneration is a real problem. Affects Prescription 2,3 and 29.
3. Minimize grizzly management in timber areas to that required by law. Grizzly should be raised in places like Yellowstone, Glacier, the Bob Marshall, Selway-Bitteroot, the Cabinets, and take their chances elsewhere. Affects Prescription 14.
4. Be sure that Special Interest areas are indeed unique (please refer to Webster for a definition) or really unusual. Affects Prescription 21.
5. Intensively manage timber optimization areas. It is MOST discouraging to discover that a mere crummy 6,560 acres of the most productive forest in Montana is fit for MA 15i. Really! You should bloody well blush over that! Affects Prescription 15.
6. Rewrite all sections that deal with hydology (please, don't choke!) to provide for more flexibility, use confidence levels on all discrete figures and carefully explain the unavoidable weaknesses. Include a monitoring plan that will allow correction or verification of prescriptions.
7. Implement the proposed 10 Lakes plan using the proposed boundaries.

John K. McBride
Governmental Affairs Manager

Attachment 1 216-7

KOOTENAI NATIONAL FOREST
MANAGEMENT AREAS

MGT.AREA #	MGT. AREA NAME	ACRES	% OF FOREST TOTAL
29	Prim. Recreation	26,680	1.2
2	Semi Prim. Non Motor Rec.	214,180	9.5
3 & 3i	Semi Prim. Motor Rec	31,050	1.4
20	Administrative Sites	1,330	.1
21	Special Interest Areas	3,710	.2
23	Corridors	2,520	.1
24	Limited Use Area	30,780	1.4
30	Water	28,350	1.3
6	Developed Recreation	3,370	.1
		341,970	15.3
	ADMINISTRATIVE NON TIMBER OPTIONS		
7	Wilderness	94,360	4.2
8	Proposed Wilderness	63,850	2.8
		158,210	7.0
10	Big Game Winter Range	45,790	2.0
14	Grizzly-Timber	119,560	5.3
		165,350	7.3
	Land where we get essentially no timber		24.3
	Land where we might possibly get timber		5.3
			29.6
5 & 5i	Viewing (mod. & intense)	48,410	2.1
17 & 17c	Viewing/Timber (mod & Extensive)	104,160	4.6
16	Timber/Viewing	223,090	9.9
18 & 18i	Min. Use-Regeneration (mod. & Intensive)	61,200	2.7
19	Min. Use Steep Slopes	52,600	2.3
13	Wildlife/Timber	5,180	.2
		494,640	
	Land we get or may get much reduced timber yields		21.8

11 & 11i	Big Game Winter Range/ Timber (mod & intensive)	270,810	12.1
12	Big Game Summer Range/ Timber	375,350	16.7
		646,160	
	Land we get timber from with some to much reduction of timber		28.8
15 & 15i	Timber (Mod & Intense)	439,330	19.6

SUMMARY

No timber available	24.3
Some timber possibly available	5.3
Timber available now or future at much reduced yields	21.8
Timber available at some to much reduced yields	28.8
Timber optimization	19.8
	99.8

217

April 8, 1983

William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden:

This letter is to register my support for including all 36,000 acres of land currently designated wilderness into the 10 Lakes wilderness area.

I am familiar with the region and anything less will reduce the quality of the 10 Lakes area as wilderness to little more than political expediency.

This is an opportunity for the U.S.F.S. to represent the public's interest rather than to continue to act as a partner to the timber industry in continual over exploitation of the public's timber and environmental resources too add to the devastation from past logging practices adjacent to the 10 Lakes area by continued logging and roading is not serving the public interests.

Sincerely,

Dale E. Fredlund
P. O. Box 3047
Butte, MT 59702

1c

April 8th-83
218

Dear Mr. William E. Morden

This letter is in regard to the "TEN LAKES Area."

I favor, Wilderness, not multiple use.

My understanding is that the Kootenai National Forest, is, and will be short on on the RPA wilderness acreage.

I believe the area contains the necessary values to support grizzly bears and some wolves

The area appears to be low in needed timber value. Even with this area as wilderness I believe you can meet and exceed your RPA demands for timber a motorized rec. Let it be wilderness

Respectfully
Larry N. Larson

Diamond H Bar L.R
Ovando MT 59852

4-7-83

219

FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST
LIBBY, MONTANA

DEAR MR. MORDEN;

I AM WRITING TO PUT FORTH MY SUPPORT FOR THE TEN LAKES
VILDERNESS AREA IN THE KOOTENAI NATIONAL FOREST.
THE AREA IN QUESTION IS A VALUABLE ROADLESS AREA WHICH WE
V MONTANA, AND THE NATION, NEED DESIGNATED AS A WILDER-
ESS AREA. ALONG WITH PROVIDING MUCH NEEDED HABITAT
SR THE GRIZZLEY BEAR, WOLF, AND MOUNTAIN CARIBOU, ALL
NDANGERED SPECIES, IT PROVIDES IMPORTANT HABITAT FOR
HE N.W. MONTANA ELK HERDS.

SINCE THE KOOTENAI NATIONAL FOREST CAN ALREADY MEET
TS TIMBER HARVEST GOALS FROM LAND ALREADY SLATED FOR LOGGING,
UT CAN NOT MEET ITS WILDERNESS GOALS, WHY THE HESITATION
O SET ASIDE THIS WILD AND SCENIC AREA AS WILDERNESS?
NOWMOBILING AND BORDERING ROADS AND CLEARCUTS ARE NOT
ULAND ARGUEMENTS AGAINST THIS. MANY OF OUR CURRANT WILD-
RNESS AREAS ARE BORDERED BY ROADS AND/OR CLEARCUTS. AND
EMOVING 35,000 ACRES FROM SNOWMOBILE ACCESS STILL LEAVES
VER TWO MILLION ACRES OPEN FOR SNOWMOBILES IN THE
OOTENAI N.F.

THE WILDERNESS VALUE OF THS LAND IS MUCH MORE SIGNIFICAN
HAN THE TIMBER VALUE, WHICH IS COMPARATIVELY LOW FOR THE
CREAGE PROPOSED TO BE LOGGED. AND WITH ONLY THE CABINET
.T. WILDERNESS SET ASIDE IN THE CORNER OF MONTANA (AND THAT
; SORELY THREATENED BY MINERAL EXPLORATION!), THERE IS A
EFINET SHORTAGE OF WILD LANDS IN THIS PORTION OF THE STATE.
ITH CURRANT WILDERNESS AREAS BEING SUBJECTED TO THE
RESSURES OF HIGH USE, IT IS OBVIOUS WE NEED MORE OF THESE
REAS.

PLEASE RECORD MY SUPPORT FOR THE TEN LAKES WILDERNESS
REA, 35900 ACRES, ALTERNATIVE C.

SINCERELY,

GREG QUELLETTE
BOX 15

C: GOVERNOR TED SCHWINDEN
REP. PAT WILLIAMS
SENATOR JOHN MELCHER
SENATOR BEN

221

April 9, 1983

Bill Morden, Forest Supervisor
Kootenai National Forest
Libby, Montana
Dear Sir:

I am writing to express dismay over the draft Kootenai Forest Plan. I feel that several changes are needed:

It appears unreasonable to add 6000 miles of road to an area already crisscrossed by 6000 miles of vehicle ways. Roads + their inevitable traffic hamper wildlife, cause erosion and greatly diminish primitive recreation experiences.

Old growth areas should not be logged, nor should riparian areas and grizzly habitat (+ potential habitat); water quality, species protection + enhancement, ecosystem diversity and primitive recreation are values protected when we protect these areas. Montana has already lost too much of these special areas.

I support Alternative C - 36,000 acres of wilderness at Ten Lakes.

I oppose paving and widening the last unpaved 17 miles of the Yaak Road.

I look forward to seeing these attitudes reflected in the final plan.

Malinee Crapsey
606 North Ave. West
Missoula MT 59801

225

Boogie Haven

April 7, 1983

William Morden
Forest Supervisor
Kootenai Natl. Forest
Box AS
Libby, Montana 59923

Dear Supervisor Morden,

We are writing to urge the Forest Service to adopt a 36,000 acre Ten Lakes Wilderness area. The Ten Lakes roadless area is an incredible recreational area; but even more important is its use by several species of rare & endangered animals. There is strong evidence that the last remaining woodland caribou herd in the lower 48 use the Ten Lakes areas along with the grey wolf & grizzly bear. All three of these species are dependent on the undisturbed habitat of the Ten Lakes area & therefore its wilderness designation.

We hope that the FS will re-consider its preliminary recommendation & expand ~~the~~ it to a contiguous 36,000 acre wilderness proposal for the Ten Lakes area

Thank you for your time & please make our comments part of the record.

Sincerely—
Ruth & Michael Gardner

April 10, 1983

Re Future Designation of the Ten Lakes Scenic Area

Dear Mr. Morden:

We are strongly in favor of expanding the present Ten Lakes area in Lincoln County and giving it full wilderness status because of its unspoiled beauty and because it is grizzly habitat, something we desperately need more of.

We have appreciated the Tobacco Valley's remoteness and purchased land there for that reason, and we plan to retire there. The only thing that has ever bothered us about the area are the clearcuts visible throughout the region.

We feel this is detrimental to the tourist industry, which is important to the Tobacco Valley and could become very prosperous there due to the proximity to Canada. We are surprised every summer at the number of Canadians we see using camping facilities there and patronizing businesses in Eureka.

We believe that a wilderness area

there would greatly enhance the region's attraction to tourists. And we must be looking to the future. Only a tiny amount of wilderness remains - it would be a travesty to let it go the way of the unprotected lands.

The timber base for that area is large enough. Ten Lakes is the public's land and what the nation needs and will increasingly need in the future is land for endangered species habitat and a place of unspoiled beauty for solitude and recreation. Living here, the residents of Montana tend to forget how sorely lacking the rest of the nation is in big game habitat and unspoiled wild land.

We sincerely hope that you, as the appointed guardian of this area's national forest lands, will hear our argument and act to preserve as wilderness for future generations the entire 35,900 acres of the Ten Lakes Scenic Area. We thank you.

Sincerely,

Robert & Kathryn Lance
1280 Bull Pine Dr.
Hamilton, Mt 59840

229B-1 APR 12 1983

April 10, 1983

PP&S 1983
DIRECTOR
SECTY
CL-TYPIST
CL-TYPIST
PROG-CL
PROGRAMMING
PROG ANAL
PROG ASST
BUDGETING
BUDGET ANAL
BUDGET ANAL
PLANNING
FOREST
SPEC ST
SOC SCI
ENERGY
CIVIL ENG
OPER RES
SUPPORT
ECON
ECON
SOC SCI
PROG ASST
COMP SPEC
CARTO TECH
RARE II
POST FILE

Re: Future Designation of the Ten Lakes Scenic Area

Dear Mr. Coston:

We are strongly in favor of expanding the present Ten Lakes area in Lincoln County and giving it full wilderness status because of its unspoiled beauty and because it is grizzly habitat, something we desperately need more of.

We have appreciated the Tobacco Valley's remoteness and purchased land there for that reason, and we hope to retire there. The only thing that has ever bothered us about the area are the clearcuts visible throughout the region.

We feel this is detrimental to the tourist industry, which is important to the Tobacco Valley and could become very prosperous there due to the proximity to Canada. We are surprised every summer at the number of Canadians we see using camping facilities there and patronizing

businesses in Ennis.

He believes that a wilderness area there would greatly enhance the recreational attraction to tourists. Now we need be looking to the future. Only a tiny amount of wilderness remains - it would be a travesty to let it go the way of the unprotected lands.

The timber base for that area is large enough. In fact the public's land, and what the nation needs and will increasingly need in the future is land for endangered species' habitat and a place of unspoiled beauty for solitude and recreation. Living here, the residents of Montana tend to forget that sorely lacking in big game habitat and unspoiled wild land the rest of the nation is.

He sincerely hope that you, as the appointed guardian of this area's national forest lands, will hear our argument and act to preserve as wilderness for future generations the entire 35,900 acres of the Gen Lakes Scenic Area.

Sincerely,

Robert & Kathryn Lance
280 [illegible] Pine Dr.
[illegible] 59804

230-1

Law Offices of
Mc Garvey, Lence & Heberling
a partnership of professional corporations
745 South Main
Kalispell, Montana 59901-5399
Telephone (406) 755-5032

Dale L. Mc Garvey, P.C.
John A. Lence, P.C.
Jon L. Heberling, P.C.

of Counsel
Diane B. Walsh

April 11, 1983

Mr. Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

Re: Comment on Forest Plan

Dear Mr. Morden:

I note that at the same time the Montana Legislature has designated the grizzly as the state animal, the Kootenai Forest is issuing a plan which has drawn a jeopardy opinion. I feel that if grizzly habitat is adequately protected, then other wildlife values will also likewise receive adequate protection. The key is roads. Additional miles of roads lead to reductions of habitat. Accordingly, it would appear that road mileage should be frozen at current levels. The plan assumption that closing roads has the same environmental impact as leaving areas unroaded is simply not creditable. Industry foresters find such an assumption silly.

Also, I suggest stricter protection in riparian areas to ensure that streams remain undisturbed. The riparian areas are essential for water quality and wildlife. Strict protection is necessary to mitigate past practices.

I urge support for alternative C for a $36,000 acre 10 lakes wilderness. This is necessary, particularly in light of the suggestion of the astounding 12,000 miles of roads for the forest.

In light of the intensity of opposition to the Kootenai Forest Plan, it would appear that a reworking is in order.

7 30-2

Otherwise, it is likely that the plan will be tied up in litigation for some time.

Yours sincerely,

Jon L. Heberling

Jon L. Heberling, P.C.

JLH:jd

cc: Bill Cunningham
John Gatchell

April 8, 1983

231

Mr. Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Mr. Morden:

Our group has had an opportunity to review the Kootenai Forest Plan and we are disturbed by what we have seen. In particular, we are concerned about the magnitude of proposed logging and associated roading, the non-wilderness decision for the Ten Lakes area, increased sedimentation and associated reductions in migratory fish populations, and the failure of the plan to provide for recovery level grizzly bear populations. The latter is probably illegal in view of the recently issued jeopardy opinion issued by the U.S. Fish and Wildlife Service.

Mineral development being contemplated in the Cabinets by Borax and ASARCO could diminish the values of that great wilderness. The potential for loss in wilderness quality of the Cabinets coupled with the fact that this is the most highly used wilderness in Montana should make it obvious that wilderness is at a premium on your forest. We feel that not recommending the Ten Lakes area for wilderness is a serious mistake.

Problems with grizzly habitat, stream sedimentation, and reduced fish populations are all related to the levels of roading and logging proposed. The forest cannot possibly maintain the proposed level of disturbance without giving up other resources that Montanans value and in many cases account for their reason for living here.

In summary, the plan poorly balances timber values against other valuable resources including grizzly bear, stream fisheries, wilderness, and other wildlife. We feel it is imperative that you give these resources greater consideration in future revisions of your plan and that roading and logging be reduced.

Sincerely yours,

Gary L. Ingman

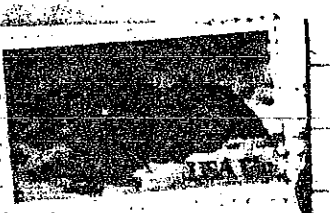
Gary L. Ingman
Spokesperson

HELENA FOREST CONSERVATION COALITION
P.O. BOX 1257 • HELENA, MT 59624

VANISHING WILDLIFE by Patricia Wynne

4818 Western Forest Habitat. Aleutian Canada goose, grizzly bear. Snowy owl.

See other side



Alternative C is needed.
Snowmobile users have
millions of other acres in
federal lands in NW Montana.
The habitat is irreplaceable
especially with increased
strain of mineral, oil, gas
exploration in Cabinets &
elsewhere. Timber value
is [illegible] — not worth
[illegible]!
As a native Montanan & family
[illegible]
[illegible]

POST CARD

To William E. Morton
Forest Supervisor
Kootenai Nat'l Forest
Box AS
Libby, MT 59923

RETURN ADDRESS
1305 [illegible]
Kalispell, MT 59901

THE EVERGREEN PRESS, WALNUT CREEK, CALIFORNIA 94596 PRINTED

Printed on 100% recycled paper

Mr. Marden,

I have ~~reviewed your proposal to increase~~ roads in timber harvesting areas in your forest. I urge you to provide more roadless recreation and areas to protect grizzly & other animal habitat. Too many more roads will be incompatible with this animal habitat! Oppose paving & widening of the last unpaved 17 miles of the Yaak road. Support full recovery of grizzly - more habitat protection & less roading.

Sincerely, Karen Pettigrew

April 11, 1983

236

William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt 59923

Dear Mr. Morden,

We strongly urge you to support alternative: guring Wilderness Protection for the entire Ten Lakes Wild Area of 36000 acres. This is irreplaceable habitat for grizzly bear, wolf, maybe the Woodland Caribou and other wildlife species which depend on non-human dominated wildlands. These lands are not needed for timbering and Ten Lakes is one of the few places left with Wilderness characteristics which we Americans have an obligation to preserve. Snowmobilers and other "off-roaders" have plenty of other places to use for their sports. Let's preserve some lands that are just for wildlife - there is an acute shortage of wilderness and primitive lands.

Pat Simmons
Dick Krauric
1103 Cherry Dr
Bozeman, Mt 59715

April 11, 1983
Box 273
Kalispell, MT. 59901

237-1

William E. Morden
Forest Supervisor
Kootenai National Forest
BOX AS
Libby, MT. 59923

Dear Mr. Morden,

I am writing to comment on your proposal for the Ten Lakes Study area in Northern Lincoln County. I encourage you to reconsider your recommendation and instead recommend that the Ten Lakes area become Wilderness. So much of the Kootanai Forest is open for timber development ~~the~~ already and I feel that

237-2

the Ten Lakes area needs protection from development. This is especially important to protect the endangered wildlife in the area, especially the grizzly and (hopefully) Mountain caribou.

As a former Lincoln County resident who uses and appreciates Wilderness I urge you to classify the Ten Lakes area as such.

Thank you.

Sincerely,

Gail Leonard

238

April 12, 1983

Jennifer A. Corrion
214 W. Main
Cut Bank, MT 59427

Dear Mr. Morden,

I am writing to express my concern regarding the "no wilderness" recommendation for the Ten Lakes area of the Kootenai National Forest. I understand the 36,000 acres surrounding Ten Lakes is the home of the endangered woodland caribou, grizzly bear, and grey wolf. I'm sure you know these animals are dependent on the undisturbed habitat of the area. The proposed 18,600 acre core "scenic" area cannot ensure their survival since the opening of oil and gas leasing and salvage timber sales would still be allowed. Couldn't the Forest meet its timber harvest goals outside the Ten Lakes area, and in so doing preserve one of its few pristine wildlands? I urge you to designate Ten Lakes as a wilderness area.

Sincerely, Jennifer Corrion

239

April 11, 1983

Forest Supervisor
Kootenai National Forest
Libby, Mt. 59923

Dear Sir;

Concerning the Ten Lakes Basin Wilderness Study: We are against making this area a Wilderness. We have studied the plan adopted by the Tobacco Valley Citizens Study Group and believe this is the best plan for this area.

We strongly urge you to endorse this plan.

Respectfully,

Mr & Mrs. John Holder
Eureka, Mt. 59917
Box 4

RESPONSE TO THE KOOTENAI NATIONAL FOREST PLAN

1. One point missed in the ISSUES is information to the public. I am not suggesting an I&E program as part of the plan but the door could be left open for media an public suggestions as to how they would like to receive information.

This could permit input in some of the day to day decisions such as road standards and locations. If reasons like residual values, total timber to be transported, time frame(s), esthetics etc. are explainable I am sure there will be better acceptance.

Example: You are making fisheric studies in the riparian zone. You find you can raise fertility X% by raising water temperature Y°. You may have reason then for small clearcuts to get more solar reception. Be able to point to past experience or research that will establish credibility.

3. I believe it would be better to leave road standards and general locations to the resource manager. This would be different from more stringent Engineering policy. There is nothing more frustrating than for a forest user to hear "The reason, it's policy."

6. Ten Lakes MWSA: I fully support the FS "Proposed Plan". Beside the proposed Scenic Area thre is considerable land that will remain DeFacto wilderness and scenic area. Economics and other management opprotunities will cause these areas to remain untouched.

Bark Beetle Problem: (Terriault Lakes). I am not knowledgeable about the timber types over most of the area but in the basin surrounding Big Terriault I am positive that the almost pure stand of spruce is in big trouble. My visual estimate is that 60+% of this stand of spruce is infested with Spruce Bark Beetle.

I would support a well conceived trap tree program with removal of the traps guaranteed in July or August.

General: I am agraduate Forester, retired from the USFS in 1972 with over 30 years service. I was born and raised in the Whitefish area, worked 3 seasons in the So.Fk. Primitive area (Now Bob Marshall). From '54 to '57 I worked in the Bark Beetle Progam on the Glacier View Dist. Some of the knowledges acquired are still retained.

Thanks for the chance to say my piece.

Sincerely,

Bert W. Morris

BERT W. MORRIS
SR-1
Troy, MT 59935

242-1

NORMONT DEVELOPMENT CO.

Box T
Libby, Montana 59923

Stuart Swenson, President
Linda Pival, Secretary-Treasurer

Office 406-293-4342
Mineral Plaza Building, Suite 1

April 13, 1983

Mr. Bill Morden
Forest Supervisor
Kootenai National Forest
Libby, Montana 59923

Dear Bill:

In commenting on the Forest Plan, I believe it is inadequate in the following areas:

Roads: 1. It does not address the long term or even the short term problems of timber economics. Building roads in the hope of prorating costs over a long period of ten years or more is not possible in today's economy.

