Kinnikinnick Native Plant Society

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March 19th, 2012

Idaho Panhandle National Forest
Forest Plan Revision
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Kootenai National Forest
Forest Plan Revision
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RE: KIPZ Draft Land Management Plan(s) dated December 2011, for the Idaho Panhandle National Forest and the Kootenai National Forest

The Sandpoint based Kinnikinnick 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 our general region of botanic interest includes northwestern Montana.

We appreciate the thorough and thoughtful approach that both forests have taken to accommodate a variety of uses and needs and generally believe that both plans outline a good set of desired conditions, standards and guidelines. We support the majority of these. However, there are some specific areas we would like to see improved and have included those in the comments below.

We also appreciate the work and thoughtfulness of the forest planning team in developing the land allocations found in the preferred alternative, B. Some of the allocations are compromises which we could support or could at least "live with." We do believe that there are some improvements which could be made to improve alternative B and have included these suggestions in the comments below.

We have made detailed comments on the Idaho Panhandle Plan, but feel that it is worth noting that the Kootenai plan contains many of the exact same desired conditions, goals, standards and objectives. Almost every one of the comments made about the Idaho Panhandle plan can be made about the same section of the Kootenai Plan by simply adjusting the page number, and we wish to extend these suggestions to both forests planners.

General Comments for both the Idaho Panhandle and Kootenai National Forests

Rare and Sensitive Plant Species and the Best Conditions for their Conservation

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 we 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 adopt the level of recommended wilderness included in alternative C, in light of the potential positive impact this would have for native plant species, as recognized by the forest service's own conclusions. Furthermore we suggest adopting Alternative C's allocations for management of those roadless areas not recommended for wilderness. Managing these roadless areas as "Backcountry" non-motorized would better protect these rare plant species than management as "General Forest" or as Backcountry Motorized.

We would point out that adopting Alternative C allocations for roadless areas and other backcountry areas provides much greater protection for native plants and their habitats for roadless areas while still allowing for almost the same level of timber production as the preferred alternative (B) since only an extremely small amount of the "timber base" is to be found in inventoried roadless areas. We also support the greater focus on the restoration goals in alternative B and C for areas where active management would be allowed.

