Public Comment for SJ 15 Study of Federal Land Management for the Environmental Quality Council

8/18/2014

From: Aaron Foster
To: Kolman, Joe
Subject: SJ15
Date: Tuesday, July 22, 2014 1:34:09 PM

I am writing to express my extreme condemnation for this misguided federal land grab. Our Federal lands are a long standing treasure belonging to all citizens of these United States, including myself! I am incredulous that elected public servants, some from my own state of Montana, would seek to pervert this time tested pact of public ownership, forged by heroic American heroes and visionaries such as Teddy Roosevelt! Shame on any self serving politician who supports this thinly veiled attempt to steal MY public land! Spin it any way you want, this land, MY LAND is not and never will be for sale.

Aaron Foster
5175 Goodan Ln
Missoula, MT. 59808

Sent from my iPad

From: Adam Koltz
To: Kolman, Joe
Subject: Comments on SJ15 Public Land Study
Date: Wednesday, August 13, 2014 8:46:40 PM

I wish to comment on the SJ15 Fedral Land Study.

I belive that our national forrest and public lands are not for sale, transfer or disposal - not today, not tomorrow, not as a last resourt, nor ever.

I belive that this legislation is way out of line. No court has ever found permanent reservation of national parks, national forest, wildlife refuges, or BLM lands for the "benefit & enjoyment of the people". These lands are not illegal as some private intrests claim.

Montana's and Americans in general continue to cherish the pricesless blessing of our public lands and hope that this legislation is defeated.

Sincerely

Adam Koltz
1125 Oceanic Dr.
Encinitas,CA 92024

From: Add Sessions
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 12:24:58 PM

Dear EQC,

Please accept this as my comment on the SJ 15 Federal Land Study.
We have all responded to "push polls", usually during political campaigns. In a push poll, the wording of the questions "push" the respondents toward the responses desired by the poll taker. They are a form of negative campaigning.
The questions submitted to the county boards of commissioners as part of your study resemble a push poll intended to lend support to a take-over of federal lands. Thoughtful voters looking for honest answers would not approve the use of this tactic in what is billed as an objective bi-partisan study.

Addison Sessions
Billings, MT

From: alandmp@aol.com
To: Kolman, Joe
Subject: SJ 15 Study - comment
Date: Thursday, August 14, 2014 8:38:06 AM

Dear Mr. Kolman:

I am writing to protest the effort to privatize Montana's public lands. I've just spent the summer traveling through New England, where public lands are constrained, chopped up, and fragmented by private holdings. The result is a diminished definition of wilderness and reduced access to country for citizens. It was an incredible relief to return to Montana, where lands and rivers are much more open to public access and use. The push to privatize our public lands is a selfish and greedy impulse and would rob future generations of the chance to enjoy our open space and recreational opportunities. I can't state my opposition to this effort strongly enough.

Thank you.

Alan Kesselheim
Bozeman, MT

From: Alex Strickland
To: Kolman, Joe
Cc: cliff@larsenusa.com; kimberly.dudik@gmail.com
Subject: SJ15 Federal Land Study
Date: Thursday, August 14, 2014 3:02:56 PM

Hi Joe,

I have recently returned to Montana after a few years living in Utah and read the SJ15 Federal Land Study with great interest, having watched Utah's recent attempt to stake its claim to federal lands across the state. Utah's attempt is regarded by many — myself included — as a grandstanding boondoggle at considerable taxpayer expense, and I would hate to see Montana turn down a similar road.

A few comments about information contained in the study:

- Broadly, I have no doubt that federal management on many public lands in Montana falls short (far short, in some cases) of ideal. I have seen many overgrown, unhealthy forests, stalled projects and frustrating closures on federal lands. However, I have also seen those exact same issues on state- and locally managed lands in similar quantity and frequency. While I fully agree that federal management of some lands is lackluster, there is no evidence that state and local agencies would do any better — nor could reasonably be expected to do so with budget constraints, etc. Further, the study specifically implicates special interest groups hamstringing land managers and agencies as a big part of the problem with federal oversight. Why should we expect that special interests — whether the Sierra Club, an OHV association, or other — wouldn't tie up state and local resources with obstructionist lawsuits and saddle our taxpayers with the bill?

- Specifically, some of the complaints highlighted by counties around the state border on the bizarre. Flathead's assertion that fires on federally managed land negatively affect air quality is certainly true. However fires burning on state and local land — not to mention state and local land in other states — affect air quality in similar ways. Perhaps Flathead County would like to maintain the lands in Washington and Oregon as well to preserve their air quality? Mineral County's elderly population not being able to access remote federally owned lands is hardly a federal issue. Nor is it a state or local one. It's one that can be dealt with using common sense — the kind of sense likely doled out by those same seasoned citizens. No agency of any size should shoulder the burden of building expensive infrastructure for senior citizens to reach the deep woods, it's absurd.

- These quibbles are dwarfed by the fundamental reason these explorations are a short-sighted populist political gambit: The land may be within the state, but it is not the state's. There is no reasonable argument to be made that Montana (or Utah, or any other state) should gain ownership of federal lands should the federal government decide to abandon them. The land is publicly owned by all the citizens of this country, not just the citizens of Montana. For Montana to take over those lands is grand larceny.

This is all to say nothing of the economic impact — not only the study's oft-mentioned lost tax dollars — Montana's public lands bring to all of us. Would products stamped with "Made in Montana" maintain their luster without our

reputation for vast open — publicly accessible — spaces? Would books, movies, and countless media pieces promoting Montana and driving tourist dollars to the Treasure State still be created if millions of acres of federally owned land were parceled out to state and local agencies to be sold off, developed or heavily leased? Perhaps, but it doesn't seem like a gamble worth taking.

Why Montana would entertain thoughts of tampering with the very arrangement that powers our substantial tourism economy and general mystique is a mystery to me, and seems to only provide benefits to a single user group: politicians.

Relegate this study and it's associated nonsense efforts to a forgotten file cabinet and let's spend our time on something more worthwhile.

Alex Strickland
508 W. Alder St.
Missoula, MT

Alex Strickland
web I blog

From: Andrew
To: Kolman, Joe
Subject: Public lands
Date: Wednesday, August 13, 2014 3:12:11 PM

Hello Joe,

I use public lands a lot for recreation and treasure them. Public lands are a vital part of what makes this state great. Without them our quality of life would suffer.

Specifically, our national forests and public lands should not be sold or transferred. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some claim. We cherish our public lands, which were described by our first state legislature as "lands belonging to the citizens of the United States."

Thank you!

Andrew Sullivan
Bozeman, MT

Sent with Sparrow

From: Arnold Lelis
To: Kolman, Joe
Subject: public lands are a public benefit
Date: Thursday, August 14, 2014 6:08:55 AM

Montana needs to preserve public ownership of its lands. We have reached the point, in the country as a whole, where everything that is not properly protected will be destroyed by corporate interests for their private, short-term gain. For long-term benefit to the citizens in Montana, as in every other state, state oversight and ownership of as much land as possible is the only acceptable alternative. Privatization under the circumstances presently contemplated means destruction.

Arnold Lelis
612 S Baird St
Green Bay WI 54301

From: ashley.stevick@gmail.com on behalf of Ashley Stevick
To: Kolman, Joe
Subject: #keepitpublic
Date: Thursday, August 14, 2014 3:11:29 PM

Hi Joe,

Our national forests and public lands should never be sold, transferred or disposed of.

Thank you for taking the time to read my email. I hope it's one of thousands reinforcing the same message.

--
Ashley Stevick

Ashley Stevick Photography
92 N. Broadway, Belgrade MT
authentic & creative photo services
ashleystevickphotography.com
406.431.2802

From: B.
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 06, 2014 5:46:08 PM

I support federal public lands and agree 100% with the following recommendations:

- Remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities.
- Montanans overwhelmingly oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires.
- Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, and outdoor recreation, and improved our quality of life.
- The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.

Thank you,
Barbara Gregovich
1301 West Porphyry
Butte, MT 59701

From: Beate von Stutterheim
To: Kolman, Joe
Subject: Public comment
Date: Thursday, August 14, 2014 1:27:18 PM

I want to add my voice to the chorus of voices to ensure that our public lands are not for sale, transfer or disposal – not today, not as a last resort not ever!
Our first state legislature describes this as "lands belonging to the citizens of the United States" and I join in the public outcry against efforts to transfer and sell our public lands.

Beate von Stutterheim

From: Beth Madden
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, July 22, 2014 5:46:11 PM

I am a 30+ year resident of Montana, a recreationist and casual hunter, and an appreciater of our Montana wildlife and wild places.

I have been following the EQC review of public lands in Montana. I am concerned with the references to transferring federal lands to the state. I am proud of and cherish our federal lands here in Montana - and respect the management that is occurring there. Sure it can be improved, but I routinely give input into these improvements through the public process. We do NOT need to 'take over' these lands for state management. That would be an expensive and crazy undertaking. I am quite dismayed to hear EQC putting this agenda of transferring public lands out there. It is not supported by our sports-people or Montanans as a whole!

Also, the money we hunters and anglers put into wildlife conservation through hunting license fees should not be diverted to other uses. This is very important to us.

Thank you for the opportunity to comment.
Beth Madden
108 S 9th St
Livingston, MT 59047

From: Betty Holder
To: Kolman, Joe
Subject: Transfer of Federal Public Lands to the State
Date: Friday, August 15, 2014 11:02:24 AM

I want you to know that I am completely opposed to the idea of state control of Federal lands. These lands are treasures and were set aside for the entire nation, not just those that live in MT and might gain greater profit from them. They need to be managed and controlled to protect the natural environment, processes, and wildlife habitat they provide. I have seen how the State manages much of their land and natural resources and frankly I am often appalled. Money and instant profit have far to much influence on the decisions made at the state level regarding natural resource management. Our natural beauty and wildlife are the reason our states draws the tourist they do. They are the reason I live here and are the basis for most of my recreation. Keep Federal lands Federal!!!

From: Bill Murphy
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 6:42:05 AM

- OUR national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.

The East part of the USA has been destroyed by greed. Florida especially. Special interests, banks, developers, ag interests are allowed to fill in wetlands, pump out fresh water, pollute waterways, destroy reefs and estuaries, all in the name of the $. If we lose nature, we lose everything that was. Once it is gone, it can not be replaced. Many people could care less. They like to sit on the couch and watch tv, or go to the mall and shop all day. But, many of us need nature, and public lands are the only areas where nature and peace are preserved.

Please don't sell of our public lands, or allow them to be exploited for profit by corporations taking out natural resources.

William Murphy, Stuart, Fl

This email is free from viruses and malware because avast! Antivirus protection is active.

From: Bill Zager
To: Kolman, Joe
Subject: Subject: SJ15 Federal Land Study
Date: Friday, August 15, 2014 9:47:47 PM

Sir:

Simply put, stealing America's public lands from all Americans would be the most grievous theft imaginable, constituting domestic terrorism, and would bring the most severe punishment down upon the heads of whomever would try such a thing. Such theft can never be tolerated.

Regards,
Bill Zager

From: BJ Blackburn
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 6:18:34 AM

Please keep Montana's public lands PUBLIC!! Montanans love their public lands, and they are an asset the state cannot afford to give up. Please eliminate recommendation #11 from the draft report of the study! Opportunity for the best public use of the lands is a management issue, not a disposal issue.

Montanans want their lands to be 'their' lands, not some private enterprise.

Please do not consider changing the status of Montana's public lands.

Sincerely yours,

Bonnie Eldredge

From: Blaine Brengle
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Wednesday, July 23, 2014 10:37:43 AM

As a sportsman who depends solely on public lands and public access to those lands, I am deeply concerned about SJ15 – Federal Land Study. The idea of the State of Montana, through the GOP controlled legislature, having control of our public lands is of great concern. It appears moving control of Federal lands to the State would amount to some kind of land grab related to corporate and individual greed.

I am strongly opposed to this and, as an independent voter, I will never vote for anyone who advocates the State of Montana controlling our public lands.

Blaine Brengle
Missoula, MT

From: Brad OGrosky
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 3:58:02 PM

Dear Mr. Kolman, I am writing to support the ownership of federal public lands to remain as federal lands. I have volunteered for many years to help protect public lands in Utah and have seen what could happen if they become state lands. Public lands must be preserved for everyone, now and in the future. They must not be sacrificed for the short term gains of a few. Thank you, Brad O'Grosky, Bozeman, MT

From: Brenda Davis
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 12:35:22 PM

Dear Joe,

I am writing to inform the Environmental Quality Council of our absolute opposition to sale, transfer or disposal of public lands in Montana or elsewhere in the U.S. America's public lands are one of the great gifts our citizens enjoy, and are a point of pride and natural beauty in our state. Montanans cherish these lands, and they attract visitors and tourism revenue from around the country and the world. My husband and I sincerely hope that no member of the MT Legislature or its staff would be so short-sighted as to sacrifice our stunning public estate for short term financial or political gain.

Thank you for your time.

Brenda S. Davis
Swep Davis
Bozeman, MT

From: Cal Cumin
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Wednesday, August 13, 2014 3:19:08 PM

The idea of transferring Federal land to states is so ludicrous it shouldn't even be an issue.

Cal Cumin
Shepherd, MT

From: Carolyn Mehl
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Saturday, August 16, 2014 10:13:32 AM

Dear Mr. Kolman-

I am writing in strong opposition to the sale of our federally-owned public lands to any other entity, be it state or private.

The legacy of our national forests, wilderness, and national parks goes back to Teddy Roosevelt; they are some of our great national treasures and should be maintained for the enjoyment of future generations. As a hunter, hiker, horseback rider, and general lover of public lands, I am deeply disturbed by this proposal. Our federally-owned public lands were meant to be enjoyed by all, rich and poor, and are one of our great democratic American traditions that sets us apart from many other countries.

Montana would not be the same place without our US public lands!

Carolyn Mehl
Seeley Lake, MT

From: Cassidy Meeks
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 8:47:13 PM

Dear Mr. Joe Kolman and EQC staff,
I am writing to urge you to oppose transferring federal lands in Montana to state hands. As a native Montanan, I cherish the ability to use these lands and enjoy the beauty found nowhere else on earth. This land belongs to the citizens of the United States and should remain so. I do not believe our national forests and public lands are for sale, transfer or disposal - not today, not as a last resort, not ever. Also, no court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim. Please: DO NOT move forward to transfer federal lands to the state to do with as it pleases, which would likely entail selling it to the highest bidder comprised of members of the private organizations like Exxon Mobile, Koch Industries, and others who do not care about keeping the land unspoiled nor available for my and other US citizens’ public use.

Sincerely,

Cassidy Meeks

From: CenturyLink Customer
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 10:58:17 AM

Mr. Kolman,
My husband and I wish to advise you that we are strongly opposed to the selling of ANY public lands in Montana. The most important thing that keeps us in Montana is access to public lands. Although we are native Montanans, we have lived all over the country and are aware of how limited public access is in other states and how seriously that affects the quality of life in those states. We recently moved from Texas back to Montana. In Texas 99% of the land is privately owned. We could not pack up our Jeep and head out to explore new countryside without encountering locked gates and NO Trespassing signs. We could not access rivers or lakes to fish. Our picnics had to be in state parks that were filled with people and full parking lots. We greatly missed the big sky and wide open spaces of Montana that make life so beautiful in Montana. We ask that you help secure this unique environment that is Montana and not permit any sell off of our land.
Thank You,
Bonnie and Doug McCombs
56 34th Ave. N.E.
Great Falls, Mt. 59404

From: CenturyLink Customer
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 7:14:18 PM

Our public lands are not for sale. Public lands are for everyone , not just rich people.

From: Cheri
To: Kolman, Joe
Subject: EQC study
Date: Saturday, August 16, 2014 2:13:50 PM

I would like to let my opinion be known that as an American citizen I am strongly opposed to the sale of our public lands. Tell Exxon and the Koch brothers that public lands are for the enjoyment of the public and not to further line the greedy pockets of billionaires.

Cheri Hall
512 Judi
Missoula, MT 59808

From: Clarence Sanders
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 12:34:19 PM

Hello,

My name is Clarence Sanders, and I reside in Bozeman, MT.

I am writing to comment on the SJ 15 Federal Land Study.

It is self-evident that our public lands -- national parks, forests, wilderness areas and wildlife refuges are of great importance, both economically and recreationally, and a source of pride among Montanans. The idea that all Americans own these national treasures, and are free to enjoy them is uniquely American and part of our identity as Montanans and Americans. Moreover, our public lands generate substantial economic benefits from non-Americans – tourists from abroad that travel and vacation in our national parks and other public lands, such as national monuments and USFS recreation projects.

Regrettably, narrowly defined and short-sighted economic interests are now at work to attack the idea and philosophy behind our public land programs. Their aim, of course, is to transfer ownership of these lands to private interests for the sole purpose of economic exploitation. This would not only be a disservice to all Montanans, but would also represent a perverse attack on the philosophy behind the mixed-use mandate of the National Forest Act.

A committee of the Montana State Legislature, known as The Environmental Quality Council (EQC), is moving at the behest of these narrowly-based economic interests in an effort to divest public lands for private economic exploitation. The so-called EQC is now accepting comments on their "study," which sets out a series of arguments for the divestment of public lands to private economic interests.

I most emphatically oppose the proposals of the EQC. The public lands are assets owned by the people of America and should not be relegated to the disposition of narrow economic interests represented by EQC.
The EQC and it's constituency has even stooped to the use of false information to

further it’s parochial objectives. For example, no court has ever found the permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests now claim.

Our national forests and public lands are not for sale, transfer or disposal and should remain that way in perpetuity.

Thank you,

Clarence Sanders
4416 Morning Sun Drive
Bozeman, MT 59715

From: Colleen Moore
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 3:15:26 PM

Dear Mr Kolman and the Environmental Quality Council,
I disagree most strongly with _any_ plan to transfer federal land in Montana to the jurisdiction of the State of Montana. There are many reasons for my disagreement, and space in an email is insufficient to elaborate them.

thanks,
colleen moore

Colleen Moore
617 S 6th Ave.
Bozeman, MT 59715
cfmoore72@gmail.com
406 586-3140 home

From: craig hall
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 9:08:10 AM

Please remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities. It is simply a ridiculous, short-sited notion, and frankly somewhat embarrassing.

From: crittersrme@juno.com
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 6:05:19 PM

Dear Mr. Kohlman,

I am writing to express my disbelief and vigorous opposition to any attempt by our Montana State Legislature to transfer the management of MY, AND ALL AMERICAN CITIZEN'S, federal public lands within our state of Montana to state control! As a former Montana State Legislator, I am appalled at the audacity of certain extreme political elements using unfounded criteria to legitimize such a transfer. The financial impact of taking such control over what is estimated to be 29% or 27.4 million acres of land within Montana should itself be a disqualifying factor. Has the Legislative Services Division estimated what the financial impact of such a transfer will be? What is the requisite personnel and administrative costs of growth needed for a state such as ours with a relatively small government to adequately administer an additional 27.4 million acres of land and do we have the professional expertise to do so? Where is such these funding coming from? These are just a few of the pertinent questions that come immediately to mind. As an avid four season outdoorsman I treasure my ability to access MY PUBLIC LANDS to enjoy the tranquility and beauty of our State, an experience that many others can only dream about. Federal public lands belong to our Nation's citizens and should be managed by a federal agency not a state agency. Do not grow our state government and increasingly tax it's citizens to achieve such a transfer. MY PUBLIC LANDS ARE NOT FOR SALE!

Sincerely,
Durward C. "Butch" Waddill
LtCol, USMC (Ret.)

From: Terry and Mary Danforth on behalf of danforth@avicom.net
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 5:29:53 PM

Dear Mr. Joe Kolman:

August 14, 2014

I would like to comment on what I believe is an ill-conceived and self-serving study to turn over federal lands to states and or privatizing these lands.

My family and I have enjoyed the use of National Forests, National Parks, Wildlife Refuges and BLM Lands for hunting, fishing, hiking, backpacking, cross country skiing for over 60 years. I would hope that my grandchildren and great grand-children will continue to have the same opportunities that my children and I have had in future years.

The federal lands in Montana as in any state belong to all US Citizens. All US citizens have the right to use and have input on how these lands are used. I don't feel it is the prerogative of state legislatures, state agencies, or private persons or corporation to determine how these lands are to be used. Citizens in all states pay taxes and have just as much right to determine how federal land are to be used as any state legislature, private person, or corporation in Montana.

Montana as well as any of the other states does not have the fiscal resources to properly manage these lands. One obligation of state and or private resources is the management of wild land fires. Montana would be required to fully fund firefighting efforts which has been growing exponentially in the past several years. Fires have become much larger and very complex to manage due to global warming and the sprawl of urbane interface fires. Suppression costs in Montana in 2012 were $113 million with the state of Montana picking up $50 million and most of the rest was picked up by the federal government. The Black Forest fire in Colorado last year cost 10 million dollars in direct suppression costs and over $85 million in property damage. The Yellowstone fires of 1988 which included forest lands in Montana, Wyoming and Idaho cost an estimated 240 million dollars to suppress. Other than loss of timber destruction to private property was relatively minimal comparted to fires that burn in close proximity of more densely populated areas. The Yarnell Fire in Arizona last year 19 firefighters tragically lost their lives in an urban interface environment. I would like to ask, who is going to take the lead in investigating and responsibility in assuring firefighting safety and firefighting objectives and standards are being met?