2. Deficit sales caused by excessive roading is bad economics and a waste of the taxpayers' dollars.

3. Excessive roading is jeopardizing our elk and deer populations, and ruining our trout streams.

Unemployment and Economics of Lincoln County: This plan does not address the economics and social issues of the community, instead it will perpetuate existing high unemployment.

Lincoln County has consistently had the highest unemployment in the state. (1973 to 1980 average unemployment is about 12%. 1980 and 1981 average 15%, 1982 averages 21.5%)

The Plan does not address the high cost of unemployment to local, state and federal governments.

The Plan is totally dominated by timber production and road building. The multiple use concept has been thrown out the window. It does not meet the needs of fish and wildlife and the Grizzly plan is totally unrealistic.

The Plan does not allow this community to diversify its economic base. The Plan is not in step with local and state goals

to develop tourism.

Employment in timber-dependent communities has been declining and will be declining in the future and our only hope for a good economy lies with tourism and recreation.

Timber Sales Program: More Small Sales

1. Sales would be more competitive and less chance for bid collusion.

2. Small loggers are more efficient as St. Regis Paper Company has found.

3. Small sales are less damaging to the environment.

4. The small loggers contribute more to local and state economies. They buy their goods and services in their communities or state.

5. It does not seem economical to haul logs 125 miles to be milled. If there are more small sales, another mill would locate in the Libby area, but they cannot compete against Louisiana Pacific or Burlington Northern on sales.

The Kootenai National Forest should not be the sacrificial lamb to meet timber demands. Roading and cutting of the magnitude proposed in the Plan is not in step with sound economics or sound land management.

Solutions:

1. Involve people in the community at the start of the planning process.

2. Allocate more land base for developed recreation, roadless recreation and more wilderness.

3. Provisions for nordic skiing and hut system for touring. Elevation and aesthetics are important criteria.

4. More quality elk and deer hunting. This means more road closures and more careful logging practices.

5. Work for improved fisheries. Rehabilitate habitat ruined by poor logging practices.

7 12-3

6. Allocate more funds for recreation. Funds for recreation in the Kootenai have been practically zero.

Specific Suggestions:

1. Ten Lakes should be designated a Wilderness (the full 36,000 acres).

2. Maintain the roadless status of the Trout Creek Area and include more road closures around the area.

3. Rehabilitate the Pleasant Valley Fisher and the Main Fisher River. The fishing has declined in both streams, because of past logging.

4. More road closures on the existing forest.

5. More protection of riparian areas in the forest. These areas are unique on the Kootenai. Big Creek, Trout Creek, and Libby Face.

In conclusion, a balanced use of the Forest would provide timber at reasonable prices, recreation and tourism could thrive, providing a better economy and yielding a greater net return to the Forest.

Thank you for reading this long letter.

Very truly yours,

Stu Swenson

Stu Swenson

cc: T. Coston
Governor Schwinden
Senator Max Baucus
Representative Pat Williams
Senator John Melcher
Representative Ron Marlenee

243-1

Flathead Chapter
National Audubon Society
Post Office Box 715
Big Fork, Montana 59911

April 11, 1983

Bill Morden
Forest Supervisor
Kootenai National Forest
Box 4
Libby, Montana 59923

Dear Mr. Morden;

The Flathead Chapter of the National Audubon Society is deeply concerned with the proposed Forest Plan for the Kootenai National Forest. As conservationists our special interest is associated with endangered and threatened species; old-growth forest habitats and their biological constituents; riparian habitats that receive significantly greater use by most species of wildlife as well as the aquatic communities dependent on clean water; and wilderness environments where the natural processes are left to function without the benefit of or human interactions. The proposed plan of action falls far short in sustaining these forest components.

More specificly, old-growth forests provide the necessary complex habitats for many species of animals such as the pine martin, wolverine, northern flying squirrel, goshawk, Cooper's hawk, pileated woodpecker, 50 species of cavity dependent animals, and perhaps the woodland caribou. There will be a criticle shortage of this habitat component in the areas where timber production will be maximized. A diverse forest provides stability as well as productivity. Eliminating the old-growth component may have a detrimental impact as a result of insect or disease outbreaks. Old-growth stands could be reasonably managed for in a well distributed pattern throughout the forest even in areas of maximum timber production.

Timber harvest is probably necessary is some riparian zones. However 100 foot buffer zones are not felt to be adequate along streams other than first and second order. We feel the plan fails to realize the importance of the riparian areas and was inadequate in addressing goals. Furthermore the plan fails to recognize the probable results of logging on stream impacts and fisheries such as sedimentation, temperature and flow changes,

743-2

habitat loss, and spawing site modifications.

It is felt that not enough consideration was given to the grizzly bear. To date information is lacking on habitat requirements, animal numbers, and home ranges in the United States let alone the Kootenai National Forest. Excluding the Cabinet Mountains the grizzly bear habitat constituent elements have not even been mapped. How then can Management Area 14 hope to provide a balance of cover and forage for the grizzly bear? How was this determined?

In addition to the threatened grizzly bear, the gray wolf and woodland caribou were not even mentioned. Yet verified sign of the caribou has been found in the Ten Lakes area. For this reason Flathead Audubon would like the entire 36,000 acre Ten Lakes Area classified as wilderness. Furthermore the area meets all the requirements for a wilderness designation.

We are concerned about the increase in access roads under the proposed plan. Twelve thousand miles of road will surely result in more restrictive hunting seasons due to increased mortality and loss of nidding cover, loss of snags to fire wood gathering, and to disturbance of the grizzly bear with increased poaching. We would like to see administrative closures on all new roads and in grizzly bear habitat structural raod blockades.

We were disappointed in the Kootenai plan not only because of the emphasis on timber production but also because the plan failed to adequately address the other components of our forest. For example there was much ambiguous wording such as: "manage up to 10% old growth" (p. III-27 & 32), "normally closed road" (p. III-28), "Strive to maintain travel corridors of 600 feet" (p.III-33), "Dozer scarification generally not acceptable (in riparian areas)" (p. III-59), "Avoid harvesting of both sides of a stream simultaneously" (p.III-59), ETC.

The lack of concern for forest components that Audubon feels important is obvious from the plan. Maintaining old-growth, animals of special interest, wilderness, and fisheries values barely survives on paper let alone on the ground for the next 50 years.

Sincerely,

Craig J. Hess

Craig J. Hess
Vice President
Flathead Chapter National Audubon Society
P.O. Box 715
Big Fork, Montana 59911

246

G. Douglas Follett
Box 196
Whitefish, MT 59937
April 12, 1983

Mr. William Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir

I would like to express my concern and opinion regarding the forest management plan for the Greater 10 Lakes Wilderness Study Area. I won't belabor the point of our experiences of the last half a century in the region. I will say only that from the 1930's when my father came up from the Elk River to the head waters of the Wigwam River on fishing trips, to the later years of staying in the Wolverine Cabin when Grizzley bears left their tracks in the snow around the door and foraged on the talus slope above Rainbow Lake, or left their sliding paths in the steep snow slopes on the side of Green Mountain in the spring, the area has held a special place in our hearts and memories. I was present when the mutilation of the upper Whitefish, Red Meadow, Stryker Ridge and most of the North Fork began. Today the people who cut and ran are dead and gone, but what they left behind is not. The generations of today and the future can only wonder what they lost. I don't have to wonder, I know. I would like to think that they will not have to wonder in the same way about the Greater 10 Lakes Area. Much that should have been protected is already gone. Certainly what is left of the original wilderness character should be preserved as much as possible. The few white-wood boards that will come from the area will make little difference to the long range economy of the region. The preservation of this resource as a wilderness, or near wilderness, will have untold value forever.

In making this crucial decision I ask you simply to search your soul and to make that choice which will allow you to say to your children and grandchildren and to everyone else, "I was responsible for making the decision that resulted in what you see and what you have on the public lands of the upper Kootenai and the Greater 10 Lakes Area and I am proud of what I did."

Please decide in favor of alternative C and the 36,000 acre 10 Lakes Study Area as a wilderness.

Yours truly

G. Douglas Follett

G. Douglas Follett

jkl

249-1

1

P.O. Box 8446
Missoula, MT 59807
April 11, 1983

William E. Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir:

I support Alternative C, wilderness protection for the entire Ten Lakes Wilderness Study Area of 36,000 acres, for the following reasons.

There is a critical shortage of wilderness in northwestern Montana. The Cabinet Mountains Wilderness Area, currently under seige by mineral exploration companies, is the only designated wilderness in the northwest portion.

The development of a "staging area" next to the WSA boundary for snowmobiles by the Forest Service is apparently in violation of the intent of S.393. However, this development does not, in my opinion, provide justification for a recommendation against wilderness. Much of the federal land in northwestern Montana is already accessible to snowmobiling and is closer to population centers. Ten Lakes need not be another "sacrifice area".

The WSA provides habitat for the threatened grizzly bear and other wilderness-dependent species, and should be preserved as bear habitat.

Because timber values in the WSA are low, the withdrawal of the area (16,500 acres) proposed for logging would be an insignificant reduction in the more than 1.5 million acres pro-

posed for logging and roading on the Kootenai Forest.

Because Ten Lakes rates high in all wilderness attributes, it should be part of the Wilderness Preservation System.

The Ten Lakes study document admits that elk and quality hunting, the grey wolf and grizzly, most RPA goals, and a forecast acute shortage of wilderness will all be accommodated by wilderness designation.

As a native Montanan I'm concerned about the dwindling wildland resource. Therefore, to maintain the "status quo" in the Ten Lakes WSA, I support Alternative C.

Sincerely,

Allen E. Hells

254B-1

TEN LAKES REVIEW TEAM, 4/14/83

UPON REVIEWING THE TEN LAKES MONTANA WILDERNESS STUDY ACT AREA REPORT & PROPOSAL I WOULD CHOOSE THE TEN LAKES CURRENT DIRECTION (NO ACTION) OR THE TEN LAKES PROPOSED ACTION PLAN.

TO ME BOTH OF THE ALTERNATIVES SEEM QUITE SIMILAR. I FEEL THE TEN LAKES AREA SHOULD BE MANAGED AS A LOCAL SCENIC & PRIMITIVE AREA. MANAGED AT A FOREST LEVEL, ALLOWING FOR PUBLIC INPUT & ALLOWING MANAGEMENT FLEXIBILITY. THE PRESENT SCENIC AREA SEEMS QUITE ADEQUATE. THE AREA AROUND BLUEBIRD BASIN & POORMAN MTN. IS PRIMITIVE & SCENIC & SHOULD STAY THIS WAY. THE AREA AROUND TWERRIAULT LAKES IS DEVELOPED FOR HUMAN CONVENIENCE & SHOULD STAY THAT WAY. THE AREA WAS PLANNED BY LOCAL PEOPLE WHO FOR THE MOST PART SATISFIED WITH PRESENT TEN LAKES MANAGEMENT.

A CONCERN I HAVE FROM A TIMBER & RESOURCE MANAGEMENT STANDPOINT IS THAT MUCH OF THE PROPOSED WILDERNESS AREA CONTAINS HIGHLY PRODUCTIVE TIMBER SITES. IT WOULD BE WRONG TO WITHDRAW THEM FROM THE

FOREST'S COMMERCIAL FOREST LAND BASE. NORTHWESTERN MONTANA HAS ENOUGH WILDERNESS NOW & WHAT WE HAVE ISN'T USED ENOUGH.

IF THIS PROPOSED PLAN FOR EXPANDED WILDERNESS DID GO THROUGH, HOW MUCH ACREAGE BUFFER SURROUNDING THE WILDERNESS AREA WOULD BE REQUIRED? THE PROPOSED AREA HAS MANY ZIGS & ZAGS WOULD STRAIGHT LINES BE DRAWN BETWEEN POINTS? THIS COULD MEAN THE LOSS OF MORE COMMERCIAL FOREST LANDS. WHERE WOULD IT STOP? EVENTUALLY ONLY THE GRAVES CREEK - THEORIAULT LAKES CORRIDOR WOULD NOT HAVE MAJOR MANAGEMENT RESTRICTIONS ON IT.

THE WIGWAM HAS & CAN PRODUCE LARGE VOLUMES OF VALUABLE WOOD. TO TAKE THAT POTENTIAL OUT OF INTENSIVE WOULD BE A MISTAKE. AREAS LIKE TEN LAKES CAN PRODUCE NEW DOLLARS (TIMBER STUMPAGE) & CIRCULATING DOLLARS (TOURIST DOLLARS), LET'S MAXIMIZE THESE DOLLARS, BY MANAGING THE AREA AS IS. LET'S KEEP TEN LAKES AS IS.

SINCERELY YOURS,

JOEL A. NELSON
RT. 3 - BOX 1004-A
LIBBY, MT.
59923

255B-1

867 North Main
Kalispell, MT 59901

William E. Morden
Forest Supervisor
Kootenai National Forest
Libby, MT 59923

April 12, 1983

Dear Sir,

The Ten Lakes Montana Wilderness Study Act Area - Report and Proposal is insensitive, inadequate, biased, illogical and misleading. It needs to be rewritten.

The Report is insensitive to the allocation issues involved because it expresses no feeling for the land involved. I searched in vain for a word indicating that the writers of the Report had actually hiked thru the Ten Lakes area. If you want the public to support your recommendations you must convince them that you made a sincere, investigative effort. This can only be done by writers with an intimate, first hand knowledge of the Study Area. I have enclosed another wilderness study report by James Bradley which illustrates what I mean by sensitivity. I hope it is of some value to you.

The Report is inadequate for at least five reasons:

1. It does not adequately describe the wilderness resource as required by Forest Service Manual 2321.11. Surely, the wilderness resource description requires more than 41 lines. (III-3, III-4) At times I thought I was reading a timber management report. Readers unfamiliar with the Study Area can only conclude the wilderness resource is almost non-existent. A

proper wilderness study should give the reviewer a feel for the land. Opportunities for solitude and primitive recreation, geological features, trails, lakes, streams, habitat types, wildlife and areas of natural beauty should be described in detail. The Report should be the next best thing to a visit to the area.

(2) Other unquantifiable benefits should be added to the lists on pages II-7, II-18 and II-19. These additions should include the value of a scientific and natural benchmark, the satisfaction many people experience just from knowing an undisturbed area exists even if they never use it (do not underestimate this satisfaction), and the quality of the recreational experience. If you can rate visual quality why can not the recreational quality be rated?

(3) No mention is made of the possibility that mountain caribou may exist in the Study Area. The habitat components of the caribou also need to be listed. A complete list of fish and wildlife in the Study Area should be included with a special notation for those dependent on wildlands and old growth. (III-5, III-6)

(4) A map showing the exact location of the mining claims should be included. (III-9)

(5) Finally, the Report is inadequate because nowhere does it state why the Proposed Alternative was chosen over the other Alternatives. Was it because of the timber and minerals lost to development? The need for snowmobiling area? A feeling that enough Wilderness exists nearby? The Report should clearly state the reasons for picking the Proposed Alternative so that reviewers can judge the

adequacy of those reasons.

The clearest example of the Reports anti-wilderness bias is the pictures included at the beginning. (ii–vi) These pictures lead the reader to believe the Study Area is best known for its clearcuts and roads. Why were no views of the Study Area's interior included? I think this point is important since the congressmen who will ultimately decide on classification will be misled by the printed photographs. The same photos will bias other readers unfamiliar with the Study Area against wilderness classification as well.

The Report is illogical for three reasons:
① It states (III–4) that roads and logging activity at the Study Area boundary detracts from a feeling of solitude. The implication is that this detracts from the Area's wilderness value. This reasoning disregards the fact that it is F.S. policy to develop lands outside designated wilderness without regard to the effects on the Wilderness. This policy means that, eventually, all designated Wilderness Areas will be bounded by roads and development. Therefore, even if the forest land outside the Study Area's borders are undeveloped now they will eventually be roaded and logged if the timber resource warrants it. The present proximity of exterior roads and development should not be used as a criteria for judging wilderness quality if that development will eventually occur anyway. The F.S. can not have it both ways. Also, I have experienced plenty of solitude while perched on mountain tops surrounded by not to distant signs of man. The type and exact location of border disturbances are more important than total amount.

(2) The Report states (IV-15) that prohibition of snowmobiling could lead to law enforcement problems. The implication is that this is a reason for not classifying the area as wilderness. These kind of legal problems occur on almost all newly created Wildernesses. Since when do illegal acts determine F.S. policy?

(3) I fail to understand how the Proposed Action could be picked over Alt. C in light of the statement concerning RPA goals. (IV-2) This paragraph really says that if the entire Study Area is placed in wilderness classification the Kootenai N.F. can still meet all its RPA resource goals with the exception of the wilderness goal. Even with the addition of the Study Area the wilderness goal will not be met. If this is true why wasn't Alt. C selected? Why isn't there an attempt to meet the wilderness goal especially when classification would not detract from the Kootenai's ability to meet its other goals? Does not the national need for wilderness, which is a rapidly shrinking resource, outweigh the slightly increased local benefits resulting from more commodity production? - even accepting the Report's economic analysis.

The misleading statements in the Report and Proposal are numerous.

(1) It is indicated (IV-2, last ¶) that all alternatives will protect the primitive core area of the Study Area. Since timber salvage sales and oil and gas development can occur under roadless management designation but not under wilderness classification it is misleading to say all alternatives will protect the core area equally. Roads and pipelines will follow oil and gas discovery (IV-12, ¶2) under a

non-wilderness designation. I believe many people are being mislead by the F.S. into thinking that roadless designation gives the same protection as wilderness classification. The differences should be clearly stated. Also, on pages IV-16 and IV-17 a clear statement should be made that the future wilderness option would be irreversibly lost on at least 17,300 acres under the Proposed Action (35,900 acres - 18,600 acres). If development occurs in the proposed roadless area the future wilderness acre option would be even more reduced, if not eliminated entirely.

(2) The effect of wilderness classification on mineral and oil and gas exploration needs to be rewritten. (IV-5) After Jan 1, 1984 no mineral exploration or development will be permitted in designated wilderness except on existing, valid claims. Also, present policy, backed by Congress, prohibits oil and gas exploration and development in designated wilderness areas and in wilderness study areas. This is not true for roadless management areas. The reason no leases have been issued for the Ten Lakes Study Area (III-7) should be clearly stated. It is not from lack of interest by the oil companies but because the Area is protected by the Montana Wilderness Study Act. Isn't wilderness classification the best protection for Ten Lakes from oil and gas development? These points should be clearly stated so that people understand the much better protection wilderness classification offers compared to administratively protected roadless management areas.

(3) Present snowmobile use seems to be used as a reason for non-wilderness classification. (II-18, 49)(III-2, 69)

Despite this reasoning the Report does not state how much snowmobiling use occurs or where it occurs. It also does not state how many other acres of Kootenai N.F. land are open to snowmobile use. These facts should be considered if snowmobiling is to be used as a criteria for judging the Area's future. The RARE II[1] report listed .5 MRVD of dispersed motorized use in the Study Area. How much of this use was due to snowmobiles? How much of an increase has occurred since 1977? Where? How much of the increase is due to the fact that the F.S. helped develop a snowmobile staging area and trail at the Study Area boundary. Is this encouragement of a non-wilderness activity in violation of the Montana Wilderness Study Act

(4) The airline mileage listings (III-5, IV-2-A) seem to indicate that classified wilderness is abundant in the general area. Ignored is the fact that the Kootenai N.F. has a low percentage of wilderness and that the Study Area is only 1.6% of the Kootenai's total area. It should also be noted that 7 out of 12 listed areas are not yet classified as wilderness. They should be deleted from the list. The listings also hide the fact that use is increasing at all neighboring designated wilderness areas and that those areas are reaching their capacity for more use. This situation indicates a need for more wilderness not less. Finally, the air miles are completely misleading in terms of car travel time.

---

[1] footnote page 85, Table 11, Corrections To The Montana Supplement To Draft Environmental Statement Roadless Area Review and Evaluation August 30, 1978

(5) The chart (II-21) and text (IV-8, A1) gives the false impression that timber cutting with retention and partial retention equals the visual quality of preservation. This is clearly misleading. Even the most sensitive harvesting methods will produce some visual change.

(6) The statements on size and quality (IV-2, A5) need more documentation. They read as if there will be a constant timber sale of 100 plus decibels completely ringing the Ten Lakes Study Area. Surely this is not accurate. Despite the size and irregular shape of the Area it retains an excellent wilderness environment. We no longer have the luxury of choosing areas it takes days to cross from which the sights and sounds of man's activities are completely absent at all times and locations. We must protect that wilderness resource we have left. A visitor's wilderness experience a few miles or a few thousand feet above man and time can be more than adequate.

(7) While wilderness designation would prevent most forms of direct wildlife management activities (IV-4, A7) a wilderness fire management program would help ensure the vegetation diversity necessary to supply a varied amount of forage and habitat. I realize that wildlife benefits are not the ultimate goal of a natural fire program but it is often one of the practical results.

(8) I am dubious about statements concerning the value of timber harvesting for the grizzly bear. (IV-9, A3-4) I recognize the potential benefits

in theory but have yet to see many actual benefits. One fact is clear. The grizzly presently survives best in roadless, wild country. If timber harvesting methods are to be used for the grizzly bear's benefit let it first be done on the commercial timberland of the Kootenai N. F. since these lands also contain grizzly bear habitat. I suspect the grizzly presently needs sanctuary areas like the Ten Lakes Study Area more than areas of increased forage created by timber harvesting.

(9) The compatibility of timber harvesting and wildlife is certainly not true for all species. (IV-11, A1) Those species needing old growth and wilderness should be listed.