Native Plant Habitat and Wilderness

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

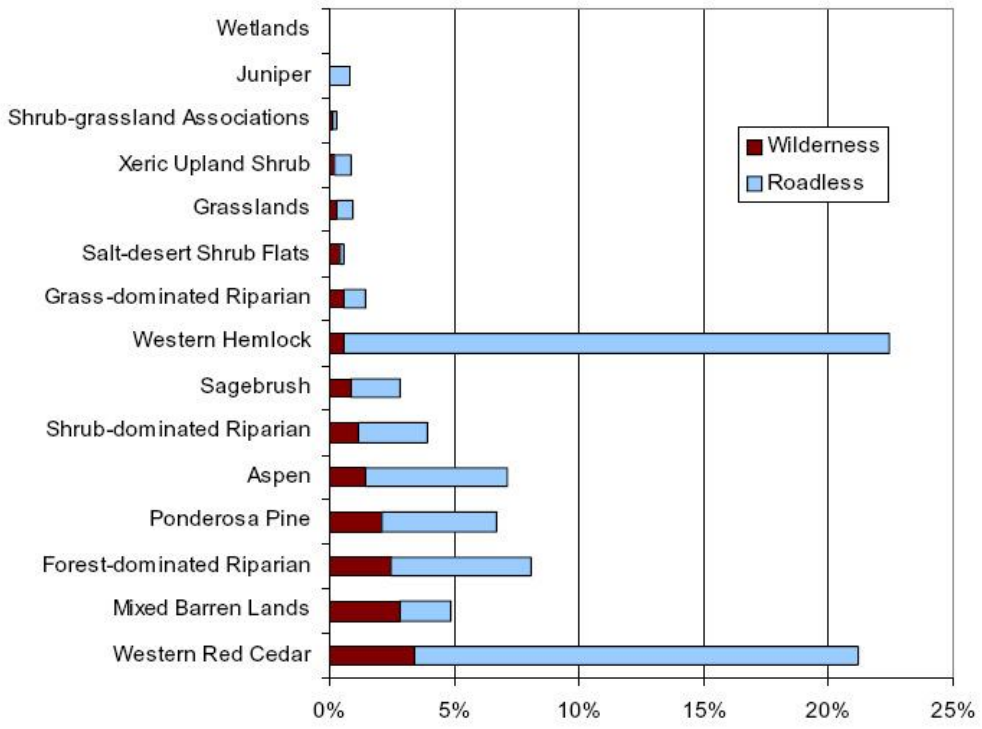

Figure x. Bars represent the percentage of selected land cover types in designated wilderness and inventoried roadless for all lands in Montana and Idaho which are within the Northern Region boundary. For example, there are 3.3 million acres of Ponderosa Pine (all land ownerships) within the Montana 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 underrepresented (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."*

Many of the areas recommended for wilderness on both IPNF and KNF contain these two desired land cover types. Again, alternative C best reflects the need to include these in the National Wilderness Preservation system. In addition there are boundary modification that could be made to many of the areas recommended for wilderness which would better incorporate warm moist western red cedar and western hemlock forests.

Specifically, on the Kootenai Forest, along the southern boundary of the proposed Scotchman Peaks Wilderness area, the 1987 recommended wilderness boundary in the vicinity of East Fork Blue Creek better incorporates both of these cover types than either the current alternative B or C. We would recommend that the 1987 boundary in this vicinity be the baseline for the final plan.

On the IPNF, the addition of the Longs Canyon area in the areas recommended for wilderness will help to protect very significant stands of Cedar and Hemlock. We appreciate and strongly support the inclusion of the Longs Canyon area in alternative B and C's recommended Wilderness allocations.

In the Upper Pack river area of the Selkirk Crest area and the Sawtooth Creek section at the west end of the Mallard Larkins area (on the IPNF) there are stand of old growth Cedar and Hemlock which are currently in the 1987 forest plan as recommended Wilderness allocations. Alternative B would remove the recommendation for portions of wilderness for these areas that include Cedar and Hemlock, while Alternative C would retain the current management of these areas as recommended wilderness. We would support Alternative C in these locations. In the Salmo Priest area, along the Hughes Fork, Alternative C would better address the need for including stands of Old growth Cedar and Hemlock in recommended wilderness than would Alternative B.

We would urge the Forest Service to consider the need for including Cedar and Hemlock stands in the National Wilderness preservation system, as identified in the CER, in the final wilderness evaluation for all recommended wilderness areas on both forests. In many locations alternative B falls short of adequately addressing this need. In addition to the specific locations we described above we would encourage a more complete review of those areas as well as the Yaak, Cabinet Additions, Ten Lakes on the KNF and the upper Coeur d'Alene River drainage and Grassy Top areas on the IPNF for specific locations appropriate for recommended wilderness in final draft. In many of these areas, alternative C's site selection and boundary determinations better address the need for including Cedar and Hemlock in recommended wilderness.

White bark Pine

The draft plans includes frequent references to white bark pine in the desired conditions, goals, objectives and guidelines for vegetation. The overall goal would improve the abundance and resiliency of white bark pine stands by increasing the amount of blister rust-resistant trees.

In the EIS supporting the plan, white bark pine is not included in the list of sensitive plants (on page 107 of the DEIS for the IPNF). In 2011 Region 1 added white bark pine to the list of sensitive species – the final plan should make note of this. White bark pine is a candidate for listing under the Endangered Species Act, further underscoring the need for the Forest Service to emphasize the specific goals and actions that the plan will undertake to assure recovery of this species. In short, more details are needed in the standards and guidelines related to the management of the landscape in ways which will benefit white bark pine. Some examples to consider might include the number of acres surveyed for healthy stands or processes to determine priority locations for treatment, or the number of acres replanted with rust resistant trees and the number of trees to be planted.

Old Growth Recruitment

The plan establishes desired conditions and sets goals, objectives, standards and guidelines to maintain old growth stands and presents a general goal making these stands resilient to disturbance. What is missing is how the plan will address the loss of old growth over time from such disturbances. Existing old growth, no matter what is done to maintain resiliency, will over time succumb to insects, disease, and disturbance events.