Currently the federal government charges livestock users on federal land $2.00 per animal unit per month. Currently grazing fees on private and state lands is approximately $12.00 per AUM. Who is going to pick up these costs or are the livestock producers going to absorb these additional fees?

Watersheds are typically in large unpopulated areas that most urban areas rely on for domestic water use. Many of these large tracts are on federal lands. Many times these lands are administered by multiple agencies. Who will have jurisdiction over these lands and who will be

setting water use priorities on how these water resources are used? I see the probabilities for municipalities and other water users being held hostage by privateers or inept public administrators.

There are many examples of how this land could and would affect recreation users and that these users would have virtually no say in how public lands would be used. It would be the highest bidder that would always have the advantage.

I believe that this study was conceived to circumvent the NEPA process, Clean Air Act, Clean Water Act, Wilderness Act and the Endangered Species Act, etc. for the profits of the rich and corporate America. These possible federal land giveaways or sales would revert back to the days of the late 1800's when the robber barons were pillaging out national heritage for the profits of a few and no environmental oversight.

Regardless of what the Supreme Court says I don't believe that BNSF, Koch Industries, or Halliburton has a vote on this issue.

Thank for allowing me to comment on your Federal Land Study.

Respectfully,

Terry Danforth
3230 Linney Rd.
Bozeman, MT 59718

From: Dave and Luci
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 10:57:39 PM

I would like to express my opposition to the transfer of federal lands to the State of Montana.

The federal government would not just give up these lands, so there would seemingly be a huge legal cost, which the state of Montana can ill afford. The financial burden would most likely fall upon Montana taxpayers.

I feel the state is not capable of managing so much land, both financially and physically. Any complaints people have now about federal management of lands would only be made worse because the money would not be there to help manage. If the budget for federal lands is inadequate, the budget for state owned lands would be even more dismal. So to help this budget, the state would more than likely begin selling those lands to private parties, since Montana has the statutory authority to liquidate state lands. What is now land where I can recreate - hunt, fish, hike, pick berries - would be closed off with trophy homes and gated subdivisions. The common folk would lose access to land and it would become a playground for the wealthy.

The counties would lose federal payments, which would affect our schools. The cost of fire suppression alone would cost Montana more money than it could afford.

If the federal lands became owned by the state, the natural resources would become a source of contention. Here again, land would be sold to the highest bidder and our open spaces, where we recreate, will be filled with oil rigs, coal mines and logging trucks.

The pursuit of the transfer of federal lands to the State of Montana is an ill advised idea that should never be implemented.

Sincerely,
Lucille R. Yeats
Columbia Falls, Montana

From: Dave and Luci
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 9:59:01 PM

I am absolutely opposed to a transfer of ownership of federal lands in Montana to the State of Montana. These federal lands are one of Montana's greatest assets even though the state doesn't manage them. I have no confidence that the state would not sell off or lease much of the land that they acquire if this were to pass. I also think the state would take years to ramp up their staff to adequately administer and protect these resources. This is a bad idea that I'm sure the rest of the nation would blow a huge fit over as well.

Thank you for the chance to comment.

David W. Yeats
Columbia Falls. MT

From: David Boggs
To: Kolman, Joe
Subject: Federal Land Management Study
Date: Wednesday, August 13, 2014 10:11:00 PM

In regards to the study of management of Federal Lands in Montana, I would like to state my absolute opposition to any recommendation of turning Federal Lands over to the State of Montana for the following reasons:

We do not currently have enough money to adequately manage our own state lands and parks, the tax burden to manage more state land is not something I am willing to pay taxes for to the State of Montana.

This whole process is a thinly disguised attempt to convey federal land to the extreme rich, at public expense, and with the ensuing loss of our property that we Americans hold as a public heritage.

Any attempt to transfer the lands to the State of Montana will bring up endless lawsuits, which we the taxpayers will be forced to shell out money for, instead of using the money for beneficial uses in this state. One only has to look at the gross stupidity of the State of Utah, and how it is throwing away millions of the taxpayers money in a futile attempt to transfer Federal Lands to the State of Utah.

There is ABSOLUTELY no benefit to be had by pursuing the idea of transfer of Federal lands in Montana, other than to the further enrichment of a small number of non-residents of this state.

David P. Boggs, MD
615 Power St.
Helena, MT 59601
(406) 433-8441

From: David Rockwell
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 6:20:08 AM

Your study is not an objective analysis and your committee is losing all credibility. Public lands belong to us, not to some dime-a-dozen legislative committee. The views in your report (for example, that the permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" is illegal) are not only goofy, they are extreme and unAmerican. Please drop this stupid idea of transferring public lands to the state or selling them off. Please focus on the real work that we send you to Helena to do.

--

David Rockwell
PO Box 94
Dixon, MT 59831
406-246-4646
rockwell@blackfoot.net

From: david Schaub
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 10:16:30 PM

I have read through a lot of the Federal Land Study. There are many good suggestions that need to be implemented. Those include identifying critical areas and cooperative efforts with local people to remediate problems. However, the recommendation to transfer control of Federal Lands to States immediately brings a loud NO from me. I've seen whats happened both east and west of the divide as rich individuals and corporations buy up private land. Places where Montanans went to hike, hunt and fish for generations were immediately closed to to them. The same will happen when rich individuals and corporations can buy up large chunks of Federal Land in Montana and keep the public out.

Please register my request that the transfer of Federal Lands to states be removed from the study recommendations. That single recommendation will destroy the access to public lands that makes Montana a wonderful place where people want to live, recreate and start businesses.

David L. Schaub
10571 Coulter Pine St.
Lolo, Mt. 59847
dlstks@bresnan.net

From: llamamamadeb@gmail.com on behalf of deb berglund
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, July 23, 2014 1:42:14 PM

I am opposed to the transfer of federal lands to the states. Control of federal lands by Montana politicians would be disastrous to users of those public lands. In Montana the federal lands now available to everybody will be closed to anyone who is not wealthy or a rancher. Please let the majority of users of public lands to continue to enjoy them and not put them in the hands of those who just want to make money off of them. Lands now controlled by the state of Montana are being logged; near my house what used to be a place to hike and hunt has been logged and this has devalued my property because of the views that are no longer forests but now are clearcuts. The state does not listen to the comments from the public on these issues.

Please vote NO to transfer of public lands to the states.

Thanks,
Deb Berglund
1406 Bear Canyon Rd
Bozeman, MT 59715

From: Debo Powers
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 18, 2014 9:20:45 AM

Dear Joe,

The idea to steal our public lands from the American people is un-American. These lands belong to all American citizens and should never be sold, transferred, or disposed of for any reason whatsoever. These lands were preserved for all of us to use not just a handful of wealthy people and companies. **The reason that Montana is so special is because of our heritage of public lands** and the ability of average, non-wealthy, citizens to use them and enjoy them. Furthermore, Montana's economy is based on these public lands and the right of citizens to use them. This brings in a huge amount of tax dollars for businesses in the state of Montana.

I hope that your "study" will show the ridiculousness of this idea to steal our public lands.

Sincerely,

Debo Powers
11499 North Fork Road
Polebridge, Montana 59928

From: Deborah Hanson
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 5:36:00 PM

Dear Mr. Kolman,

As Montana citizens, my husband and I treasure our public lands. We believe our public lands are priceless.
This study appeared to be skewed toward a conclusion for the State to assume ownership of public lands which
would certainly lead selling them to the highest bidder.

The surveys to the Counties seemed simplified and designed to not get indepth information. If the real purpose of this study is to foster better coordination between local, state and federal entities, then
let us work on that. More transparency, more participation from the public. If it is to make it easier for the
corporations and the 1% to do a final land grab, let's shine the light on the real purpose of this study.

The first Montana Legislature referred to our public lands as "belonging to the citizens of the United States." The public
lands are for the "benefit and enjoyment of **the people**".

Let us be very clear, our national forests and public lands are **NOT FOR SALE,** transfer or disposal, not today, not tomorrow,
not ever!!!

We are alarmed that there is a group both nationally and in Montana pushing to takeover Federal lands in the guise
of state control, knowing full well that we do not have the wherewithal to pay to properly manage them.
This is a thinly disguised effort to privatize our heritage.

Very concerned citizen,

Deborah Hanson
1002 Pleasant
Miles City, MT 59301
406 232 2134

From: Del Blackburn
To: Kolman, Joe
Subject: US Government Lands.
Date: Wednesday, August 13, 2014 10:10:26 PM

The National Forests, BLM lands, National Parks and Monuments are not for sale, transfer or disposal. Not now not ever! We in the west cherish or public lands don't mess with them! We have lots of friends in Montana that vote!

Del Blackburn
Worley, Idaho

From: Diane Bayuk
To: Kolman, Joe
Subject: Public Lands
Date: Wednesday, August 13, 2014 5:52:30 PM

Please know how important the "public" is in public lands!

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Diane W. Bayuk
Michael J. Bayuk
Helena, MT

From: diane ensign
To: Kolman, Joe
Cc: diane ensign
Subject: Public Lands
Date: Saturday, August 16, 2014 5:49:36 PM

I am very upset to hear there is talk of privatizing the American citizens public lands. This must never happen if we have any decency left as a country that has a brilliantly written constitution. America is supposed to be the land of the free where all of it's citizens have a right to the pursuit of happiness. It is not to be the country where only the rich & privileged & power wielding companies get to take over what belongs to everyone. It is essential for families & individuals to continue their rights to be in our public lands to study, learn, enjoy, recreate in, photograph, find peace & solitude & healing(mental, emotional, physical, spiritual), etc. & so forth . Our public lands belong to everyone in America not just a few selfish & self serving, & greedy few. I like so many I visit my public lands many times each year. I spent summer 2013 in Montana's public lands to celebrate being alive after very extensive surgery & chemo from late stage ovarian cancer. I need wilderness, wildlife & nature as much as I need air to breathe. So many of my happiest memories take place in our public lands with other people or by myself. In fact part of my career was spent in our public lands teaching others photography & learning about nature. Please take my concerns to be those of most of our nations peoples who don't realize that such a tragedy like selling our public lands could even happen. Sincerely,
Diane Ensign 5556 N. Maria Dr. Tucson, Az. 85704 (520) 8257273

e

From: Dick & Donna Shockley
To: Kolman, Joe
Subject: SJ 15 FEDERAL LAND STUDY
Date: Tuesday, July 22, 2014 5:14:34 PM

After viewing televised meetings of the Montana EQC and reading the SJ 15 Federal Land Study report, I am concerned about the process and the final product.

It is commonly held that complexities in federal public land management have resulted in a situation that must be improved by collaboration and creative problem solving including improved cooperation and communication between and among the responsible federal agencies, as well as representation from county and state agencies in locales where the federal public lands are located.

This report simply reflects a veiled agenda to significantly increase motorized vehicle access to federal lands and to transfer management of public federal lands to state ownership. The last recommendation on page 19 clearly points to the assertion of this transfer. Read the statement. Intent is clear.

Findings, conclusions, and recommendations are entirely based on a survey which solicited **opinions.** Unfortunately, analysis of opinions can only result in some form of aggregation of opinions. The disconcerting reality is that those opinions proffered in the report have been expressed time and again by certain members of the working group. The report contains little of which could be described as fact finding, scientific analysis, or specific proven recommendations for improvement.

Furthermore, as a sportsman, wildlife advocate and a senior third generation Montanan, I highly value those public lands and do not want to see any possible scenario where their management as America's public lands is put in jeopardy by transferring management to a state or other entity that cannot provide the necessary fiscal, manpower, expertise, and other assets required for effective management. I am also strongly opposed to hunting license dollars being transferred for uses unrelated to wildlife conservation.

The history of Montana is rife with examples of this state's beautiful landscape and tremendous natural resources being exploited for short term financial gain and for a few short jobs for a few short-sighted entities. With the data now substantiating that the beauty and the wild places in Montana, most of which are found on public federal land, form the engine driving an ever increasing tourism industry and creating ever increasing related employment opportunities in Montana. It is also becoming more and more evident that many strong business enterprises are locating to Montana and providing many job opportunities and a boon to the economy because of the outdoor recreation and other attractions of America's public federal lands. To even consider exploitation or selling of these lands for a short term gain to satisfy government debt is irresponsible and appalling.

It appears that SJ 15 was a strongly supported endeavor, which unfortunately went awry through flawed process and skewed findings, conclusions, and recommendations.

Respectfully submitted, Dick Shockley 627 Gateway South Rd, Gallatin Gateway, MT 59730

From: Dick Forehand
To: Kolman, Joe
Subject: SJ Federal Land Study
Date: Wednesday, August 13, 2014 5:11:54 PM

Please accept these comments.

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

.Thank you, Dick Forehand, Box 1632, Red Lodge, MT 59068

From: Dixie Hooper
To: Kolman, Joe
Subject: SJ 15 federal land study
Date: Friday, August 15, 2014 3:53:32 PM

Hi my name is Dixie and I am writing in regards to SJ 15 federal land study. My hope is that public land remains federally controlled because I do not want to see the land divided and sold off by the state government because of budget and profit reasons. Public land is much more important for everyone in the U.S. and should continue to be managed by the federal government.
I am from Helena, Montana and have grown up with access to public land. As a result of having direct experiences and personal memories with these public lands, I know how they benefit humanity and the planet and see the need to preserve and protect these precious resources now and in perpetuity.
Providing clean water, air, and soil, they are invaluable for every American's health and well-being and not to mention the planet as a whole. Studies in Japan, reveal forest therapy is helping their nation's people reduce stress and promote happiness while connecting them with the natural world. Studies in the U.S. reflect that children who spend more time in the outdoors do better in school. Nature deficit disorder, a term coined in Richard louv's book, is a growing concern in the country and reveals the negative effects on children not being outside in nature. So continuing access the public lands should be paramount in your legislation.
In addition to providing a clean environment and ultimately a healthier people, they possess biodiversity in plant, animal, fungi and microbial life. Everything effects everything else on this earth, and in order to function properly needs to continue to exist and perform it's duty.
My fear would be the state deciding to sell off public lands for short term financial gain. Nature also holds the potential to solving human and environmental problems and should not be ignored and sold off nonchalantly.
As the song so poignantly exclaims, "this land is your land, this land is my land," let's keep public lands in the public's hands to provide the greatest service to the earth and humanity.
Thank you for your time.
Sincerely,
Dixie hooper
Sent from my iPhone

From: Don Skillicorn
To: Kolman, Joe
Subject: NOT FOR SALE! Only TODAY left to share your feelings about US public lands being sold
Date: Saturday, August 16, 2014 10:07:46 AM
Attachments: image001.png

Dear Mr. Kolman:

I am writing in strong opposition to the sale of US public lands to any other entity, be it state or private.

The legacy of our national forests, wildernesses and national parks goes back to Teddy Roosevelt; they are some of our great national treasures that we need to keep for all future generations to enjoy.

In most other countries large forests and hunting rights are owned by private interests, going back to the fiefdoms of the Middle Ages.

The US public lands which can be enjoyed by all, rich and poor, are one of great democratic traditions of America and one of the American values that sets us apart from most other countries.

Let's keep it that way!

Thank You!

Garden City
PLUMBING - HEATING
406-728-5550

Don Skillicorn
4025 Flynn Lane
Missoula, Montana 59808
Work: 406-728-5550
Cell: 406-327-5404
dskillicorn@gardencityplumbing.com

From: Donna Murphrey
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, July 23, 2014 11:16:00 AM

I asked you to allow the federal government to continue to manage our Montana public lands. Our state politics seem to be so fractured that taking the chance for a state controlled government to manage these could see dramatic changes will only the party in control's interest being addressed. Our public lands are what make Montana such a tourist destination as well as a state economic driver. These need to be protected for the future, not just for the benefit of the current politicians.

From: Duane Claypool
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Wednesday, August 13, 2014 9:19:05 PM

Dear EQC,

I am writing to comment on SJ15 The Federal Land Study.

In regards to this study & this issue I want to comment that our public lands & national forests are not for sale, transfer or disposal now, not as a last resort, not ever.

No court has ever found permanent reservation of United States national parks, national forests, wildlife refuges or BLM land for the "benefit & enjoyment of the people" to be illegal, as some private interests claim.

Myself & my family as well as all Montanans continue to cherish the priceless blessings of our public lands - described by our first state legislature as "lands belonging to the citizens of the United States"

The federal public lands in Montana are a treasure that Montanans want & need to have stay in public ownership not only from a recreation perspective but also from an economic perspective. These public lands provide a multitude of important recreational benefits to Montanans as well as crucial economic benefits as the people that use these public lands brings millions of dollars in economic benefit to Montana communities. It is imperative that all Montana public lands stay in public ownership.

Please place me on the list to receive all future information on this issue.

Thank you,

Duane Claypool
911 South Sutton Avenue
Miles City, Mt 59301

From: Dylan DesRosier
To: Kolman, Joe
Subject: Public Comment, Federal Lands Study
Date: Thursday, August 14, 2014 2:14:06 PM

To the MT Environmental Quality Council,

Although the challenges in contemporary federal lands management are significant and complex, the transfer of pubic lands would not ultimately solve the disputes between local communities, extractive industry, and the national interest in conserving National Forests, Parks, Wilderness, BLM lands, Refuges, and the wildlife therein. Nor would it resolve certainty issues, funding issues, accountability issues, and/or environmental conflicts. The false claims of illegality surrounding our nation's public lands have never been validated and serve only limited exploitive interests.

Further, Montanans have the most at stake in any transfer or sale of federal public lands. Montanans value our public lands as priceless landscapes that greatly benefit our environment, our economy, our well being, and our future. They are not for sale.

Dylan DesRosier

From: Elaine Sedlack
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Friday, August 15, 2014 9:58:12 PM

I am opposed to Montana or any other state attempting to take over Federal lands within their state. Federal lands belong to all the citizens of the US to enjoy, not only the few rich people as in parts of Europe where the general population is excluded. Montana cannot afford to manage all the federal lands within its border and state laws require state lands to be money making to support schools, etc. I am afraid that means the lands will be auctioned off to the highest bidder, thereby excluding the average Montanan from hunting, fishing, hiking, biking, and generally enjoying these lands as they do now.

The thing that attracts people to Montana are the large tracts of federal lands where they can recreate or just enjoy the natural scene. That's why people move to Montana, people in other states without federal lands envy us, and tourists spend billions of dollars here.

What a waste of time, effort, and money to even consider taking over management of federal lands. The federal lands in Montana were purchased by the federal government before Montana even existed and should remain under federal management.

Elaine Sedlack

From: Elizabeth Schenk
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 3:12:06 PM

Hello:

I am outraged to hear that our own Montana elected officials would even consider trying to put our public lands for sale. They are not ever for sale. They are to be public in perpetuity, so we can all have wild spaces, and recovery spaces for ourselves and other species. Also, an important and underappreciated crucial role undisturbed public lands in national parks, national forests, wildlife refuges, BLM lands provide is performing ecosystem services such as nutrient cycling, oxygen formation, carbon storage, water filtration, snowpack holding, and other processes necessary for human life. We need more undisturbed public lands, not less.

In Montana we are the very fortunate beneficiaries who live near these federally owned lands. Our economy benefits, our people benefit and our environment benefits. This is priceless and any "sale" would be a losing proposition. Private management of these lands would be at odds with the public good, and would restrict access unfairly to the general public. This is neither fair nor wise. Please tell our elected officials to not support this effort to privatize public lands, which will impoverish many and further enrich the wealthy few.

Thank you,
Elizabeth Schenk, PhD, MHI, RN
Missoula, Montana

ecschenk@msn.com

From: Emmons, David M.
To: Kolman, Joe
Subject: land transfer/grab
Date: Wednesday, August 13, 2014 4:59:17 PM

Dear Mr. Kolman,

I would like to add my voice to the thousands of others in this state who see this land transfer for what it is, a brazen attempt to take lands reserved for all of the people and sell those lands, like some cheap hustler, to private parties that will either close them to public access or mine, log, and otherwise exploit them for private gain. Everything about this tea-party inspired land grab is noxious. If Montana wants to go the way of some Texans and secede, then do it up front; don't hide behind some states right rhetoric. It is obvious to anyone who has looked at this scheme that the state of Montana cannot afford the loss of tax revenue and the cost of administering these lands. That being the case, the state of Montana will have "no choice" but to manage these lands for maximum profit to private interests. I was born in 1939; I've been a Montanan since 1967; I made my living teaching and writing history as a member of the History Department at UM. In my personal and professional experience, I have never witnessed anything more destructive of America's historical legacy, to the environment generally, and to basic concepts of fairness than this proposed transfer of lands from the Federal Government to the state. Thank you for your time.

David M. Emmons

Missoula, MT

From: First NameDean Center
To: Kolman, Joe
Subject: SJ15
Date: Wednesday, August 13, 2014 8:25:40 PM

Mr. Kolman,

I have some comments on the work group report and recommendations under SJ 15.

