



Ellen Frament  
Forest Planner  
31374 US Highway 2  
Libby, MT 59923

May 7, 2012

#### DRAFT KOOTENAI FOREST PLAN COMMENTS

Dear Ms. Frament:

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources including those on Forest Service administered lands. Our members are regular users of the Kootenai National Forest.

Most comments will be confined to wildlife and wildlife habitat although it appears that other resources such as watershed and fisheries deserve similar comments.

The Desired Future Conditions (DFC's) spelled out for wildlife and most other resources sound pretty good as they are indeed something to try to reach in the future. To achieve those DFC'S, a host of Forest-wide applicable Goals, Objectives, Guidelines, and Standards are described for wildlife and other resources. Many of the Guidelines address important wildlife issues such as old growth, snags, down woody material, big game winter range, nesting and calving/fawning habitat, etc., however, none of these are firm direction as they use wording like "should", "relatively free", or "low levels." There are no guidelines or standards for road density on big game winter or summer range where there is in the existing Forest Plan. The closest thing to road management for wildlife is related to elk where a certain level of "non-winter security" is addressed. The only firm direction is previously established through various threatened and endangered species actions that resulted in INFISH (bull trout), Cabinet-Yaak Grizzly Bear Access Rules, and the Northern Rockies Lynx Management Decision. The wildlife issues addressed in the draft plan require firm direction in the form of standards otherwise they can easily be ignored. Road density management for wildlife needs to be clearly stated and included as firm direction throughout the Forest and not just in the grizzly bear recovery areas.

On page 3 of the Draft Forest Plan, the four criteria used to judge if a proposed project is consistent with the Forest Plan are so broad and open to individual decision-maker interpretation that virtually anything could be judged consistent with the Forest Plan. A manger/decision maker with the proper attitude toward wildlife could interpret and apply all the DFC's, Guidelines, etc. and result in sound wildlife conservation, but a manager/decision maker could just as easily go the other way and still say that the

project is consistent with the Forest Plan. These criteria need revision to insure a consistent interpretation of making progress toward DFC's.

Another area of concern is the Management Areas described and mapped. Although it makes some sense to reduce the existing 30+ Management Areas, the proposed 7 MA's fail to provide for many of the same concerns the original MA's addressed. None of the proposed 7 MA's are wildlife oriented, yet the Forest states that terrestrial wildlife was one of the main issues for Forest Plan Revision efforts. For example, large portions of the area along Koochanusa Reservoir have long been recognized and managed as important big game winter range for deer, elk, and bighorn sheep, yet the proposed MA's for these areas are either MA 6 General Forest, MA 7 Primary Recreation, or MA3 Special Areas none of which are oriented to wildlife. MA's need to be developed and mapped that emphasize wildlife values such as travel corridors, winter ranges, calving/fawning areas, old growth, and the like. Also, wildlife direction within the proposed MA's needs to be firmed up so that wildlife and wildlife habitat conservation is required and not open to interpretation.

The whole issue of Border Patrol access and activities near (and not so near) the Canada border require much more analysis and disclosure. If the Forest Service really has no ability to manage the Border Patrol access and activities on Forest Service managed lands, then it must be clearly stated and disclosed what effects the Border Patrol will have on the ability to achieve the Forest Plan. Clearly, road density management and wildlife security are major issues. Unrestricted use by Border Patrol agents on roads gated and restricted to the general public and motorized use of trails and off-road routes negates the security values the gated roads and non-motorized areas are designed to provide.

Among the analyzed alternatives, Flathead Audubon Society prefers Alternative C. Even with Alternative C many aspects of the direction for wildlife needs revision and firm direction established as have been discussed above.

Sincerely,

Paula L. Smith, President

Flathead Audubon Society