(10) The statement (IV-14, A1) concerning access points and overuse of wilderness values should be extended to include all recreation classifications. If a lakeshore is pounded bare of vegetation, damage has occured regardless of the area's classification. Would this type of damage be ignored under the semi-primitive, roadless classification? The statement, as written, implies that over use and/or misuse occurs only under wilderness classification. It is also misleading to imply that corrective measures to prevent damage are needed only in designated wilderness areas.

In conclusion, I hope my comments are of some value to you when revising the Report and Proposal. A more detailed description of the wilderness resource is needed as well as a feeling that the Report reflects first hand knowledge of the Ten Lakes Study Area by the writers. It should not read like a rehash

of old reports and computer print outs. I urge all those involved in writing the Report and in making the allocation decisions to spend at least several days hiking and camping in the Ten Lakes Study Area.

The revised Report should also clearly state that wilderness classification is the best method available for protecting the Area from development. The differences between congressional wilderness designation and administrative U-3 roadless area designation should be explained in detail. The Report, as written, gives the false impression that roadless designation will protect the Ten Lakes Study Area as well as wilderness designation. I believe most people want to see the Ten Lakes country left like it is. The revised Report should clearly state that wilderness designation is the best method for achieving this goal.

I support Alt. C. This alternative will provide Northwest Montana and the nation with a quality wilderness of about 35,000 acres. I hope the revised Report reaches the same conclusion.

Sincerely,

Richard A. Kuhl

Richard A. Kuhl

Enclosure

ED LIVINGSTON
1007 5 ST
DEER LODGE MT 59722 13AM

Western Union Mailgram®

4-014418S103 04/13/83 ICS IPMMTZZ CSP HELB
4068462707 MGM TDMT DEER LODGE MT 72 04-13 1140A EST

256

WILLIAM MORDEN
USDA FOREST SERVICE
KOOTENAI NATIONAL FOREST
PO BOX AS
LIBBY MT 59923

18 DEER LODGE AREA RESIDENTS SUPPORT FOREST SERVICE PREFERRED PLAN NO MORE WILDERNESS

DONNA MCGUIRE
NORA AND RAY STOLP
BETTY AND ED LIVINGSTON
DIXIE AND DAVE WOZNY
TERESA AND BOB LEE
NANCY AND PAUL PLOYHAR
SHEILA AND TONY ROGERS
CHERYL AND LEE STOLP
STEVE PLOYHAR
BILL LIVINGSTON
CONNIE LIVINGSTON
CONCERNED CITIZENS AND WOMEN IN TIMBER BETTY LIVINGSTON PRESIDENT

1144 EST

MGMCOMP MGM

5241 (R 7/82)

TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

256

Columbia Falls, Mont.
April 12, 1983

Sirs:
I am writing in regard to the Forest Service plan for the Kootenay Forest. I prefer the Preferred Alternative Plan.
They do not need any more Wilderness! A lot of study has gone into this and we don't need to redo it.

A Concerned Citizen
Mildred Walter

Box 788
Col. Falls, Mt 59912

April 13, 1993

Dear Mr Morden

I support the Forest Service's Plan 4A. Right now I believe we need more jobs then wilderness. Good management leads to a healthy forest.

Sincerely Yours
Pam Nicol
Montana Women in Timber

Also I agree with the recommended action on the Ten Lakes mini forest.

PO Box 582
Darby MT 59829

261-1

To: Bill Morden 4/10/83
Forest Supervisor
Kootenai N. F.

Subject: Comments on the Kootenai National Forest Plan and the Ten Lakes Wilderness Study.

First of all, I apologize for waiting so long before responding, I have no excuse other than procrastination.

I would like to say that I recognize the monumental nature of the task represented by these documents and I believe that the folks who worked on them did an excellent and professional job.

I do feel that different philosophies concerning public land management are more appropriate than the ones obviously in the minds of the planning people in the K.N.F.

Concerning the proposed Forest Plan:

The long term sustained yield calculations and the yields shown in the proposed plan are based on a series of assumptions which (while I recognize that the people who developed this yield information felt that they had been conservative) are far too liberal to be in the best interests of the majority of our national public. For example: we haven't proved that the increases from commercial thinning of non-resinous species even offsets the volume losses from thinning induced injury to the crop trees. If we demonstrate an ability to consistantly achieve good results with this type of commercial thinning sometime in the future, then at that time we can update our yield calculations accordingly. In the meantime lets not take the chance of following a program which may lead to a declining flow of forest products sometime in the future if our commercial thins don't pan out, if we can't get 85% of our stagnated stands converted to productive stands within the next 30 years, if less than 85% of the acres designated as regulated are truely "commercial forest lands", and if regeneration failures continue to occur more frequently than our yield tables assume.

I would recommend that we base our yield tables on a no commercial thin basis. In addition, it seems reasonable to remove the acres which are non-merchantable sized and stagnated, only adding them into our calculations after they have been regenerated.

The opening statement on Timber in the Forest Policies and Management Intent section, SAYS THAT timber will be managed with sensitivity for economic efficiency. This statement bothers me because as public land managers we have a mandate from the national public that says basically that a majority of Americans are willing to pay more (ie- not necessarily economic efficiency) to insure clean air, water and a quality environment (several recent polls support this statement including a Harris poll taken about a year ago and the enclosed documentation of an industry sponsored poll). Many of our external publics recognize this administration's economic efficiency jargon as a thinly disguised attempt to justify reduced environmental constraints to provide for greater short term economic gains for a few privledged concerns. I believe I have the gist of the philosophy and I doubt if it reflects the true philosophy of our national public.

Again, I want to make it clear that I d n't want to belittle this monumental planning effort. I am questioning however, the philosophies which were assumed to be appropriate. I hope we can reassess the validity of these philosophies and make sure they are in the best interests of our National Public.

Concerning the Ten Lakes Proposal:

I feel that the roadless area is worthy of Wilderness designation based on the fact that it is one of the last unprotected roadless AREAS of very high scenic value. I am pretty sure that if given maps, photos and guided tours of the area, a majority of the National public would vote to preserve this area in wilderness status in its entirety. It would be nice to see a Forest Service proposal with the courage to embrace the philosophy of the national public in spite of the unpleasantness of explaining this philosophy to the predominantly user oriented local public.

We can afford to set aside the 35,900 acres as a wilderness area. The reasons are obvious: Very high scenic values, Valuable viewshed for the Tobacco Valley, Proximity to the international boundary and to Glacier national Park, Shortage of wilderness in the vicinity and the need to protect the area for endangered species habitat.

Why have congress tell us later that we are proposing something contrary to what their constituents are telling them they want?

Let us recommend wilderness status now based on our revised assessment of the areas' wilderness values and our public input. It would be nice to have congress reaffirm our decision rather than counterdict it, as I feel they will if we stick with our non-wilderness recommendation.

I appreciate this opportunity to comment.

Robert E. Wetzel
Forester
Rexford District, Kootenai N.F.

261-4

TAKEN FROM INTERNATIONAL WILDLIFE

JAN - FEB 1983

More Light On Lead Shot

For the past six years, the U.S. Fish and Wildlife Service (FWS) has urged sportsmen to use steel shot instead of the traditional lead. The reason: each year, an estimated two to three million ducks and geese die from swallowing spent lead shotgun pellets. Lead shot, unlike steel, is toxic to waterfowl. But many hunters claim that steel shot cripples more birds than lead and damages firearms—arguments that have not withstood legal or scientific scrutiny, according to the National Wildlife Federation.

Now, in cooperation with 24 state wildlife agencies and several private businesses, the NWF has started a lead poisoning control and information program. As part of the project, former FWS ballistics specialist Tom Roster is conducting seminars and shooting clinics around the country. To date, Roster has held programs for state biologists and agency officials in South Dakota, Oklahoma and Oregon.

Visiting In D.C.? Drop In On NWF

When you're in the Washington, D.C. area and want to know what's going on at the National Wildlife Federation, just call 703-790-4506 for a taped summary of NWF events. The organization's Virginia facility, just outside metropolitan Washington, regularly offers college level field ecology courses and art exhibits, and its gift shop, conservation library and nature trails are open to the public.

Public Supports Environmental Laws

The "environmental ethic" got a solid show of support in a recent survey billed as the most comprehensive study to date on national environmental attitudes. Of 263 top business executives interviewed in the nationwide survey, two-thirds indicated they want to protect the environment—even if it means a slow down in economic growth. Nearly half of the businessmen said that certain areas in the United States should remain "untouched by people" instead of being developed for energy and minerals. The same survey, conducted for a Connecticut forest products company, Continental Group, Inc., found that a majority of the American public is in favor of maintaining current air pollution standards "even if some factories close, as a result." In addition, 60 percent of the 1,300 people polled said they would be willing to pay more for products and services in order to clean up the environment. According to a company spokesman, Continental did the survey because many of its activities are regulated by environmental laws. The findings reinforce the results of other polls, which have shown strong public opposition to relaxing environmental regulations, in spite of general support for reducing regulatory burdens on business.

Industry Tries New Approaches To Resource Shortages

Several American businesses are discovering some common sense ways to resolve environmental conflicts—and in several cases, they're recycling materials and conserving resources at the same time.

- Tenneco Oil is now making retired offshore oil and gas platforms work for wildlife. The company recently donated an old platform to the state of Florida and sunk it in the Gulf of Mexico where it will function as an artificial reef for marine life. It is believed to be the first such use of an oil platform in the world.
- When ITT Rayonier was told to clean up discharges from its pulp mill plant in Port Angeles, Washington, the company not only complied, but discovered a way to recycle the wastes and sell them. The mill now turns residual sludge into a high-protein animal feed supplement—600 tons of it a month.

Tenneco Oil

This retired oil production platform is now an artificial reef.

- New York City has entered into an unusual agreement with a privately owned housing complex that could save the equivalent of one million gallons of heating oil and 77 million gallons of water a year. The City has agreed to give treated water and methane produced at one of its sewage treatment plants to a nearby housing complex called Starrett City, which will use the methane for fuel and the cold water in its industrial cooling system. In exchange, Starrett will give the city all the hot water it needs to run the treatment plant. The plan will save the city $50,000 a year and could save Starrett up to $1 million annually.
- To help solve noise pollution caused by low flying planes at the Grand Canyon, Republic Airlines responded by changing the takeoff and landing course of its flights.
- Baltimore Gas and Electric Company in Maryland is building a $500,000 hatchery for striped bass. The project, the first intensive large-scale program for the cultivation of striped bass, will attempt to use the heated effluent of a power plant to speed up the growth of the fish.

U.S. Researchers Want Piece Of Caviar Market

An ugly gray-black fish at the bottom of the Sacramento River in California may someday challenge the Soviet Union's hold on the world's caviar market. The fish is white sturgeon. Its roe can be made into caviar that will reportedly match the quality of the top Russian variety. But because overfishing and pollution almost destroyed California's sturgeon fishery decades ago, it is no longer legal to sell either caviar or sturgeon flesh from fish that come from the Sacramento River.

Still, the fish—which can grow to more than 1,000 pounds and live longer than 100 years—isn't out of the running in the ongoing competition to produce the best caviar. Researchers at the University of California—under the knowledgeable eye of Sergei I. Doroshov, once considered one of the USSR's top authorities on sturgeon culture—are trying to help five sturgeon farmers develop commercial fisheries. Doroshov defected from the Soviet Union in the 1970s, and now he heads one of the most advanced research programs in the United States on anadromous fish (fish that swim upstream from salt to fresh water—to spawn). Though the research has had encouraging results, commercial production is probably six years away, experts say.

But state fish and game officials already call the program a success. Permits for breeders require that they release half of their hatchlings to the Sacramento River to replenish the fishery. With additional females regularly reaching the roe-bearing age of 20 or 30 years, officials say that the wild population may make a comeback and that commercial fishing for sturgeon in the river may one day be resumed.

Tax 'Checkoff' Now In 20 States

One out of seven Utah taxpayers did "something wild" with state income taxes last year—by contributing a portion of their tax refunds to nongame wildlife programs. Utah had the highest taxpayer participation among the 20 states that now include a "checkoff for wildlife" on income tax forms. Colorado, which pioneered the concept in 1978, had the second highest level of participation. Twelve states that had checkoff programs in effect for the 1981 tax year had by last fall collected $3.3 million for nongame wildlife programs. More than 570,000 taxpayers contributed an average of $5.73 apiece.

261-5
TAKEN FROM JOURNAL OF FORESTRY
JANUARY 1983

of the RARE II study lands as wilderness.

According to Forest Service estimates, the court decision could mean that proposed 1983 timber sales of 12.3 billion board feet would have to be trimmed by 10 percent.

USDA Assistant Secretary John B. Crowell, Jr., who is a lawyer, has suggested that the deficiencies cited by the court on studies of nonwilderness areas could also be applied to recommended wilderness areas. The Forest Service has 90 days to appeal.

IN-HOUSE SQUABBLES. David A. Stockman, director of the Office of Management and Budget, has ordered a 10.8-percent cut in the 1984 operating budget request for the Environmental Protection Agency. His action would mean a cut of $105 million from a $975 million budget request submitted to OMB by the agency.

Research and development would be trimmed by 22 percent below EPA's proposal, bringing 1984 research funding down to $175 million. The amount for the current fiscal year is $226 million.

EPA Administrator Anne M. Gorsuch says she will appeal to OMB. A 1984 budget of $870 million is down considerably from previous years. EPA's 1981 budget was $1.4 billion and the 1983 budget exceeded $1 billion.

THE ENVIRONMENT OR THE ECONOMY? A recent study claims that citizens of the United States, West Germany, and England prefer environmental protection over economic growth by at least two to one. The study was conducted by scholars at the International Institute for Environment and Society in Berlin, West Germany; the University of Bath, England; and the Environmental Studies Center at the State University of New York at Buffalo. Questionnaires were sent to the "general public," business leaders, labor leaders, environmentalists, public officials, and journalists.

According to the study report, "Environmentalism appears to be a true social movement that is led by a vanguard cadré of thinkers and activists and which has widespread and solid support in the broad public."

In the study, both U.S. and German citizens showed a declining faith in industrial societies and their presumed benefits, as well as a growing mistrust of scientists. In the United States, there was increased emphasis on social change rather than technological development for solving environmental problems. And respondents in all three countries indicated lessening trust in government's ability to solve environmental problems.

Similar results were obtained with a survey sponsored by the Continental Group, a company with 1.5 million acres of woodlands. In Continental's poll of 1,906 Americans, a majority opposed reducing pollution-control requirements in order to stimulate economic growth.

Some 70 percent of those interviewed indicated that they had been affected by the current recession, but only 24 percent favored economic growth through relaxed environmental standards.

Continental found that wilderness preservation "at all cost" was favored by 40 percent of the general public, 20 percent of business executives, and 77 percent of the environmentalists interviewed.

NORTHWEST LUMBER REELING BUT STILL ON TOP. Oregon and Washington suffered an overall decline in income from forest products of $2.8 billion during 1980 and 1981—tough news for these two states, which count lumber as their most important commodity. According to a report by the Industrial Forestry Association, production fell most drastically in lumber, pulp and paper, and plywood. Even with the decline, lumber maintained its supremacy as the economic mainstay of these two states.

Employment during the two years dropped by some 4,000 in Oregon and 3,000 in Washington. Total payroll figures remained about the same though, totaling $3 billion annually for the two states.

Figures for 1982, currently unavailable, are expected to be similar to 1981.

FEDS IN THE WOODLOT. The USDA intends to take the lead in promoting management of nonindustrial private forestlands. Assistant Secretary John B. Crowell, Jr., addressing a timber industry group, cited a recent USDA study which shows that 74 percent of "small" woodlots are more than 100 acres in size. These lands thus might be managed more efficiently and economically than is commonly believed.

The studies also demonstrated the potential for landowners to realize more than a 10-percent real rate of return, after inflation, on investments such as tree planting and thinning.

With such findings in tow, Crowell is encouraging state governments, forest industries, forestry organizations, universities, and individuals to help the Forest Service plan to boost the productivity of nonindustrial private forests.

#271 4/14/83

RENEE STAPLEY
RT. 3 TROY MT.

CALLED IN TO SAY SHE AGREES WITH A NON-WILDERNESS PROPOSAL FOR TEN LAKES BECAUSE SHE THINKS THAT ADEQUATE AREAS ARE ALREADY AVAILABLE FOR WILDERNESS IN THIS AREA.

HER HUSBAND IS A LOGGER & HE SAID THAT THERE IS GAME AROUND THEIR LOGGING OPERATION ALL THE TIME & DOESN'T SEEM TO BE ANY CONFLICT.

BY PHONE

BY Paul A. Leinhart
FOREST PLANNER

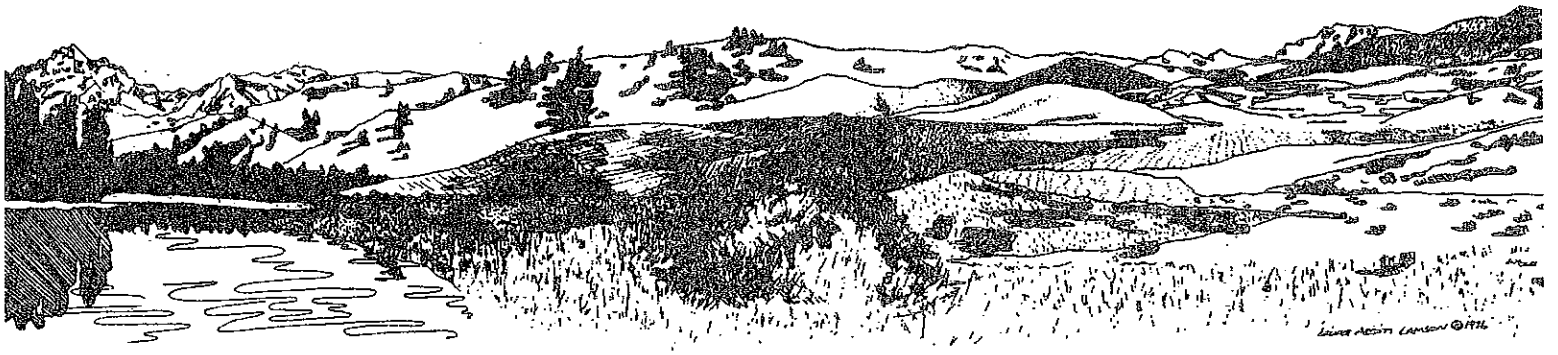
#272

4/13/03

JOHN OLSON
324 SOUTH YELLOWSTONE
LIVINGSTON, MT.

PHONE COMMENT ON THE TEN LAKES AREA
TO PAUL LAMBACH - FOREST PLANNER

HE HAS LIVED IN THE EUREKA AREA.
HE SUPPORTS A MAXIMUM WILDERNESS
DESIGNATION BECAUSE IT COULD BE
GOOD GRIZZLY HABITAT & THAT ADEQUATE
SNOWMOBILING AREAS ARE AVAILABLE
ELSEWHERE. HE FEELS THAT THE
TIMBER VALUES ARE FAIRLY MINIMAL
AND SHOULDNT REALLY BEAR ON THE
DECISION TO MAKE IT A WILDERNESS.
HE FEELS THAT THERE IS NO DOUBT
THAT THE TEN LAKES AREA QUALIFIES
FOR WILDERNESS BECAUSE OF ITS SCENIC



The Montana Environmental Information Center

- P.O. Box 1184, Helena, Montana 59624 (406) 443-2520
- Flathead Office 433 S. Main, Kalispell 59901 (406) 755-7763

April 13, 1983

#296

William Morden, Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Sir:

In the interest of preserving the unique qualities of the 35,900 acre Ten Lakes Scenic Area, we, the members of the Board of Directors of the Flathead Environmental Information Center want to go on record as supporting alternative "C", which would add it to the National Wilderness system.

Respectfully,

Dave Percival

Bill Rossiter

Mike Dailey

Gene Graf

Lex Blood

Printed on 100% recycled paper to help protect the environment

#318

Lolo Creek Road
Lolo, MT
59847

William Morden
Forest Supervisor,

Dear Sir;

I would strongly recommend Alternative C for the future of the Ten Lakes Study Area. It seems locally the people would like to leave the area as much as possible the way it is, as I would. I feel any attempt to decline the core area as "scenic" would invite such things as oil and gas leasing. Please do everything possible to preserve such a unique and pristine area as it's been for ~~ou~~ thousands of years. I also don't believe that the Kootenai Forest needs any of this area for additional logging sites.

I know I speak for quite a few people and of course the vital wildlife of the area, — grizzly bears and others

Sincerely
John E. Crawford
John E. Crawford.

#319

April 12, 1983

Dear Mr. Morden,

I favor the Ten Lakes Wilderness Study Area for wilderness. The Ten Lakes area is great habitat for wildlife, including the grizzly bear. The only wilderness area in Northwest Montana is the Cabinet Mountains. The Ten Lakes Area would add a great deal to the potential recreation revenue to the area in the decades to come. If the Ten Lakes Area would become wilderness future generations of Americans will thank you.

Thank you,

Joe Marino

Joe Marino
3000 Villard #127
Helena, Mt 59601

#380

Tom R. Sewell
P.O.Box 8494
Missoula, MT.
59807

Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT. 59923

Dear Mr. Morden,

Your Forest Plan Alternatives are appaling, not a one gives adequate protection to any other values, only road construction and timber harvest.

For what they're worth here are my suggestions;

1) Preserve the Big Creek and lower Trout Creek drainages in a natural state. the recreation, old growth diversity, and wildlife habitat are unique to the Kootenai.
2) You guys should make a long overdue commitment to preserving what few grizzly bears, and their habitat, you have remaining on the Kootenai. You're killing them and you don't even give a damn. No more development in the Cabinets or Scotchmans.
3) Leave the unpaved Yaak road alone, no more improvments.
4) Support Alternative C for wilderness of 36,000 acres for the Ten Lakes. More roadless recreation on the Kootenai.
5) Freeze total road miles at current levels. A drainage with a closed road is NOT the same as one with no road at all.