First, the work group was small and based on the content of the report, I don't believe it was broadly representative or truly bipartisan.

Second, the questions directed to county commissioners were very limited in number, severely limited in breadth, and did not really get unbiased, useful information. For example, in the section on Public Health, there were 6 questions and 3 of them, fully half, were about motorized recreation. What has increasing motorized access to do with public health? Water "yield" was addressed, but not water quality, suggesting that the questions were biased in favor of a preconceived agenda. How could there not be many more questions to ask commisioners about the critical area of public health than two? Since the constitutional requirement to promote a health environment was prominently cited in the legislation, having such a skimpy portion of the survey devoted to public health issues clearly shows that the work group did not address the legislative mandate.

Third, the field trip cited in the report looked at one water system in one forest. There are dozens of others that could have been viewed to provide a more comprehensive perspective. For example, the Bozeman water supply also comes from a reservoir on forest service land, which the forest also manages as an intensely used recreational resource. This has been a highly successful cooperative arrangement, and produces a very different image of the situation than Helena.

Fourth, the report regularly includes statements that are not supported by evidence. For example, it states that big game habitat is adversely affected by wildfire, but a strong case can be made that, in the longer term, improves habitat for huntable species by removing the overstory trees and allowing increased food materials to grow in the cleared areas.

Fifth, the report does not address many factors contributing to problems with our forests. For example, global warming is having an adverse effect on the forests, but there is no mention of the state promoting efforts to slow the warming process. For another, the report implies that poor management by the Forest Service, in part due to reduced funding, is having an adverse effect, but no where do they suggest calling on Congress to increase funding for the USFS.

Finally, the report fails to use the evidence the work group obtained in their work. One study commented that past fire suppression had contributed to the current high risk of catastrophic wildfire, but the work group failed to recommend the state fund or perform controlled burns to remedy this aspect. Similarly, another study reported that implementing building codes in the WUI could reduce risk to structures and lives, but the work group failed to recommend the state develop stricter regulations for development in the WUI, even though fighting wildfires in these areas costs taxpayers money and puts our firefighters in jeopardy.

In my opinion, this report ultimately fails to meet the mandate contained in SJ 15 and should not be used by the legislature in crafting solutions. A better effort by a more broadly representative committee which produces more useful recommendations is needed.

Dean Center
Bozeman

From: Frank Sedivy
To: Kolman, Joe
Subject: transfer of federal lands
Date: Friday, August 08, 2014 4:30:44 PM

This is about the dumbest plan i have ever heard of. Our public land would none exestant in 50 to 100 years.

From: Gail Trenfield
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:04:16 PM

I am writing to express my concern that some of our federal public lands may be in danger of being turned over to the state - where they may be more at risk than if they were managed by the federal system, under which they have prospered. The development of federal public lands is one of the most profoundly democratic acts in our history. The lands truly belong to us all. The policies leading to these lands being part of a democratic commonwealth have been emulated around the world.

Claims have been made that setting aside these lands for the public interest and enjoyment is illegal, but, as you know, no court has ever found that this was the case.

Please do everything in your power to protect our federal lands, described by our first Montana State Legislature as "lands belonging to citizens of the United States."

Thank you,

Gail Trenfield

From: Gene & Linda Sentz
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, July 22, 2014 9:29:57 PM

To whom it may concern:
Keep national public lands public, and national !
Any crazy notion to turn over federal lands to the states is insane.
It should never happen.
Gene Sentz
Choteau, MT 59422-0763

From: Gerry Jennings
To: Kolman, Joe
Subject: SJ 15 federal land study
Date: Wednesday, August 13, 2014 3:55:22 PM

The subject of federal land transfer to the states should have never even been thought about, never mind being seriously considered. First off, it's another study to waste time and money and take these precious resources away from more important government work and considerations.
Second, what problems have you found with federal management of the land? It is a very sneaky way to get these lands in the hands of private people who will exploit them for their own purposes. Imagine transferring these lands to the states. How many of our United States have the resources to manage these lands? Most states are in debt or very close to it. Think of all the aspects of cost for managing federal land: grazing permits, trail maintenance, fire suppression, road maintenance, trail heads, security, safety, oversight, etc. There is not one state that can afford to care for lands transferred to its budget.
It's an idea that should be forever buried. It's foolish, sneaky, and very expensive. There's also nothing in anyone's state constitution stating that the states should be managing these lands.
I ask you on behalf of everyone who loves our federal public lands to reconsider this proposal and look to the future. Our children deserve the same opportunities to use these lands, which will be forever locked up, as we have had. Let's not take that away from them.

Gerry Jennings
317 Fox Drive
Great Falls, MT 59404
406-452-3476

Sent from my iPad

From: Gessaman
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 9:49:42 AM

Dear Mr. Joe Kolman,

We the People need your help to keep our public lands and national forests safe from the ever greedy corporate interests. We have plenty of land available for corporate use but in many cases some irresponsible corporations have left environmental disasters for the public to clean up. Unfortunately, many corporations have so polluted the land, like the Berkeley Pit in Butte, MT, that the public will have to pay for generations before the polluted site can be reclaimed, if ever. Meanwhile, the corporations look for unpolluted, uncontaminated, healthy lands like our national forests and public lands to plunder for their own profit.

Once upon a time, many corporations were proud of their commitment to the environment but with bottom line profits ruling most corporations today we the public can no longer trust them. We taxpayers pay more to reclaim polluted lands than the locals were ever paid in wages - the "jobs, jobs, jobs" creation story by corporate interests is a travesty of truth and common sense.

I do not want any more mining on public lands and definitely not in national or state forests or parks.

I also agree with the following key points from the Montana Wilderness Association as I enjoy hiking in our national forests and wilderness areas. Please keep our public lands safe for future generations to enjoy. The protection of our public lands from corporate plunder may be what keeps our climate stable in the future as well. I am using plunder deliberately because many corporations have stolen money from past, present, and future taxpayers to clean up the environmental disasters they left behind after taking the resources they were mining, drilling, etc. for.

1) Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.

2) No court has ever found permanent reservation of national parks,

national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.

3) Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Sincerely,
Kathleen Gessaman
1006 36th Ave NE
Great Falls, MT 59404
406-452-7106

From: Glenn Hockett
To: Kolman, Joe
Subject: EQC National Public Lands Study
Date: Saturday, August 16, 2014 5:28:08 PM

Dear Joe:

Please tell the Environmental Quality Council that:

1. Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
2. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
3. Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as "lands belonging to the citizens of the United States."

Please know that I oppose any transfer of national public lands to the State or any private interests as contemplated in this study.

Sincerely

Glenn Hockett
745 Doane Rd.
Bozeman, MT 59718

From: Gordon Whirry
To: Kolman, Joe
Cc: Bullock, Steve
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 8:08:46 PM

EQC Committee Members,

Having read your draft report for the SJ15 Federal Land Study, I am dismayed by the pro-development tone it takes toward our cherished Federal lands. These have rightly been held in trust for all citizens of this country and protected from narrow local economic interests for generations. As Montanans we have reaped the benefits to our watersheds, wildlife, economy, and recreational opportunities. Our public lands are the envy of the nation and a major engine for economic growth. They attract those interested in our unique quality of life and provide beauty and solitude not available elsewhere. My Montana family has enjoyed these natural treasures for 6 generations and will do our best to avoid privatization of these lands or transfer to State management.

I seriously question the objectivity of this study and the extent of opportunities for public comment. The questionnaire given to county commissioners seems slanted toward development, logging, and transfer. The responses of 28 commissions should not be taken as representative of a majority of Montanans. A transfer of federal lands to the state would have dire consequences for management and be unlawful. These lands are owned by all for the benefit of all and should not be sacrificed for private gain.

It seems to me that State collaboration with Federal agencies can improve management and protection of our natural resources within existing structures.

Regards,

Gordon Whirry

Gordon Whirry Architecture
1912 4th Avenue North, Great Falls, MT 59401
Phone: (406) 452-4370 Fax: (406) 761-7031
g.whirry@bresnan.net

From: Gregg Messel
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 1:18:04 PM

Dear Mr Kolman,

I moved to Montana over 20 years ago and have been visiting the state for over 40. I have taken advantage of Federal lands using various accesses. I support the current bill concerning Federal land usage. I object to the following:

1. Transfer or Sale of Federal lands to state, private landowners or other entities
2. Letting Montana assume control of federal lands

Montana has many Federal lands throughout the state which is a good thing for Montanans. These lands provide opportunities to explore the outdoors. My children have wonderful memories of adventures in the back country.

The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.

I look forward to the comments and the final decision reached.

Regards

Gregg B Messel
P.O. Box 517
320 Second Avenue East
Three Forks, Mt. 59752-0517

406 581 7865

From: Guy Dean Bateman
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 5:24:04 AM

As Americans and Montanans, we pride ourselves on our public lands: our national parks, forests, wilderness areas and wildlife refuges. The idea that each and every one of us owns these national treasures and are free to enjoy them is uniquely American and part of our identity as Montanans.

Unfortunately, powerful interests are now at work to tear the idea of public land--the very essence of what makes Montana unique--to shreds. Their aim is not to give more power to the state, but to auction off these lands to the highest bidder. THIS IS TOTALLY UNACCEPTABLE!!!

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Unfortunately, the Montana State Legislature has a long history of doing very stupid things. Please don't do yet another stupid thing. Federal lands need to remain in federal ownership - after all, that just means that they are owned by ALL American citizens, but we Montanans are lucky to have these lands in our backyards for our quiet use and enjoyment. They also bring numerous out-of-staters to Montana, where they leave millions of dollars in our local economy while they also enjoy these lands. Changing the ownership patterns will destroy these dynamics, leaving us much the poorer, in many respects, not just financial.

--
Guy Dean Bateman, Ph.D.
P.O. Box 1636
Poplar, MT 59255
406-768-5227

From: Hal Herring
To: Kolman, Joe
Subject: from hal herring in augusta, montana
Date: Thursday, August 14, 2014 11:56:37 AM

Mr. Kolman,

I hope you are well, and having a good summer. I recognized your name from reading your byline over the years in Montana newspapers, and from an interview you did with Poynter- I am a writer and reporter and follow their sites.

I'm writing today to express my wholehearted support for maintaining the legacy and heritage of our public lands- National Forests, BLM, Bureau of Reclamation, and USFWS wildlife refuges.

I've lived in Montana for about 25 years, and have chosen to buy a home and raise my family here in Augusta because of the ready access to public lands. We fish, hunt, swim, hike, cut firewood and posts and poles, and generally live a lifestyle dependent on public access to healthy public lands. These lands support the hunting and outfitting industry where we live. They are the incentive for the thousands of visitors we have each year.

Our water supply- the aquifer that supports my home and property value and that of our entire town is 100% dependent on the National Forest lands and the Scapegoat wilderness complex. If those lands were in private hands, we would have no control over our water, and neither would the thousands of farmers and ranchers on the eastern side of the Rockies from rogers Pass to Canada. The north and South Forks of the Sun River feed Gibson and Pishkun Reservoirs—that snowpack, all on public land, feeds the USGS canal without which Fairfield, Montana, "the Malting Barley Capital of the World" with 93,000 acres of land under irrigation from the Greenfields district- DOES NOT EXIST. Watershed protection and the entire economy that depends on it, was a primary reason for the public lands in the first place. If public lands are divested, the most profitable lands- the sources of water, always more valuable than gold, will be the first areas sold into private hands. From there, we will lose all autonomy, all property values, all private property rights.

Our BLM lands, where we hike, hunt antelope, shoot our guns, camp, and wander were America's brilliant answer to the Dust Bowl, to overgrazing and to the much vaunted "tragedy of the commons" which was avoided by our forefathers by establishing the system of public lands. If misguided politicians have their way and these lands are ever divested, one- small scale ranching in the West will disappear over night. Two, we will face a Pandora's Box of issues related to watershed management, wildlife management, soils conservation, long term viability of the lands, US sovereignty (who among us cannot see the international hunger from China, the Saudis and others, to acquire land in nations where the rule of law generally prevails?). There is not single answer in that Pandora's Box that will be as good as the ones that we came up with in the period between 1900-1976. Times change, and we adapt, but the key is to make sure that what you have is better or equal to what you are giving up to change, and our system of public lands works on every level, and is open to adaptation, albeit slowly and with healthy controversy over direction.

The legal mandate for the creation of the public estate is clear. The ownership by the American

people of these lands is legally clear. Efforts to obfuscate this are egregious and ugly. The question must be asked: what motivates the divestiture movement? We know from Terry Anderson of PERC that, in 1999, the motivation for Anderson's study of divestiture was motivated primarily by ideology. Secondarily, the motivation was to enable more access to the lands by extractive industry. No consequences were ever discussed in the reports from PERC. No extrapolation.

Please take note of my and my family's wholehearted support of retaining our public lands heritage.

Thanks,

Hal Herring
406 562 3433

From: Hallie Rugheimer
To: Kolman, Joe
Cc: Hallie Rugheimer
Subject: EQC study comment
Date: Friday, August 15, 2014 5:23:56 PM

Hello staff of Environmental Quality Council,

Time for Montana citizens to add to the public comments re: the study which is being proposed and supported by out of state and other special interests which violate the lands which U. S. citizens consider to be the people's lands and resources. Those of us, including my family members, have chosen to live in Montana for 50 years now because of our natural resources which are available to all residents and visitors to our state. I do not want to see change to the identity that has been protected for even longer than the 50 years before the Wilderness Act in 1964. I am in agreement with the Montana Wilderness Association and an advocate for the protection of Montana's resources. Briefly stated and in unison with others I submit the following:

- Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”
- This insures that the heritage of the past will continue forward into the future for generations to come.

Respectfully submitted: Dated August 14, 2014
Hallie Rugheimer
678 Flathead Crk. Rd.
Wilsall, MT 59086

From: Harold Johns
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, July 22, 2014 9:56:04 PM

I am opposed to transfer of public lands to states: States cannot afford to manage that land, fire suppression costs are prohibitive, a new state agency would be required. As a result of inability to finance those lands the state would have to sell them or at least part of them. The land would then pass from public to private ownership. This what HR 2615 (passed in House recently) is all about. SJ15 on the State level is being promoted for the same reason: **Transferring public lands to States so the wealthy buy them is the purpose of both.**

From: Harry
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Saturday, August 16, 2014 5:49:52 AM

Please keep our federal lands federal and find another more reasonable option. Why should one state pay for all the states for these lands? What is not working? How is this better? This needs further discussion and comment.

sincerely,
Harry Strong

From: Harvey
To: Kolman, Joe
Subject: Public Lands in Montana, SJ 15 Federal Land Study
Date: Sunday, July 27, 2014 8:24:58 AM

Good Morning: I am writing to express my total opposition to any plan to sue the Federal Government to turn over our public lands to Montana or any other state. Please include my comments in the public record of the SJ 15 Federal Lands Study, and include me on the mailing list for all future meetings, reports, or requests for comment.

I am a lifelong hunter, angler, hiker, camper, and wildlife watcher. I pursue all of these activities on public lands in Montana and other states. I also grew up in eastern South Dakota, a land without BLM or Forest Service lands. In that country, we either had to ask permission from private landowners or use the road ditch. The few state owned parks are too small for any real hunting, hiking or camping. Fishing was restricted to small Fishing Access Sites or public lakes. Believe me, that is a pale shadow of the opportunity available on Federal public lands in Montana and other states. That is the future we are choosing if we sue to take over Federal Lands in Montana.

I oppose this concept for several reasons.

Montana does not have the financial resources to manage the vast Federal Estate. Federal public lands are managed for a few income generating and a much higher number of non-income generating activities such as hunting, fishing, wildlife watching, hiking, mountain biking, backpacking, camping, driving for pleasure, sightseeing, developed camping, huckleberry picking, mushroom picking, field trips for school kids, boy scouts and others, maintaining high quality water for cities, towns and farmers for irrigation, maintaining habitat for threatened or endangered species, and many others. Or is the plan to increase fees for those activities that generate income and assess a fee for all of the non-income generating activities? In addition, one good fire season would bankrupt our state. Montana citizens have not shown any interest in paying the much higher additional taxes that would be required to fund that management.

Efforts to take over or dispose of Federal Public Lands ignores the work of Montana farmers, ranchers, loggers, conservationists, local communities and local governments to develop collaborative solutions to bridge the many and varied interests in managing public lands in Montana. These efforts have resulted in numerous positive outcomes and provides a good model for resolving differences where they occur. These processes also increase local peoples ownership of decisions on how to manage our public lands in their areas. These are win-win solutions in which no one group gets everything they want but all get something they can live with. That creates community, which is a positive outcome for Montana.

The predictable outcome of Montana taking over the Federal Public Lands is for them to be sold to private interests. That would disenfranchise all Montanans now and in the future. When that happens, these lands should be sold to the highest bidder to

maximize the economic benefit to the state and to recoup the costs of managing them. It's hard to imagine many Montanans competing in that marketplace. Ironically, many of our traditional Montana ranchers, who may have been on the land for several generations, who rely on public grazing land will also lose those lands. They will be unable to compete in the public marketplace for the same lands they now graze. When that happens, we will all be blocked from these same lands.

The alternative to selling these lands to the highest bidder would be to approve a large number of sweetheart deals and who knows where that would lead especially given the huge influence that big money has in politics these days. We can speculate however based on what is happening here and elsewhere, and it doesn't look good for the culture and traditions of Montana and the average Montanan.

It is in vogue now for politicians and others, who have their own agenda for public land ownership or management and have never had to make decisions about managing land for multiple uses, to criticize the Federal government. Unfortunately, in those complaints, I have not seen many if any specifics. It may be easy to make vague unsubstantiated complaints and develop a following. It is also very dishonest.

Federal Public Lands belong to all citizens of the United States. When I go to other western states to recreate on public lands, I exercise my ownership rights. I do not want to be disenfranchised under false premises.

I am fundamentally opposed to taking over Federal Public Lands by Montana or any other state.

Thanks for the opportunity to comment on this ill advised proposal.

Harvey Nyberg
609 W Evelyn Street
Lewistown, MT 59457
406-366-6215

From: Heather Bengtson
To: Kolman, Joe
Subject: EQC study - public comment
Date: Thursday, August 14, 2014 7:42:17 PM

Hi, my name is Heather Bengtson and I have lived in Montana since I was 5 years old. Montana's public lands make Montana an amazing place to visit, live, work and grow up. This state has so much beauty, wonder, and adventure to offer.
Now I am no politician, and I don't know how everything with land management works, but I do understand that it is very important and I definitely support it. My concern about this report is that many are saying it will lead to the transfer of federal public lands to the state. If that happens, how could the state afford to handle all the expenses? Also, how would that improve the land management? Would the state eventually have to sell some of our public lands to keep up financially?
God has blessed us with beautiful landscapes here, please don't allow that blessing to be transferred, divided and sold. The land He made was designed for us all, not for a select few.
Thank you.
- Heather B

From: Hilary Eisen
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 2:30:52 PM

Dear Mr. Kolman,

Please accept my comments on the SJ 15 Federal Land Study. As a life-long Montanan I am incredibly proud of our great state. A Billings native and now a Bozeman resident, I have also lived in Missoula, Whitefish, Red Lodge, Cooke City, and Hungry Horse over the course of my 30 years. There is a common thread that binds my choice of community, one that almost every Montana town shares but that is unique to only a few states. This common thread is the close proximity to public lands. Above all else, I value Montana for our public lands. I love that as an American they are my lands, just as surely as the federal lands in Wyoming, Alaska, Vermont, and elsewhere belong to me and all other Americans. I absolutely love that I can visit federal public lands and hike, climb, ski, and explore to my hearts content. In the summers I pick berries on these lands. The meat in my freezer comes from public lands. I have introduced my young nieces to public lands and watched them blossom with the opportunity for discovery. Almost all of my most memorable life experiences have occurred while visiting and enjoying federal public lands. My patriotism as an American stems from our public lands system and our nation's recognition that some places belong in the public trust. These lands are more meaningful than the economic value that can be extracted from them and, as much as I love Montana, the federal lands within our borders are not exclusively Montana's. Nor should they be.

Beyond my idealistic love of public lands for their intrinsic value, I believe that any proposal to transfer federal lands to state ownership and/or potentially sell these lands into private hands is ludicrous. From a practical perspective, managing vast swaths of land takes vast amounts of money. Money Montana does not have. This leaves the alterative of selling these lands, selling our cultural heritage and children's inheritance out from under us. What becomes of Montana without public lands? It seems the proponents of this study want to see some places, the postcard places, become a private playground for the rich, while turning the rest of the state into an industrial sacrifice zone with callus disregard for the immense biodiversity and ecological value contained within our borders. This is not acceptable.

As a scientist (M.S. Wildlife Biology at the University of Montana) and a conservation professional (currently Recreation Planning Coordinator at Winter Wildlands Alliance, previously Public Land Advocate at the Greater Yellowstone Coalition) I have grave concerns about the Federal Lands Study. In particular, I have two top concerns with the details of this study.

