Kinnikinnick Chapter Of The Idaho Native Plant Society

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Idaho Panhandle National Forest
Kootenai National Forest
ATTN: KIPZ Forest Plan Revision Team
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RE: KIPZ Draft Forest Plan(s) for the Idaho Panhandle National Forest and the Kootenai National Forest

The Sandpoint based, Kinnikinnick Chapter of the Idaho Native Plant Society advocates for the conservation of native plants and their habitat. We wish to submit the following comments regarding the draft forest plans for the Idaho Panhandle National Forest (IPNF) and the Kootenai National Forest (KNF). Most of our detailed comments will be directed to the Idaho Panhandle National Forest draft plan. But we will also comment on the Kootenai National Forest draft plan, as the KNF manages substantial lands within Bonner County and the two forests are conducting a joint planning process in order to address areas of concern common to both forests.

GENERAL COMMENTS FOR BOTH THE IDAHO PANHANDLE AND KOOTENAI NATIONAL FORESTS

The Need for Management Area Specificity and Standards

The final forest plans should consider additional management areas or more site-specific designations (sub-categories) within the MAs. The draft plan only contains 12 management areas, which do not adequately address the range of issues and resource conditions present on these two forests. Specifically the General Forest MA6 is too broad and all encompassing to provide adequate direction to the long-term management of these lands. This prescription covers nearly two-thirds of both forests without providing specific management direction for the wide variety of resources present. This MA allocates the vast majority of the forest as potentially open to any form of recreation or logging.

While this very general approach has been touted as being "adaptive" (and it certainly seems to provide great flexibility in management options) it basically leaves the public to know only that "active management" and a "range of

recreation opportunities" will be allowed on the vast majority of the forest.

Simply put, this MA should be divided into additional MAs to allow for planning with greater site specificity.

Rare and Sensitive Plant Species

The draft plan's supporting documentation, the Comprehensive Evaluation Report (CER), which was used as a basis for developing these draft plans contains information useful to review as we submit these comments. The "Wilderness Assessment" found in the CER "Supporting Documents" contains the following chart regarding native plants in the USFS "Region 1" (of which both the IPNF and KNF are a part):

Results

The following table summarizes the number of rare plant species in the Idaho and Montana portions of Region 1 that are found in wilderness areas (of any ownership), Forest Service IRAs, or both.

Rare Plant Species Category	Total # of rare plant species in Natural Heritage Program databases (ID + MT)	# of rare plant species occurring in Wilderness (any ownership)	# of rare plant species occurring in both Wilderness and FS IRAS	# of rare plant species occurring in FS IRAs (but not in Wilderness Areas)
A -- FS Sensitive Species (globally rare)	45	3	17	**19**
B -- FS Sensitive Species (state rare)	118	3	36	**52**
C -- Non-FS Sensitive Species (globally rare)	64	4	13	**13**
D -- Non-FS Sensitive Species (state rare)	299	24	65	**78**
TOTAL	**526**	**34**	**131**	**162**

Note: This table is found on page 8 of the Wilderness Assessment in Supporting Docs of CER

Please note that I have added the "TOTAL" line at the bottom for the convenient reference.

This same report, on page 9 describes the conditions found in the above referenced table.

"For rare plant species that are not designated as sensitive by the Forest Service, 13 globally rare species and 78 state rare species have occurrences in IRAs but not in designated wilderness areas. Thus, designation of additional wilderness acreage in the Region could also provide a greater level of habitat security for 91 additional plant species that are rare at the global or state level according to the state Natural Heritage Programs."

We would like to point out that this same chart indicates a total of 162 rare and sensitive plant species would fall into the category described above where the *"designation of additional wilderness acreage in the Region could also provide a greater level of habitat security."* We would urge both forests to re-evaluate their recommendations for wilderness and set aside more IRAs into the category of

recommended wilderness in light of the potential positive impact this would have for native plant species, as recognized by the forest service's own conclusions.