The desired conditions, goals, standards and guidelines should focus more directly on the need for ***recruitment*** of areas that will become old growth to replace those that will be lost through management activities or natural causes. This should include a means of identifying specific areas that are available and appropriate for old growth recruitment. It should also represent the diversity of different types of old growth found on our forests and the specific ecological niches they occupy.

Scotchman Peaks Recommended Wilderness – Some Special Notes

The Kinnikinnick Native Plant Society has supported and endorsed wilderness designation for this special area since 2006. Among the many reason for our support is the botanical diversity of this roadless area. From the dry southwestern facing ponderosa covered slopes of Goat Mountain to the deep, steep valleys of Spar Creek, Ross Creek and Dry Creek which represent some of the most southern reaches of interior rain forest this area contains a unique, divers collection of native plant species and habitats. We support the strongest possible wilderness recommendation for this area.

One specific part of the Scotchmans we would draw your attention to is the West and East forks of Blue Creek and most especially the land between the two. The topography in this area creates conditions for special precipitation patterns which receive an abundance of moisture. The unique soil and mixed aged forest which includes some old growth retains a high level of moisture in the soil as well as generally humid conditions. The effect is that the Blue Creek area contains occurrences of very rare lichens, especially near the convergence of the two forks. Survey work done in the year 2000 as well as more recently by lichenologist Toby Spribille has turned up evidence of several rare lichens and the potential for many more species unique to Montana and Idaho, should more survey work be done. This area deserves the highest level of protection. In short the entire Scotchman Peaks IRA in this vicinity should be recommended for Wilderness.

Climate Change

The forest plans makes note of climate change as a potential cause of disturbance in several desired conditions regarding resilience, but establishes no clear goals or objectives on how to manage the forests to be resistant to the potential impacts from Climate Change.

Clearly one of the challenges is developing a better understanding of how climate change may impact the landscape. We suggest that one desired condition and goal would be to develop a better understanding through baseline studies of vegetation in locations likely to be impacted first and most dramatically by climate change. Additional guidelines might include long-term monitoring of these baseline study locations.

Specific areas of interest include the Selkirks where there are mountaintop “balds” that some models suggest may change in a short period of time to forest cover. Baseline, and ongoing botanical surveys, studies and monitoring would be critical to understanding how native plant habitats may be adaptive and/or resistant to change. These studies could be facilitated by considering these areas for designation as additional Research Natural Areas, or as Areas of Special Botanical Interest in the forest plan, or by setting goals, objectives and guidelines for the study of otherwise unclassified areas.

In addition to these mountaintop “balds”, we would suggest that the forest plan establish clear direction for other specific areas where botanical surveys and monitoring would be of high value because of climate change or

other special interest including all timber and development projects.

Biomass Fuels

Since 2006, the role that biomass might play in energy production has received considerable attention nationally, regionally and locally. Potential supplies for biomass energy production should be addressed in ways that may not have been considered in the draft forest plan. Course, woody debris serves many valuable ecological functions for healthy native plant habitats. We would encourage that forest planning establish guidelines for determining ecologically sustainable locations and levels of biomass removal.

Comments Specific to the *Idaho Panhandle National Forest* Land Management Plan

Chapter 2, Section on Vegetation

Page 13 FW-DC-VEG-03 In order for Old Growth stands to be resilient to disturbances and climate change, the plan should include a stated desired condition for managing areas with an emphasis on Old Growth ***Recruitment.***

Page 15 FW-DC-VEG-10 addresses new invasive species and in part states, "Areas requiring revegetation use locally adapted, native plant species where feasible and appropriate." We believe that the last four words "where feasible and appropriate" should be eliminated. These words imply that the use of non-native plants might be appropriate. If an area requires revegetation we do not see any circumstances in which native plants would not be appropriate.

Pages 15-20 FW-DC-VEG-11 Lists "The desired forest composition, structure, and pattern for biophysical settings". A more complete description of the desired conditions for Alpine (not just sub-alpine) settings should be considered for inclusion.

Page 21 – 23 Standards and Guidelines for Vegetation – lists only 2 Standards for Vegetation. We believe that additional standards and/or guidelines should be included which would:

- Direct activities to limit construction of new roads, which are vectors for the introduction of noxious weeds.
- Include a statement of intent for guidelines for complete pre-project botanical surveys.
- Include a set of guidelines for implementing post project monitoring for invasive species.