First, I question the assumption that Montana would be able to reduce our fire season if only we cut more trees. I have fought wildfires as a Forest Service employee and studied bark beetles as a graduate student. There is not a one-size fits all solution to bark beetles or wildfire management and, short of clearcutting all our forests, logging

will not magically bring these issues under control. Bark beetles and higher-intensity fire seasons are the result of many factors, including past timber management practices that left us with millions of acres of similarly-aged trees, and above all, climate change. Logging is just one tool in the toolbox to address these problems but it is not the best tool in many situations. In addition, the study voices concern for watershed health but completely ignores how all of this desired increase in logging would drastically degrade our watersheds.

Second, I completely disagree with the study's call for more roads and more motorized access. Again, the study expresses concerns about water quality but ignores the absolutely irrefutable fact that roads degrade water quality. This is particularly true for poorly maintained roads. Given, again, that Montana does not have endless pots of money, I question how the Legislature proposes to maintain all these new, or newly reopened, roads I would rather seen efforts devoted to maintaining the millions of miles of roads that are already open and would be accessible if only they were in better shape. The study also identifies issues with invasive species. Roads are a conduit for spreading invasive species, not a solution. In addition, as a wildlife biologist, I am deeply concerned about the impacts all these new roads will have on our wildlife. Elk, moose, deer, and many other species are negatively impacted by roads on the landscape. If we want to maintain or grown our wildlife heritage it is essential that we protect their habitat. Habitat protection is incompatible with an extensive road system as elk and other wildlife require hiding cover and secure areas. Finally, as somebody who values public lands because I like to get away from roads and motor vehicles, this proposition flies in direct opposition to my values.

The Federal Land Study seems to view Montana through the lens of the past and looks backwards for solutions to present-day issues. Today Montana is increasingly an amenity-driven economy but privatizing those amenities and squeezing every mineral, log, and AUM out of our state while crisscrossing it with countless roads will destroy the very reasons people and businesses want to move to Montana today and in the future. Survey after survey have shown that Montanans value our public lands and absolutely do not want to transfer them into state ownership. There are many things that they majority of Montanans do not agree on, but on the issue of federal-state land transfer, the consensus is an overwhelming “NO!”

There is one aspect of this study that I do support. I agree that there needs to be some way to make it easier for volunteer groups to help the Forest Service and BLM, be it will trail maintenance, weed eradication, or otherwise. I support the idea of creating an affordable group insurance policy that covers liability for injuries.

Finally, there is absolutely no legal basis for transferring federal lands to state ownership. Montana was carved out of the federal domain and the federal lands within our borders have never belonged to the state. In addition, no court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal. Again, public lands belong to ALL Americans and it is Congress and the Executive Branch, not State Legislatures and Governors, who can and should manage these lands. If our

elected officials feel that the Forest Service and BLM are failing in their duties to manage these lands then they should focus their efforts on lobbying Congress to fully fund these agencies so that the professionals within them have the capacity to do their jobs. Wasting taxpayer money on pointless studies to satisfy political agendas does a disservice to Montanans, Americans, and the lands we love.

It is time for the State of Montana to move beyond political gimmicks and pointless studies and start to focus on issues that matter. Federal lands belong to the American people, not Montana. There are plenty of issues within the Legislatures jurisdiction that deserve attention and I hope that this coming legislative session will devote their attention to these issues rather than wasting any more time or taxpayer money on fulfilling the fantasies of private corporations and individuals who do not have the public's best interest at heart.

Sincerely,

Hilary Eisen

Bozeman, MT

From: Holly Williams
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Saturday, August 16, 2014 9:39:26 AM

Please don't destroy Teddy Roosevelt's vision. It has given us so much joy to vacation and enjoy the public lands that we hold so dear. Please keep the Montana wilderness in Federal hands to ensure that future generations can experience our amazing wilderness in its natural state.

Regards,
Holly Williams
New York, NY
+1.917.975.0143

From: Hugh McFadden
To: Kolman, Joe
Subject: J 15 Federal Land Study
Date: Wednesday, August 13, 2014 9:01:49 PM

I live in the West because of public land. I've spent time in the Midwest and East where someone owns every square inch and charges money for you to look at it, much less walk across it, and forget hunting unless you know a farmer or can pay heavily for the privilege. Who will buy public land? Well it won't be you and me. It will be corporations and the rich. Think how it will be when you want to go for a hike in the Bridgers. Pay to park in the corporate parking lot below the M. Pay to enter the turnstile. Pay based on how much time or how many miles you walked when you get back. Not for me. Not for you either if you think about it. This is one of the most evil ideas I've ever heard. Do you want corporate Japan owning YNP? Can you foresee the Private Prison Geyser Basin? Or McDonalds National Park? I think not.

Please do not consider this idea seriously. We may be dumb, but we ain't stupid. I do not want the likes of Mr. Trump and his buddies putting up a curtain so that I can't see Mt. Ellis, or charging you and me to go look at wildflowers or ride a horse or a motorcycle or a bicycle. Someone is behind this, and it isn't the common folks or the middle class. Stop and think. Which of your constituents, your stakeholders, will selling off the public land benefit? None of the two legged ones. Not one, except the guy with the bucks to prevent us all from enjoying where we live.

I ask that you vote this idea down and treat it like a whack-a-mole whenever it pops up.

Thank you.

Hugh McFadden
Bozeman

From: Jack and Gaynelle
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 9:16:16 PM

Mr. Kolman:

I write in regards to the draft report of the Environmental Quality Council which recommends a study of transfer of federal lands in Montana to the state. This, in my opinion, is at best a misguided effort and at worst an effort which, if successful, would cost the state of Montana dearly in many ways. First, and most important, the state of Montana has no financial capacity to manage these lands and would have to sell most or all of them to private concerns. This would be catastrophic to the hunting, fishing, and wildlife habitat.

I urge rethinking and rewriting of the draft report to include the following points:

- Remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities.
- Montanans overwhelmingly oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires.
- Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, and outdoor recreation, and improved our quality of life.
- The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.

Thank you.

Sincerely,

John Stamm
2 Donlan Flats Rd.
St. Regis, MT 59866

From: Jack Conner
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 6:04:24 PM

If the interests which are trying to take our federal lands away from us are trying to start an actual revolution, then they're on the right track. There is no way even one square inch of land should be granted, given or sold to ANY private individual or state. This is totally absurd. The land is there for all of us to enjoy in our own private way(s) physically or mentally. Losing any of our federal lands is a loss of one of our freedoms and part of our American heritage. I can't believe this!

From: Jack kligerman
To: Kolman, Joe
Subject: Wilderness
Date: Thursday, August 14, 2014 7:36:53 AM

Once lost, wilderness is irreplaceable. Our legacy to future Americans is our land. It must be preserved.

Jack Kligerman
Bozeman, MT

From: Jan and John Wilson
To: Kolman, Joe
Subject: Public lands disposal
Date: Wednesday, August 13, 2014 3:46:27 PM

EQC Members,

The long-term multi-use value of public lands...federal, state and local... to Montana and Montana residents is huge. The idea that transferring, selling or otherwise disposing of Montana public lands on a system-wide basis makes bad economic sense and clearly is not in the best interests of Montanans, particularly future generations. I don't expect to convince the advocates of this foolish measure to agree with me as clearly they are special interests whom stand to benefit personally from transferring public lands. This measure smacks of personal greed to the detriment of present and future generations of Montanans and I strongly oppose it.

John Wilson
405 Monroe Ave.
Helena, MT 59601

From: JaneDoug HortonHolly
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 9:01:59 PM

For all EQC members:
I have three points provided by an organization I respect, and I have my own points which follow:

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

There are fatal flaws in this idea of states taking on management of our federal lands. First and foremost, they are public lands, destined to be open to all citizens and visitors to this great country. Our predecessors had incredible insight to visualize what these open landscapes would provide to all. Yes, access is a wrinkle in that statement I just made, but still, the majority of these lands is accessible. Roads, rivers, trails, flights are all available transportation alternatives into these great spaces of our federal lands. It is absolutely unique to our United States, for example, how someone from Tasmania can visit our national monuments, our national forests, without any barriers. How would it change if it was transferred to state ownership? It is an unknown.

The transfer of federal lands to state ownership and management is a thinly veiled corporate takeover of federal/PUBLIC land. The unknown extent of natural resources contained in these landscapes is such a draw for these stock holder corporations. To access these resources, these companies must navigate the legal protections in place with our **publicly** instated National Environmental Policy Act and other protections of our land, our water and our air. In Montana, we have our own MEPA, but with the past few legislative sessions, both it, and at the national level, NEPAL, have been compromised at the expense of the ground.

Another flaw is the funding to support all the increased points of management, if we remove the infrastructure that exists with the federal systems and reinvent new infrastructure in each state. Think of the time that this transition would take that would be lost and all of the on-the-ground management time lost in what is already a plate-full for existing efforts. And how will we fund and staff this proposition? If the funding that has been cut and cut and cut from our USDA and USBI could be restored, these dependent agencies would be staffed and funded to better accomplish this work that needs to be done, and NOT have our lands sold to the highest(?) bidder.

The tenor of all questions asked of the 35 counties failed to be unbiased. The questions were geared towards the obvious concerns such as wildfire or water quality, but asked no questions about the advantages of having these broad landscapes of federal land. Tourism and hunting dollars are extremely significant in most of these counties, I suspect, and with the change in management, there may

be some changes in how the public will use these landscapes. And the focus on wildfire is understandable, but measures are being taken across the damaged forests by federal agencies to mitigate and reduce the wildfire risks.

And why do we have such an issue with wildfire in forested lands anyway? It is because of a flaw in county planning efforts that have allowed "freedom" to develop subdivisions in forested lands, wild-land urban interface lands, with serious fire risk for these homes. I think that needs to be discussed ad nauseum, as an example of how poorly states and counties have handled urban planning and risk management. The highest fire fighting cost is directly and positively related to WUI fires.

Weeds are another topic that needs to be fairly addressed. Yes, weeds are found on our public federal lands, and they are found on county, private, city, ALL lands! They are a force to be reckoned with, that is certain. These weeds are not a point of contention about how public federal lands are managed, as the areas of forest I visit have very few weeds...I travel the entire state, and see our suite of noxious weeds exhibited on all l

I am extremely concerned about the path this EQC effort is taking. There needs to be a well rounded approach, if there is to be research like this done for pending bills. I must say also, that I did not really hear much about this project and its potential impacts on our general well being, our public lands, as well as the fiscal impacts, should any of this outrageous legislation come to pass. We need to properly manage our public lands, and we have a long standing working template to use...the United States Forest Service, the Bureau of Land Management, the National Park System...and why is the National Park System not a higher profile in the document? That is a concern to me, as that is going to be right with the rest of the federal land grab.

Jane Horton

From: JaneDoug HortonHolly
To: Kolman, Joe
Subject: SJ-15 Federal Land Study.
Date: Wednesday, August 13, 2014 5:29:42 PM

After just finishing reading this document, having dinner, thinking some more about it, I must respond with a resounding "NO".
Another thinly veiled land grab attempt using sketchy reasoning and made up problems.

Over twenty years a concerted effort to cut funding to the responsible agencies for public lands has resulted in the inability to properly do their jobs. Now all these 'problems' are used as a excuse for this study.

Restore these agencies to the levels to which they can once again provide the services to all of our public lands, and maintain these landscapes for all Americans well into the future. There is nothing like what we have anywhere in the world, this is a part of the American fabric that make us special, I do not want these lands going to the highest bidder, which in the endgame, is what this study is all about.

Doug Holly

From: janeti@cyberport.net
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 10:24:45 AM

NO to transferring our federal public lands to the State!!!!!! People from all over Montana and the whole U.S. come here to enjoy these open beautiful lands.

ABSOLUTELY NO !! to transferring these lands to the State.

Jane Timmerman
186 Rosewood Dr. Apt. A
Kalispell, Mt.

From: Jean Dickey
To: Kolman, Joe
Subject: "SJ 15 Federal Land Study"
Date: Saturday, August 16, 2014 11:38:51 AM

Dear Mr. Kolman:

I write to express my strong opposition to the sale of US public lands to any other entity, be it state or private. Our national forests and public lands should not be for sale, transfer or disposal--not today, not as a last resort, not ever.

The legacy of our national forests, wildernesses and national parks goes back to Teddy Roosevelt; they are some of our great national treasures that we need to keep for all future generations to enjoy.

The US public lands were set out for all Americans to enjoy, they are an example of one of values that sets us apart from most other countries. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.

Montanans and all who visit this great state continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Please do your part to ensure we don't lose these great treasures.

Jean Dickey
PO Box 1345
Seeley Lake, MT 59868

From: Jim & Jeanne Clark
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Wednesday, July 23, 2014 12:14:54 PM

Mr. Kolman:

I enjoy our current Federal public lands and having access to them.

I do not believe Federal public lands should be taken over by the State of Montana. I fear this would end up being a kind of 'land grab' motivated by political desires and not be in the best interest of the general public.

I am a faithful voter who is not party-bound. I vote for the person or issue I believe represents what I believe to be the best for the general public, not a special interest of any kind, be that personal or corporate. Therefore, I would not vote for anyone who supports a State takeover of our Federal public lands.

I look forward to continued use of our Federal public lands, without State involvement.

Jim Clark
Missoula, MT

From: Jim Allard
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 9:27:59 PM

Dear Mr. Kolman,

I've lived in Bozeman for 40 years and I hike, camp, and hunt on public land. I very, very strongly oppose any plan to dispose of, or even to consider disposing of, public lands.

Sincerely,
Jim Allard
2121 S Tracy Ave
Bozeman, MT 59715

From: Jim Merifield
To: Kolman, Joe
Cc: Murphy, Maren; Hathaway, Mike; Steve Daines; Schreck, Julie -FS; Jennifer Fielder
Subject: SJ15 Federal Lands Study
Date: Wednesday, August 13, 2014 9:51:17 PM

Sir:

Public Lands Comments

Tell the Environmental Quality Council that...

<!--[if !supportLists]-->• <!--[endif]-->Our national forests and public lands are not for sale, they shall remain public lands even if transfer 'management wise' is to a state (and that transfer must be economically supported and not cause the state or its citizens financial hardships). Disposal is not an option--not today, not as a last resort, not ever.

<!--[if !supportLists]-->• <!--[endif]-->Continue smart use of Forest service and BLM and DNRC lands through lumber sales by reducing dead fire fuels. An entire forest bounded area need not be the goal fire hazard reduction, but priority on fire hazard areas bounding communities, private land, utilities and water ways should be a priority.

<!--[if !supportLists]-->• <!--[endif]-->Continue to get more existing public land roads open to motorized use (ATV, Motorbikes, snowmobiles, chain saw use, etc.). 'Wilderness' means access only by foot or horse and be quiet doing so. Thus, many public lands are NOT accessible by many Montanans. If you can't walk ten miles or ride a horse – you can't get there to enjoy it. Montana FW&P information shows wildlife are more spooked by quiet personnel (hunters and hikers) than by motorized vehicles. They hear the latter coming and move some till it hears the vehicle pass on by.

<!--[if !supportLists]-->• <!--[endif]-->I don't see the need to hire more attorneys. The attorneys the state has now should suffice.

<!--[if !supportLists]-->• <!--[endif]-->Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States." Let's make it more so.

James Merifield
Missoula MT

From: Joe and Tani Campbell
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 12:22:45 PM

Dear Joe,

- It is troubling that your short-sighted committee is considering taking over the ownership and administration of any federal lands in Montana.
-
- The short-term economic objectives of your sponsors, like Exxon Oil and the notorious Koch brothers, should not be a part of any Montana political agenda. Selling or taking over public land that belongs to all citizens of the US is a very sick objective.
  - Our national forests and public lands are not for sale, transfer or disposal. Never have been.....never will be.
  -
  - You and your committee are wasting Montana tax dollars by attempting to “steal” land that belongs to all the citizens of the United States. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some of your “cronies” in private interests claim.
  -
  - We Montanans (my wife and I are both 4th generation) continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States." Be advised that we intend to keep it that way. Public means public, to be enjoyed by future generations...not something to be squandered to private business interests to further line their pockets.

Please advise your committee to spend their time on more worthwhile and productive issues. We have a lot of needs in this state that have not been met. Stealing federal lands, that the state is not qualified to manage, with the intent of turning control over to short-term business interests or mis-managing them at the state level, is not a good way to invest our tax dollars.

Thanks for your time...

Joseph G. Campbell
Po Box 509
Augusta, Montana 59410

From: Joe Newman
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, July 22, 2014 10:45:16 PM

I am adamantly opposed to any transfer of any land from the Federal government to any state. I believe it is almost inevitable that just about any state would eventually be driven by moneyed interests to sell that land to the highest bidder in order to pay its bills, and that the ownership of that land would be such a drain on a state's revenues as to actually provoke such a sale. Nor do I believe that states can do a better job of managing those lands. They would be continually tempted to sell off timber and minerals in order to pay for the management of those lands, to the great detriment of those lands. I think this is just another grab of wealth from the people to the oligarchs, at a time when oligarchy needs to be reigned in, not promoted. These lands don't need to be raped to save the people living near them with a living. There is money to be made from pristine land, which provides tourism with vistas and wildlife and provides farms and ranches with water, timber, and clean air and grass.

Joe Newman
Cardwell
Montana
59721

From: John Ashley
To: "jkolman@mt.gov"
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 2:49:10 PM

To the Environmental Quality Council –

I have read with interest your Draft Report "Evaluating Federal Land Management in Montana". As a 30 plus year resident of Montana, as well as a PROUD American, I am deeply dismayed by your suggestions that the management of our cherished public lands should be transferred to the state**.** **For the record, I am OPPOSED to this idea**. Our public lands and national forests are part of America – not just Montana – and they belong to everyone – not just those whose short term interests are extraction, development, privatization, and enhanced political status. Montana's beautiful environment has a long history of being plundered by mining, logging, and now gas/oil extraction to the detriment of our air, water, and quality of life. Those who reaped the profits are long gone, but the scars and polluted streams still remain. We who live in Montana choose to live here for more reasons than economic gain – we value our nearness to true wilderness – not how close we are to a road. We enjoy hiking and hunting in quiet solitude – not every forest needs a road and motorized access for the public to enjoy it. People from around the world come to experience our forests, wilderness areas, and national forests, and they contribute greatly to our long-term economy – they are a true renewable resource. We proudly state that Montana is the "Last Best Place" – I am whole-heartedly opposed to the idea of our state politicians managing our nation's public forests and lands for short term profit at the risk of making our state look just like everywhere else.

I have no confidence that placing public lands in the hands of State Management will keep our lands safe for future generations to enjoy, nor will it provide a "clean and healthful" environment as mandated by our own Montana Constitution.

I appreciate your consideration of this taxpayer and voter's opinion,

John Ashley
PO BOX 6517
833 Colt Road
Bozeman, Montana 59772

Scanned with McAfee MX host server.

From: John Mundinger
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Thursday, July 31, 2014 5:52:15 AM

Re: SJ15 Federal Land Study

Dear Mr. Kolman

The belief that federal lands in Montana ought to be managed to promote greater economic activity appears to be the primary conclusion drawn from the EQC report, Evaluating Federal Land Management. That result is not surprising because the survey that was sent to the Boards of Commissioners appears to have been crafted to yield that result.

It is clear that a significant majority of the county commissioners desire greater economic activity from the federal lands. However, except to document that expectation, the report contains no information to suggest the capacity of federal lands to sustainably support increased economic activity. Given the history of resource extraction from the federal lands, it is understandable that local governments might expect greater economic activity. However, it also is clear from that history that much of that resource extraction was not sustainable. Minerals are not renewable resources. Most of the high value, accessible timber has gone to the mill and those trees have not been replaced. It would make more sense to align expectations with resource capacity. However, that is not possible because this report does not document capacity.

It should also be noted that federal lands belong to all Americans – not just the people who had the opportunity to respond to EQC's survey. Responsible management of our federal lands must be responsive to the legitimate interests of all citizens, not just the local governments.

Thank you for considering my comments.

John Mundinger
1414 Hauser Blvd.
Helena MT 59601

From: john parker
To: Kolman, Joe
Subject: Public Lands
Date: Thursday, August 14, 2014 10:00:13 AM

Please do all you can to keep the public lands where they are and where they belong, with the people. Once in state hands, the lands will soon go to the highest bidder.
Thank You,
John Parker
601 Longstaff
Missoula, Mt 59833

From: John Repke
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Saturday, August 16, 2014 10:32:46 PM

Dear Mr. Kolman,

I have read through the draft report on the SJ15 Federal Land Study. There is no doubt that the management of 25% of the land within the borders of Montana is an important issue. I applaud the work done by the committee to study this issue and prepare a clear, well organized report on the findings.

In general, I support the recommendations. In particular, I fully agree with the recommendations which seek to establish better communication and joint cooperation between local state/local authorities and representatives of the federal agencies.

The only recommendation that I object to is number 11. I strongly believe that the very low threshold as stated in recommendation 11 for pursuing transfer of ownership will create a disincentive for certain parties to commit to the success of 'other options' as referenced in earlier recommendations. Furthermore, I believe it is very premature to even consider transfer of ownership, let alone pursue it, without an exhaustive analysis of the impact of such a significant and fundamental change. I did not see any compelling arguments or rationale articulated in the report which clearly defined the benefits of state ownership to the citizens of Montana (and, for that matter, the US). I therefore request that recommendation 11 be struck from the report.

