



November 6, 2023

Chris Bachman
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P.O. Box 622
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Chad Benson
Forest Supervisor
Kootenai National Forest
Attn: Forest Plan Amendment
31374 US Highway 2
Libby, MT 59923-3022

RE: OBJECTION: DRAFT Decision Memo Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone

The following objection is submitted on behalf of the Yaak Valley Forest Council on the DRAFT Decision Memo Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone.

The Yaak Valley Forest Council (YVFC), created in 1997, is a Montana based 501(c)3 nonprofit whose mission focuses on maintaining and restoring the ecological integrity of the Kootenai National Forest, and specifically the Yaak Valley, through conserving and improving habitat for all native species.

We incorporate by reference our comment letter dated September 5, 2023, on the Kootenai National Forest Plan Bears Outside Recovery Zones Forest Plan Amendment Proposal. We support delineating additional areas to meet criteria for recurring use by grizzly bears outside of the Cabinet-Yaak Grizzly Bear Recovery Zone as Bears Outside of Recovery Zone (BORZ) areas.

We object to the DRAFT Decision Memo Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone for the following reasons.

Amending the baseline for linear miles of roads and the established “no net increase” standard for BORZ areas in the Kootenai National Forest 2015 revised Land Management Plan (LMP) will:

- Accommodate a documented increase in linear road miles in each BORZ, which is in violation of the current LMP.
- Fail to capture open linear road miles not included in the current baseline inventory due to insufficient barriers on administratively closed roads.
- Fail to include, and later allow inclusion of, increases in Total Linear Miles of Roads on NFS Lands or a Total Linear Miles of Open Roads on NFS Lands due to currently undocumented open roads and currently undocumented user-created roads.

Total Linear Miles of Roads and Total Linear Miles of Open Roads

We object to the accounting of overall total linear road miles within the Kootenai National Forest and the determination of how many of the total linear road miles are currently considered “open roads,” particularly within the BORZ areas. KNF has failed to effectively update and improve road data to include all Total Linear Miles of Road (TMRD) and Total Linear Miles of Open Roads (OMRD) prior to baseline TMRD and OMRD designation.

We object to the “clarification” that allows the baseline of permanent linear miles of roads within the BORZ area to be adjusted with “updated/improved road data without an actual change on the ground”¹ with “no net increase.” This is an admission that the current road inventory of baseline permanent linear miles is inaccurate and understates the presence of total linear miles of roads and open roads at the time of the DRAFT Decision Memo. Updating road data “without an actual change on the ground”² should not be necessary with an accurate baseline inventory.

Additionally, any noted future increase in linear road miles has a mandate to be compensated for with in-kind reductions in linear total road miles concurrently with, or prior to, new road construction or reconstruction of currently bermed or barriered roads.³ Any change on the ground must be counted toward TMRD and OMRD and must adhere to no net increase.

¹ USDA Forest Service, Kootenai National Forest. (2023, September 21). *DRAFT Decision Memo Kootenai Forest Plan Amendment for Bears Outside of the Recovery Zone*. <https://usfs-public.app.box.com/v/PinyonPublic/file/1313663461394>, p 3

² Ibid

³ *Record of Decision Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones: Kootenai, Lolo, and Idaho Panhandle National Forests Lincoln, Sanders, Bonner, Boundary, and Pend Oreille Counties Montana, Idaho, and Washington*. (2011). USDA Forest Service, p.62.

The DRAFT Decision Memo states that database corrections after amendment adoption capturing total linear miles of road and total linear miles of open road will not be considered “net increase.” We object to this flawed approach.

We object to the lack of verification of effective road closures that differentiate between the two designations of Total Linear Miles of Roads on NFS Lands and Total Linear Miles of Open Roads on NFS Lands. Documented discrepancies exist between roads the USFS deems closed and those which are providing effective barriers to access.

Road density, or linear road miles per square mile or linear miles per BORZ area, in the Cabinet-Yaak Grizzly Bear Recovery Zone is the greatest factor affecting grizzly bear habitat security and recovery in the Cabinet-Yaak Ecosystem. The metric of linear road miles per BORZ is in effect a measure of road density.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chris Bachman', is written over a blue horizontal line.

Chris Bachman
Conservation Director
Yaak Valley Forest Council