Native Plant Habitat

Page 20 of the *Wilderness Needs Assessment* contains the following table:

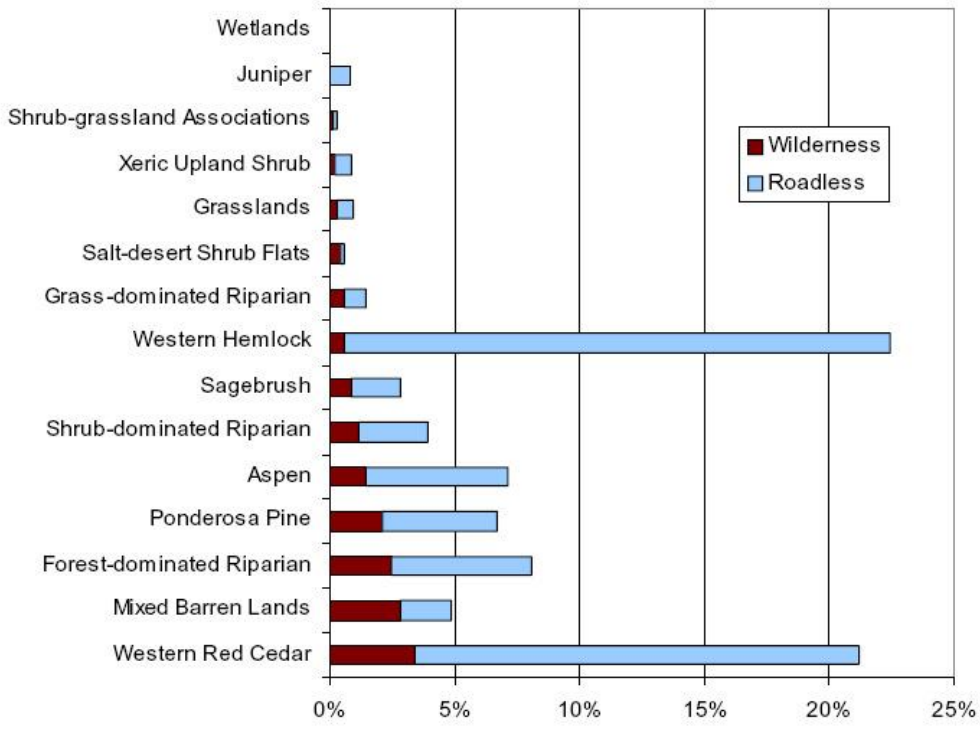

Figure x. Bars represent the percentage of selected land cover types in designated wilderness and inventoried roadless for all lands in Montana and Idaho which are within the Northern Region boundary. For example, there are 3.3 million acres of Ponderosa Pine (all land ownerships) within the Montana and Idaho portion of the Northern Region; of these 3.3 million acres, approximately 70,000 acres are in designated wilderness, (i.e., 0.07 / 3.3 = 2.1%) and approximately 151,000 acres are in inventoried roadless (i.e., 0.15 / 3.3 = 4.5%)

The above graph is summarized in the conclusion to the "*Representation of Ecological Sections*" which notes that *"warm moist western red cedar and western hemlock forests in north Idaho and northwest Montana"* as well as *"riparian types"* are under represented (and would benefit from inclusion) in the National Wilderness Preservation System. This conclusion goes on to state that: "*these systems are inherently small landscape components that have high value."* We would suggest that both forests need to

allocate more IRAs into the recommended wilderness category in order to achieve the objectives for these habitats that are suggested by the forest service's own Wilderness Needs Assessment.

COMMENTS SPECIFIC TO THE IDAHO PANHANDLE NATIONAL FOREST

Section: Forest Wide Desired Conditions by Sustainability Topic

Bottom of page 1-2 the desired condition reads: *"Impacts from authorized roads, and trails are reduced, and the development of unauthorized roads and trails is curtailed*." We believe that **unauthorized** roads and trails should be **eliminated**; "curtailed" implies that some level of such illegal activity is permissible. Unauthorized roads and trails have potentially severe impact on native plant habitat and simply should not be allowed.

Section: Vegetation Monitoring Questions

On page 1-17, we urge adding this monitoring question: "Have management activities taken into account any annual changes in rare/sensitive plant classification made by the Idaho Conservation Data Center?

Also on page 1-17, the desired timber production, as discussed in the first sentence of the last paragraph, should be restricted to those areas where these activities are *sustainable*. We would suggest that this sentence read: "Lands classified as suitable for ***sustainable*** timber production have a regularly scheduled timber harvest program." Without an assurance of sustainability timber harvest should be conducted only for the restoration of forest health, not strictly for production.