Regarding the transfer of ownership - I believe this is a very dangerous slippery slope. Federal ownership of land in Montana and the western US has been overwhelming positive. While there may be specific management policies and practices that could be improved, I believe it is extremely short sighted to address these issues by taking drastic, irreversible action. Our forefathers had the wisdom to set aside this land and we should not take our stewardship of that legacy lightly - nor let it be driven by a few with short term interests.

Thank you for consideration of my comments.

John Repke
411 Sunset View Ct.
Whitefish, MT

1. The Legislature should not pursue the transfer of federally-owned lands to the state of Montana until all other options are investigated.

From: johnnya
To: Kolman, Joe
Subject: Federally Managed Lands
Date: Tuesday, July 22, 2014 7:51:56 PM

The history of the management of federally managed lands in Montana does not lead me to believe they can change...Montana needs to manage Montana's OWN land....We need control and we need it as soon as practical....We should move to start the transfer of OUR OWN land back to Montana State Forestry control ..... A target date could be at the end of then next legislative session..... Johnny Armstrong Eureka, Montana

From: Jon Haufler
To: Kolman, Joe
Subject: SJ 15 Federal Lands Study
Date: Saturday, August 16, 2014 10:48:33 AM

Mr. Kolman,

I want to voice my opposition to transferring Federal lands to state or private management. Federal lands in Montana are a primary reason that this state has the quality natural resources that it does, offers tremendous recreational opportunities, and attracts a huge number of visitors. Our Federal lands are managed to meet a diverse set of objectives not only to assist local citizens and business, but for the benefit of all of the country. While there are always improvements that could be made to how lands are managed, transferring management of Federal lands to state or private interests would be a disaster for the citizens of Montana and the country. Please make sure that this study clearly identifies what a bad idea this would be.
Thank you for the opportunity to comment.

Jonathan Haufler, Ph.D., CWB.
Executive Director
Ecosystem Management Research Institute
P.O. Box 717
Seeley Lake, MT 59868
406-677-0247
www.emri.org

From: Joseph Dalbec
To: Kolman, Joe
Subject: Our Lands
Date: Friday, August 15, 2014 9:16:24 AM

Please do not even consider the sale of our Wilderness lands in Montana. I read an article in the Gazette this morning, "Wild Prairie" about the lands around Winnett, MT and having had Grandparents who struggled to make a living in that area, cannot really imagine development there...but...it has its own beauty.

Profit is not always the answer.

Thank you for taking comments. Jeri Dalbec, 1010 Pleasant St., Miles City, MT 59301

This email is free from viruses and malware because avast! Antivirus protection is active.

From: Joy Carlough
To: Kolman, Joe
Subject: EQC "study" comment
Date: Friday, August 15, 2014 12:35:38 PM

I want to weigh in strongly in favor of all national lands--land that belongs to me--remaining as public lands for the use of all who come to enjoy Montana. Pushing for our national lands to be in the hands of states is a cheap disguise for bankrupting states in their protection efforts thus opening the doors to private owners and big corporations to gain control over our lands and our resources. This is not acceptable.

. . . *government of the people, by the people, for the people, shall not perish from the earth.* The first steps toward perishing is selling out to big money of individuals and corporations at the expense of the people!

- Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”
- With tourism a major and **continual** resource for the state of Montana, our lands, meant to be enjoyed by all, are critical to our state's continued tourism income as well as the enjoyment of people from around the world.

Building anger over lies, greed and personal hypocrisy, yours,

Joyce Carlough
Bozeman, Montana

From: Joy Claar
To: Kolman, Joe
Subject: federal lands
Date: Monday, July 21, 2014 6:04:19 PM

I am for Montana taking over the federally held lands within our State borders. The State can manage more efficiently the lands within her borders for the good of our citizens here. The State will be closer to the people and able to respond to citizen desires.
Joy Claar
Ronan, Montana

From: Judith Heilman
To: Kolman, Joe
Cc: John Heilman
Subject: Comment on SJ15 Federal Land Study
Date: Thursday, August 14, 2014 10:35:41 AM

Protect our public lands - they are not for sale, transfer, nor disposal. I cherish them and fully agree with and rely on with our first state legislature's description of them as "lands belonging to the citizens of the United States."

http://www.leg.mt.gov/content/Committees/Interim/2013-2014/EQC/Public-Comment/sj15-publiccommentdraftreport-withoutappendices.pdf

--
Judith Heilman
341 Saddle Peak Circle
Bozeman, MT 59715

Go out into the world and do well. But, more importantly, go out into the world and do good.

From: Judy Lund
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Friday, August 15, 2014 7:10:01 PM

To whom it may concern: National forests and publiclands are priceless blessings that belong
to the citizens of the U. S. These forest and public lands should NEVER be sold, transferred
or disposed of for any reason. We have already destroyed so much farmland and forests and
waters---why must we destroy what is so precious in this "last best place"!
Judy Lund Kalispell, MT 59901

From: Julia Ellison
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:02:05 PM

To Whom it May Concern:

As a citizen of the United States and of Montana, I am appalled at the cry from special interest groups to turn federal lands over to the state. Our wonderful federal lands provide a retreat for wildlife, diverse plant life, and our citizens. We are so blessed in this country to have access to wild places to recreate, hunt, fish, and just find quiet places to be.

I am hereby stating my strong opposition to turning these federal lands over to the state or to any other private interest groups.

Sincerely,

Julie Ellison
1423 Dickinson St.
Missoula, MT 59802

From: Karen Stevenson
To: Kolman, Joe
Subject: EQC Study on Public Lands
Date: Thursday, August 14, 2014 3:03:21 PM

Dear Mr. Joe Kolman,

I am writing in regards to the EQC Study regarding public lands. My husband and I have raised our children on and near public lands by introducing them at an early age to the wonders of hiking, exploring, camping, hunting and discovering the beauty of public lands which have been preserved and protected by a few very forward thinking men and women.

For the past 6 years we have led a hike into the Terry Badlands Wilderness Study Area. This year we guided 30 people ages 5 through 80 into the badlands. Young and old alike, even the teen-agers couldn't mask their awe, hiked ridges with a breathtaking view, viewed unusual rock outcroppings, and walked over natural bridges. The people on the hike were extremely grateful for the guided trip into a place that was in their own backyard. We were thanked time and time again followed by letters to the editor exclaiming the beauty of this treasure on public lands.

These public lands MUST not be put up for sale!

I feel very strongly that:

- Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

Thank you for sharing my thoughts with the committee.

Sincerely,

Karen Stevenson
232-7261
Miles City, MT 59301

From: Kathryn QannaYahu
To: Kolman, Joe
Subject: EQC SJ15 Work Group
Date: Thursday, August 14, 2014 10:41:54 PM
Attachments: mail_email_pic.png

Environmental Quality Council, Thank you for the opportunity to participate in this public process and submit my public comments on the SJ15 Work Group Evaluating Federal Land Management in Montana, which involves our public lands.

According to the Congressional Research Service, Federal Land Ownership: Overview and Data, about 28.9% of Montana land is Federal Land, which means it belongs to all US citizens as a Public Trust. As such, I would like to go on record opposing any attempt by this work group, the EQC or other governmental group to promote the transfer of Federal Public Lands to the State of Montana. While there may be some management aspects that could be handled more efficiently, it would not benefit US public land owners, nor Montana's to endeavor to do so for a number of reasons.
1. This would greatly increase the state government
2. As such, an expanded government would necessitate greatly increasing Montana taxes to pay for such a bloated government
3. The cost of which bankrupt the State (one major fire alone would do this)
4. The public access and abundance of those resources would be denied to not only Montanans, but other Federal Land owners, as Montana public lands do not afford the same access for the same time period as Federal Lands.
5. As rumored or proposed, the State would sell off lands, thereby removing it from the Public Trust.

I believe far too many hours and resources (tax payer dollars?) have been spent on the minority special interest agenda of transfer of Federal Public Lands to the state, led by Sen. Jennifer Fielder, associated with the American Lands Council. Attorney Generals of other western states facing the same neo carpetbagger land grab agendas have determined that This needs to stop.

To address some aspects of this draft:

- Your county surveys were biased to produce the results intended to promote the agenda that state management would be better, therefore promoting transfer of Federal Public Lands
- Information on Fuel load/fire was biased towards fire suppression or timber harvesting as an idea to preventing fires. I did not see information from Sam Fuhlendorf of the University of Oklahoma's academic papers, one of the experts on fire as a land management tool, including forests (Pyric Herbivory in Action on Boreal Rangelands) or other experts/organizations. Neither was there scientific data on the contribution of old growth forests to biological diversity. Also missing are the Congressional Reports and papers by Ross Gorte on the bogus hypothesis that logging reduces forest fires, wildlife management costs and climate change factors affecting forest fires.

- Biased information was also provided concerning the timber industry and revenue generated. Missing are reports such as Below Cost timber Sales by Ross Gorte and the fact that the majority of Montana is classified as Unprofitable and Highly Unprofitable with only a tiny corner of the northwest being classified as Profitable. From the Congressional Research Service, Historical Profit and Losses on National Forests, Montana consistently reports net financial losses (except Kootenai), the fact that with the Timber industry reports (Aug. 2014), "Demand is not showing an upward trajectory from new construction at this time...Unsold inventory is holding at a low level, albeit not as low as 2005."

Not being paid to do a line by line refutation of this draft, I will simply state that I am disappointed with the focus on materials provided by the American Lands Council with an agenda to prepare the draft, rather than a balanced perspective of scientific data that would benefit all of Montana, not just a special interest group agenda.

As a hunter/fisher conservationist, I keep up with the economic reports, especially those generated by the University of Montana's Institute For Tourism and Recreation Research. Each year tourism, highly connected with our Public Lands, wildness and wildlife, has brought increased economic growth to this state, now listed as $5.8 billion dollars, which include jobs. Also as a hunter/fisher and generally enjoying the natural resources Montana has to offer, I want to see our greatest treasure protected for future generations - our Public Trust through the NEPA and MEPA processes. Additionally, as a conservation hunter and wildlife advocate, I want to make sure that roads do not have a negative impact on wildlife habitat and security.

Seeing the statements made by Sen. Jennifer Fielder on her social media sites and the presentation associated with the SJ15 Work Group, I dont believe this SJ15 draft plan was ever intended to really be a problem solver report of how to better work with the Federal Government. It focused and exaggerated on "problems", was a stab at all things federal, to promote a transfer of Federal Public Lands to the State of Montana, producing skewed findings, wasting time, resources and manpower hours in what could have been a real opportunity to work towards solutions and see other alternatives.

Thank you,
Kathryn QannaYahu
406-579-7748
www.EMWH.org

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COLLABORATIVE
Anglers
emwh.org

From: Kathy Lloyd
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 4:35:22 PM

To the Environmental Quality Council:
We are appalled to learn that you are considering the sale of public lands. These lands belong to all of us and are not for sale to the highest bidder, whose personal gain should never be put before the public good. Our heritage and history of a public conscience and public ownership of land and wildlife in Montana is uniquely American and should not be sold to private interests who care little for anything but profit. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim. These priceless assets should be protected and passed on to future generations.

Kathy Lloyd and Drake Barton
503 State St.
Helena, MT 59601
406-449-6586
drakekath01@gmail.com

From: Ken Silvestro
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 3:09:40 PM

Mr. Joe Kolman:

Please do not transfer federal public lands (National Forests, National Parks, Wildlife Refuges, and BLM land) to state. This would produce a major problem for those of us who appreciate this federal public land. With such a transfer, the potential dangers for changing the landscape of our beloved Montana are far to real.

Thank you,
Ken

From: Kim & Bill Birck
To: Kolman, Joe
Subject: Public Lands ownership
Date: Friday, August 15, 2014 3:37:49 PM

Hello,
Do not allow the transfer of Federal public lands to the states. These lands belong to all of us, regardless of where we live. They should not be placed into the control of individual states because state governments cannot be trusted to maintain public ownership or public access to our lands. Politicians can be bought and the public lands could be sold to the highest bidder. Short-term gain for a few, big-time loss for most of us. There's nothing wrong with federal land ownership.
Please resist calls to transfer federal lands to the states.
Thank you,
Kim Birck
Missoula, Montana

From: Kim Davis
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 1:56:56 PM

Dear Committee Members,

I would like to submit my comments about Senate Joint Resolution No. 15, the study of federal land management. I would first like to thank all those who committed the considerable time and effort needed to look at a very important issue to our state.

I find the 11 recommendations in step 5 to be very well thought out and a good guideline for the state to follow. Number 11 is one that I find particularly important. I do not believe that the state should pursue the transfer of federally owned lands to the state of Montana. I do not believe that the state would be able to adequately manage them.

The example of noxious weeds and beetles mentioned in the survey is a good example of problems that are not being handled very well on a state and county basis.

There are definite changes needed when it comes to timber access, I agree. But, that is not the only issue contributing to the lack of harvestable land. Thousands of acres of timber lands are no longer able to be harvested because they have been sold. Plum Creek, a few years ago, publicly called itself a bigger land company than a timber company.

Forest lands have a ways to go when it comes to management. 100 years of mismanagement like the “10:00 fire suppression policy” have left us with some pretty bad forest health. Those types of policies take some time to recover from.

More motorized travel in the forest is a bit of an issue for me. I still travel mostly by foot, so I do have a bit of bias here. I do know that the areas I travel that allow motorized travel have a much greater prevalence of noxious weeds. I would hope that something like that can be addressed. Our 20 acres of property can be walked and it is not real easy to find noxious weeds. We are somewhat of an island. That is because of over 20 years of work, done every year, to get and keep it that way.

I want to thank you again for allow me to express my opinion. I do believe the 11 recommendations are well thought out and provide a good framework for the state to follow. I again would like comment that I do not believe federally owned lands should be transferred to the state of Montana.

Thanks you very much for your time and effort.

Sincerely,

W. Kim Davis
200 Brookside Trail
Kalispell, MT 59901
wkimd123@centurytel.net

From: kimbirck@aol.com
To: Kolman, Joe
Subject: Keep Public lands public
Date: Thursday, August 14, 2014 7:58:59 AM

No transfer of federal-held public lands to states and no sales of public lands to private entities. These lands are held in trust for ALL Americans. Stop the lunacy, which is piracy, actually.

Kim Birck

Via mobile

From: Klaus von Stutterheim
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Saturday, August 16, 2014 10:00:00 AM

Dear Mr. Kolman:

I am writing in strong opposition to the sale of US public lands to any other entity, be it state or private.

The legacy of our national forests, wildernesses and national parks goes back to Teddy Roosevelt; they are some of our great national treasures that we need to keep for all future generations to enjoy.

In most other countries large forests and hunting rights are owned by private interests, going back to the fiefdoms of the middle ages.

The US public lands which can be enjoyed by all, rich and poor, are one of great democratic traditions of America and one of the American values that sets us apart from most other countries.

Let's keep it that way!

Klaus

Klaus von Stutterheim
2525 Horseshoe Hills Trail
Seeley Lake, MT 59868
406-210-8576

From: Laurie
To: Kolman, Joe
Subject: Comment on SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 7:22:08 PM

Dear Mr Kolman:

Please find my comments on the SJ15 Federal Land Study below:

- No court has ever found that reserving national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" is illegal, as some private interests claim.
- Montana's first state legislature described our public lands as "lands belonging to the citizens of the United States". It is essential to keep it that way for the benefit of ours and future generations.
- Returning public lands and national forests to their original state after sale to private interests is extremely unlikely , so these important wild places would be lost to us forever.
- National forests and public lands are not for sale, transfer or disposal - not today, not tomorrow.

The EQC committee needs to look at the highest and best LONGTERM use, for the greater good.

Teddy Roosevelt called national forests and public lands "essential democracy", owned and manage not to enrich the few but for the people as a whole".

Let Utah and Rep Ivory do what they want. To Montanans, our ability to use public land to hunt, fish, hike, camp and enjoy the quiet beauty is a generational value and not one we intend to give up without a fight.

Respectfully,

Laurie Lohrer
466 Snowberry Lane
Lewistown MT 59457
406-538-5187

From: Lee Boman
To: Kolman, Joe
Subject: Public Lands Make Montana, MONTANA! --- SJ 15 Federal Land Study
Date: Friday, August 15, 2014 11:40:13 AM

To: Joe Kolman, EQC Staff
Re: Economic and Social Value of Public Lands

Dear Joe,

Public lands in Montana make our state the dream destination of millions of people. Some want to ski, some want to tour Glacier National Park, some want to hunt, and some
want to raise their family and run their business with mountains and wildlife nearby.

Long term prosperity in Montana is tied to our public lands. Few other states have the
wildlife and scenery we are blessed with. Those wild public places will only increase in value as time passes. We love our public places now, but those places will make our
state even more desirable to people and businesses in the future.

Quality of life in Montana is largely driven by our public lands. (Grizzly Football helps too)
Transferring the source of joy, inspiration, and healthy outdoor activities to others risks
our state losing the main reason we live here. To ensure future generations have wild
places to enjoy we need to preserve our public lands.

Transferring public lands would make us the same as Kansas or Texas. Help keep Montana the place we love by keeping public lands public. Please don't allow public lands
to be transferred.

Sincerely,
Lee

Lee Boman
Seeley Lake, **MONTANA!**

From: Lisa Autio
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 11:10:56 AM

J Kolman:

This effort to remove lands from federal control in Montana is ill-advised and blatantly political.

I'm ashamed of a state agency of Montana that undertakes a pseudo study in the name of multiuse - which is already an option in many areas of the state - to actually increase access to the treasure and timber of Montana that is currently not available to corporate grabbing.

Contrary to your statements, no court has ever found the reservation of parks and forests to be illegal - preposterous - as suggested by private interests.
All they want to do is get their hands on more of the Treasure State that they don't already have.

SHAME SHAME SHAME on the Environmental Quality Council for undertaking this study to grab more land for industry. I wish my tax dollars did not support you, and you all ought to be let go.

Sincerely,

Lisa Autio
Missoula resident and state taxpayer

From: Lou Bahin
To: Kolman, Joe
Subject: SJ 15 Federal Land Study - comment
Date: Wednesday, August 13, 2014 3:36:02 PM

Hi Joe,

Thank you for conducting and making available for public comment the Federal Land Management Survey conducted by the EQC.

I strongly urge the committee to seek options other than the transfer of federal public lands to the state or private ownership.

Best regards,

Lou Bahin

8625 Jacot Lane
Missoula, MT 59808
(406) 542-1542 (h)

From: Lynn Simpson
To: Kolman, Joe
Subject: public lands
Date: Friday, August 15, 2014 5:38:44 PM

Do not do this! This well be a huge mistake!

From: m s
To: Kolman, Joe
Subject: Public lands
Date: Thursday, August 14, 2014 4:44:04 AM

Dear Mr. Kolman,

Please note my strong objection to any measure that changes our government's current status regarding the sale or transfer of public lands, as described below per the Montana Wilderness Association:

Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
• No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
• Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

Thank you

Regards,

Michael Schwartz
6307 Hillview Way
Missoula, Montana 59803

From: Margaret Schmidt
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 3:33:34 PM

Dear Mr. Kolman,

I support the preservation of public lands in Montana for future generations. Public lands must not be sold off. Please consider the following comments:

First, remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities.

I strongly oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires.

Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, and outdoor recreation, and improved our quality of life. My family enjoys our access to public lands for hiking, camping, bird watching and skiing.

The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.

Thank you for your consideration of my comments.

Sincerely,

Peggy Schmidt
214 Pattee Canyon Drive
Missoula MT 59803

From: Margie and Kenda
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 3:29:08 PM

Hi Joe Kolman

I am a voting resident of the state of Montana that is very much **against** the sale of our public lands. The same thing will happen as happened with our rivers and dam, and we will lose control of the land. Special interest and the rich will get hold of the land and lock us out, build giant homes that they visit on the holidays, and thumb there nose at the regular people of Montana. Just like the have in many parts of the state already....Pleas DO NOT let this bill go on.

Thank you
Kenda Kitchen
Plains Montana

From: Marianne Madler
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 5:02:55 PM

My family and I cherish the wonderful blessing of our public lands. I don't think our public lands should ever be for sale, transfer, or disposal under any circumstances.
Sincerely,
Marianne Madler
920 Dakota Ave.
Whitefish, MT. 59937

From: Marilyn Wolff
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:37:29 PM

I urge the legislature and the study group to dump the proposal to transfer federal lands to the state. Here is terrible example of the greed of big business to steal lands belonging to all Americans. Montanans know how much hunters, fishermen, and nature lovers cherish our public lands. KEEP OUR LANDS OPEN AND FREE TO ALL CITIZENS.

For the legislature to even consider such a travesty is amazing stupidity.

Marilyn Wolff
1320 Bridgecourt Way
Missoula MT 59801
360-4316

From: Mark and Julie Donald
To: Kolman, Joe
Subject: EQC
Date: Thursday, August 14, 2014 9:37:54 AM

Dear Mr. Kolman and the Environmental Quality Council,

I am not a native Montanan, but moved here because of the natural beauty that exists in this state. It is concerning the direction some are willing to head with our public land.

- Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

Please do not allow public lands to be transferred to private interests.

Julie Donald

From: Mark Himmel
To: Kolman, Joe
Subject: SJ15 Federal land Study
Date: Wednesday, August 13, 2014 3:27:28 PM

I can not believe someone would actually consider selling off Federal Public lands, these lands belong to the public and no one else.

--
Mark Himmel

From: Mary & Pat Schelle
To: Kolman, Joe
Cc: Schelle Patrick & Mary
Subject: SJ 15 Federal Land Study
Date: Friday, July 25, 2014 9:51:00 AM

We are opposed to any transfer of Federal Public Lands to states. These federal lands are protected from outside resource grabbers, and other mismanagement agencies, corporations or individuals. This is the reason that these federal protections exist. We can't gamble on states, already financially burdened and stressed, to preserve the lands for us, the public.

****

Patrick L. Schelle
710 Castle Butte Rd.
Lewistown MT 59457
406-538-8837

From: Mary Coar
To: Kolman, Joe
Subject: EQC Study, SJR15
Date: Thursday, August 14, 2014 7:44:51 PM

Hello,

Federal lands should be managed by the federal government, representing the needs of all citizens of the United States. I do not support the transfer of management of federal lands to the state in which those lands are located.

Thank you,

Mary

From: Mary S.
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 3:53:03 PM

Dear Environmental Quality Council

-
- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

From: Mary Schelle
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, July 25, 2014 9:57:09 AM

NEVER TRANSFER FEDERAL PUBLIC LANDS TO STATES OR INDIVIDUALS .

Mary Schelle

From: Meredith Eckerdt
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 11:17:19 AM

Dear Kolman,

I do not support selling off public lands, such as National Forests or Bureau of Land Management (BLM) areas, as a way to help reduce the budget deficit. These public lands are what makes Montana beautiful and unique to the rest of the United States; there are other ways to reduce our budget deficit.

I support our public lands!

Sincerely,

Meredith Eckerdt
eckerdt_m@hotmail.com

From: MICHAEL
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Thursday, August 14, 2014 10:51:10 AM

After reviewing the SJ15 draft report it appears to me this was a push poll aimed at discrediting the Federal Governments efforts on public land management. A lot of it references the effects of wildfire on the landscape. If that is the biggest concern perhaps you should be directing our federal delegation to increase spending on programs such as thinning of the forests or other remediation issues regarding forest lands. The best place to start would be to have a resolution directing Representative Daines support Senator Testers' Forest and recreation bill which would reduce the fire load on a number of Montana forests.

These are our public lands, all the people of the United States, not just the 28 county commissions that answered your questions. We Montanans enjoy them, as do many tourists from around the country and the world, for recreation of all types; hunting, hiking, fishing, camping, ice climbing, skiing, and more, and the freedom they provide to us. They help protect our water sources. They should not be in private hands where we would be closed out of them. If you are looking at the economic side you have not even considered the negative cost on our economy to the loss of the tourists that a transfer to private hands entail, or paying for things like the wildfire fighting cost that the federal government picks up.

These lands are what make Montana a great state and MUST NOT be transferred to the state or to private hands.

These are OUR lands and must remain in the hands of the American people through ownership by the federal government.

Michael Lebwohl
PO Box 354
Gallatin Gateway, MT 59730
406-763-5106

From: Michael
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 7:26:56 PM

Mr Kolman,

Please do not allow the natural grandeur of Our Montana Wilderness to be placed under the control of private, narrow, or special interests.
Montana is a jewel of the west. Let's do our best to keep it that way for posterity.
There are better ways to deal with land management issues.
Those in government who feel that private use/abuse of public lands is the best way to deal with land management issues should be voted out or otherwise removed from office. All interestes, private and governmental, who would stand to gain from from changes in the law should be forced to live on the east coast.

Thank you.

Michaell

Michael A Schiavone II MD FACOG

From: Michael Dax
To: Kolman, Joe
Subject: DO NOT SELL OUR PUBLIC LANDS - SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 3:20:10 PM

Dear Mr. Kolman-

It is of paramount importance that Montana, the American West and the country at-large keep control over its public lands. Historian Frederick Jackson Turner was partially correct when he decreed that it was the frontier experience that defined our nation and the West. I say partially correctly, because clearly the West still maintains unique characteristics that separate it from other parts of the country. The main characteristic that continues to make the West, the West and unite places as diverse as soggy Washington, desiccated New Mexico and Montana is the presence of significant public lands. Public lands are vital to the region's exceptionalism and without them,it will become no different than other parts of the country where access to recreation is limited.

Keep Montana, Montana and keep our Public Lands Public!

Michael Dax
Missoula

From: Michael Enk
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 4:06:33 PM

PO Box 1408
Great Falls, MT 59403

August 14, 2014

Draft Report
Montana EQC
SJ 15 Federal Land Study

Dear Mr. Kolman,

Thank you for the opportunity to comment on the draft report for the Federal Land Study. It was difficult to read this report without cringing at the many personal biases, philosophical positions, incomplete or inaccurate statements, and other distractions contained within it. It is very tempting to believe that federal lands in Montana should be managed primarily for the benefit of local communities, but that ignores federal land management planning rules that give a voice to all US citizens who actually have a right to use and enjoy them, benefit from their management, and petition for sustainable use and protection of the many natural resources they can provide.

In that spirit, it would have been very useful for the EQC to conduct a survey of out-of-state visitors who support our tourism industry to better understand why they choose to spend their money in Montana. Of course they would avoid areas and times when the smoke from wildfires would impact their recreational enjoyment, but it is very presumptuous to assume that they would want to see more logging, motorized access, and commodity extraction from these federal lands.

I found many of the generalizations and inferences in the report to be based more on opinion than fact or science. For example, the body of peer-reviewed science does not support the unqualified threat to wildlife, including Threatened, Endangered & Sensitive species, from "high intensity wildfire" as implied in this report. If this were true, then much of Yellowstone National Park would be a biological desert from the 1988 wildfire season. The lack of acknowledgement and understanding of the role of climate change in increasing wildfire risk was also apparent in the report. It's very unfortunate that this topic has become a political debate instead of an objective scientific discussion.

The questions posed in the county survey sections were often leading and heavily biased with presumptions about cause-and-effect between wildfire risk and federal land management. As a reviewer, I have to ask where is the science to support these opinions from the counties, who answered the questions and how widely were those answers reviewed among the most knowledgeable county officials? Also, the answers were often contradictory. With 50% of the counties indicating that motorized access is inadequate to accomodate their needs, one wonders how they would reconcile the impacts of additional motorized access on water quality and fisheries, let alone the further invasion of noxious weeds into federal lands from these new routes. One should also ask how the counties, many of which face major funding challenges of their own for adequate road maintenance, would propose to pay for maintaining additional roads and motorized trails on federal lands. Too often, it seems that some county officials have an incomplete understanding of the logistics, costs, feasibility, and legality of reducing fuel loads in remote forest lands, roadless areas, or designated wilderness. And finally, these same survey questions could be raised about management of state lands in Montana, with many similar concerns being identifed.

Additional specific comments:

Suvery question #11 - The counties should support their answers to this question with actual data and specific comparisons rather than just an opinion. Are they referring to taxes on undeveloped privately-held forest or grazing lands? What exactly are their answers based on?

Survey question #12 - The answers to this question are meaningless without an actual analysis of the costs and revenues that could be generated by "responsible harvest or extraction of natural resources" from those lands, which itself is a vaque concept open to much debate. What qualifications do the survey respondents have to evaluate net return from commodity use of these lands? Have they consulted on this question with road engineers, forest health experts, wildlife biologists, and watershed specialists? The fact remains that the subject lands are NOT state or private lands. They are federal public lands whose primary purpose is not revenue generation for local county governments.

Survey question #15 - Again, the answers to this question are entirely subjective without meaningful supporting analysis. Other analyses conducted by qualified researchers who actually understand the full scope of economic impacts from federal land management have contradicted such claims of adverse impacts to local economies.

Finding #3 - A very large part of the increased wildfire risk is due to the expansion of subdivisions and rural homes into the Wildland Urban Interface where fuels have increased due to insect epidemics and conditions exacerbated by climate change. Although there are certainly opportunites to reduce this risk through forest fuel treatments, it is not economically feasible to mitigate this risk with accelerated timber harvests across federal lands.

Finding #4 - More "multiple use access" is not a panacea for better federal land management. While it can sometimes improve initial attack on lightning-caused fires, it also increases opportunity for human-caused fires. More motorized routes means higher maintenance costs, increased impacts and risks to water quality and fisheries, loss of wildlife security, and further proliferation of noxious weeds. The report should not conveniently and repeatedly ignore the downside of expanding motorized use on federal lands.

Finding #5 - Economic productivity may be desired by state and local governments and by many rural residents, but it is not necessarily compatible with forest health, wildlife diversity, or watershed protection on federal lands in Montana. The report suggests that economic productivity (resource extraction) can be increased substantially on federal lands without compromising other resources, but there remains widespread disagreement among researchers and specialists that this is universally true. At the least, such an assertion requires many qualifiers. Again, it should be acknowledged that these lands were not set aside by the United States government for the primary purpose of increasing economic opportunties for local communities.

Recommendations #1, 6, 8 and 10 - I fully support these as reasonable and rational approaches to help resolve some of the legitimate concerns raised in the study.

Recommendation #7 - The goal of increasing economic production from these lands should not be viewed solely from the perspective of resource extraction. It must consider the consequences to watershed health, wildlife diversity, opportunities for solitude and quiet recreation, and our tourism industry. It's worth noting that while most of Yellowstone National Park is in Wyoming, gateway towns in Montana benefitted from an influx of tourists who most definitely came to see the new ecosystems and wildlife communties which sprang from the 1988 wildfires. Likewise, we cannot pretend that all wildfires should be suppressed, or that fire doesn't play a major role in shaping healthy forest and range ecosystems in our state.

Recommendation #11 - An attempt to transfer federal lands to state ownership would be a total waste of money and would not be in the best interest of most Montanans. Let the folks in Nevada and Utah squander their resources on this futile land grab fantasy and let Montana focus on realistic collaborative efforts with federal land managers.

Table 1, References - In reviewing some of these reports and publications, I often found them to contain a variety of conclusions, recommendations and other information that indicated the complexity of the resource issues and the lack of a scientific consensus on simple solutions. Because the SJ 15 draft report did not refer to specific statements or sections of the referenced materials, it's often impossible to determine the credibility of the study findings. I am left to believe that the body of agency reports and peer-reviewed scientific publications would not support some of the pervasive generalizations about land management contained in this report -- at least not without much more

qualifying information and site-specific considerations.

Table 1, R&C #6 - If state/county government wants to improve multiple use access on national forests, they can start by lobbying our congressional delegation for higher road and trail maintenance budgets for the Forest Service.

Table 1, R&C #7 - There is an obvious contradiction between the concern about the spread of noxious weeds and the desire for more multiple use access.

Table 1, R&C #10 - Where is the connection between supposedly inaccurate science used in federal decisions and the resource outcomes from Montana's perspective? Further explanation and examples are needed to support this accusation. The Information Quality Act has been used as a political tool to promote other agendas. It might easily be argued that the Forest Service has selectively ignored scientific information that suggests wildland fuels removal is ineffective in significantly reducing catastrophic wildfire risk, or that such treatments merely delay ecosystem processes.

Table 1, R&C #12 - Livestock grazing is not benign. When inadequately managed, as is common on remote federal lands, severe damage to water quality, fish habitat, stream channel form and function, and riparian wildlife habitat can result. A well-established body of scientific research has confirmed this, especially for arid and semi-arid western lands. BLM's own range condition surveys show that many of its grazing allotments in Montana are degraded below their potential. The draft study report fails to address this important concern.

Table 1, R&C #15 - What role do low timber prices play in this equation? R&C #27 implies that Canadian timber subsidies are a significant factor in the viability of Montana's timber industry.

Table 1, R&C #18 - It is noteworthy that no references are provided to support these assertions concerning the proper management of timber resources. I suspect they are too narrowly focused to be scientifically supportable. Thankfully, the associated Desired Condition statements are more holistic and adaptive.

Table 1, R&C #19 - This concern seems to reflect a bias against the ESA whenever it results in a restriction on human uses. Ensuring adequate habitat for longterm viability of a listed species is a challenge in the face of expanding human development, so clearly we have some hard choices to make if we want to keep the full array of plants and animals on our Montana landscapes. That burden certainly falls more heavily on some than others. This concern may be related to wolf management, although wolves have already been delisted and are no longer protected by the ESA.

Table 1, R&C #24 - It should be recognized that the recent federal government shutdown was orchestrated by an extreme faction of one political party in Washington, DC. Let the blame for the consequences fall fairly on those representatives who are responsible for the stunt.

In summary, I remain hopeful that the final report will take a less-biased tone and a broader perspective of the issue. Many of the benefits Montanans receive from these lands being managed for non-commodity resources by federal agencies seem to have been ignored or minimized in the draft. I would also like to see fewer generalizations that do not accurately reflect the complexity of federal land management and its consequences to Montana residents. Any suggestion that the state could more effectively manage these lands through revenues generated by increased resource extraction (or by sale to private parties) is particularly offensive to me as a Montana resident who frequently uses federal lands for hunting, fishing, hiking, wildlife watching and solitude.

Respectfully,

Michael Enk
trouter@q.com

From: molly montana
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 11:45:49 AM

I am 100% opposed to the federal government selling any portion of land or rights to the land or minerals in the National Forest system or federal parks or blm land. This is very upsetting. We have sold off enough of our land. My tax dollars should be going toward the U.S. not wars in other parts of the world.
Mollie Kieran

Molly Montana Real Estate Management
P.O. Box 696
Troy, MT 59935
406-295-4400
mollymontana.com
molly@mollymontana.com

From: Nancy Jochem
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 6:51:21 PM

Dear Mr Kolman,

We are contacting you to comment on the SJ15 Federal Land Study. We are totally opposed to having the Legislature explore a takeover of federal lands in Montana. The vast majority of Montanans oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires.

Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, and outdoor recreation, and improved our quality of life.

In particular, remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities. The possibility that states might sell-off these lands is too great.

Thanks for your time and consideration of these comments.

Best regards,

Nancy and Dan Jochem
Bozeman, MT

From: Nancy Wiggins
To: Kolman, Joe
Date: Thursday, August 14, 2014 9:34:17 AM

Please be aware that:

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

--

NANCY WIGGINS
BILLINGS, MT
NWIGGINS83@GMAIL.COM
Enjoy Life - It Has An Expiration Date

From: Norman Bishop
To: Kolman, Joe
Subject: Comment on SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 9:53:34 AM

To me, it is unthinkable, unconscionable, and indefensible on any grounds to even consider the State of Montana taking ownership of federal lands that lie within state boundaries. I recall that a GAO audit of national forest timber management in the region determined that the Forest Service was spending $2 million for every $1 million it collected on timber sales. On economic grounds alone, the idea of the state managing our forests and BLM lands is without merit.

These lands are far more valuable as carbon sinks, as watersheds, as reserves of biodiversity, and as breathing space for all Americans, than as chattel to be sold to the highest bidder for short-term gain. This puts me in mind of the story of the Golden Goose: people got impatient with the goose for not laying enough golden eggs to satisfy their unbounded greed, so in anger they killed the goose. The EQC appears determined to sell our Golden Goose to slaughter.

I agree with the Montana Wilderness Association that our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever. No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim. I am among those Montanans who continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

During my 36-year career as a ranger with the National Park Service, I worked in numerous states, but in none of them was there a question that the parks I worked in belonged to the people of the United States, not just any state or county in which the parks were set. One has to ask, "Where is your sense of national unity?" If you wave the flag of the United States, then seek to shred the fabric of the national landscape for personal gain, that is the height of hypocrisy.

Norman A. Bishop
4898 Itana Circle
Bozeman, MT 59715

From: Norman Bishop
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 6:44:49 PM

Thank you for the opportunity to comment on the subject study.

This entire direction of thought is untenable, irresponsible, and indefensible. I recall, decades ago, a GAO report that revealed that for every million dollars it took in on timber sales, the U.S. Forest Service spent two million to manage them. It is laughable to think the State of Montana could manage national forests. Similarly, BLM is obligated, under Congressional direction, to permit livestock growers to graze their cattle on public lands for an eighth what it would cost them on private lands. The state can't afford to do that, so would almost assuredly turn around and sell those lands to the highest bidder, taking them out of public ownership, and reducing our public lands to private fiefdoms. Perhaps that is the hidden agenda behind the proposal.

Specifically, I would remove recommendation #11 from the draft report, and delete any other reference to pursuing a transfer or sale to the state, private landowners, or anyone else. I join the majority of Montanans in opposing the State of Montana assuming management of federal lands within the state, and having Montana taxpayers pay all resulting costs to manage those lands, including the exploding costs of fighting wildfires. Federal protection of public lands in Montana has benefitted Montanans like me. I hike on national forest trails several times a week. National forests protect my clean water, provide opportunities for me to hunt, fish, and hike, The very real possibility that states might sell these lands is obvious.

Norman A. Bishop
4898 Itana Circle
Bozeman, MT 59715

From: Nowakowski, Sonja
To: Field, Dawn
Subject: FW: SJ 15 Federal Land Study
Date: Friday, July 25, 2014 7:58:38 AM

From: Harold Johns [mailto:hdjohns72@gmail.com]
Sent: Thursday, July 24, 2014 10:38 PM
To: Nowakowski, Sonja
Subject: Fwd: SJ 15 Federal Land Study

---------- Forwarded message ----------
From: **Harold Johns** <hdjohns72@gmail.com>
Date: Thu, Jul 24, 2014 at 9:36 PM
Subject: Fwd: SJ 15 Federal Land Study
To: hstockwell@mt.gov

---------- Forwarded message ----------
From: **Harold Johns** <hdjohns72@gmail.com>
Date: Tue, Jul 22, 2014 at 8:55 PM
Subject: SJ 15 Federal Land Study
To: jkolman@mt.gov

I am opposed to transfer of public lands to states: States cannot afford to manage that land, fire suppression costs are prohibitive, a new state agency would be required. As a result of inability to finance those lands the state would have to sell them or at least part of them. The land would then pass from public to private ownership. This what HR 2615 (passed in House recently) is all about. SJ15 on the State level is being promoted for the same reason: **Transferring public lands to States so the wealthy buy them is the purpose of both.**

From: Pam Kellogg
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Wednesday, August 13, 2014 4:31:42 PM
Importance: High

Dear Mr. Kolman,
I am writing to you because I am horrified that Montana is considering selling or transferring federal public land to the state of MT and ultimately to private purchasers. This would be a violation of all that Teddy Roosevelt did to establish public protected areas for all of the citizens of the U.S. to enjoy. Especially with climate change and increasing pollution we need to preserve these wild places for our citizens. My sense is that various MT constituencies are working together to share the use of this land –for some commercial ventures as well as hunting and recreation. Why do we need to sell it? My husband and I travel to MT twice a year from our home in Brookline MA, to canoe, cross country ski, and hike . These are special experiences for us. The lands need our ongoing protection for all our citizens. Pamela Kellogg and Stephen Porter

---

This email is free from viruses and malware because avast! Antivirus protection is active.

From: Pamela Poon
To: Kolman, Joe
Subject: Comment on SJ15 Draft Study Report
Date: Wednesday, August 06, 2014 2:33:59 PM

Dear J. Kolman:

I heartily agree with those aspects of the report that require collaborative efforts between all stakeholders who use and manage federal lands. The committee's findings about the health of federal lands, prevention of wildfire and economic use should be respected to the extent that they are consistent with unbiased scientific research about these topics.

Thank you for your efforts.

Sincerely yours,

Pamela Poon

Pamela G. Poon, P.L.L.C.
Attorney Mediator
pgracep@gmail.com
www.middlegroundsolutions.com

P.O. Box 665
Bozeman, MT 59771-0665
406.539.2474

Resolving disputes for families and businesses since 1992

From: Pat Simmons
To: Kolman, Joe
Subject: public lands
Date: Wednesday, July 23, 2014 9:33:03 PM

I am extremely opposed to transferring federal lands to Montana. This is outrageous that your department is so biased and acting like it is viable. The costs to manage federal lands are enormous and these lands belong to all American citizens, not just right wing Montanans. Stop wasting your time and my tax dollars on such ridiculous activities. We have work to do in this State protecting the health of Montanans in terms of water and air quality. Stop letting the coal plants in Colstrip ruin people's health. Stop the de-watering of thousands of miles of streams so fish can't survive. We have one of the best fishing opportunities in the US, but our State allows one industry over power. We have plenty of opportunities to recreate on state and federal lands as long as government entities, special interest groups, and corporations don't stop our access or favor one type of use. We have in Montana "The Last Best Place". Please do your best to protect our land, water, air, wildlife for the benefit of the people citizens.
Thank you.