You've got a very unique forest and I hope you will cease trying to ruin it as fast as possible. There are other uses of the National Forests besides roads and clearcuts!

Sincerly, Tom Sewell

Tom Sewell

326-1
WM

Mr. William E. Morden
Regional Forester
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Re: Kootenai National Forest Plan Comment

Dear Mr. Morden:

1. The issues I feel should be addressed in a plan should be the amount of logs harvested should be related to the market available so as to eliminate deficit sales.

2. The Plan should provide for smaller sized timber sales to provide work for local logg

3. The plan should provide for less roads. we have to many already I like to hunt in solitude, not having a road every 350 yards

4. More emphasis should be given to fish & game. it seems that there is more attention gi to logging than anything else.

over →

Yours truly,

Thomas J Matilas
Star Rt 1 Box 32
Libby, Mt.
59923

cc: Governor Ted Schwinden
Congressman Pat Williams
Senator Max Baucus

5. would like to see the Cabinets & ten lakes protected in the wilderness state

6. Please protect the Griggly bear.

7. I feel we don't need any ~~mines~~ ~~[illegible]~~ in the Cabinet system, there are mines in Kellogg Idaho and the silver valley that a sitting idel. Butte Mt. ect.

326-2

328-1

MONTANA LOGGING ASSOCIATION

P.O. Box 1716, Kalispell, Montana 59901
(406) 755-3185

April 14, 1983

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Dear Mr. Morden:

The following comments are respectfully submitted by the Montana Logging Association (MLA) relative to the proposed management plan for the Kootenai National Forest. The MLA is an association of independent logging contractors from throughout the timbered regions of Montana. One of our principal objectivies is to provide our members with a united voice on issues of concern to the logging industry.

Although the MLA has 439 members statewide, 40% of our membership resides in the Libby/Eureka/Kalispell vicinity. It is important to note that the 2.2 million acre Kootenai National Forest is much more than a place where we work or recreate. . . . . it is our home!

And now a few brief comments on relevant issues the proposed forest plan addresses:

TIMBER For the residents of Lincoln County, the Kootenai National Forest represents 73% of the land base and the wood products industry represents 76% of the employment opportunities. The proposed plan objectively favors timber harvesting without compromising other forest values.

PROTECTION Timber represents one of the most valuable renewable resources on the face of the earth. Protection of that resource from insects, disease and fire must necessarily be a priority of any forest plan. The single greatest threat to our manageable timber stands in Montana is the reservoirs of infestation we are creating in areas set aside as wilderness, roadless, scenic, etc. The path of devastation being wrought by the mountain pine beetle and the resultant fire hazard of catastrophic magnitude make the difficult job of protection nearly impossible. The MLA has serious reservations regarding how well the forest plan addresses protection of the timber resource.

ROADS Logging activity and forest protection simply cannot be economically accomplished without roads. The forest plan proposes an acceptable level of road construction to facilitate logging objectives, however, we retain reservations as to minimum access requirements for protection. The logging industry has no objections to road closures for protection of wildlife, watershed and non-motorized recreation. We further support lower standard roads where applicable and returning temporary logging roads to their original contour following harvesting if the road is not necessary for protection.

RECREATION It is only natural that an expanding population living on a fixed land base will place increasing recreational demands upon that land base. Recognizing that the confrontation between timber harvesting and roadless recreation is classical in nature, the forest plan correctly emphasizes motorized recreational opportunities. Harvesting and protection further result in unavoidable deterioration in visual quality, however, the proposed plan minimizes this consequence through acceptable mitigation measures.

WILDLIFE By correctly contending that timber management can maintain and enhance wildlife populations the proposed plan will provide for a 40% increase in the elk population and a 40% increase in habitat for the grizzly bear. Proper management combined with necessary mitigation will further result in protection of fisheries and water quality.

WILDERNESS The MLA firmly opposes any increase in wilderness for the Kootenai National Forest. We further wish to express our staunch support for the Kootenai Forest's preferred alternative to manage the Ten Lakes Wilderness Study Area as nonwilderness. We commend the thoroughness of the study performed and the conclusions reached.

IN GENERAL As we studied the various documents which comprise the proposed Kootenai National Forest Plan, we discovered most, especially the summaries, to be complete, objective and comprehensible. The environmental consequences section substantiates the difficulty of developing an "acceptable" forest plan. Depending upon individual philosophy this section is either rational or contradictory. As a logging association it would be easy to demand a forest plan which maximizes timber harvesting such as alternative 7a. Objectively, however, we reluctantly agree that the proposed plan, alternative 4a, "meets regional resource targets without disrupting community stability, while maintaining the viewing resource, protecting the grizzly bear, and maintaining the existing roadless area." (ouch!)

In conclusion, we respectfully suggest that the continuing impact of the final Kootenai National Forest Plan upon local communities is the single most important issue. Although the various documents comprising the proposed plan imply an insignificant impact upon local communities, we retain some reservations as to the accuracy of that implication.

The proposed plan states that intensive management will result in higher logging costs, thus, reducing timber receipts to the counties. Since these receipts are awarded in lieu of property taxes, this will result in higher taxes for local citizens. We further question whether income gained from the recreation/tourism industry even approaches income lost from the woods products industry? . . . . and this question totally ignores in lieu of taxes.

Mr. Morden, we take a great deal of pride in the fact that logging operations are frequently family businesses which transcend generations of loggers. We are sincerely concerned about changes which compromise our heritage. We pray you are correct when you state, "changes occuring as a result of the proposed action would not be an abrupt departure from the way of life we have now."

Thank-you for this opportunity to submit comments on behalf of the Montana Logging Association. As you analyze the input you receive we extend our sincerest best wishes, wisdom, and sympathy.

Respectfully yours,

Keith L. Olson
Executive Director

329

April 11, 1983

Dear Sir:

In regard to the Ten Lakes study I am for Alternative 4A, There is room in this area for timber Harvest & Recreation, besides protecting the grizzly bear.

In regard to your Kootenai Forest Plan I believe we can up your timber harvest, & also am in favor of Closing some roads but not all, leave some open for Sunday drive & hiking.

Your present goal of 30 Grizzley is I believe enough for the Kootenai. I don't believe there Pop. was ever more there is only a couple of Areas really suitful for there habitat.

Thank you

Stan Heuscher
1125 – 8th Ave. East
Kalispell Mont.

April 14 1983

Mr Bill Morden
Forest Supervisor
Kootenai National Forest
Libby Mt 59923

~~509~~

Mr Morden:

I am in favor of Alternative 7A because it promotes the use of timber

In Ten Lakes, I support the Forest Svc Alternative for a roadless area.

I dislike the waste as in the Kootenai Forest - Prefer seeing the wood used to the benefit of man.

Wildlife & recreation need not suffer if proper management of timber lands

Yours for better Forest Management

Mr & Mrs Ernest H Eggert
Rt 1 Box 1285
Libby Mt 59923

515

APRIL 12, 1983

911 MAIN
LIBBY, MT. 59923

MR. WILLIAM MURDOCH, FOREST SUPV.
KOOTENAI NAT'L FOREST
FOREST SUPERVISOR'S OFFICE
LIBBY, MT. 59923.

DEAR SIR,

AFTER BRIEFLY REVIEWING THE KOOTENAI FOREST PLAN I WOULD LIKE TO MAKE THE FOLLOWING RECOMMENDATIONS:

1) IMPROVE THE DORR-SKEELS CAMPGROUND TO ACCOMODATE THE BOATERS AND OTHER DAY USERS;
2) TEN LAKES SCENIC AREA SHOULD BE OPEN TO SNOWMOBILE USERS;
3) DEVELOP MORE TIMBER SALES IN THE 520M - 2MM RANGE UTILIZING ALL THE DIFFERENT LOCAL LOGGING SYSTEMS (HORSE, TRAC, JAM, SKY);
4) LIMIT HABITAT MANAGEMENT TO 30, AND POSSIBLY LESS, GRIZZLIES IN THE CABINET/YAAK ECOSYSTEM;
5) PROMOTE DEVELOPMENT OF LOCAL ECONOMY, EG. GREAT NORTHERN MOUNTAIN SKI AREA;

GENERALLY, I APPROVE OF THE KOOTENAI FOREST PLAN.
THANK YOU FOR THE OPPORTUNITY TO COMMENT.

SINCERELY,
JERRY OBENSKI

522B

April 13, 1983

P.O. Box 1310
Hamilton, Montana 59840

William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden:

This letter is to express my feellings on your proposed action on the Ten Lakes Montana Wilderness Study Area. I am completely opposed to your proposed action of non-wilderness designation with only a small core roadless area. Alternative C is the only option that will protect this area from destruction by future development.

There is a shortage of protected wilderness in Northwestern Montana. The Ten Lakes area will provide desperately needed wildlife habitat for the Grizzly bear and other animals dependent on undisturbed wildlands.

The study document even admits that if the area is classified as wilderness the Kootenai Forest could still meet or exceed RPA timber goals. The report also states that the Kootenai will have an acute shortage of wilderness and primitive land in the future. With these facts it seems rediculous not to place the entire Ten Lakes study area into wilderness protection.

I hope you will change your proposal to Alternative C. The Ten Lakes Area is too beautiful and needed in its wild untouched state to change its distruction. Please designate the entire area as wilderness.

Thank you for your time.

Sincerely,
Kevin Suzuki
Kevin Suzuki

524

Box 102
W. Glacier, MT 59936

Mr Bill Morden, Forest Supervisor
Kootenai National Forest
Libby, MT 59923

Dear Mr. Morden:

I have worked with grizzlies in Montana and Wyoming the past ten years and I want to comment briefly on the Forest Plan.

Since we are currently losing the battle to keep a few remnant populations of grizzly bears in the lower fourty-eight, it is alarming to hear of the Forest Plan to build some 12,000 miles of roads. It is clear to me that road building in any degree is an adverse factor in maintaining habitat for the bears. I realize your priorities may be different, but since my primary concern is in saving the grizzly, I can only comment accordingly.

I urge more provisions for roadless recreation and wilderness areas; specifically, Alt. C calling for a 36,000 Ten Lakes Wilderness. The Recovery Plan for the grizzly bear provides guidelines. I oppose any paving or widening of the unpaved section of the Yaak road. Road mileage should at least be frozen at current levels and reduced when possible. Old gowth forests and riparian areas such as Big Creek and lower Trout Creek deserve protection.

Thank you for consideration of these matters.

Sincerely,

Doug Peacock

Doug Peacock

525

Forest Supervisor
Kootenai National Forest
Box AS, Libby, Mt. 59923

Robert Dello-Russo
P.O. Box 736
Troy, Mt. 59935

Greetings Mr. Morden

April 13, 1983

This letter is written in response to the present draft of the Kootenai Forest Plan and should be included in the record of testimony.

It is my opinion, in view of the fact that the Kootenai Forest already has 6,000 miles of roads, that a doubling of road mileage in the forest is totally unwarranted, and a waste of taxpayers money.

There is a great need to maintain old growth forest, to protect and improve habitat for Elk, Mountain Caribou, and the Grizzly Bear, and to spare our precious water resources from over-sedimentation.

These forests belong to everyone and do not exist solely for the benefit of mining and timber concerns. Copper prices are depressed and there is no need to exceed a federally-dictated timber target.

I <u>oppose</u> the paving and widening of the last 17-mile stretch of the Yaak Road.

I <u>oppose</u> more roads in the Kootenai--Our forest already has more roads than any other forest in the state.

I <u>support</u> full recovery of the Grizzly Bear and Mt. Caribou.

I <u>support</u> an increase in roadless recreation and wilderness;

I support Alternative C for the Ten Lakes Area!

I await your <u>immediate</u> <u>acknowledgement</u> of this letter, and thank-you for the opportunity to comment.

Sincerely,
Robert Dello-Russo
Robert Dello-Russo

529

529

Please adopt Alternative C. I would like to see the beautiful Ten Lakes area receive wilderness designation. Unless this is done I don't feel it will remain "scenic". Oil and gas leasing, and timber sales with the 6 miles of road/sq mile will ruin the quality of the area. There are ~~so~~ many other more profitable + less pristine areas for development. Let's keep an area for grizzly, wolf, elk, and our children. Dyant Madine

531

Star Rt. A
Twin Bridges, Montana 59754

April 14, 1983

Bill Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Mr. Morden:

I have reviewed the issues involved in the Kootenai National Forest plan and wish to offer the following comments:

I strongly oppose the high levels of timber harvest and road development called for by the preferred alternative. The plan represents single-use timber management at the expense of water quality, fisheries, and roadless recreation. This is unacceptable management of our public lands.

Old growth timber and riparian zones merit better protection than provided for in the plan. The Kootenai contains stands of large, old growth timber unique in Montana. Big Creek, lower Trout Creek, the East Fisher River, McGinnis Creek, Elk Creek, Pleasant Valley-Fisher River, Little Wolf Creek and Fortine Creek are some of the areas where old growth retention should be emphasized.

I strongly support Alternative C for a 36,000-acre Ten Lakes Wilderness. The Kootenai is extremely short of designated wilderness recreation and, as evidenced by the bias shown in the Forest Plan, wilderness may be the only way to protect roadless recreation in the forest.

I support efforts to insure recovery of grizzly bear populations in the Kootenai. I believe protection of bald eagle nesting habitat should be an important component of the wildlife aspect of the plan, as the Kootenai contains some of the most important eagle nesting sites in Montana.

I oppose paving the Yaak Road.

Sincerely,

Hugh Zackheim

Hugh Zackheim

April 13, 1983
Kalispell, Montana

532

Dear Mr. William Worden:

I beleive there is a shortage of protected wilderness in Northwest Montana. Setting aside 35,000 acres in the Ten Lakes Wilderness area would do much to reverse this terrible trend. I believe most people would prefer to maintain what remaining wildlands we still possess. Please support alternative "C".

Sincerely yours,

Peter Felt

Peter Felt

533-1

Champion

Mr. William E. Morden
Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

May 12, 1983

Dear Mr. Morden:

Personnel of Champion International Corporation's Rocky Mountain Operation, have completed their reviews of the proposed Kootenai National Forest (KNF) Plan and Draft Environmental Impact Statement (DEIS) dated November, 19, 1982. We wish to thank the many Kootenai Forest personnel that have been very helpful and quite open during the entire public participation period.

During the Kootenai plan review period, Champion participated in a comprehensive industry review, spearheaded by the Inland Forest Resource Council. Champion agrees with the results of this review which will be mailed to the KNF under separate cover.

Employees of Champion who participated in the review of the proposed Kootenai plan and DEIS included Ernest Corrick (Vice President and General Manager), Jim Bentley (Forest Lands Manager), Andy Lukes (Planning Manager), Keith Engebretson (Pleasant Valley District Land Manager), Mitch Richael (Forester), and Dick Graf (Forester).

Champion International Corporation manages 682,000 acres of timberlands in western Montana and operates a total of 10 mills and plants in Montana. Over 100,000 acres of Champion land occurs within the KNF boundary.

Decisions that have been proposed by the KNF plan and DEIS are of critical importance to Champion as well as the communities in and adjacent to the Forest. Since Champion owns and manages over 100,000 acres within the KNF boundary, forest management decisions in the final plan will have a direct effect on forest management to adjacent Champion ownership. In addition, Champion relies heavily on mills in the KNF area for chips, sawdust, and hogfuel for Champion's pulp mill at Frenchtown.

As a major employer in western Montana, Champion is concerned about community stability as well as being able to provide adequate raw material to our converting facilities at a cost that allows the production of competitive wood products.

533-2

Champion is pleased that the KNF choose to designate 13 percent more land area for timber management in its proposed plan compared to the current direction (no action alternative). However, only about 20% of the KNF area is designated for timber optimization. This seems quite low since this part of Montana relies so heavily on the timber industry for jobs. Champion requests that a reanalysis of areas for timber optimization be performed before the release of the final plan.

The grizzly bear receives too much attention in the KNF proposed plan. According to the proposed plan and DEIS, 843,000 acres of forestland will be managed for grizzly bear habitat. This will be managed to provide habitat for 30 grizzly bear (one bear per 28,000 acres). According to the proposed plan, grizzly management does not preclude other activities, but detailed scheduling and road restrictions are necessary to minimize impacts to the bear.

It is inappropriate to manage for grizzly bear at this large a scale when so many other grizzly habitat (Glacier Park, Whitefish Range, Cabinet Wilderness) are in close proximity. At a maximum, the grizzly should only be managed for in areas that are proposed to remain roadless on the KNF (399M acres).

More explanation is in order in relation to areas to be retained as old growth. According to the proposed plan, 117,000 (8% of the KNF) is to remain as old growth. The old growth MA only designates 5,180 acres. In addition, it is stated in the proposed plan several times that many of the prescriptions are to be carried out that allows 10% of the area to be managed as old growth. It seems that there is a danger that more than 8% of the KNF area could be managed as old growth. Certainly the 399 M acres proposed to be managed in a roadless state will provide more than enough old growth habitats. A re-analysis of this issue is appropriate for the final plan.

Champion supports and recommends the adoption of the proposed action alternative of the Ten Lakes Montana Wilderness Study Act Area. The proposed action alternative of the KNF DEIS calls for a nonwilderness classification. Champion agrees with this because there is already adequate legislated wilderness in the national wilderness system. Presently, 1.7 million acres is within 150 air miles and .4 million acres is within 100 air miles of the study area. Ten Lakes does not lend itself to a high opportunity for solitude. This is due to the areas irregular configuration and, existing roads and previous logging activity adjacent to the study area.

The Ten Lakes Study Area has provided a diversity of other uses as well as timber production adding to the stability of the local economy. Recreation use is of the nonmotorized form of dispersed recreation, including hiking, nature study, camping, horseback riding, hunting and fishing. Snowmobiling has also been permitted since 1976 and is expected to increase. As stated in the DEIS, total visitor use has increased 45% from 9,200 visitor days in 1976 to 15,700 visitor days in 1981. These uses provide a more balanced local economic base. By

narrowing the economic base with the inclusion of the study area into wilderness would place insecurity on the local encomic stability.

Generally, the management area (MA) allocations assigned to lands in the Pleasant Valley-Fisher River drainage that are intermingled with Champion land are appropriate. Allocations on those lands in the Davis Creek, McGregor-Bar Z, Meadow Peak, and North and South Pleasant Valley areas fit the existing resources. Following is a list of suggestions that should be incorporated to the KNF final plan.

1. Twin Creek Area - The only objective is the allocation of Section 32, T27N, R26W. More appropriately, the SW¼ should retain its MA 19 designation, but reallocate the remainder of the section to MA 16.

2. Barnum Creek Area - We recommend that those sections allocated as MA 16 be changed to MA 15, timber optimization. These sections are intermingled with timber industry lands and are far enough away from major highways where visual quality would not be an issue. Another recommended change is that portions of Section 18 be assigned to MA 5. By changing it to MA 5i, the viewing quality would be retained while providing for programmed harvests.

3. Calx Mountain Area - Allocations made to this area are generally acceptable with two exceptions. First, the MA 17 designation in Section 8, T29N, R27, is not suitable because of its location. The site is situated in an area that is managed for timber optimization by adjacent landowners where viewing is not a primary concern. Champion recommends a MA 15 designation. The second exception is the area west of Calx Mountain allocated to MA 2. This designation places restrictions on access for adjacent landowners. Also, it does not meet the minimum acreage set for managing this type of allocation. This area should be assigned to MA 15. This loss of MA 2 acreage could be added to a larger MA 2 designation at another location on the Forest.

4. The following parcels of land have incorrect MA designations. Currently, these lands are in the final stages of a land exchange with Champion International Corporation which should be completed by mid 1983. The designations should change from MA 15, 16, and 24 to MA 27.

T28N	R25W	Section 8, S½S½, NW¼NE¼
T29N	R26W	Section 18, SW¼NE¼, NE¼SE¼, W½SE¼
T29N	R26W	Section 26, S½S½
T29N	R26W	Section 34, NW¼SW¼, SE¼NE¼, N½SE¼
T29N	R27W	Section 28, NE¼NW¼, W½NE¼
T27N	R28W	Section 2, NE¼SE¼, Lots 2, 3 and 4

533-4

5. On page B-15 of the KNF proposed plan there is a list of areas to be acquired by the Forest through exchange. Champion requests that two additional areas, owned by Champion, be added to this list:

T25N	R31W	Section 33, N½NE¼, NE¼NW¼ (120 acres)
T25N	R31W	Section 29, S½NE¼ (80 acres)

These areas are extremely isolated from Champion ownership pattern, but are adjacent to to the KNF. In return Champion would be interested in exchanging into isolated KNF land near McGregor Lake.

Thank you for this opportunity to comment on the KNF proposed plan and DEIS. If you have questions, please contact me.

Very truly yours,

James E. Bentley
Forest Lands Manager

kjg-JB2

534

April 13, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden;

I am writing to express my concerns regarding the Ten Lakes Wilderness Study Area. I spent a weekend hiking in the Ten Lakes area during the summer of 1980. The Distict Ranger from the Fortine station and one or two other Forest Service personel were on this hike and we attempted to see as much of the area as possible in two days. I was quite impressed with the beauty of the area. I was surprised at the number of other people backpacking in the area besides our party. It appeared to be a very popular hiking area.

I hope that you will see fit to leave this area as it is and put no roads in it and take no logs from it. There is alot of land on your forest that has or will be logged, but little that has been left alone as wilderness. I feel that you have a responsibility to leave a few areas in your forest in a wild undeveloped state. The grizzly needs this wildland to exist and it there is any chance that woodland caribou exist in the area, then we have another reason to leave the area wild.