Chapter 1 – Vision – Vegetation, page 1-58

Page 1-58 of the draft plan states: "*These glacial influenced landforms, plus the cool moist environment are probably at least part of the reason why the Priest sub basin contains the highest concentration of moist coastal disjunctive plant species and boreal plant species, and the most extensive rare plant communities in the IPNF. These same environmental conditions are also likely responsible for the highest concentration of peat lands in northern Idaho, with many rare peat land plant communities*." Clearly the Priest Lake area has an elevated importance to native plant habitat. We would like to see this reflected in desired conditions not yet found in this plan. The Vegetation Desired Conditions outlined on page 1-59 should include:

1. Preservation of all native plant habitats likely to harbor rare, sensitive and disjunctive species.

2. Preservation of all peat lands in their native state.

3. A thorough botanical assessment of the Priest Lake Basin should be completed to help guide and management activities.

Vegetation Objectives outlined on page 2-2

We would like to note that we fully support the Vegetation Objectives outlined on page 2-2, in section 3 *"Noxious Weeds and Invasive Plant Species"*. Discovery and 100% treatment of new invaders or invasive plants in sensitive habitats is a very laudable goal which we fully support.

Chapter 2 – Strategy – MA 6 General Forest – Desired Conditions

On Page 2-28 it states the desired condition for this MA: *"includes using active management as a primary tool to affect ecological change*." This section further notes that it is in this MA where the majority of active management activities are likely to occur. Since this management areas is where we are most likely to see the development of timber projects and roads, it also the area where we are most likely to see the introduction of noxious weeds. We believe that the desired conditions should reflect this threat. Desired conditions for MA 6 should include standards to limit the introduction of new noxious weeds and the reduction of noxious weeds already present.

In addition, desired conditions should direct that:

1. All Forest Service Equipment as well as contractor equipment should be inspected and washed prior to entering the forest to remove seeds and vegetative materials of noxious weeds and invasive plants.

2. All livestock, including that of forest users and Forest Service personnel, is fed with certified weed-free feed while on the forest.

3. Guidelines should also be in place for reseeding and replanting sites where soil disturbance have occurred, which create a seedbed for noxious weeds and invasive plants such as knapweed.

Chapter 3 – Design Criteria Old Growth

Guideline 1 states: *"Management activities should not reduce the amount (acres) of existing old growth."* We believe that this guideline does not go far enough. The guidelines should include the need for ***recruitment*** of areas that will become old growth to replace those that will be lost through management activities or natural causes.

COMMENTS SPECIFIC TO THE KOOTENAI NATIONAL FOREST

We do not believe that the Kootenai National Forest acted in the best interest of native plant habitats by removing recommended wilderness. As already mentioned in our comments, the forest service's own wilderness needs assessment indicates that additional recommended wilderness areas (not less) would benefit rare and sensitive native plant habitats.

This change of categories was more than a matter of semantics. So called "Wildlands" are not the same thing as "Recommended Wilderness" even if the management prescriptions are the same. The draft forest plan specifically states that it ***does not carry a recommendation for wilderness for "wildlands***." The lack of such a recommendation creates a roadblock to achieving congressional wilderness designation. Whereas a ***Recommendation for Wilderness*** opens up a pathway to the political process and to protecting native plants.

The forest service has a role in creating wilderness, well defined by federal law as well as internal forest service policy and directives. The forest service is ***required to both identify and recommend*** potential wilderness. To identify without recommending only fulfills part of this obligation. We ask the forest service to fulfill its obligation and mission and restore wilderness to the Kootenai forest plan.

With a few exceptions, all the Inventoried Roadless Areas on the KNF include under-represented habitats that would benefit from inclusion in the wilderness system (ponderosa pine, western red cedar, western hemlock and riparian). From a biological point of view the KNF's decision ignores the clear need to protect these high value habitats.

We are particularly concerned that the KNF decision shows no effort to coordinate with the Idaho Panhandle forest for managing areas where they have common interests, such as the Scotchman Peaks. The KIPZ was formed as one planning zone to be able to develop forest plans with ecological and social integrity. The KNF decision to ignore the Idaho Panhandle's Forest's strengthened wilderness recommendations for the Scotchmans only underscores the arbitrary, capricious and unfounded nature of the wildlands category.

We urge the Kootenai Forest to return recommended wilderness to the final plan, particularly to those eligible areas adjacent to Idaho.

Thank you for the opportunity to submit these comments. WE understand the hard work that the KIPZ planning team has done on these forest plans. And we recognize the long road ahead in developing the final forest plants. We hope these comments provide some value and we look forward to remaining engaged in the planning process in a positive way. We would like to request that we continue to be included to receive any information related to forest plan revision process and a copy of the final plan when it available.

Sincerely

Philip J Hough
President – Kinnickinnick Chapter – Idaho Native Plant Society