Pat Simmons
357 Pine Creek Drive
Bozeman, MT 59718
psimmons100@gmail.com

From: Patti Steinmuller
To: Kolman, Joe
Cc: Patti Steinmuller
Subject: SJ 15 Federal Land Study
Date: Tuesday, July 22, 2014 11:51:30 PM

Comments on the draft: SJ 15 Federal Land Study

I have viewed this study and I am strongly opposed to the concept of transferring federal lands to the states or to any similar idea. I recommend that all proposals aimed at this idea be eliminated for future study and that this draft be rewritten to remove these concepts. Although data within this report may be worthwhile, consideration of or support of anything similar to the Sagebrush Rebellion is inappropriate and should be stricken from the final document. Instead, this committee needs to document how it intends to work collaboratively with the Governor's office regarding management of state lands. Anything else is a waste of our state dollars. Please note that although my representative in the Montana House, Kerry E. White, is a member of this committee and a key author of the draft report, he does not represent my views on this issue. Federal lands belong to all citizens of the US, not to the states. Public lands, federal and state, are economic drivers of Montana and the source of our water supply, wildlife habitat, recreation, solitude, and our outdoor heritage.

Patti

Patti Steinmuller
14665 Spanish Breaks Trail
Gallatin Gateway, MT 59730
V: 406-763-4145

From: Pete Kurtz
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 8:52:03 PM

Dear Mr. Kolman,

I'm writing to protest the idea that Montana public lands can be sold to the highest bidder. One of the shiniest treasures in the state is her mountains, forests, clear blue rivers and lakes, and unique (and fast disappearing) wildlife. These treasures don't have a price tag.

These lands belong to EVERYBODY, not just to those who can throw their money around for exploitative purposes. I urge you to do the right and honorable thing, and stand up to the money-changers and their greed.

Do it for Montana, for America, and for Mother Earth.

Sincerely,
Peter Kurtz

From: phil newhall
To: Kolman, Joe
Subject: SJ15 Federal Land
Date: Wednesday, August 13, 2014 5:46:10 PM

Sirs, in the interest of all, Federal protected lands must be preserved for the generations to come and should never be sold to private interests.

Phil Newhall
Sent from my iPhone

From: Rachel Lopez
To: Kolman, Joe
Subject: Public Lands
Date: Saturday, August 16, 2014 10:43:24 AM

Dear Mr. Kolman:

I am writing in regards to the proposed sale of federal lands to the states, or to anyone else. Since 1492, when Europeans landed on this continent, there has been a steady, rapid, decline in all of the beauty this land has to offer. There is now less than 2% left of the tall grass prairie where the millions of buffalo (also gone) made their home. Almost daily, I see open lands around Missoula being covered with housing developments. The pace of our life in Montana has accelerated to the point that many of us have little time to enjoy the beauty of our amazing state. I think too, that we tend take for granted the natural beauty that surrounds us.

Using Helena as an example. There is no place to go near Helena where the mining industry of the previous two centuries has not left its mark, and degraded the land. The mind set of some of our present political leaders apparently believes that everything: healthcare, the environment, the economy, is meant for the enjoyment of the rich and powerful. The lack of logic in this rationale is so startling, that I personally feel powerless to think of either an argument or an understanding to combat it.

Please understand that these precious resources contained in our public lands are irreplaceable. They are the places where people can revive and restore themselves. They are home to millions of plants, animals, and rocks that will never come again once destroyed.

Sincerely, Rachel Lopez
6445 Mullan Rd. Apt. B
Missoula, MT 59808

From: Ray
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 06, 2014 4:33:18 PM

To whom it may concern:

I am against the state taking over management of any federal lands in Montana. While the issue is interesting, given the poor track record of the USFS in recent years, the solution is not for the state to take over control of these lands. In recent memory, our state government has a history of hasty decisions that are politically expedient, but have not had the long term effects properly explored. The deregulation of electricity comes to mind. Besides resulting in the bankruptcy of Montana Power in the end, we now pay more for electricity than before, and our dams are owned by an out of state corporation. There are so many financial pitfalls in the way of properly managing our federal land, that I fear our state people would be overwhelmed. We taxpayers would end up paying for this folly. I also fear there would be an unintended result of the sale or leasing of USFS land to private individuals, effectively closing them off to hunters and other current land users. I recommend leaving it the way it is, and devoting our efforts to putting pressure at the federal level to end the analysis paralysis and court dictated management of timber sales and fuel reduction projects. The US Government owns these lands. We need to hold their feet to the fire and insist these lands are managed properly.

Thank you for allowing me to comment on this issue.

Ray Kenney
1015 Blackmer Lane
Columbia Falls, MT 59912

This email is free from viruses and malware because avast! Antivirus protection is active.

From: Ray Pearson
To: Kolman, Joe
Subject: SJ15 Federal Land STudy
Date: Tuesday, July 22, 2014 9:53:00 AM

The Montana lifestyle is predicated on the availability and accessibility to large tracts of public land.

Please drop any reference to the transfer of public lands in the Montana Environmental Quality Council federal land study. And tell it that the dollars we put into wildlife conservation through hunting license fees should not be diverted to other uses.

Ray Pearson
President
Software Design Associates
115 N. Broadway Suite 410
Billings, Mt 59101

From: RBlalack@comcast.net
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:51:45 PM

Dear EQC staff person Joe Kolman,

I wish to provide the Environmental Quality Council with my views on the SJ 15 Federal Land Study.

It has been established in law that our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.

No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim. In fact, it is a great American legacy for all our citizens to enjoy.

Montanans continue to cherish the priceless blessings of our public lands - lands described by our first state legislature as "lands belonging to the citizens of the United States."

Yours truly,

Russell Blalack
Section 26, R31E, T1N
nr Hardin, MT 59034

From: Rebecca Schmitz
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 9:31:12 AM

I am writing today about the Senate Legislative panel's potential proposed transfer of federal lands to the State of Montana. This is an idea I completely oppose. If this were enacted (and it's doubtful it will pass muster with our court system to begin with, thus wasting millions more taxpayer dollars on top of the scheme itself), the first serious wildfire season will bankrupt our state. I know its proponents claim increased logging and mining on any new state lands will cover the cost of fighting wildfires, however Montana will never return to the intense extractive management of the 1980s and before; too many citizens and organizations oppose clearcuts and open pit mines and will sue to stop massive development. And what happens when we can't pay our bills? Lands will be sold. This is why these laws come straight out of bill mills like the American Legislative Exchange Council. The corporate lobbyists who give them to legislators like Senator Jennifer Fiedler to introduce know the end result: their clients and employers will benefit from what will be, literally, a fire sale.

"Cui bono?" should be our elected officials' guiding principle here. It isn't the people. It isn't the state. It's corporations who want our public lands for their private profits. Please reject any results of a study which begin the transfer of our property into corporate hands. Thank you for your time in this matter.

Thanks,

Rebecca Schmitz
104 Westview Dr
Missoula 59803

From: Rebecca Tamietti
To: Kolman, Joe
Subject: Public Lands
Date: Friday, August 15, 2014 2:02:19 PM

Keep our Public Lands Public
Thanks,

Rebecca Tamietti

Ramp Sports Ski Rep

http://www.rampsports.com/?acc=6c8349cc7260ae62e3b1396831a8398f

From: reggie mcmurdo
To: Kolman, Joe
Subject: SJ15 federal land study
Date: Saturday, August 02, 2014 1:02:15 PM

Am supportive of efforts to bring logic and sanity to harvesting federal forests. We desperately need fuel reduction and the economic benefits of professional management that has been stymied for far too many decades. However, am opposed to efforts to bring federal land under state control. The reasons are many, but my worry is the eventual transfer of these lands to private ownership and exclusion of the public from our traditional outdoor recreational opportunities, which would surely happen as big money continues to gain control of our political system.

From: Reid Erickson
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 11, 2014 9:05:40 AM

Hi Joe, We need to retain and protect our public lands. Reid Erickson

--
Reid Erickson
KMA Inc.
108 N. D St.
Livingston, Mt. 59047
(406)-222-8611

From: revken38@aol.com
To: Kolman, Joe
Subject: MT lands
Date: Monday, August 04, 2014 11:05:36 AM

NO to taking over of federal public lands!

Sent from AOL Mobile Mail

From: Rich Day
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 06, 2014 10:11:34 AM

August 6, 2014

Dear Montana Environmental Quality Council:

I **strongly oppose** recommendation #11 in the draft report on SJ15 that references pursuing a transfer or sale of federal land to states, private landowners or any other entities.

Rich Day
2615 Yale Ave
Butte, MT 59701

From: Rita Harding
To: Kolman, Joe
Subject: Preserve and Protect Our Public Lands
Date: Thursday, August 14, 2014 9:48:35 AM

To Environmental Quality Council

I have lived in Montana and enjoyed its public lands for over 40 years and I hope to be able to continue this for another 40+ years. I want to wholeheartedly emphasize that I cherish the beauty of these lands and the recreational opportunities they provide. We have a very unique environment that is treasured by the people who live here. I do NOT want to see these public lands changed and developed by commercial interests. I do NOT want to live in a wasteland scarred with timber cuts and energy development or to be locked out of beautiful areas by private commercial interests.

I know multiple use of public lands is always controversial and more so when resource management plans or proposed legislation is in process. Consequently, multiple use cannot be everything everywhere all of the time. I would like to share just a few of the reasons why protecting natural, undisturbed wildands is so important:

- Families, youth, children, solo people find knowledge, peace and beauty in natural surroundings. Mechanized and video formats do not come close to providing these values.
- Wild places bring relief to stressed life styles and become superb settings to exercise and build self confidence. Our nation is dealing with growing obesity and mental health crisis – we need to preserve places where people can find healthy and natural recreation.
- Wild lands cannot be replaced. Once critical wildlife corridors are lost, native habitats will disappear. Future generations will only be able to see wildlife and wild habitat in books and videos - what a loss!!!
- Many poor countries are forced to lose their natural habitat. Poor countries like Ethiopia need to feed their people and had little to no choice. We in the United States have choices – we need to make the right choices to protect our natural habitat!!!

These wonderful public lands were best described as "essential democracy" to be owned and managed not to enrich a few but to be enjoyed and used "for the people as a whole" (President Theodore Roosevelt in Gardiner MT in 1903). Please carry out the public trust and do not destroy public lands.

Rita Harding
123 Alderson
Billings, MT 59101
406-259-7586

From: Rita Wolfe
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Thursday, August 14, 2014 3:39:02 PM

Mr. Kolman – I would like to comment on the Federal Land Study that was conducted by the Environmental Quality Council. I want to leave our wild public lands in better condition than I found them so that future generations can enjoy the benefits we are blessed to have today.

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Thank you. Rita Wolfe, Missoula, MT

From: Robert Hopkins
To: Kolman, Joe; Shining Mountains Chapter - Montana Wilderness Association
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 7:49:12 PM

Greetings Mr. Kolman,

Please consider the following comments regarding the SJ 15 Federal Land Study.

Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.

No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.

Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

The last thing we want is our public lands in the hands of private corporations, especially, out of state business interests. We've seen too many instances of a corporation pulling up stakes, declaring bankruptcy, or selling to another corporation and leaving US taxpayers with the mess to clean up.

Thank you for your consideration of these comments.

Regards,

Robert Hopkins
1915 Montana Street Unit D
Missoula, MT 59801

From: Robert Hughes
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:54:03 PM

Dear Mr. Kolman,

As a long-time Montana resident and voter, I am strongly opposed to the State of Montana pursuing transfer of federal lands within its borders to any entity outside of current federal ownership. Please consider the following:

Recommendation #11 should be removed from the draft report. Any other reference to pursuing a transfer or sale to states, private landowners, or any other entities should be removed.

We Montanans strongly oppose having the state of Montana take control of managing federal lands inside the state. It would be too expensive for Montana taxpayers to pay all resulting costs to manage those lands and fight fires.

Protecting public lands in Montana has been a good thing for Montana's economy and has resulted in opportunities for clean water, hunting, fishing, outdoor recreation. This protection has improved our quality of life.

The possibility exists that the state might sell off such lands. There needs to be improvement in federal-local relations in managing federal public lands. However, we need to ensure that those lands are protected for future generations by keeping them as federal lands.

Sincerely,

Robert Hughes
Livingston, Mont.

From: Roger and Noreen Breeding
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 11:40:35 AM

Joe Kolman,
This draft report is very poorly done and seems to based on hearsay and opinion rather than facts. It is a scatter shot approach rather than a systematic consideration of the topic.

The county survey is biased and responses show ignorance of the full nature of issues being discussed. For example, the term "multiple use" is not defined, yet used in a limited way that does not include characteristics contained in the Multiple Use and Sustained Yield Act from which the term is derived.

Of the 11 recommendations, the only useful one is #9 which would require statewide use of a WUI building code, but it also needs a WUI zoning code.

Recommendation #11 must be removed. State control of federal lands is opposed by most Montanans and would be an impossible burden for state government to handle.

Recommendation #4 is too vague for implementation. What is the purpose of improved "multiple use" public access? What is "multiple use access" to begin with? Does it mean more roads so partiers can reach more remote areas by vehicles in order to start wildfires from neglected campfires? Does it mean more trails for hunters? Does it mean more foot access across private land? What is the justification for these things?

Coordination and communication between state agencies and federal agencies that manage public land could certainly be improved, but this report does not provide an effective plan for doing so.

Noreen Breeding
1970 Star Ridge Rd., Bozeman, MT 59715

From: Ron Cox
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Saturday, August 16, 2014 11:40:00 AM

Dear Staff;

I adamantly oppose wholesale transferring US government land currently managed by the US Agencies, particularly the USDA Forest Service, to state or private ownership.

I have been a Montana resident for 45 years, am a lifelong "outdooraholic," professional forester and very familiar with private, State and Federal land management.

Accusations of poor land management by the Federal agencies are not necessarily valid, particularly regarding insect infestations and fire control. Western forests have been subjected to cycles of insects, disease and fire for eons resulting in renewal of the forest ecosystems. No agency, whether state or federal, is capable of "controlling" these natural events at the landscape scale.

If management of federal lands is being done badly, transferring responsibility to the state would only make it worse. The only way the state could possibly come close to the providing the expertise and staff necessary to even approach the current professionalism of federal management would be a budget buster. Part of the problem facing federal managers is lack of funding and personnel. How could the state possible provide more?

I've had considerable experience dealing with DNRC over the past few years. I've not been impressed by their professionalism or ability to deal with site specific situations. All they can parrot is the need to maximize revenue for the trust lands. That maxim overrides any concern for public good or benefit that doesn't line the state coffers.

I'm sure that State management would be subject to extremist influence more than is Federal management. Extremist environmental groups would probably fare worse that economic develpement interests, but a balanced approach to issues and concerns would be less likely.

I've been told by DNRC that roads on State land most people regard as being public are essentially private unless an easement is held by a public entity other than DNRC. How can that policy possible provide reliable public access for the future? Public access would likely be even more limited than currently available US government land.

We have a state section of land adjoining our community enjoyed by residents as open space. A lease is now being processed for a municipal sewage treatment plant. It has often been mentioned as a possibility for leasing cabin sites. A DNRC employee said it's not beyond imagination that it could even be sold to the highest bidder for residential or commercial development. We don't want public lands subject to the whim of the highest bidder.

How will the public like to pay the currently required $10 State recreation use fee to even enjoy their natural resources for leisure activities? DNRC considers roads and trails as a "concentration of use" and requires any group to have a license or easement to use it. Even showing them on a map is considered as "concentrating" use -- would all road and trails not under license or easements need removed from public maps?

I'm completely confident that even with all the Federal regulations, our local National Forest managers have more discretion, authority and willingness to deal with local conditions than do DNRC staff.

In addition to all the knowledge, ability and fiscal challenges for Montana to provide satisfactory management of the US government lands, there would have to be years and years of legislative finagling and feuding to change Montana state laws and regulations to provide user satisfaction for what Montana residents now enjoy on the federal government lands.

In earlier times the US Forest Service was accused of too much clear cutting. It's easy to visualize DNRC renewing that policy on forest lands to "improve the economy" maximize financial return from the land, reduce fire hazard, etc.

DNRC and FWP have their hands full managing the lands they now have. They don't need the growing pains to enlarge that responsibility by 100 fold. Nor does the public deserve to have to put up with all the hassle of that transition.

The USDA Forest Service has been recognized as a "Center of Excellence" in the federal government many years. Laws and legal situations may have reduced customer satisfaction for some, but it still the best possible agency to put our trust in.

Everybody may not be happy with the Feds, but they give everybody more of a chance to sit at the table than does Montana State agencies. Our Montana lifestyle is much more attuned to enjoying our natural resources under federal authorities than State.

Please do not threaten our access and enjoyment to them by transferring ownership to State or private interests!

Regards,
** Ron Cox
Seeley Lake, MT

From: Ross Prosperi
To: Kolman, Joe
Subject: SJ 15 Federal Lands Study
Date: Wednesday, August 13, 2014 3:22:54 PM

Keep our public lands in public hands! Montana can't afford to manage our federal public lands especially considering the cost of wildfires. This is nothing more than an attempt to privatize our public lands. This would be a huge loss to Montanans, Americans and our tourism industry!

--

Ross Prosperi, Field Director
Montana Conservation Voters
PO Box 9335 - Missoula, MT 59807
MCV Education Fund
PO Box 853 - Billings, MT 59103
Phone: 406-542-1055 - Cell: 406-880-7346
Donate - Facebook - Twitter

For Montana's air, land, water and outdoor heritage - who we elect matters!

Please consider the environment before printing this email

From: Sally Hughes
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 4:35:22 PM

Dear Mr. Kolman:

As a Montana business owner and resident, I am adamantly opposed to the transfer of Federal public lands to the State of Montana. Though these lands belong to the citizens of the United States, Montanans derive huge benefits from them. Transferring or selling them off would be a terrible blow to our economy and quality of life. OUR NATIONAL FORESTS AND PUBLIC LANDS MUST NOT BE TRANSFERRED AND ARE NOT FOR SALE! In addition, no court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim. This scheme is short-sighted and not in the best interest of the people of Montana.

Sincerely,

Sarah G Hughes
Livingston, Montana

From: SANDRA ABRAHAM
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 7:00:35 PM

This email is to inform the Environmental Quality Council that...

1) Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
2) No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
3) Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

Sandra

****
Surround yourself with the dreamers and the doers, the believers and the thinkers, but most of all, surround yourself with those who see the greatness within you, even when you don't see it within yourself.

****
"Maybe happiness," the human thought, "does not come from a store."

adopted from Dr. Seuss

****

REDUCE, reuse, RECYCLE, rethink, REPAIR...

****

From: Sarah K. Yarlott
To: Kolman, Joe
Subject: Public Lands - A Symbol of Democracy
Date: Friday, August 15, 2014 1:20:31 PM

Mr. Kolman,

While the economy of Montana could afford to be bolstered, exploiting our public lands is not an option. Growing up in Montana, it shames me that after only 50 years our protected wildernesses are up for grabs by the agenda of private groups with less than ideal motives.

Moving forward in politics, I would hope our leaders would begin to look toward sustainability and conservation rather than an immediate payoff with great consequence to our environment. While this option may not show itself as immediately profitable, with a little bit of creativity and forward thinking, one might be able to conjure a solution that satisfies both the present and future generations. These large tracts of land are the habitat of a diverse amount of species and offer solace to animals from the busy lives of humans (i.e. roads, cities, ranchettes that don't want bears eating their dogs).

Fires may pose a threat to our national security, but this is a part of Montana's ecosystem. Growth, renewal, and change is inevitable. I hope you will reconsider your actions in legislature. It saddens me that profit so often overshadows the health of our ecosystems and our relationship with wild landscapes.

Sincerely,

Sarah K. Yarlott
Missoula, MT

From: Scott
To: Kolman, Joe
Subject: SJ 15 Public Land Study.
Date: Thursday, August 14, 2014 9:32:56 PM

Our public lands are not for sale!!!!! Your study is flawed from the start and it makes me very angry that anyone would even suggest that actions such as these are even being considered. If these lands were sold to the highest bidder they would become off limits to the general hunting public which would be catastrophic for any Republican regardless of what he thought about the Second Amendment. Please take that to the Legislature.

From: Sharon Johnson
To: Kolman, Joe
Subject: SJ 15 Federal land Study
Date: Thursday, August 14, 2014 9:49:08 AM

Sir- I am shocked to learn of the treacherous plans to possibly take away our public lands by means of sale or transfer, now or ever in the future!

This would be a betrayal of the worst order. To even consider such a proposal is an act of treason to the people of the United States.
Sharon Johnson, Troy, Montana

From: Sharon Teague
To: Kolman, Joe
Subject: Not For Sale!
Date: Saturday, August 16, 2014 10:20:22 AM

Dear Mr. Kolman:

I am writing in strong opposition to the sale of US public lands to any other entity, be it state or private.

The legacy of our national forests, wildernesses and national parks goes back to Teddy Roosevelt; they are some of our great national treasures that we need to keep for all future generations to enjoy.

In most other countries large forests and hunting rights are owned by private interests, going back to the fiefdoms of the Middle Ages.

The US public lands which can be enjoyed by all, rich and poor, are one of great democratic traditions of America and one of the American values that sets us apart from most other countries.