I don't believe that developing about 16,500 acres of timberland in the Ten Lakes area is worth the loss of the wilderness values that would disappear with this development. I support Alternative C for the Ten Lakes area. Please leave the area as it is now and don't develope any of the wilderness study area.

Thank you for accepting my comments.

Sincerely,

Scott Kronberg

Scott Kronberg
718 S. 12th Ave.
Bozeman, MT 59715

cc: Senator Max Baucus
Senator John Melcher
Representative Pat Williams

April 11, 1983

576

George M. Ochenski
Southern Cross
Anaconda, MT 59711

Bill Morden, Forest Supervisor
Kootenai National Forest

Dear Mr. Morden:
I am writing to submit my considered opinions on the Kootenai Forest Plan. I wish this letter to be entered into the record of testimony for this plan.

Considering that the Kootenai National Forest already has more miles of road in it than any other National Forest in the State, your proposal to double the 6,000 miles of roads now in existence seems ludicrous, at best. Further, considering that the forest under your supervision already exceeds the Federally dictated timber target, there seems little sense in using additional timber harvest as your excuse for building more roads.

Moreover, since the elk, grizzlies, and clear-running streams of the area cannot speak in their own defense, please register this letter as an attempt to preserve those assets of the forest that are enjoyed by all, not just the monetary gains of a few.

I propose a complete moratorium on further road-building in the Forest, including pavement of the last 17-mile stretch of the Yaak road.
I support Alternative C for the Ten Lakes area.

I request that you acknowledge receipt of this protest to your proposed Forest Plan.

Sincerely,

George M. Ochenski

George M. Ochenski

540

W. ALEXANDER BLOOD
880 BLACKMER LANE
COLUMBIA FALLS, MT. 59912

April 14, 1983

Mr. William E. Morden
Forest Supervisor
Kootenia National Forest
Box A S
Libby, MT 59923

Gentlemen:

We write in support of Alternative "C" - Wilderness designation for the 36,000 acre Ten Lakes Area.

Having visited this area several times, it is our strong feeling that only wilderness designation of the proposed 36,000 acres will adequately protect the values of this area.

Potential threats such as additional timber sales, oil and gas leasing and motorized recreation make this action imperative.

The Forest Service recommendation for a 18,600 acre scenic area does not meet essential requirements. These are:

a) provide minimal protected wilderness in northwest Montana;

b) protect critical habitat for wildlife; and

c) guarantee that future generations may enjoy this area in its present or possibly enhanced state.

Respectfully,

Alice F. Blood W. A. Blood

Alice F. and W. A. Blood

571

505 1/2 S. 12th
BOZEMAN, MT 59715
APRIL 13, 1983

WILLIAM MORDEN
FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST
BOX AS
LIBBY, MT 59923

DEAR MR. MORDEN;

I AM WRITING TO URGE KOOTENAI FOREST OFFICIALS TO CHANGE THE NON-WILDERNESS RECOMMENDATION FOR THE TEN LAKES AREA. WILDERNESS DESIGNATION IS NECESSARY IF THE HABITAT PROVIDED BY THIS AREA IS TO BE PRESERVED. THE TEN LAKES AREA IS USED BY SEVERAL RARE SPECIES, INCLUDING THE WOODLAND CARIBOU, GRIZZLY BEAR, AND GREY WOLF. SURELY THE FEW ROADLESS AREAS REMAINING IN THE KOOTENAI NATIONAL FOREST CAN BE PRESERVED WITHOUT A SIGNIFICANT SACRIFICE IN TIMBER HARVEST. PLEASE RECOMMEND A WILDERNESS DESIGNATION FOR THE TEN LAKES AREA.

THANK YOU.

SINCERELY;

Quentin Rener

Wm M. Starkey
April 11, 1983

543

Dear Mr. Morden,

I am writing to express concern for the future of the Ten Lakes Wild Area. Northwest Montana is my favorite place to enjoy wilderness solitude and I believe wilderness protection for the area (Ten Lakes) would preserve this wonderful area for the future of the ever-increasing numbers of hikers & skiiers as well as providing pristine habitat for wildlife -- in particular, members of the deer family & grizzlies.

In lve of the overall timber-cutting projections for the Kootenai, I'm sure you'll agree the Ten Lakes region represents a rather small and insignificant portion of the logging pie.

Please know that my sentiments speak for many present and future friends of the Ten Lakes Wilderness Area. You, sir, have the opportunity to make a truly farsighted decision. Please do it.

Sincerely yours,
Bill Starkey

P.O. Box 8771
Missoula, MT 59807

(EXCERPT)

544

tions would increase 40% appears to me to be a fantasy.

Doubling the amount of roads on what is already the most heavily roaded forest in the state can only be justified if you subscribe to the idea that it's nice to build roads everywhere you can, just in case you might want to drive there sometime. Doubling the sediment load in the forest's streams by doing so cannot be justified for any reason. Most people I know feel there are plenty of roads already. Any new ones that must be built should be gated.

I am disturbed by the proposal to build so many roads, but I am angered by the near completion of a particular road — the Yaak Road. After all the public concern and outcry against the state's attempt to pave the road all the way through, I was shocked to learn that the Forest Service has almost completed doing so, in what I consider to be a sneaky manner, contrary to my understanding of how things should be done in a democracy. All work should be stopped until a study of the impacts of a through paved road has been done, and the residents of the area given a chance to comment on it.

Two other points about the proposed plan bother me. One is the non-wilderness recommendation for Ten Lakes. The arguments for wilderness have been made many times; it would take another letter at least as long as this one to do so again. For what it's worth, I support alternative C, a 36,000-acre wilderness designation.

The other is the lack of concern for the grizzly bear. It should be evident to everyone that if the bears are to survive, every effort must be made not only to maintain, but to increase their numbers. Of course it will mean some trade-offs. We can cut trees in other places, people can go elsewhere to ski, but there are precious few places where the bears can be found. I feel they are of importance to the nation and the world, and it's worth some sacrifices to keep them alive, if that is at all possible.

Sincerely,
Bill Martin
Bill Martin

Rt. 3
Troy, MT 59935

 (EXCERPT) 545

We strongly support Section 8 (b) which calls for minimum standard roads wherever possible. This approach to building the transportation system will conserve wildlife habitat, fisheries and capital.

We are interested in the roadless resource on the forest and support the placement of significant intact essentially roadless blocks in the administrative designation of primitive recreation. This will protect the most valued of the resources (old growth or wilderness character) while recognizing that other multiple use demands may be made upon those lands in the future.

Old growth management has not received adequate attention in the Forest Plan. We believe it would be helpful to identity specific areas in which old growth management and visual retention are concurrent. The visual quality objectives of "retention" is not merely a scenic value, but also contributes to the diversity and stability of the forest ecology.

We would like to make an editorial comment regarding the riparian management practice listed in the proposed plan. We found the standards and guidelines difficult to locate in Section III and it was impossible to correlate them with the terms (MA5), (MA5i) that were part of the management prescription.

According to our information, Resources Planning Act goals are tied to historic cutting levels on the forest rather than to ground-based data. We believe that updated timber inventories would better reflect current productive capacity of the Kootenai National Forest. We are looking for <u>realistic</u> timber harvest goals, which in turn determine the miles of road to be built.

In the area of human needs we urge consideration of the social and economic requirements of the citizens of Lincoln County. The Kootenai National Forest covers much of the area of Lincoln County and the county's main economic base is in the forest products industry, with lesser emphasis on mining. The Forest Plan focuses on the economic needs of the forest products industry, while we believe another economic need of the communities is for diversification. It is believed that our opportunities for recreation could lead to a strong development of tourism, which would add to the stability of Lincoln County. Such diversification could help maintain and improve the quality of existing communities, a League goal. The appropriate level of government, in this case the Forest Service, should identify and regulate those large scale private developments that may have substantial impact upon the physical, social and economic environment.

The League supports wilderness designation for the Ten Lakes area, because this area ranked high in wilderness attributes ratings and because the Kootenai does not have the percentage of wilderness found on most timbered forests.

In summary, the League supports a Forest Plan and managment prescriptions that (1) gives high priority to conservation and wildlife habitat while minimizing access to that habitat, (2) uses management methods compatible with the ecosystem rather than toxic chemicals, (3) gives more emphasis to old growth timber, (4) Maximizes water quality for fisheries and recreation, (5) retains sufficient roadless areas to meet future recreation needs, (6) increases consideration of the need for diversification in the economy, and (7) designates the Ten Lakes area as wilderness.

Yours very truly,

Mary Kennaugh

President, South Lincoln County
League of Women Voters

copies
Morden
Schwinden

546

April 14, 1983

William E. Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, Mt. 59923

Dear Mr. Morden:

Thank you for asking for opinions regarding the Ten Lakes Wild Area of the Kootenai Forest. I am writing to let you know that I support Alternative C (Wilderness Protection for the entire Ten Lakes Wild Area of 36,000 acres). I support this alternative because it is an area important to the grey wolk, grizzly bear and woodland caribou. These species, as you know, depend on large areas like Ten Lakes. I also feel the recreational and hunting activities should be encouraged and would be enhanced with wilderness designation.

Thanks again for your consideration of this letter.

Sincerely,

Miss Lynn Kelly
Box 2289
Polson, Mt. 59860
(883-5797)

From: Richard C. Kerr II
c/o Canoe Gulch R.S.; Star Rt #2
Libby, Mt. 59923

April 12, 1983
Libby, Mt.
562-1

To: USDA Forest Service
Kootenai National Forest

Subject: Forest Plan and the Ten Lakes Wilderness Study Area

Upon reviewing the forest plan alternatives, I strongly favor Alternative #5 over all other alternative choices. Though I am trained as a wildlife biologist and Alt. #5 is the best wildlife alternative presented, my selection criteria was more with regards to managing the forest resources in a well balanced manner. I believe the other alternatives weigh too heavily towards resources requiring extensive access development (i.e. timber, minerals, and oil/gas), versus those resources that benefit from little or no access development (i.e. wildlife, fisheries, watershed, and roadless recreation).

I feel future increases in timber production are significantly dependent on accessing marginal timber areas which may prove to be

reasonable sustained yield.

I favor managing the Ten Lakes Area as wilderness (Alt. C).

I favor acquiring land in the Barnum Creek drainage for wildlife and dispersed recreation values.

Sincerely,
Richard C. Kerr II

565

[illegible] Box [illegible]
[illegible], [illegible]
April [illegible], 19[illegible]

[illegible], Forest Service
[illegible]

[illegible]:

Thank you for your letter in response to my first letter voicing concerns about the effect of roads and larger timber cuts. I admit that there is some weighing to be done between the "wants" of millions of "alls" and the studied concerns of the fewer who wish to keep a large enough part of "wilderness to ensure that the original intent of the establishers of the protective acts is not controverted.

Two considerations vie, here-- the quantitative versus the qualitative-because they are not the same. One conserves, and the other considers ways and means of <u>using</u> the forest. The"all"s think of cars, snow-mobiles, guns, picnics, "doing what they <u>feel like doing</u>, disregarding signs, advise, etc. So they want as many roads as possible: Roads "bring trash, noise, gas and abuse."

On the other hand, to see ourselves critically, our origins, our manner of thinking, needs some peace and "re-creation"; in the world as God created it; then, we know that when these species in his world disappear by the hundreds, our time to disappear is around the corner,.

Where else can man go to see himself whole, in the scheme of things?

The majority of people are now getting a distorted view of themselves, bent to the pressures of salesmanship, on T.V. Are these, the majority, the best judges of what a government can do? Or should do?. Read the statistics of how little the "all" care about serious "care" or "stewardship" of our natural resources. "Mobocracy" is the worst tyranny" of all, and the most destructive.

I just can't see our government officials trailing the skirts of the mob. You know what they do to campgrounds, etc. A Park official told me that no Park official (rangers) had ever had a confrontation with a grizzly, even when the grizzlies were more plentiful.

"The majority" of the people has been used as an excuse before, and any historian can prove that "the majority" is always wrong at the time and comes to realization 100 years too late."

I know that it's easier for a mechanical age person to think of ways and means and techniques and blueprints and machines, instead of purposes; it's easier to chart , and to meet the people with. But let there be some of us who think in terms of "Will we have something of our beatiful Earth with all its components left, someplace?" And I guess that the Kootenai Forest is one of the very few, best, last places.

Thank you,

Olga Erickson

Olga Erickson

NW CITIZENS FOR WILDERNESS
(EXCERPT)

566

is a list of areas that we feel deserve wilderness protection: 1) Scotchman Peaks 2) The Cabinet Additions 3) Ten Lakes (Alt. C) 4) Mt. Henry 5) Trout Creek.

We have done our best to point out the wisdom of retaining as much of the remaining roadless areas as possible. It should be self-evident to any multiple use oriented person that a significant amount of roadless national forest land is essential to meet the demands of a diverse, recreation oriented country like our own. The land manager of the future will have to recognize that fact and provide a balanced stewardship of the land. To fritter away the last remnants of America's (and Lincoln County's) wild heritage is not only irresponsible but also immoral and unforgivable. We assure you, if you do sacrifice our heritage, you will <u>not</u> be forgiven.

Libby Sno-Kats
(excerpt)

567

another way of saying that "grizzly/timber areas can be either roaded or unroad." How many acres of these grizzly/timber areas do you plan to have closed to vehicles in the summer? How many acres do you plan to have closed to snowmobilers in the winter? We believe an ORV plan is also needed to answer these questions.

4. The present high use snowmobile areas including existing groomed trails are not included in the Forest Plan. We have outlined these on the attached map.

Are you planning to close any of these areas to snowmobile use?

Ten Lakes

The Libby Sno-Kat Club support a Scenic Area designation rather than the Wilderness designation for the Ten Lakes Area. We would readily support an alternative which provides for a larger scenic area size (approximately 36,000 acres) rather than the present 18,600 acres dispersed recreation proposal.

IFRC 568-3
(EXCERPT)

During the recent recession, the forest products industry has relied heavily on private land for a major portion of their raw materials supply. As a result, private timber supplies may be available at reduced levels in the future, and in turn create an increased demand for federal timber.

Another factor influencing the demand for Forest Service timber has been the economic viability of timber sale packages that have been offered. The forest products industry has been working with the Forest Service to produce more desirable timber sale packages. The demand for federal timber will increase as timber sales improve.

The elements that create demand for federal timber are in a state of change. With increased demand comes increased competition, increased stumpage prices and a totally different set of economic factors surrounding timber harvest.

DEPARTURES

We are concerned that departures have not been considered throughout the planning process. It appears that the Forest Service does not understand how departures are used to achieve not only timber goals but other resource goals as well. Departures can be used to meet wildlife targets, range targets, community stability objectives, and recreation targets as well as timber targets. The Kootenai departure analysis is very narrow and only deals with one aspect of planning. Departures should be considered throughout the planning process as part of the analysis for all resources. It should not be used solely as an economic analysis for timber.

ECONOMICS

The Kooteani Plan does not discuss the fact that the management of federal timber is the key to solid economic growth of much of northwest Montana. Private lands and state lands are being managed more efficiently than federal lands and their opportunities for increased resource production are limited. Federal lands contain the major undeveloped resource base in the area and have the most obvious opportunities for growth, which is an important component of our economic system. The management program for the Kootenai National Forest must provide this opportunity for future economic development in that area. Federal land management agencies have the responsibility and the obligation to contribute their share to the future development of the area.

TEN LAKES

We support the Forest Service decision to recommend non-Wilderness for the Ten Lakes Wilderness Study Area. We concur that other resource values such as snowmobiling, timber and opportunities for

IPRC (EXCERPT)

568-4

a somewhat more developed form of recreation supersedes the need for Wilderness. With the close proximity to Glacier Park, the Cabinet Mountains, the proposed Scotchman's Peak Wilderness and areas where the Forest Service proposes no development, there is little need for a Wilderness designation for the Ten Lakes area.

SCOTCHMAN'S PEAK

The Forest Service recommended Scotchman's Peak for Wilderness under the RARE II study. The administration later modified that recommendation to include additional areas. One of the responsibilities of the Forest Service under the National Environmental Policy Act is to recommend needed changes in legislation, regulation and other policy matters. We agree with the original Forest Service recommendation and believe that the Forest Service should have recommended a return to their original proposed Wilderness boundaries and acreage.

ROAD MANAGEMENT

The proposed Plan recommends that approximately one-third of the roads that will be built on the Kootenai Forest will be closed to enhance other resource values. We fully support this road management policy. Our concern is that the road closures do not go far enough. We would prefer to see road closures in the vicinity of 50% at a given time. This would enhance the Forest Service ability to manage for grizzly bear and other wildlife species. It would also reduce maintenance costs and extend the life of individual roads.

FISHERIES

We note that all of the alternatives project a decrease in fish populations. We recognize that the Forest Service is only projecting numbers based on suitable habitat. The Montana Department of Fish, Wildlife and Parks controls fish numbers through the length of their fishing seasons. In order to supplement fish numbers, the Forest Service could recommend to the Department of Fish, Wildlife, and Parks that they periodically supplement fish populations through the use of hatchery-reared fish.

INTERMINGLED LANDS

The Plan does not consider land exchanges that are, at present, close to being consummated. One such proposal is a land exchange between the Forest Service and Champion Timberlands. The Forest Service lands contained within this proposal should be included under Management Area #27.

571

April 12, 1983

Stan Billheimer
1655 Rose Crossing
Kalispell, MT 5990[illegible]

US Forest Service
Mr. William Morden
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Mr. Morden,

I am writing to express my views on the Ten Lakes Scenic area.

I reside in [illegible]l, but am employed in Lincoln County and spend most of my ti[illegible]

I am against [illegible] this area turned into a wilderness area, and support the Fore[illegible]ice proposal for the area.

Thank you,

Stan Billheimer

572

Dear Mr. Morden:

I feel the Ten Lakes should remain a Scenic area. I have been backpacking and snowmobiling in that area for several years. I think if this is made a wilderness area, it will be overpopulated, because of the wilderness title. I am very against making this area and feel very strongly about leaving this area scenic.

Thank you

Gary W. Mason

Box 241
Eureka, MT 59917

573

4-14-83

Dear Mr. Morden,

I am writing in regards to the Ten Lakes Scenic Area. I agree with the forest Service plan & don't want to see it become a wilderness area. We need jobs in Eureka.

Regards.

Fowler
Box 488
Eureka, MT 59917

DEAR WILLIAM MORDEN'

THIS IS IN REGUARDS TO THE PROPOSED WILDERNESS PROTECTION, FOR ALTERATIVE C WILDERNESS PROTECTION FOR THE ENTIRE TEN LAKES WILD AREA OF 36,000 ACRES PLEASE NOTE.

I WISH FOR YOU TO THINK WITH A CLEAR MIND AND TRY TO PRESERVE THIS PRESIOUS RECREATION FOR ALL OF US AND THE FUTURE OF MAN-KIND. NOW DOESN'T THAT FEEL BETTER? SAVE OUR 10 LAKES.

WATCHING YOU, AND YOUR ACTIONS.'

THOMAS KNUTSON

575

April 13, 1983
Box 1742
Whitefish MT
59931

Forest Supervisor
KNFS.

Dear Mr. Morden,

I feel [illegible] corner of Montana has no areas protected permanently for future generations. I think Ten Lakes Scenic Area is an important area and is critical to non-game wildlife that no longer has habitat in the lower 48 states.

[illegible] that in a few years [illegible] will be gone [illegible] the Cabinet Mtns and [illegible] will be in the [illegible] area and much [illegible] for [illegible]

I think it is important that [illegible] Lakes area have more protection. It is an important buffer zone in the North Fork area.

Montanans will be proud to have had the foresight to protect these wild areas

Thank you for your time,
Constance V. Kay

Rob Leyerberg
Box 607
Hungry Horse, MT
59919

14 Apr 83

577

Dear Kootenai National Forest

After reviewing the Report and Proposal for the Ten Lakes Montana Wilderness Study Act Area, I am under the opinion that the best designation of the area would be a combination of Wilderness designation, especially managed roadless dispersed recreation and timber harvest similiar to Alternative B.

Wheras I feel strongly that a significant part of the area should be managed as Wilderness, I also feel it would be in the best interest of all users to manage the readily accessible and heavily used areas as roadless dispersed recreation areas.

I would appreciate it if you would keep me informed of the final reccomendations for this area.

Sincerely,
Rob Leyerberg

FROM: BOB TRAINA 578-1
RR 1, BOX 37C
EUREKA, MONTANA 59917
APRIL 14, 1983

TO: KOOTENAI NATIONAL FOREST PLANNING
COMMITTEE
SUPERVISOR'S OFFICE
LIBBY, MONTANA

I'd like to comment on the proposals and current direction for the 10 LAKES SCENIC Area. This is somewhat "last minute rush" so I hope you'll bear with, as I just learned about the April 15 deadline.

FIRST, I HAVE COVERED A MAJORITY OF THE AREA IN QUESTION EITHER WHILE WORKING FOR THE FOREST SERVICE DOING SALVAGE RECONS OR BACKPACKING AND HIKING. SO I feel that I know this study area well enough to make these comments.

PROPOSED ACTION

I'll limit my discussion to those areas proposed for timber production. One area is above the upper robin creek - wolverine creek roads. This area does contain a fair amount

(2) (S)
OF LARGE, OLD-GROWTH SPRUCE, ALONG WITH SUB ALPIN FIR (AF) IN A FAIRLY OPEN STAND. THE BRUSH IS EXTREMELY THICK AND ANY PARTIAL CUTS WOULD RESULT IN SLOW REGENERATION. EVEN CLEARCUTTING WOULDN'T BUY MUCH UNLESS IT ~~WAS~~ INCLUDED PLANTING. THIS AREA ~~HAVE~~ WOULD BE BETTER ALLOCATED TO RECREATION (2 WELL USED TRAIL HEADS ALONG THIS ROAD), GRIZZLY BEARS (NUMEROUS SIGHTINGS OVER THE YEARS ALONG THE UPPER ROADS), AND VIEWING AS THIS AREA IS WELL VIEWED ~~ALONG THE~~ FROM THE THERRIAULT LAKES ROAD.