Page 22 FW-GDL-VEG-07 We appreciate that this guideline directs evaluation of projects for species on the regional sensitive species list. But, we believe this should be a *standard* not just a guideline.

Chapter 2, Section on Fire

On page 25 FW-DC-FIRE-03 we strongly support the increased use of wildland fire, in a responsible manner, to achieve desired ecosystem conditions.

On page 25 Objectives – we would encourage both of these objectives to set higher targets for prescribed burning and for managing naturally occurring fires. The levels suggested would not likely have sufficient impact to achieve the stated desired conditions.

Chapter 2, Section on Wildlife

Page 25 – Goal-01 states that the "INPF contributes to the diversity of desired native and non-native plant and animal communities…" Without a more complete definition of what non-native plant communities might be

considered desirable (beneficial), we would recommend that the "non-native plant communities" be removed from this goal. At best, this goal is not clearly stated. At worst, this goal is simply not a valid goal for the IPNF.

Chapter 3 Management Area Direction

Page 60 – 63 **Botanical Areas** – we would like to express the strongest level of support for the expansion of 2 existing Botanical Areas (Hobo Cedar Grove and Roosevelt Cedar Grove), the expansion of 2 ***new*** botanical areas (Huff Lake and Upper Priest Lake) and the continued management of 3 others as botanical areas (Hanna Flats, Sandhouse Cedar Grove, and Settlers Grove)

Page 63-66 **Research Natural Areas –** we also strongly support the creation of three new research natural areas: Red Horse Mountain, Theriault Lake and the Upper Priest River.

Chapter 4 Priest Lake Geographic Area

The opening description of unique features correctly recognizes some of the topographic influences on tree growth. A more detailed description of the environmental and topographic influence that create unique conditions for plant communities was found in the 2006 draft plan and is absent here. We would encourage that the current draft plan incorporate the observations (see below) made in the 2006 IPNF draft forest management plan:

> **Chapter 1 – Vision – Vegetation, page 1-58** "*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 better reflected in desired conditions for this geographic area. Some Vegetation Desired Conditions to consider:

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. Complete a thorough botanical assessment of the Priest Lake Basin to guide management activities.

Comments Specific to the Kootenai National Forest Plan

Please review the comments made above regarding the desired conditions, goals, standards and guidelines. Many of the same observation are applicable to both forests.

<u>Some site specific comments on the KNF allocations for MA 3 Special Use Botanic Areas</u>

There are a number of areas currently managed under the existing forest plan for their botanical values, designated as Special Use MA3 Botanic. Ten of these have been dropped from the proposed plan without sufficient explanation in the EIS and placed under "general forest" category. We would recommend that the final plan retain the MA3 Special Use Botanic allocation for these ten areas. They are not very large in size but each represents areas of significant botanic interest. Collectively, the total area is small, approximately only 500 acres, and so their preservation should have no discernible impact in timber production or the achievement of other landscape objectives. Most importantly, these areas collectively represent a high level of unique biodiversity that are not well represented in other areas where conservation is a main focus.

Fortine Creek Meadows (37 ac)
Hamilton Gorge (144 ac)
Kerr Meadows (58 ac)
Lower Brimstone (39 ac)
Magnesia Fen (12 ac)
Napi Knob (18 ac)
North End Alkali Ecosystem (21 ac)
Sterling Forest (127 ac)
Swamp Mountain Meadows (34 ac)
White Creek Fen (14 ac)

In addition, the 494 Bedrock Meadow (35 ac) was proposed in the 2006 draft plan for inclusion as an MA 3 Special Use Botanic Area and it too appears to have been dropped from the draft plan. Once again we would urge that the final plan include it in this category of protection.

Of all these areas, there is a particularly high level of diversity in the Sterling Forest, Magnesia Fen, Swamp Creek Mountain Meadows and 494 Bedrock Meadows areas and their protection through special use management is most important.

In Closing

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 there are challenges in finalizing these land management plans. We hope these comments provide value and we look forward to remaining engaged in the planning process in a constructive way. Please continue to include us on the mailing list for any announcements or information related to forest plan revision process. We look forward to seeing a copy of the final plan when it is available.

Sincerely,

Gail Bolin
President – Kinnikinnick Native Plant Society