THE WIGWAM EAST FACE DOES CONTAIN A LARGE AMOUNT OF LARGE S, BUT KEEPING IN MIND THE EXTENT OF CLEARCUTTING DONE IN THE WIGWAM BOTTOM, THE STEEPNESS OF THE SLOPE, AND THE VIEWING SIGNIFICANCE, I FEEL THIS AREA SHOULD BE LEFT ALONE.

UPPER WAM CREEK DOES CONTAIN SOME HIGH YIELD TIMBER STANDS AND COULD STAND SOME SALVAGE CUTTING. GRIZZLY USE IS ALSO OF IMPORTANCE.

UPPER CAMP, DIVIDE, AND FOUNDATION CREEKS: THESE AREAS HAVE BEEN EXTENSIVELY CUT AND I FEEL A BETTER USE OF THE REMAINING TIMBER WOULD BE FOR AESTHETICS, WATERSHED, AND WILDLIFE.

THE AREA ABOVE THE GRAVE CREEK ROAD, FROM LEWIS CREEK JUNCTION ON DOWN, DOES CONTAIN A FAIR AMOUNT OF LARGE Spruce, WESTERN WHITE

PINE, WESTERN LARCH, DOUGLAS-FIR, CEDAR, SUBALPINE FIR, AND EVEN SOME PONDEROSA PINE. FOR THE MOST PART, THE SLOPES ARE STEEP AND WOULD DICTATE SOME SORT OF CABLE SYSTEM. THIS IN TURN WOULD MEAN CLEARCUTTING, SOME EXPENSIVE ROADS, AND THE RESULT WOULD BE SOME TERRIBLE SCARS ALONG A MAJOR ARTERIAL ROAD. I WOULD, HOWEVER, BE IN FAVOR OF SALVAGE CUTTING WHEREVER THERE WAS TRACTOR GROUND.

THERE IS GOOD TIMBER AT THE HEAD OF CLARENCE CREEK, UNDER STAHL LOOKOUT, BUT THIS BEAUTIFUL ALPINE STAND IS CHARACTERIZED BY NUMEROUS ELK WALLOWS, WET GROUND AND A NETWORK OF SMALL STREAMS RUNNING YEAR ROUND, AND, IN PLACES, VERY SHALLOW, ROCKY, HIGHLY EROSIVE SOIL. I STRONGLY INSIST THAT THIS BEAUTIFUL SPOT, WHICH INCLUDES A SMALL LAKE AT THE BASE OF STAHL PEAK, BE LEFT UNDISTURBED.

I AM NOT REAL FAMILIAR WITH THE EUREKA-FOCI AREA BUT I DO KNOW THAT ANY CUTTING WOULD HAVE TO BE DONE ON STEEP GROUND, OVERLOOKING EUREKA, WITH EXTENSIVE ROADWORK.

LIKEWISE WITH GIBRALTER RIDGE; I FEEL THAT THESE AREAS ARE BETTER SUITED FOR ELK & DEER WINTER RANGE, VIEWING, AND WATERSHED PROTECTION ALSO RECREATION DUE TO THE AMOUNT OF TRAILS.

SO, IN SUMMARY, THE PROPOSED ACTION DOES NOT IN ANY WAY, APPROXIMATE WHAT I FEEL SHOULD BE DONE WITH THE AREA.

ALTERNATIVE A

ALL OF THE AREAS I DISCUSSED IN THE PROPOSED ACTION ARE INCLUDED IN THE ALTERNATIVE, AS WELL AS THE FOLLOWING:

THE AREA BEHIND "BIG THERRIAULT LAKE" DOES CONTAIN AREAS OF LARGE OLD-GROWTH S ON TRACTOR GROUND. DUE TO THE PRESENCE OF THE SPRUCE BEETLE I FEEL THAT THIS AREA SHOULD BE LOGGED. HOWEVER, ALSO INCLUDED IN THIS AREA, IS SOME WET SWAMPY GROUND, UNDERNEATH THE PASS (THERRIAUL WHICH HAS HIGH VALUE FOR RECREATION (NUMEROUS TRAILS) AND WILDLIFE. I FEEL THAT THIS AREA SHOULD NOT HAVE BEEN INCLUDED.

THE OTHER ADDITION IS AT THE HEAD OF DIVIDE & CAMP CREEK, ALSO WICKIUP CREEK. AS I STATED EARLIER, DUE TO THE PREVIOUS EXTENSIVE CLEARCUTTING I FEEL THESE AREAS SHOULD BE LEFT ALONE.

THAT AREA ON CLARENCE CREEK, THAT WAS ALSO INCLUDED, IS CHARACTERIZED BY AVALANCHE CHUTES AND NON-PRODUCTIVE GROUND SO I DON'T SEE WHY IT WAS ADDED.

SO, EXCEPT FOR THE ADDITION OF PART OF THE AREA BEHIND "BIG THERRIAULT LAKE", ALTERNATIVE A WOULD BE A <u>WORSE</u> CHOICE.

ALTERNATIVE B

IN SOME WAYS, I FEEL THAT THIS IS A BETTER ALTERNATIVE. BUT STILL, THIS ONE HAS DELETED SOME AREAS WHERE TIMBER PRODUCTION COULD BE CONSIDERED, AND RETAINED THOSE AREAS

WHICH I FELT SHOULD NOT: EUREKA FACE, GIBRALTER RIDGE.

SO, AGAIN I DO NOT FEEL THAT THIS IS A GOOD, LOGICAL CHOICE.

ALTERNATIVE D

SINCE THIS ALTERNATIVE DOES NOT IMPROVE ON ANY OF THE OTHERS, AGAIN I DO NOT FEEL THIS IS A VIABLE CHOICE.

CURRENT DIRECTION

OF ALL THE ALTERNATIVES SO FAR, I FEEL THAT THIS MOST CLOSELY FOLLOWS WHAT I WOULD CHOOSE FOR THE AREA. IT FOLLOWS WITH WHAT TYPE STANDS ARE THERE, i.e. where there is a chance for timber yield, it allows timber cutting, IN SOME CASES. THEREFORE, I STILL FEEL THERE IS A NEED FOR SOME KIND OF NEW DIRECTION. ALTHOUGH, I SOMEWHAT AGREE WITH THE WAY THIS AREA HAS BEEN MANAGED IN THE "RECENT" PAST, I SEE A NEED TO CLASSIFY IT "PERMANENTLY" (IF I CAN USE THE TERM LOOSELY HERE) AS EITHER WILDERNESS OR NOT, WHICH BRINGS ME TO THE LAST ALTERNATIVE.

ALTERNATIVE C

ALTHOUGH, I DO NOT AGREE, TOTALLY WITH MAKING THE AREA WILDERNESS, I FEEL THAT

(6)

OF THESE 6 CHOICES, THIS MOST CLOSELY FOLLOWS MY MANAGEMENT RECOMMENDATIONS. IN MOST OF THE AREAS UNDER STUDY, I DO NOT PRESENTLY OR IN THE FUTURE SEE ANY NEED FOR TIMBER PRODUCTION. IN SOME OF THOSE AREAS I DISCUSSED, I DO SEE A STRONG NEED (IN SOME CASES URGENT) FOR SELECTIVE SALVAGE CUTTING DUE TO THIS NEAR EPIDEMIC POPULATION OF SPRUCE BEETLES. I FEEL THAT THIS IS A TREMENDOUS WASTE OF WOOD-FIBER IN THOSE AREAS THAT CAN BE TRACTOR-LOGGED IN ONE SEASON, WITH NO ROAD CONSTRUCTION, AND NO DAMAGE TO STREAMS, CAMPGROUNDS, AND OTHER RECREATIONAL OPPORTUNITIES. BUT SINCE THESE AREAS HAVE NOT BEEN DELINEATED, AND I CAN SEE THE DIFFICULT IN DOING SO ALTHOUGH WITH ADEQUATE RESEARCH I FEEL COULD HAVE BEEN ACCOMPLISHED, I FEEL THA THE OVERALL BENEFIT OF RETAINING THIS UNSPOILED CORNER OF MONTANA ENORMOUSLY OUTWEIGHS THE LOSS OF BOARD FEET.

MYSELF, A SNOWMOBILE ENTHUSIAST, I WOULD GREATLY MISS BEING ABLE TO RIDE SNOWMOBILE IN THE TEN LAKES STUDY AREA, BUT I WOULD READILY PUT ON MY SKIS AND WORK UP A SWEAT RATHER THAN RIDE, IF IT MEANS THAT THIS AREA COULD BE RETAINED AS IT IS. BY CURTAILING ROAD BUILDING, WILDLIFE, VIEWING, AND RECREATION WOULD BENEFIT TREMENDOUSLY.

I UNDERSTAND OTHERS' CONCERN THAT BY CLASSIFYING TEN LAKES WILDERNESS, WE'LL BE CALLING ATTENTION TO "OUR" TEN LAKES

AND ITS USE WILL NO DOUBT INCREASE. THERE IS NO SOLUTION TO THIS UNWANTED BYPRODUCT. THE ONLY CONDOLENCE I CAN GIVE IS THAT THE LOCAL ECONOMY COULD BENEFIT FROM THE INCREASED TOURISM.

SO FOR WHAT IT'S WORTH, I VOTE TO MAKE THE ENTIRE 35,900 acre study area a Wilderness AREA. I FEEL THAT THE AMOUNT OF TIMBER LOSS DUE TO THE ACRES TAKEN OUT OF TIMBER PRODUCTION, WILL BE INSIGNIFICANT WHEN COMPARED TO THE TREMENDOUS GAINS, NO NOT GAINS— SAVINGS IN THE OTHER RESOURCES.

SINCERELY,

BOB TRAINA

Bob Traina

4-14-83

Dear Mr. Morden, 580

Lets keep ten lakes as a scenic area, because I like to snowmobile and so do alot of my friends.

Todd Feathers

TODD FEATHERLY
Box 917
EUREKA, MT 59917

April 14, 1983

Dear [illegible],

It [illegible] recently come to my attention that a [illegible] is being considered for the Ten Lakes [illegible] I understand that if the proposed 18,500 [illegible] area designation were to go into effect, [illegible] for oil and gas leasing could be allowed [illegible] as salvage timber sales. This designation [illegible] seem to be a wise choice for an area [illegible] endangered species, such as the [illegible] grizzly bear, and grey wolf, depend on as an [illegible] environment for their survival.

As a [illegible] student in environmental microbiology and as [illegible] very concerned about balancing land dis[illegible] with the preservation of wildlife habitats, I urge you to reconsider and allocate the entire 36,000 [illegible] Ten Lakes area as the Ten Lakes WILDERNESS area! Pa[illegible] areas and wildlands are a necessity to the Kootenai National Forest.

Thank you for your time and consideration.

Sincerely,
Karen L. Anderson

Dept. of Microbiology
MSU
Bozeman, MT 59715

Mt. Wildlife Federation (Excerpt) 584-28

grizzly habitat, and land allocation considered supportive of grizzly recovery should reflect such a policy.

5. The Proposed Plan inadequately addresses the bald eagle and the gray wolf.

The bald eagle is listed as an endangered species under the ESA for the conterminous States, except Washington, Oregon, Minnesota, Wisconsin and Michigan. 50 C.F.R. § 17.1. The gray wolf is listed as an endangered species for the 48 conterminous States. 50 C.F.R. § 17.1. Even though both of these species are endangered, i.e., in danger of extinction, they are only passingly mentioned in both the proposed Plan and the DEIS.

The DEIS mentions that the number of bald eagles appears to have increased in recent years, and that the Forest supplies more habitat than is currently occupied. (DEIS, p. III-7). It then goes on to state that the management for trout fisheries (which will decrease in the proposed Plan), will benefit the bald eagle (DEIS, p. IV-18). Is the Plan proposing to decrease the habitat without documentation of how many bald eagles may utilize that habitat?

The DEIS states that management for elk will benefit the wolf (DEIS, p. IV-18).

Neither the proposed Plan nor the alternatives even purport to comply with the ESA with respect to the bald eagle or the gray wolf.

The ESA mandates that the Forest Service, as a federal agency, take action to conserve endangered species. Yet the DEIS admits that "[l]ittle change would occur to the bald eagle and rocky mountain wolf population" (DEIS, p. III-7).

V. RECREATION

A. The Forest Service's proposal for the Montana Wilderness Study Act areas is in violation of Federal law and regulation.

When Congress passed the Montana Wilderness Study Act it directed the Forest Service to maintain the presently existing wilderness potential of the

Montana Wilderness Study Areas until otherwise determined by Congress. These areas are to be managed as de facto wilderness areas. The allocation of the Ten Lakes and Mt. Henry WSA's to non-wilderness uses and inclusion of timber from these areas in potential timber yield within the suitable timber base is a violation of the Congressional mandate. These allocations severely diminish the potential for including these areas in the National Wilderness Preservation System. We fear that in the future the Forest Service will pressure Congress into releasing these areas by arguing that they have been cutting other areas at a higher rate (violating non-declining even flow) in anticipation of cutting these WSA's in later decades. Congress rejected a provision in the Act which would have required them to reach a conclusion in a certain number of years because they did not want a "gun at their heads." 123 Cong. Rec. 31059 (1977). It would be prudent to leave these areas out of the timber base at present, and add them in only after Congress determines their suitability for multiple-use management.

The Ten Lakes Wilderness Study Area should have been analyzed completely independently from the rest of the Kootenai National Forest. Instead, "As the Kootenai National Forest Plan alternatives were modeled, Ten Lakes MWSAA was also modeled in different degrees of wilderness or non-wilderness, whichever was consistent with the overall intent of the forest-wide alternative" (Ten Lakes Montana Wilderness Study Act Area Report and Proposal, p. II-1, emphasis added). The Forest Service simply allocated the Ten Lakes Area "... to meet Regional resource targets without disrupting local community stability" which is the goal of the proposed action for the Forest (DEIS, p. II-24; TLMWSAA Report and Proposal, p. II-2). It is more than mere coincidence that the Ten Lakes proposal fits the goal of the Proposed Kootenai National Forest Plan. The two

choices were interrelated. This action clearly violates the Montana Wilderness Study Act.

Further evidence that the Ten Lakes evaluation was not done independently is found on page II-11 of the TLMWSAA Report and Proposal. The report states:

> 1. Nondeclining even-flow (NDY) constraint was used in all the Forest-wide alternatives that apply to Ten Lakes. This was done to insure a constant supply of wood products, now and in the future. This does not mean that timber harvest flows will always be non-declining within the Ten Lakes Study Area. It means that it will be non-declining on the entire Forest only.

TLMWSAA Report and Proposal, p. II-11. It also means that the Ten Lakes Wilderness Study Act Area was not evaluated on the basis of its suitability for wilderness classification. The proposal for the Ten Lakes Area was chosen to support the goals of the proposed Forest Plan, i.e., to meet Regional resource targets without disrupting community stability, and increase the timber harvest. Departing from non-declining even flow in the Ten Lakes area illustrates how the Forest is using that timber base to increase the cut on the rest of the Forest. The Forest is apparently planning to cut the Ten Lakes area at a more rapid rate once they pressure Congress into releasing it to make up for overcutting in other areas. By doing this the cut forest-wide is non-declining.

The proposal for the Wilderness Study Areas also violates federal regulations. These regulations provide that:

> 219.14(a). During the analysis of the management situation, data on all National Forest System lands within the planning area shall be reviewed, and those lands within any one of the categories described in paragraph a(1) through (4) of this section shall be identified as not suited for timber production -
>
> ... (4) The land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture or the Chief of the Forest Service.

47 Fed. Reg. 43046 (1982) (to be codified at 36 C.F.R. § 219.14(9)). Montana Wilderness Study Act Areas are to be managed as wilderness areas until Congress

determines otherwise. These lands were withdrawn from timber production by an act of Congress, and they should not have been designated as suitable for timber production during the analysis of the management situation.

B. The Proposed Kootenai National Forest Plan is biased against roadless recreation.

The proposed Plan provides motorized recreation opportunities in excess of the expected demand under all alternatives (DEIS, p. IV-55). However, the areas allocated to roadless dispersed recreation activities will not meet the projected demand in all alternatives (DEIS, p. II-68). The Forest Service seems willing to provide only those recreational opportunities semi-compatible with commodity production and has not even attempted to formulate an alternative that approaches meeting the projected demand for roadless recreation. No benefit to the public is gained if the opportunity for recreation offered by the Forest Plan is not needed or used.

The Forest Service claims that most people in the local area will favor present or increased amounts of motorized recreation (DEIS, p. IV-55). No survey data is cited in the Plan or DEIS to support this claim. It is also inconsistent with hunter surveys conducted by the Montana Department of Fish, Wildlife and Parks that show a majority of hunters favor the present level or increased restrictions on road use during the big game seasons. These surveys were based on a substantial sample of hunters at checking stations.

The Forest Service erroneously assumes that hunting opportunity is directly related to the size of the animal population (DEIS, p. II-41). This is true only if there is adequate security cover. Increased success rates do not necessarily mean more hunting opportunity. If security cover is lost through timber harvest and roading, shorter seasons and more restrictive regulations will cause a loss in hunter recreation, i.e., an "extractive (or consumptive) recreational use" that is most prevalent will change local lifestyles. (DEIS, p. IV-55).

Nat. Audubon Soc. (excerpt) 586-8

margin much valuable wildlife habitat will be ignored, mismanaged, or destroyed. The definition (III-57) should be based on plant species composition rather than physical distance. Other recommendations:

1) The goal statement should emphasize management to protect soil, water, vegetation and fish and wildlife resources under the principles of multiple use and sustained yield, not vice versa.

2) Only selection or group selection methods of timber harvest should be permitted in riparian areas. Even aged management should be discouraged.

Grizzly Bear Populations

The Proposed Action will not provide for recovery of grizzly bear populations. The number of bears it will support - 32 - is below both the number recommended by the Grizzly Bear Recovery Plan (60 bears) and the Region 1 RPA goal of 58 bears (Regional Plan B-4). The Proposed Action will not aid in the recovery of the grizzly population and is thus inconsistent with the Endangered Species Act.

The reasons for this lack of recovery are not hard to find: the Plan's increased timber harvest levels, increase in acres suitable for timber production, increase in road-miles and road densities. No acres are allocated to the grizzly prescription (DEIS, II-91) and substantial portions of grizzly habitat Situations 2,3 and 4 are allocated to nonsupportive allocations (FWS, 1983). Some 97-98% of Situation 1 habitat is indeed allocated to supportive prescriptions, but this is not evidently adequate to allow grizzly populations in the Cabinet-Yoak ecosystem and the Whitefish mountains to increase.

This is one more - albeit a major - reason why the proposed Plan is inadequate and unacceptable. We believe that a revised Plan that gives appropriate emphasis to old growth, fisheries, riparian areas and primitive recreation will also meet the goals set by the Grizzly Bear Recovery Plan.

Wilderness

A. Ten Lakes Wilderness Study Area

The proposed Plan would designate none of the Ten Lakes MWSA as wilderness, due to the goals of meeting Regional resource targets without disrupting local community stability. In this context, we point out that:

1) The timber that could be cut on the Ten Lakes MWSA (a maximum of 3.8 MM BF/year) is not needed to meet regional timber targets, since the Kootenai plans to exceed this target. Non productive and low-to-moderately productive lands constitute about 29,000 acres of the 36,000 acres (Report, II-14).

2) The maintenance of Ten Lakes' roadless qualities will provide opportunities to meet the demand for primitive recreation, which the Proposed Action will not meet.

3) Wilderness designation would provide the highest possible security for grizzly bear populations, and aid in achieving the Regional goal for populations of that threatened species.

The evidence supporting wilderness designation of at least an expanded scenic area is strong: a high WARS rating (20 out of 28); grizzly, wolf and possibly caribou populations present; high scenic values (III-2); only 99 acres of patented mining claims (III-9); high demand for primitive recreation (Plan, V-6). The area is one of the few places left untouched by previous destructive logging, and in addition to the threatened and endangered species mentioned, supports a variety of wilderness - associated wildlife. Its importance in protecting watershed conditions and water quality has been completely ignored in the Report. At the least we should be able to judge impacts on water quality under the various Alternatives.

The Proposed Action would keep 18,600 acres roadless and manage for wildlife, viewing and timber production on the rest of the area's 36,000 acres. We believe that the scenic, wildlife, recreation and watershed values of the area can best be protected by wilderness designation of the whole. Wildlife benefits, particularly for grizzly, wolf and caribou, can still be provided. Prescribed, natural and man-caused fires can be used to improve habitat if necessary; timber harvest is not the only means to that end. Wilderness designation will maintain the habitat effectiveness so crucial to wilderness-associated species.

The Report does not contain a thorough economic analysis of wilderness/ non-wilderness management. Given the high values the public is willing to pay for wilderness-based recreation and wildlife (see, for example Walsh, Gilman and Loomis, 1982) and the relatively low costs of management, wilderness is a cost-effective way to manage land. We challenge the Forest to look at this more closely.

B. Mt. Henry Wilderness Study Area

Although the Plan hardly mentions this area, we believe that it, like Ten Lakes, also deserves wilderness designation. It lies at relatively low elevations, comprises a manageable unit and, above all, contains wilderness-associated wildlife and ample opportunities for wilderness-based recreation. We urge that the revised Plan look more carefully at Mt. Henry and recommend its designation as part of the national Wilderness Preservation System.

Monitoring and Evaluation

The monitoring schedule in Chapter IV of the Plan includes annual surveys of old-growth dependent indicator species, old growth habitat quantity and condition (every other year), riparian habitat quantity and conditon, cavity habitat quantity and condition, acres of habitat by condition for

600

BAGLEY & KOSKY
CERTIFIED PUBLIC ACCOUNTANTS

POST OFFICE BOX R
EUREKA, MONTANA 59917

RICHARD BAGLEY, C.P.A.
KELLY KOSKY, C.P.A.

296-3122
AREA CODE 406

April 15, 1983

Mr. Jim Schadle
Kootenai National Forest
Libby, Montana

Dear Jim,

We are writing to express our views on the Ten Lakes Scenic area which is currently under review for wilderness status. We are both of the opinion that this beautiful area should be designated as wilderness area. With good forest management practices which the Forest Service is striving to attain, the remaining lands under jurisdiction of the Kootenai National Forest should be able to produce an over abundance of forest products, along with oil and gas, if discovered.

Designating Ten Lakes as wilderness will assure that these types of development activities won't take place, allowing an individual to enjoy God's creation in its natural beauty. Thank you for your consideration and allowing us to share our opinion.

Sincerely,

Kelly Kosky

Richard Bagley

Received 4/15/83 0900 hrs 601-1
John W. Pritchard

TO WHOM IT MAY CONCERN: Dist Ranger Murphy Lake Ranger District

We, the undersigned, belive that the plan of the Tobacco Valley Citizens Committee, for the Ten Lades Senic Area should be withdrawn from consideration, as it violates our right of choice. wheras they, (Tobacco Valley Citizens Committee), failed to hold any public meeting with the citizens of this valley or with any of the Clubs they claim to represent.

If this plan is not withdrawn from consideration we ask that a copy of this petition be attached to their proposal.

Nick Carvey - Logger and vice president of rod and gun Club
Esther Carvey - member of Women in timber
Floyd Carvey
Barbara Carvey
[illegible] Newton Logger
Hal Wills
[illegible]
Don Carvey
Lois Workman
Helen Tuell
Nicki Carvey
[illegible] Pinson Local citizen
Judd Pinson snow catter Logger and citizen.
[illegible] Anderson

601-2

James [illegible]
R. Keith Glover
Bill R. Driese
Stub Cox
Ray DeShazer
Steven Hoover
Wayne Workman
Steve Gay

Charles Carvey
Kenneth Goff
Joseph [illegible]
Arnold Puell
Pat Kearney
Jerry A. Lucy Eureka, mt
Don Palmer Logging Eureka

602

April 13, 1983

Bill Morden, Forest Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden,

The Lincoln County Planning Board has passed a resolution to the effect that, a committee assembled under Lloyd West to advance a new proposal for the management of the Ten Lakes Scenic Area, represents a good cross section of Tobacco Valley citizens and that the proposal is a valid alternative that should be given equal consideration with the existing alternatives.

Thank you for the opportunity to comment on this project and please keep us informed of any new developments concerning the Kootenai National Forest and the Ten Lakes Scenic Area Plan.

Sincerely,

Ted Rollins

Ted Rollins, Chairman
Lincoln County Planning Board

c/o ASARCO
Troy Project
P.O. Box 868
Troy, MT 59923

604-1

Libby, Montana
April 15, 1983

Mr. William E. Morden
Regional Forester
Kootenai National Forest
P. O. Box AS
Libby, Montana 59923

Re: Kootenai National Forest Plan Comment

Dear Mr. Morden:

The concept of the Kootenai National Forest plan appears to be good in that it provides for both modification and diversification in the management of the forest toward the end of reasonable resource allocation. It is hoped this concept can be fully implemented. Of concern is the assumed importance of public input in helping to define goals and management alternatives. Realizing the ever present difficulties of interpreting public input, some guidelines must be established to give effect to the public participation possibly through a better response to the utilization or nonutilization of public input.

Of great concern to the Libby area Chamber of Commerce is the direct or indirect economic impacts of various management proposals contained in the Kootenai National Forest. The seven long-range management goals set forth in the plan are commendable, but point out the problems encountered with the lack of specificity or a failure to provide means of conflict resolution other than resorting to courts. Specific comments we would request you consider are:

1) Setting management policies to encourage timber sales to locally established small firms with harvest figures related to local capacity to process timber, together with road construction costs and timber sale costs which are competitive with the timber logging costs of timber removed from private property.

2) More realistic incorporation of the Threatened and Endangered Species Act as it relates to the grizzly bear in the forest to lessen the impact of areas managed specifically for grizzly bear habitat to logging, mining and recreational industries.

604-2

3) Stricter accounting in cost analysis figures including cost of Forest Service planning efforts, Forest Service staffing needed to implement alternate management proposals, better evaluation of aesthetics.

4) Reconsideration of future road construction to maintain the least possible impact on the environment. Some consideration should be given here to increased traffic management for safety and the fact that subsequent to road utilization for timber removal allow the areas to revert to, in essence, a roadless area increasing recreational opportunities in both an organized and individual basis.

5) We support the proposed action for the Ten Lakes Wilderness Study area.

6) We support the proposed action of timber harvest based on the sustained yield concept.

7) We support the proposed action for the Scotchman Peak Wilderness Study area.

In reviewing these comments hopefully it will be seen the inherent conflict with the long-range goals enumerated in the plan more specifically providing a stable base for economic growth in dependent geographic areas, cooperating with land and resource management efforts of other federal agencies, and cost in economic efficiency to produce the greatest possible net public benefit. Without some type of more effective public participation it is felt that our concerns for the local economy will not only be met but may very well go unheeded.

Yours truly,

Mark J. Fennessy, President
Libby Area Chamber of Commerce

MJF:rd

605

April 15, 1983

Supervisor
Kootenai National Forest
Libby, MT 59923

Dear Sirs:

I wish to express myself regarding the Ten Lakes Scenic Area. It is my considered opinion that the area should be managed to maximize the recreational aspects. There are ample number of acres being managed for timber in the Kootenai. There should be no roads pushed any further into the area and some roads that are there should be closed off.

I believe that the Tobacco Valley has a future other than in logging and I desire to see this last unspoiled pocket managed to that end.

Sincerely,

Gary Montgomery

GM:sb

606

Gary Sakahara
356 1/2 6th av W.N.
Kalispell, Mt 59901

William Morden
Forest Supervisor
Kootenai National Forest
Box AS,
Libby, Mt 59923

COMMENTS "TEN LAKES STUDY ARE"

For several reasons I have to support Wilderness Designation for the study area (alt. C)..

1) The timber resource values are minimal and the loss of this resource would be insignificant in meeting R.P.A program goals.

2) The study Area offers the best grizzly habitat and has the highest Grizzly concentration anywhere in the KNF. Wilderness offers the most sure protection for the grizz and other T &E species.

3) Wilderness designation for the study area is essential to the KNF to bring the plan closer to meeting RPA goals for wilderness.

4) With the pressures of the Oil & Gas Industry on the area the best and perhaps the only protection is the congressional protection of wilderness status

5) Special areas like Ten Lakes are are becoming more special every day by the rapidly diminishing numbers of these special areas.

WILDERNESS DESIGNATION for the "TEN LAKES" is not only appropriate it is an ABSOLUTE NECESSITY.

COMMENTS ON THE KOOTENAI FOREST PLAN

The Kootenai Forest plan could include:(a more complete program to mitigate sedimentation & water-shed protection; drastically smaller roading totals and less timber emphasis; more consideration for amenity values; an honest consideration fish & wildlife and their habitat; and wilderness designation for Ten Lakes) and still easily meet RPA program goals for timber

The Kootenai National Forest needs a balanced, well thought out plan that the non-logger public can live with on a long term basis.

The "PROPOSED KOOTENAI NATIONAL FOREST PLAN" is definately not it!!!

Thank You

Gary Sakahara

Gary Sakahara
V.P. Flathead Wildlife Inc.

Bill Morden, Supervisor
Box A5
Libby, Mt 59923

April 13, 1983

607

Dear Bill:

I want to see the Ten Lake Wilderness Study area remain roadless and be recommended for WILDERNESS. It's a unique, pristine wild area, dotted with high mountain lakes. It's prime value is the lakes, it's remoteness, and the visual qualities needed to preserve the lakes. It's a high quality recreation area — a very backcountry rec area. Let's keep it that way.

The rest of the Kootenai Forest Plan will have the Kootenai looking like a bowl of spaghetti was dropped on it. Preserving the best scenic, recreational, and roadless area you have, shows you care about the rest of the world and wildlife habitat.

The timber value of Ten Lakes is low and won't help you meet RPA goals anyway.

LET TEN LAKES BE WILDERNESS!

Elaine Snyder
Box 112
Kila, Mt 59920

Sir 608

As very concerned snowmobilers of the Ten Lakes Scenic Area. We the undersigned would very much like to see it as a Scenic area, where we could use the area for winter recreation as we do so now. As snowmobilers of this area each one of us put about 800 miles or more on these snowmobiles in this area in a year. We the undersigned have been doing this for 10 years, a few of us longer. We have seen cross contry skiers twice in this area, when we came across them they were using are old snowmobile tracks & said they really appreciated the packed trail. We have never come across any people on snowshoes in the area, we have never seen any sign of Caribou in the area, we are all outdoors men, loggers, hunters. I feel that if the caribou were there we would have surely seen sign of them. As for the Grizzly bear they are still in their hibernation so we do not disturbed them at all. So our point is we do not hurt the Area at all with these snowmobiles. We use it as a recreational playground in the winter months of the year. We would like to see it left as a Scenic Area & not a Wilderness.

Snowmobilers of the Ten Lakes Area

c/o Bob Morris
Box 486
Eureka, MT 59917

LeRoy R. Morris
Brad Osler
Robert J. Morris
Dennis J. Morris
Pat Stoken
Ron Colvard

Ken Peterson
Lee Pa[illegible]
Stan Phil
Roy Cornelison
Mike Stoken
Lake Klub

Ben Phil
Paul Kjensrud
John Morgan
Herb Black
L. Jack Higle
Mike Marvel

609

213 Edgewood Drive
Kalispell, Montana 59901
April 15, 1983

William Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Re: Ten Lakes Wilderness Study Area

Dear Mr. Morden:

I am writing you to express my support for Alternative C of the draft report of the Ten Lakes Wilderness Study area for a 35,900 acre wilderness.

As you are aware, the Ten Lake report itself states on page IV-2 that no alternative including the one of total wilderness would appreciably affect the Kootenai Forest's ability to meet the RPA Resource goals for any other resource with the exception of wilderness. Only if the entire Ten Lakes area is classified as wilderness will the Forest be able to meet all of its goals including temporary and wilderness.

The Ten Lakes area contains all of those primitive attributes necessary for wilderness designation. In addition, it provides habitat for the grizzly bear and other wildland dependant species. Any degradation of the area would endanger the survival of these animals. There is a critical shortage of protected wilderness areas in the Kootenai Forest. You must act now to prevent impacts of mining, logging and roading from permanently destroying the wilderness and natural attributes of this area which many Americans have had the opportunity to enjoy. I urge you to adopt Alternative C of the draft report of the Ten Lakes Wilderness Study Area to ensure that future Americans will be able to enjoy the wilderness experience which the Ten Lakes area offers.

Sincerely,

Diane B. Walsh

DBW:sp

610-1

Ms. Jen Follett McCaw
218 12th Street, W
Columbia Falls, MT 59912

April 15, 1983

Dear Sir:

I am writing to make my plea in support of alternative "C" for the 35,900 acre Ten Lakes Wilderness. Having been born and raised in northwestern Montana, I have spent my 28 years watching the wilderness areas slip away. We have a serious shortage of these areas and I am extremely concerned.

The wilderness areas, such as Ten Lakes, provide a habitat for the grizzley bear, the wolf and other wildlife species that are so dependent on a wildland existence. A Wilderness classification would protect that existence.

Another point: On page IV-2 of the Ten Lakes Report, it is stated that the Forest Service's ability to meet the RPA resource goals for any resource, including timber, would not be radically affected by a Wilderness classification, except the wilderness goal itself. Timber goals could still be made if the entire 35,900 acres were classified "Wilderness". The only goal still not met would be the end of a wilderness shortage. Therefore, to deny the Wilderness classification of Ten Lakes would only make this shortage worse.

The argument, by the Forest Service, that the Ten Lakes area should be available for the use of snowmobilers, I find not only to be weak but disappointing. There are literally millions of acres of federal lands in northwestern Montana much closer to population centers that are now available to snowmobilers and other "off the road vehicle" uses. We hardly need to destroy the wilderness areas that are left, with roads and accesses, so that those who enjoy invading the quiet, solitude and clean air environment with loud, energy wasting machines can do just that---Invade. Let them get off their soft, cushioned seats and be a part of the wilderness, on foot.

In closing, I must seriously question whether it is in our best interest, as a society as a whole, to let go of the Ten Lakes area and let it be anything but the Wilderness which it so rightly deserves to be.

I live in northwestern Montana, because I co-exist best in her environment. You take away her wilderness areas and scar her forever with roads, clear-cuts, erosion, hydro-power projects, oil and gas riggs, which will happen without the Wilderness classification, and you take away Montana's most valuable assest and contribution to the rest of our country.

610-2

People live in northwestern Montana and travel,not only from around the country, but from all over the world just to spend a little time in Montana's Wildernesses. People need the wilderness to experience its wildlife and wildland, its adventure, its solitude and even its sanity. Remeber also, that money is spent in man's endeavor to be "one with the land". Wipe out the wilderness and that economic factor is also lost.

The Ten Lakes area as a "Wilderness" is important in so many ways and I have listed only a few.

Please save it. The Tens Lakes Wilderness area classification is sorely needed.

Sincerely,

Jen E. Follett McCaw

Jen E. Follett McCaw

611-1

WILLIAM P. MCCAW
218 12TH ST WEST
COLUMBIA FALLS, MT. 59912
(406-892-2080)

WILLIAM MORDEN
FOREST SUPERVISOR
KOOTENAI NATIONAL FOREST

DEAR SIR:

I AM WRITING IN REFERENCE TO THE TEN LAKES WILDERNESS IN YOUR AREA OF MONTANA. I FEEL THAT THIS AREA HAS TO BECOME A WILDERNESS AREA. MY REASONS ARE NOTHING NEW OR CREATIVE. THERE ARE MANY THINGS THAT ONCE ARE LOST ARE NEVER REGAINED. IT MAY BE A TYPE OF SPECIES, WILDERNESS AREA, OR LIFE STYLE.

TO HAVE AN AREA AS BEAUTIFUL AND AS UNTOUCHED AS THE TEN LAKES AREA IS A TREASURE IN ITSELF, NOT SO MUCH BECAUSE OF THE HABITAT PROTECTION FOR THREATENED AND ENDAGERED SPECIES SUCH AS THE WOLF, GRIZZLY BEAR, AND MOUNTAIN CARIBOU, BUT BECAUSE THIS IS AN AREA THAT CANNOT BE FABRICATED ANYWHERE ELSE IN THE WORLD. ZOOS AND WILD GAME PARKS CAN PROVIDE HABITAT THAT WILL ENSURE THE SURVIVAL OF SPECIES BUT NO WHERE CAN ANYONE PUT TOGETHER ALL THE ELEMENTS AND CHAINS THAT MAKE UP THE AREA KNOWN AS TEN LAKES.

THERE IS A SERIOUS REASON WHY THE TEN LAKES AREA AS IT IS NOW OFFERS A WILDERNESS EXPERIENCE AND A HABITAT SUITABLE FOR MANY THREATENED AND ENDANGERED SPECIES.

THERE ARE MANY AREAS THAT HAVE ALREADY UPSET THE NATURAL BALANCES THROUGH ROADS AND LOGGING OPERATIONS, - USE THOSE AREAS TO LOG FROM AND LEAVE THE UNTOUCHED AREAS AS WILD AS THEY ARE NOW - THEY WILL NEVER BE WILDER.

ONE DAY I WOULD LIKE TO SHOW MY CHILDREN THE TEN LAKES AREA AS IT IS NOW, NOT TELL THEM HOW IT WAS AS WE DRIVE THE LOGGING ROADS AND WALK THE SKID TRAILS. PLEASE THINK OF THE LAND, ITS HABITANTS, AND FUTURE GENERATIONS BEFORE YOU DECIDE ON THIS ISSUE.

SINCERELY,
WILLIAM P. McCAW

614

Thomas M. Holland
4105 Meadow Hills Dr.
Kalispell, Mt.
59901

William E. Morden
Forest Supervisor
Kootenai National Forest
Libby, Mt.

April 14, 1983

Dear Sir:

I am in support of Alternative C which would provide for wilderness designation of the 36,000 Acres of the Ten Lakes Basin. I have hiked and fished the Ten Lakes Area and believe it deserves permanent protection through wilderness designation. It is an excellent Area for families to experience primitive recreation because young children can make the shorter hikes to lakes that is not Available in large wilderness areas such as the Bob Marshall. The area, in addition to being very scenic, may be important to grizzly bear recovery and may also provide habitat for the gray wolf and mountain caribou. Thank you for the opportunity to comment on the future of the Ten Lakes Basin.

Respectfully, Thomas M. Holland

615-1

14 April/'83

Mr. Wm. Marden
Kootenai Natl. Forest Supervisor
~~Box~~ A.S.
Libby, Mto

SIR:

I would like to make the following comments regarding your forest plan. They are as follows:

1) The proposed plan sacrifices Forest Service's Multiple Use goals in favor of maximized Timber harvest.

2) The proposed plan includes unacceptable levels of new road construction. This will denigrate not only big game habitat but also severly disrupt stream siltation levels in virtually every major drainage in the Kootenai Valley.

3) The proposal for the Ten Lakes area should be changed in favor of a wilderness designation in order to protect the special recreational qualities of the area. Not To

2

mention the ten lakes area as prime Grizzly habitat, some of last in the K.N.F.

4) Not nearly enough consideration was given to the impact that the proposed plan would have on the fisheries in the K.N.F. Currently the K.N.F. provides the finest fishing in all of N.W. Montana. The number of man-days of usage (590,200 by 1978 scorp, fish, wildlife + Parks) shows just how important this recreation demand is to region one & the K.N.F. Current forest Service plans attemp to downplay the very serious risks to stream siltation, stream flows, trout spawning areas, and destruction of riparian habitat. All of these would result in total trout loss much greater than the 3 percent estimate in the DEIS.

5) The forest Service would do well to pay less attention to the needs of the timber industry and more

3.

of the Nation as a whole and the people of the Pacific N.W. in particular. More weight should be given to the review & comments submitted by the Mont. Dept. of Fish, Wildlife & Parks. The Dept. of F. W. & P. has a wealth of information and data that is currently being mostly ignored by the F.S. to the detriment of a truely unique area, the Kootenai.

Sincerely,

Richard A. Frazier

Richard A. Frazier
Box 1514
Kalispell, Mt. 59901

617

4-13-83

Mr. Bill Morden, Supervisor
Kootenai National Forest
U. S. Forest Service

Mr. Morden:

Ten Lakes area should not be considered for wilderness for some of the following reasons:

* It has beauty no greater than much of the Kootenai
* We already have enough wilderness
* Ten Lakes is adjacent to wilderness park systems that are already quite large
* There are mining claims in the area both patented and non-patented
* There are roaded areas and many logged areas within the proposed and adjacent boundaries
* Additional traffic would be encouraged if Ten Lakes were to become wilderness, which in turn would be damaging to the area - if this is truly a concern
* There would be an economic loss both in mineral and logging potential (timber should be a managed resource). To leave timber untouched or cultivated such as in a wilderness area is a mismanagement stand.

Please DO NOT consider Ten Lakes for wilderness disignation!

Sincerely,

Helen Wylie

4515 So Ave. W.
Missoula, Mt 59801

G18

April 15, 1983

Forest Supervisor
Kootenai National Forest
Libby, Montana 59923

Dear Sir,

We are writing to you regarding the Ten Lakes Scenic Area which is under review for possible inclusion into the wilderness system. Having made several trips into the area on foot, we both have developed a special love for the area, and feel strongly that it should remain in its present state. We both favor inclusion of the area into the wilderness system, rather than any other proposed development plan. With an increasing chance of oil and gas development in the Kootenai Forest, along with the continued demand for forest products, there will be much pressure under any other proposed plan to exploit the area for whatever reason.

Please consider our opinion in this matter when you make the decision regarding the Ten Lakes, which we hope will favor wilderness designation.

Sincerely,

Richard and Susan Bagley
Route 1 Box 41
Eureka, Montana 59917

619 4-15-83

Dear Mr. Morden,
Please no
wilderness area
on Ten Lakes
I need a job.
I like to
backpack with
my friends.

620

April 14, 1983

James L Hurst
Box 644
Eureka, MT 59917

Wm Morden
Forest Service
Kootenai National Forest
Libby, MT 59923

Dear Mr. Morden,

I would like to have the Ten Lakes Scenic Area the same size as it is presently. I like the present Forest Service proposal, it is well researched plan.

Sincerely,

J L Hurst

621

April 12, 1983

James Biggar

Box 603

Eureka, MT 59917

Mr. Wm Morden
Forest Service
Kootenai National Forest
Box AS
Libby, MT 59923

RE: Ten Lakes Scenic Area

Dear Mr. Morden,

I am writing in regards to the Ten Lake Scenic Area. I am not in favor of having this land turned into a wilderness area.

With the economy the way it is, I feel the wilderness area would aid in making less employment for our community.

Thank you,

James E. Biggar

James E Biggar

622

Kootenai National Forest 4/15/83

I'm writing concerning the Tenkaw area. I feel it should remain a wilderness area. It's an excellent area for hiking & fishing in the summer. It also remains a good wildlife habitat. Any more roads in the area would just open it up too much effecting both its serenity and the home for wildlife. It should remain as is a wilderness bordering Canada which is unique in its own way.

Thank you
Daniel J. Hodges
Columbia Falls, Mt.
370 Woodland Rd 59912

623

160 Gawain Way
Bozeman, MT 59715

April 14, 1983

Mr. William E. Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Dear Mr. Morden:

As a Montana native, I am very concerned with any more of our public lands being put into wilderness. This designation restricts many of the types of recreation my family and I enjoy.

I support the Forest Service recommendation for the Ten Lakes wilderness study area and wish to see the continuation of snowmobiling in that area.

Very truly yours,

Sharon Hicks

Dawn Thompson
(daughter)

625-7

April 15 '83

Dear Bill Morden

As a resident of the Cabinet/Yaak area I want to inform you that many who are here to enjoy the seclusion, isolation & beauty of the Kootenai are very upset at the Kootenai Forest Plan! You & I know the consequences of the plan - Why would such action be done - when there is the special & rare beauty that needs to be preserved!!! The residents, my friends, want a more protected plan initiated. We do not want more road building which would directly endanger our vast & special wildlife. We want the Grizzly habitat protected!

We do not want the Yaak Road widened & repaved allowing for greater traffic which would directly delete our grizzly ranges plus that of elk, moose, black bear, wolverine, cougars, lynx, bobcat, etc!

We urge support of alt. C - for a 34,000 acre Ten Lakes Wilderness. We need many more protected areas. We do not need more roads or oil & mining exploration - We need a much better

6252

Forest Service Plan!!

The Kootenai needs to be protected. It is one of the just places in this country like this - it has much to offer to the hiker - those who like to keep the forest "untouched" - those who like to "walk softly thru the wilderness."

The area need not be destroyed with further road building & logging.

Please urge for freezing road mileage at current levels.

Protect our grizzly habitat

Do not build more roads

We need to protect the Beauty & seclusion of our mts, streams & lakes -

Please reconsider the Kootenai Forest Plan

We do not need the changes as is stated in that plan.

Sincerely

Rt. 1
Troy, MT 59935
CARMEL CIPRIANO

629B

Montana SNOWMOBILE Association

410 No. 18th Ave.
Bozeman, MT 59715
April 15, 1983

Mr. Bill Morden, Supervisor
Kootenai National Forest
P.O. Box AS
Libby, MT 59923

Re: Ten Lakes Montana Wilderness Study Area

Dear Bill:

As an organization concerned with snowmobiling and the right of snowmobilers to the use of public lands for their sport, we do not support wilderness for the Ten Lakes MWSA. Our long-time position is that we can only support wilderness on areas that are not suitable for motorized recreation.

Snowmobiling has been a historic use in the Ten Lakes MWSA and has been the only permitted motorized use in the Ten Lakes Scenic Area per se. We do support the Forest Service proposed recommendation for the Ten Lakes MWSA and support the continued and expanded snowmobile use for the wilderness study area.

Very truly yours,

Nina Smith

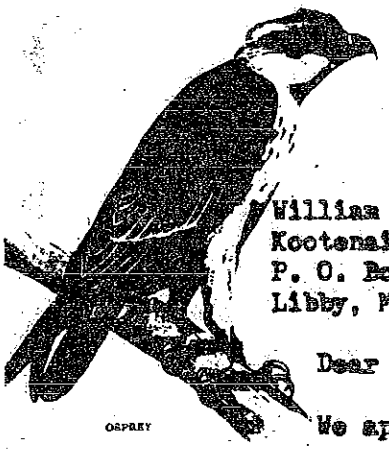
Nina Smith, Chairman
MSA Public Land Committee

cc: MSA Board of Directors
cc: Congressional Delegation
cc: Gov. Ted Schwinden

630 -1

LAST CHANCE AUDUBON SOCIETY

1100 Missoula Avenue
Helena, MT 59601
April 15, 1983


OSPREY

William E. Merden, Forest Supervisor
Kootenai National Forest
P. O. Box A5
Libby, MT 59923

Dear Mr. Merden:

We appreciate the opportunity to comment on the Kootenai Plan and EIS.

It is apparent that massive changes are planned with respect to timber cutting and road construction. The timber cutting area will increase by nearly 200,000 acres, and roads from 4,800 miles to 12,000 miles. Even with 36% closures the net gains in roads left open would be nearly 3,000 miles. By way of comparison, the total mileage of roads on the Kootenai Forest will equal all State Highways in Montana.

The real losers here are the watersheds, fisheries, and wildlife--particularly elk and grizzly. A few examples follow:

1. Roads on timber cutting areas will be about 300 to 350 yards apart. Such a heavy density can hardly be beneficial to elk, grizzly, or other wilderness type wildlife. It is highly doubtful that the elk population can grow to 6,500 animals in this changed situation unless hunting seasons are drastically reduced.

2. Sediment yield (loss) is estimated at 270 million lbs./year, or 135,000 tons. On a 15,000 acre cut each year this would average cut 9 tons of soil lost per acre per year. Even on prime Iowa farmland replacement of four tons of soil/acre a year is about the maximum expected. It is doubtful if Kootenai soils can even approach the replacement figure for Iowa. One consequence is deterioration of fisheries. Your report acknowledges a loss of 20% of the migratory fish population, and the need for more strict regulations to limit and disperse fishermen.

3. The heavy cutting will lead to rapid reduction of old growth timber and a substantial impact on wildlife dependent on this habitat. Riparian areas in particular must be protected.

Perhaps Kootenai computer models can mix intensive logging and maximum road densities with elk, grizzlies, and trout and show a paper compatibility--but it won't happen on the ground. More equal protection for soil, wildlife, and dispersed recreation are needed:

1. Preserve more of the general forest/riparian areas in a natural state, including old growth diversity.

2. Freeze total road mileage at current road levels. Road closures offer many problems in enforcement, are expensive to enforce, and only partly restrict easier entry. Helicopter logging can reduce much of the damage attributed to roads and it is not that expensive when compared to the annual cost of road maintenance. The cost of road maintenance runs about 21 million dollars per mile over a 100 year rotation (calculated at an average cost of $200/mile/year compounded at an annual rate of 10% interest).

3. Fully implement grizzly recovery--this will reduce the expected timber cut and roading on the forest. Results will include better protection of the watershed, fisheries, and wildlife.

4. Provide more roadless recreation and wilderness areas for protection of grizzly habitat and other values.

5. Wilderness protection for a 36,000 acre Ten Lakes Wilderness.

6. Oppose paving and widening for the last unpaved 17 miles of the Yoah Road.

Sincerely,

Noel Rosetta

Noel Rosetta, Conservation Chairman
Last Chance Audubon Society

P.S. I assume that letters postmarked April 15 will be included in the "official" public comment summary.

631

c/o P.O. Box 970
Bozeman, Mt. 59715
April 14, 1983

Kootenai National Forest
P.O. Box AS
Libby, Montana 59923

Re: Ten Lakes Wilderness
Study Area

Dear Sirs:

My wife and I have snowmobiled for over 16 years and are landowners in that part of the country, with plans for retirement in the near future. I am a civil engineer and due to the seasonal demands of my job, winter has been the time for our vacations.

We are users of public lands for our sport and personally know snowmobilers from all over the state of Montana and know how much the areas mean to them.

The area under study has been used in the past, is being used at present, and we hope can be continued to be used in the sport of snowmobiling. I hope we do not find this area is lost to us when we are in a position to use it.

We do not support the Ten Lakes Wilderness Study area for wilderness and do support the Forest Service proposed recommendation.

Very truly yours

Ray Smith

Ray Smith

105 South Pacific
Dillon, Montana
April 15, 1983
634-1

Bill Morden, Forest Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Mr. Morden:

I hope you will accept these comments on the proposed Kootenai Forest Plan. I realize that the letter's post mark will not be April 15, but I hope my remarks will be included.

I am very concerned about the proposed increase of roading throughout the forest. An increase of collector roads from 6000 to 12,000 is incredible! The Kootenai is already the most heavily-roaded forest in Montana and the accompanying destruction of forest habitat by such a large increase of roads does not speak well for the U.S.F.S.'s idea of multiple use.

I do not believe that long-range goals based on

maintaining a healthy well-balanced forest, utilizing the multiple-use concept, have been adhered to in the writing of the proposed Kootenai Forest Plan. The Plan's heavy emphasis on timber over other legitimate forest uses - watershed, wildlife, recreation, and maintenance of natural diversity - reveals short-sighted, short-term "benefits" based only on one, overly-emphasis use of the forest, on timber.

In particular I recommend the plan incorporate the following:

1) the preservation of more general forest/riparian areas in an old-growth state, allowing for natural diversity, wildlife, and recreation use;

2) leaving current levels of total road mileage; closing new roads is not the same as leaving the area unroaded;

3) providing for more roadless recreation and wilderness for the protection of grizzly bear habitat; and

4) emphasizing the full

recovery of the grizzly through habitat protection and reduced roading.

In addition I urge that the Kootenai Forest Plan recommend not paving and widening the last unpaved 17-mile stretch of the Yaak road, choose Alternative C for a 36,000 acre Ten Lakes Wilderness, and preserve Big Creek and lower Trout Creek in their natural states.

I appreciate the opportunity to make these comments on the proposed Kootenai Forest Plan

Thank you.

Sincerely,
Claudia Schaeffer

635-1

American Wilderness Alliance

4260 East Evans Avenue/Suite 8/Denver, Colorado 80222/(303) 758-5018

BOARD OF TRUSTEES
Sally A. Ranney
President
W Mitchell
Vice-President
Nancy J. Borra
Secretary-Treasurer
Dr Bernard Shanks

ADVISORY COUNCIL
Dr John Craighead
Wildlife Scientist, Author
L.W (Bill) Lane, Jr
Chairman of the Board, Publisher
Sunset Magazine
Francois G Leydet
Author
Martin Litton
Photographer, Author
Dr Roderick Nash
Professor, History and Environmental Studies
University of California
Margaret Wentworth Owings
President, Friend Of The Sea Otter
Eliot Porter
Photographer, Author
James A. Posewitz
Montana Fish, Wildlife and Game Department
Dr. Wallace Stegner
Author

EXECUTIVE DIRECTOR
Clifton R. Merritt

EDITORIAL OFFICES
Wild America
William A. Schneider
Editor
124 Fuller
Helena, Montana 59601

April 14, 1983

Mr. William Morden, Supervisor
Kootenai National Forest
Box AS
Libby, Montana 59923

Dear Bill:

This is to comment for the official record on the Kootenai Forest Plan and draft EIS.

The American Wilderness Alliance is a Western-based national non-profit organization whose members are dedicated to conserving the nation's decreasing wildlands, wildlife habitat and free-flowing river resources.

Many of our Montana members are very familiar with the Kootenai National Forest and its management. As a native Montanan who lived in the upper Flathead for many years and visited the nearby Kootenai country often, I too am well acquainted with the national forest and its resources.

Your tentative plan to double collector roads to 12,000 miles seems designed to make timber harvest the dominant use on the Kootenai Forest for the next half-century. Over such a large area, more than 1.6 million acres of forested land, this is an apparent violation of the Multiple Use-Sustained Yield Act and subsequent forest legislation which require equal consideration for all renewable forest resources.

Your plan, if carried out, would severely impact fish, wildlife, watersheds and roadless recreation. Specifically, the large increase in roads will impact undisturbed fish and wildlife habitat on a large scale. Stream quality and stability will be greatly reduced. Wilderness-associated species, especially, such as the threatened grizzly bear, elk and cutthroat trout, will be extremely adversely affected.

It is totally unreasonable to expect, as planned, that you can increase elk numbers by 40 % with such increased road incursions into their security areas. The Forest Service's

Working Together To Conserve Wild America

own investigations verify that elk don't remain around roads. The plan's excessive emphasis on greatly expanded roadbuilding and logging will result in decreasing, not increasing, the elk population in the Kootenai country. This in turn will lead to shorter hunting seasons, more restrictions and reduced harvests of elk.

Moreover, establishment of a Ten Lakes Scenic Area of only 16,000 acres means a commitment to road and log the remaining 20,000 acres of undeveloped national forest land, major parts of which must be considered as important grizzly bear habitat. This development alone will sound the death knell of the threatened grizzly in the Ten Lakes area. Closing roads, as proposed, after their construction and human use has eliminated the backcountry-seeking grizzly will not bring the noble animal back.

Your recommendation against wilderness for any part of the Ten Lakes Wilderness Study Area eliminates further wilderness consideration from the plan, since it is the last remaining area in the national forest that can be so considered. It would surely seem that in the Kootenai National Forest of some 2¼ million acres it would not be unreasonable to set aside as wilderness one 36,000 acre area, in addition to maintaining the existing 94,000 acre Cabinet Mountains Wilderness, whose future even now is uncertain because of mineral exploration and development. These two areas as wilderness would consist of a more 4 % of Kootenai National Forest lands.

Accordingly, the American Wilderness Alliance and its Montana members respectfully urge that the Forest Plan be revised to:

1. Keep road mileage at present levels.
2. Provide for much more roadless recreation.
3. Recommend wilderness status (Alternative C) for the 36,000 acre Ten Lakes area.
4. Protect presently undeveloped grizzly bear and elk habitat by keeping it undeveloped, and do the same for undeveloped cutthroat trout streams.
5. Provide for complete recovery of the threatened grizzly bear.

Finally, and just as importantly, we again call on the Kootenai National Forest to manage the 20,000 acre Mount Henry area in its present essentially pristine condition for its superb fish, wildlife, watershed protection and roadless recreation. We are satisfied that such management, in the long run, will best assure its highest and proper use.

Sincerely,

Clifton R. Merritt

Clifton R. Merritt
Executive Director

Western Forest Industries Assoc.

(Excerpt) 638

Mr. William Morden
April 14, 1983
Page Three

prescriptions that emphasize resources other than timber or that restrict timber management levels to provide for other resources. Many of these prescriptions are rather obscure. For example, the proposed action would allocate 223,090 acres for "Timber/Viewing". This prescription is to "manage for timber production while giving consideration to the visual resource". Yet, there exists a different prescription encompassing some 104,160 acres called "Viewing/Timber". This prescription is to "maintain or enhance a natural appearing landscape...while managing the timber resource". While there may be a discernable difference in the intent of these two prescriptions, it is not apparent to WFIA. It is also not apparent whether the FORPLAN model was allowed to allocate the land base to these prescriptions or whether they were "pre-allocated" outside the model.

How many of the prescriptions shown in Figure III-1 of the DEIS were "pre-allocated" outside the FORPLAN model?

WFIA is very supportive of the Draft Plan's recommendation for managing the Ten Lakes Wilderness Study Area. We believe the land allocations prescribed in the proposed action for this area represent a reasonable compromise that emphasizes the most efficient resource mix.

In summary, while the Draft Plan and DEIS are sound from an analytical standpoint, the proposed decision does not adequately respond to the overriding issue of economic stability in northwest Montana. The key to long-term timber supply and economic vitality is the amount of land that will be available for timber management. The proposed action allocates an unreasonable amount of productive forest land to non-timber or timber-restrictive uses. We believe an effort should be made to provide for multiple uses while managing the timber resource simultaneously. For example, more extensive use of road closures in grizzly bear habitat areas may allow a more efficient use of the timber resource while also providing for a higher number of bears. Also, the Draft Plan seems to allocate productive land for what appears to be very similar uses. For example, primitive recreation vs. semi-primitive non-motorized recreation or timber/viewing vs. viewing/timber. There is no reason why these supposedly different uses cannot be provided for on the same piece of land.

WFIA recommends that the final decision incorporate a larger portion of the 1.8 million acres of capable, available and suitable land into the "timber optimization" management area in a cost efficient manner. The

64c-1

MONTANA WILDERNESS ASSOCIATION

April 15, 1983

Bill Morden
Forest Supervisor
Kootenai National Forest
Box AS
Libby, MT 59923

Dear Bill:

Please accept this letter as comment on the Proposed Kootenai National Forest Plan and DEIS. I ask further that this letter be accepted as initial comment even though today is the deadline for comments. With your approval, I would like to reserve the option of submitting further comments clarifying our concerns by around May 1. I would also hope that we can maintain a continuing dialogue on various aspects of the Plan before it is finalized.

I first want to thank you and your staff for an excellent field tour on the Kootenai March 30 and 31. The tour gave us a valuable perspective of the uniqueness of the Kootenai country and of the incredible pace of development which threatens the quality of life and dependent lifestyles of the region. Sadly, the proposed plan would not only accommodate these threats; it would actually encourage them!

Our first tour day in the Yaak was a real eye-opener. The Yaak road (#92) project is a classic case of piecemeal development in seemingly innocuous stages to where the sum becomes far greater than its' individual parts. The MWA strongly opposes the paving of the last 17 miles of unpaved road on the grounds that the project is not needed; that it would threaten local lifesyles and the remote quality of the Yaak country; that it would jeopardize the continued existence of grizzlies and other wildlife species; that it would increase secondary development pressures on private lands; and that it would cause undue economic hardship in the already depressed Libby area as a "Libby bypass" route. I would appreciate your response to this specific issue.

Our second day gave us an opportunity to discuss the F&WS Jeopardy Opinion on the Plan in relation to the threatened grizzly and in relation to the failure of the DEIS to consider any alternative that would meet the minimum grizzly recovery goals of 40 to 70 animals. We also discussed at length the proposed Scotchman Peaks Wilderness and, as a result, John Balla, John McBride myself and others will review the area in detail next month. We also visited the Cliff Mtn. RARE II area--a former 14,000 acre roadless area near Heron recently bisected by a road, albeit a low standard road. The Cliff Mtn. area is a microcasm of the rapid rate of development on the Kootenai as too many engineers build too many roads in too many roadless areas--1400 miles of new roads in the last two years alone.

The general forest zone/riparian areas is what the Kootenai has the most to offer in comparison with all of the other national forests in Montana. These low elevation lands contain the critical wildlife habitat, nesting sites, old growth diversity and family-based recreation where you don't have to be a rugged mountaineer to "get away from it all". Sadly, this is also the area where the nearly 1.6 million acres of "suitable" timberlands with some 12,000 miles of roads will occur. The rocks and ice won't begin to compensate for the loss of the general forest zone to extensive over-development. This qualitative dimension is ignored in the Plan. Further, the "dense-pack" road plan flies in the face of Congressional intent in NFMA (sec. 8) which is

to minimize, not maximize roads.

The MWA strongly recommends that all of the remaining roadless portions of the Big Creek and Trout Creek drainages remain roadless in a nonmotorized primitive recreation allocation without roads. There are many other such areas where the existing roadless values exceed short-term commodity values from both an economic and socio-environmental standpoint. With the predicted shortfall in roadless and dispersed recreation as well as wilderness in the Kootenai we need more than a few token ridgetops.

Overall, the Plan is highly fragmented into a patchwork maze of small, complex allocations. Basically, if an area is going to be managed for timber, and it makes sense, go for it! On the other hand, the Plan should provide for larger blocks of country to remain in a roadless, primitive condition. The aggragation and blocking up of the roadless area resource will go a long way toward helping to bring the Plan into compliance with the Endangered Species Act in terms of providing essential grizzly bear habitat.

The Plan fails to address the impacts of Forest sctivities off the forest, such as downstream impacts on fisheries. Further, a drainage-by-drainage calculation of sediment yields should be completed.

The Plan further fails to properly address old growth management. Small "leave" strips are simply not adequate for wildlife diversity requirements.

History has shown that road closures are not an effective means of assuring elk security. The assumption about increased elk populations with more absolute roads as well as more roads opened to unrestricted public use is dubious at best. Other important big game species, such as moose, bighorn sheep and mountain goats are virtually ignored in the Plan.

The MWA has repeatedly raised the concern that the partial logging proposal for a portion of the Ten Lakes WSA violates the Montana Wilderness Study Act in that the non-wilderness recommendations which includes some of Ten Lakes in the "suitable" land base reduces the potential for inclusion of this highly suitable area in the National Wilderness System. We again urge you to adopt Alternative "C" for a 36,000 acre Ten Lakes Wilderness recommenation. Our rationale for this recommendation is already a matter ofpublic record as expressed during the Forest Service hearings in January.

In conclusion, the MWA strongly supports the joint conservation organization statement on the Kootenai Plan submitted by the Montana Wildlife Federation/Northern Rockies Natural Resource Center. Thank you for the opportunity to submit these comments on behalf of the Montana Wilderness Association.

Sincerely,

Bill Cunningham

Bill Cunningham
Conservation Director

cc: Sen. Melcher
Sen. Baucus
Rep. Williams
Gov. Schwinden
Reg. Forester Coston

643

Dear William,

April 10, 1983

I recommended Ten Lakes Study for the Wilderness, because it can support three ~~unpad~~ ~~an~~ important wildlife, grey wolf, grizzly, and new woodland Caribou in today I feel you have some more plenty wilderness in Northwest Montana.

I have been in almost all wilderness in Montana, except the Cabinet Mountains Wilderness, and future the Ten Lakes Wilderness.

Thank You,

John F. Keever
1127 McDonald #212
Missoula, Mt. 59801

644

William Morden
Forest Supervisor
Kootenai National Forest
Libby, Montana

Dear Mr Morden,

I am writing on the behalf of the few woodland caribou left not only in Montana but in the world. I read recently the Forest Service has recommended to change the Ten Lakes wilderness from a wilderness to "scenic" area. I enjoy hiking and camping as much as anybody but I for one feel I would enjoy doing it somewhere else more knowing I was not partly responsible for the extermination of an innocent animal. My wife and I are asking you to reccomend atleast waiting until more is known if not just voting against this proposal for good.

Thank you.

Tim & Laura Tagne
Dept. of Microbiology
MSU
Bozeman, MT 59717