Let's keep it that way!
-Sharon Teague
Seeley Lake, MT

From: Sonny Mazzullo
To: Kolman, Joe
Subject: Please don"t give up on federal land
Date: Thursday, August 14, 2014 9:10:52 PM

Public lands are essential to the Montana way of life. Please don't do it.

From: Steve Haas
To: Kolman, Joe
Subject: Comment on SJ15 Federal Land Study
Date: Thursday, August 14, 2014 10:34:16 AM

Joe,

I would like to comment on the SJ15 Federal Land Study.

Personally I would like to see the federal lands in this state stay in federal hands. The amount of jobs to be gained by pillaging our forests for the timber industry pales in comparison to the amount of jobs created by tourism, and after all every single one of the comments provided by counties is focused on creating jobs, so let's not ignore reality by pretending that logging is our future.

Tourists do not like to see whole mountainsides clear cut, nor do they want ATV's cruising about all over their lands. The individuals in this state that want to transfer these federal lands to the state have noting but large $$$$ signs in front of them provided by their corporate masters.

The publicly owned federal lands in this state need to remain federally owned.

Thanks,

Steve Haas
1261 Mountain Meadow Rd.
Kalispell, MT 59901
212-6214

From: Steve Mcarthur
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 04, 2014 2:30:10 PM

Dear Joe,
Just a short note to say it is not the right direction to sell off our public lands or have the state take them over! We need the protection of our public lands to keep them wild and open to the future use of all . Not the objects of the monied interests of this world. They are a treasure that we must preserve for the future of all. Steve

From: Stockwell, Hope
To: Kolman, Joe
Subject: FW: Funding FWP
Date: Tuesday, August 05, 2014 3:06:45 PM

From: Cary Gubler [cary.gubler@cowlesmontana.com]
Sent: Tuesday, August 05, 2014 2:04 PM
To: Stockwell, Hope
Subject: Funding FWP

The single greatest thing about living in Montana (I've lived here for 63 years) is the incredible outdoor opportunities that we have. I urge full funding of FWP whatever it takes. If we have to pay more for the privilege, so be it. Having Montana turn into a place where the wealthy get to use all the land and waters while the rest of us polish their boots doesn't sit well with me. Anybody that believes that "Conservation through Privatization" has anything to do with conservation is a damn fool. Its all about taking access away from the tax paying citizens and giving it away to the wealthy. Selling public land should be a hanging offense. That land belongs to the people of Montana. Stealing a horse used to get you hung. Stealing the peoples LAND should warrant a public lynching… Now, to be clear, I don't advocate violence in any form, but I was momentarily swept with the vigilante spirit that comes with the history of this great land… Sincerely, Cary Gubler

From: Stockwell, Hope
To: Kolman, Joe
Subject: FW: SJ 15 Federal Land Study
Date: Tuesday, July 29, 2014 9:03:00 AM

From: Mary Schelle [mailto:mpschelle@gmail.com]
Sent: Friday, July 25, 2014 10:02 AM
To: Stockwell, Hope
Subject: SJ 15 Federal Land Study

NEVER TRANSFER FEDERAL PUBLIC LANDS TO STATES OR INDIVIDUALS
.

Mary Schelle
****

From: Stoney Burk
To: wwranch@3rivers.net; Kolman, Joe
Subject: Re: SJ15 Federal Land Study....Montana NOT for Sale - EVER!
Date: Thursday, August 14, 2014 2:19:25 PM

Richard: Who is jkolman@mt.gov.? Maybe I should know but probably don't care. At a recent meeting with Congressman Daines he emphasized that the plan to sell public lands had to do with sale of empty storage buildings and storage units, unproductive bulidings, etc. and nothing to do with sale of "lands" as we see it; however, knowing how slippery and crooked some of the congrssmen and fat cats are, it would not surprise me a bit to see a wording that would allow broad discretion which in turn would be interpreted to allow them to sell all public lands. I agree with your comments 100%.

Stoneu

-----Original Message-----
From: wwranch@3rivers.net
Sent: Thursday, August 14, 2014 1:09 PM
To: jkolman@mt.gov
Subject: SJ15 Federal Land Study....Montana NOT for Sale - EVER!

As a cattle rancher and retired Army Lt. Colonel, I OBJECT to any suggestions
to SELL federal land or give it over to states that would - without reservation
and at the encouragment of corporate lobbyists - SELL public lands
to GLOBAL corporate interests.

NO WAY! President Teddy Roosevelt and fellow soldier would NEVER tolerate that, he was our Warrior on the battlefield and fought for our public lands, parks and monuments.

THE LAST BEST PLACE IS NOT FOR SALE - EVER!!

Richard D. Liebert
Lt. Colonel, Retired, US Army
289 Boston Coulee Road
Great Falls, MT 59405
406-736-5791

From: stuart
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 5:08:41 PM

Please add this comment to your official record on the SJ 15 Federal Land Study.

- I oppose having federal lands privatized.

- As someone who has lived and worked in Montana for over 40 years, I strongly believe that our national forests and public lands should not be for sale, transfer or disposal.

- There is no question that the over whelming majority of our citizens benefit from the public lands because they are public. One must only travel to England to see how poorly the people live because their open spaces and natural areas have been developed or are owned by the privileged.

- Privatizing public lands will restrict hunting opportunities for those but the very wealthy.

- I have personally benefited from the public lands being public. My family when they visit from out of state have benefited from the public lands being public.

- Privatizing our federal and public lands will change what we believe important for our children's upbringing as being. I believe that public lands give us and our children unmatched opportunities to part of the land and its bounties. Privatizing our public lands would be a huge loss to our citizens and future generations

- Montanans continue to cherish the priceless blessings of our public lands- described by our first state legislature as "lands belonging to the citizens of the United States."

- I understand some are advancing the idea that permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal. This is not true. In fact our state constitution requires all of us to provide a "clean and healthy environment." Our federal and public lands make that so for us. There is no assurance that

lands held in private hands will continue to be so.

Stuart Lewin
615 Third Avenue North
Great falls, MT 59401

From: Sue Janssen
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 8:07:40 AM

Dear Mr. Kolman and the Environmental Quality Council,

It has been brought to my attention you are considering changing the ownership of our public lands. After reading some of the plan, it's quite clear this is being pushed by the "Right", of course, because they are most in control of this state. How sad - reduce the risk of wildfire through logging and grazing! In other words, turn our National Forests into clear cuts full of cows - how wonderful! All the old clear cuts of the past are now overgrown thickets of fuel loaded, pathetic looking, stubby, thick monoculture trees - nothing like the former forests that were there before the clear cuts happened. And it looks like "Motorized Recreation" will also be a top priority - great - 4 wheelers, dirt bikes, pick-ups tearing around among the cows and clear cuts. Can't wait! There's so much sign of motorized damage to our forest such as erosion and weed infestations - I can see complete devastation from this plan. But money speaks and has so much power. How can you think of selling out our public lands? Opening up more roads in the forest to spread weeds and erosion issues and adding to watershed problems. There are currently so many miles of roads through our National Forests one can travel on - many, many more than there were in - say - the 1950's. This is all being encouraged by greed and money under the smoke screen of "reducing the risk of catastrophic wildfire" and "increasing jobs". Maybe your committee should look into Senator Testor's Forest Jobs and Recreation Act. But no, no conservative would ever consider supporting a liberal's proposal - even though this act was a collaborative effort put together by many diverse political interests. But collaboration is a dirty word to some...

Please - the following are not my words, but they truly express my feelings and values:

- Our national forests and public lands are not for sale, transfer or disposal--not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands-described by our first state legislature as "lands belonging to the citizens of the United States."

I urge you to not sell out our treasured public lands.
Thank you for taking my comments.

Sue Janssen
301 River View Dr.
Troy, MT 59935

From: Susan Mattson
To: Kolman, Joe
Subject: This land is OUR land!
Date: Thursday, August 14, 2014 9:52:06 AM

Where are the buffalo expected to roam? Where can the deer and the antelope play? In general, public land than that becomes private seises to be viable for wildlife. Have we learned nothing in this world?!

What kind of world do you want for the future?

From: Susan W Newell
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 8:30:02 PM

- I concur with ALL the points below as recommended by Montana Conservation Voters:
- Remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities.
- Montanans overwhelmingly oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires. It's an absurd proposal. Throw it in the trash now.
- Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, hiking, backpacking, astronomy, canoeing, botanizing and many other outdoor activities and improved our quality of life.
- The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.
-
- By far, the most important reason is that it is contrary to the US Constitution and will simply provoke a court battle. Going farther with this wrong headed proposal is ridiculous waste of the state's time and money.
-
- NO TO SELLING/TRANSFERING FEDERAL LANDS TO THE STATE.

Sincerely,

Susan W Newell

From: Teddy Roe
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 3:52:53 PM

Mr. Kolman and members of the EQC:

Instead of indulging the dreams of a tiny minority of the American people, I believe cooler heads in positions of authority should try to educate them instead. The EQC has an excellent chance to do this with its ongoing "study" of transfer and sale of public lands in Montana.

The story of acquisition of lands by yesteryear's central government is well-known. Those original colonies without fixed Western borders ceded some of their territory in the process of creating the United States of America. The central government bought a huge tract known as the Louisiana Purchase. And so on and on for a couple of centuries. After numerous schemes to (quite literally) give the lands away, there came a point when it became more difficult and costly to do so. So the people's representatives declared that henceforth, the public lands would be managed on behalf of all Americans. That has been official policy for nearly a half a century -- and the only persons clamoring for privatizing the "people's" lands have not been able to move the needle of public opinion one millimeter.

With this background, why should the EQC expend public money and time pursuing a will of the wisp?

I remember as legislative director for the late U.S. Senator Lee Metcalf how he would address the issue of "public lands." He would remind Montanans that a citizen of New Jersey (or millions of other Americans from a thousand different places) was as much an "owner" of each acre of Montana public land as a Montana citizen was in owning a part of the Smithsonian Institution on the Mall in Washington DC.

As you "quiz" the proponents of privatizing Montana's public lands, ask each person if he/she is willing to cede his/her right as an American citizen to co-ownership in the Smithsonian. Or a part- interest in assets ranging from Acadia National Park to the Mojave National Preserve to Yellowstone National Park or to any number of federal installations from military bases to NASA to the National Weather Service to the Centers for Disease Control.

Historically, most exploitation of federal lands came at the hands of persons who did not want to own the lands. Rather they wanted to "use" them -- tax-free -- and walk away. Today's crop of Sagebrush Rebels appear to have singled out the more valuable acreage -- cherry-picked, if you will -- but the issue remains one of appropriating the assets of fellow Americans for personal gain.

Enough. Montana's representatives should concern themselves with managing federal lands better, not giving away their constituents' birthright.

From: Terri Eastman
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 1:50:15 PM

To the Environmental Quality Council –

I have read with interest your Draft Report "Evaluating Federal Land Management in Montana". As a lifelong Montanan, as well as a PROUD American, I am deeply dismayed by your suggestions that the management of our cherished public lands should be transferred to the state**. For the record, I am OPPOSED to this idea**. Our public lands and national forests are part of America – not just Montana – and they belong to everyone – not just those whose short term interests are extraction, development, privatization, and enhanced political status. Montana's beautiful environment has a long history or being plundered by mining, logging, and now gas/oil extraction to the detriment of our air, water, and quality of life. Those who reaped the profits are long gone, but the scars and polluted streams still remain. We who live in Montana choose to live here for more reasons than economic gain – we value our nearness to true wilderness – not how close we are to a road. We enjoy hiking and hunting in quiet solitude – not every forest needs a road and motorized access for the public to enjoy it. People from around the world come to experience our forests, wilderness areas, and national forests, and they contribute greatly to our long-term economy – they are a true renewable resource. We proudly state that Montana is the "Last Best Place" – I am whole-heartedly opposed to the idea of our state politicians managing our nation's public forests and lands for short term profit at the risk of making our state look just like everywhere else.

I have no confidence that placing public lands in the hands of State Management will keep our lands safe for future generations to enjoy, nor will it provide a "clean and healthful" environment as mandated by our own Montana Constitution.

I appreciate your consideration of this taxpayer and voter's opinion,

Terri Eastman
PO BOX 6517
833 Colt Road
Bozeman, Montana 5977215

BioScience Laboratories - EXPERIENCE SCIENTIFIC EXPERTISE WITH MONTANA HOSPITALITY
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From: Terry and Mary Danforth
To: Kolman, Joe
Cc: neal@mtvoters.org
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 5:14:22 PM

Dear Mr. Kolman:

I would like to comment on what I believe is an ill-conceived and self-serving study to turn over federal lands to states and or privatizing these lands.

My family and I have enjoyed the use of National Forests, National Parks, Wildlife Refuges and BLM Lands for hunting, fishing, hiking, backpacking, cross country skiing for over 60 years. I would hope that my grandchildren and great grand-children will continue to have the same opportunities that my children and I have had in future years.

The federal lands in Montana as in any state belong to all US Citizens. All US citizens have the right to use and have input on how they are to be used. I don't feel it is the prerogative of state legislatures, state agencies, or private persons or corporation to determine how these lands are to be used. Citizens in all states pay taxes and have just as much right to determine how federal land are to be used as any state legislature, private person, or corporation in Montana.

Montana as well as any of the other states do not have the fiscal resources to properly manage these lands. One obligation of state and or private resources is the management of wild land fires. Montana would be required to fully fund firefighting efforts which has been growing exponentially in the past several years. Fires have become much larger and very complex to manage due to global warming and the sprawl of urbane interface fires. Suppression costs in Montana in 2012 were $113 million with the state of Montana picking up $50 million and most of the rest was picked up by the federal government. The Black Forest fire in Colorado last year cost 10 million dollars in direct suppression costs and over $85 million in property damage. The Yellowstone fires of 1988 which included forest lands in Montana, Wyoming and Idaho cost an estimated 240 million dollars to suppress. Other than loss of timber destruction to private property was relatively minimal comparted to fires that burn in close proximity of more densely populated areas. The Yarnell Fire in Arizona last year 19 firefighters tragically lost their lives in an urban interface environment. I would like to ask, who is going to take the lead in investigating and responsibility in assuring firefighting safety and firefighting objectives and standards are being met?

Currently the federal government charges livestock users on federal land $2.00 per animal unit per month. Currently grazing fees on private and state lands is approximately $12.00 per AUM. Who is going to pick up these costs or are the livestock producers going to absorb these additional fees?

Watersheds are typically in large unpopulated areas that most urban areas rely on for domestic water use. Many of these large tracts are on federal lands. Many times these lands are administered by multiple agencies. Who will have jurisdiction over these lands and who will be setting water use priorities on how these water resources are used? I see the probabilities for municipalities and other water users being held hostage by privateers or inept public administrators.

There are many examples of how this land could and would be affect recreation users that could have virtually no say in how public lands would be used. It would be the highest bidder that would always have the advantage.

I believe that this study was conceived to circumvent the NEPA process, Clean Air Act, Clean Water Act, Wilderness Act and the Endangered Species Act, etc. for the profits of the rich and corporate America. These possible federal land giveaways or sales would revert back to the days of the late 1800's when the robber barons were pillaging out national heritage for the profits of a few and no environmental oversight.

Regardless of what the Supreme Court says I don't believe that BNSF, Koch Industries, or Halliburton has a vote on this issue.
Thank for allowing me to comment on your Federal Land Study

Respectfully,

Terry Danforth
3230 Linney Rd.
Bozeman, MT 59718

From: Terry Hanson
To: Kolman, Joe
Subject: Sale of public lands
Date: Wednesday, August 13, 2014 5:07:01 PM

The very thought of the sale of our public lands, of course to the highest bidder, is insane and the work of the rich, who care nothing for this country. I cannot imagine any person who has any loyalty to this country supporting this attempted giveaway. As a veteran, I did not serve nor can I imagine others who served, some paying a terrible price for this country, only to watch our public lands being given away. I say given away because that is what will happen. It will be the same old crap, a give away to the 1% so that they will then have 99.9% of our lands and recreation retreats.

Terry J Hanson
1002 Pleasant St
Miles City, MT 59301

406-232-3074

This email is free from viruses and malware because avast! Antivirus protection is active.

From: The Tookeys
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 14, 2014 1:47:46 PM

Dear Sir,

I was shocked when I read that Montana or any state would even think about not keeping public lands public. This view is not for sale. Private interests of greed and corruption are not welcome. Look at the disasters of fracking in other parts of the country. Water is now not drinkable. Oil spills contaminate the environment. Increase rates of cancers, birth defects and other chronic illnesses. The answer is "NO" to any development, period. Montana is great because of the rugged beautiful terrain.... God's country.

Please don't even think of selling the future, Montana's public lands are "priceless'. As other places in the world become more contaminated, Montana's beauty will only go up in value in every sense of the word.

Best regards,

Geraldine Tookey

From: tia@nowherehealing.com
To: Kolman, Joe
Subject: No to privatizing public lands!!!
Date: Wednesday, August 13, 2014 5:59:34 PM

Do NOT allow the privatization of our public lands!!

Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever. We have the moral obligation to our children and future generations to leave behind something other than destruction, privatization and profit mongering at the expense of our FINITE natural resources!

No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim. This is a private agenda driven by greed.

Not only Montanans but PEOPLE FROM ALL AROUND THE WORLD continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.” Were these lands are privatized, developed, mined or whatever else is on the minds of the people that want this to happen, there would be NOWHERE else for the wildlife to go or for us to ever witness their existence. This is a finite and fragile natural resource that must be protected. Forever. Period. I cannot fathom a world, a Montana, with no more wilderness that can make our hearts burst wide open with awe. We cannot allow this to happen!!!

Tanjariitta Anttila
Whitefish, MT

From: Tim Brooker
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Thursday, August 07, 2014 8:59:31 AM

To Whom it May Concern,
As one who in the past has made a living in the timber industry, I urge you to protect our federal lands. We realize our system is not perfect, but the possibilities of losing so much is not worth this bad idea.
Thank you for your consideration
Sincerely,

Tim Brooker
Business owner and outdoorsman
406 274-2639

From: Tim Crawford
To: Kolman, Joe
Subject: Federal Lands
Date: Tuesday, July 22, 2014 12:04:14 PM

Montana Environmental Quality Council, regarding "SJ 15 Federal Land Study": please be advised that any reference to Montana acquiring federal Public Lands is unacceptable. Also, any monies from hunting license sales should be only applied to Wildlife Conservation and not diverted to other uses.
Respectfully,
T.H. Crawford
1300 Dry Creek School Rd.
Belgrade, MT 59714
(406) 585-9333

From: Tim Hodges
To: Kolman, Joe
Subject: divestiture of Federal lands
Date: Friday, August 15, 2014 10:31:10 AM

Mr. Kolman;
I am writing to express my strongest disagreement with the proposal for federal lands to revert to state control.

States simply do not have the money to properly manage these lands, and at the first budget crisis they will be sold off, to disappear in the wind into the hands of private owners or corporations.

It helps define us as a nation that as a Montanan I can go to Utah and enjoy the federal land that I am part owner of. It brings great value to Montana that someone from Delaware can come to Montana and know they will find unlimited opportunities for outdoor recreation on our forest and BLM lands.

If we screw this up, our great grandkids will wonder "what were they thinking?".

Regards,
Tim Hodges
Great Falls

From: Tom Kilmer
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Wednesday, August 13, 2014 8:39:20 PM

Joe Kolman:

First: I am a native Montana resident. Born here in 1950.

Second: I cherish our public lands.

In Montana public lands including our National Parks, National Forests, BLM lands, Wildlife Refuges and our National Monument belong to all of us. They do not belong to a select minority of old rich white men. They belong to us all regardless of race, creed, color, religion or financial means. Such public ownership of and enjoyment of these lands is not now and has never been illegal.

Woody Guthrie said it best: "This Land Is Your Land, This Land Is My Land."

This land is not for sale.

So hands off. Drop this ridiculous proposal now please.

Thomas R. Kilmer
621 2nd Street
Helena,Montana
59601

From: Whitney Kimptonw
To: Kolman, Joe
Subject: Public Lands
Date: Wednesday, August 13, 2014 10:40:36 PM

Dear Mr. Kolman,

I would like to make my voice heard and share with you one of our country's greatest resource: public lands. These lands are our identity, livelihood, provider of food, soul-restorer, and tribute to the powers of nature. They need to be reserved for the use by all, not just specific people.
The following are statements that I support:

- Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.
- No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the “benefit and enjoyment of the people” to be illegal, as some private interests claim.
- Montanans continue to cherish the priceless blessings of our public lands, which were described by our first state legislature as “lands belonging to the citizens of the United States.”

Thank you for taking the time to read my email. Please work to keep public lands public. Do not allow public lands to be sold, transferred, or disposed of.

Thank you,
Whitney Kimpton
Billings, MT

Sent from my iPad

From: Will Hammerquist
To: Kolman, Joe
Subject: Sj 15
Date: Wednesday, August 13, 2014 3:24:06 PM

As a business owner with 15 employees who pays a significant amount of federal And state taxes every year I oppose the transfer of federal lands.

Spending my taxpayer dollars to pursue this idea, which has no economic or environmental rational is simply a waste of time and resources.

Perhaps the EQC could enter the 21st century where over 10 million people a year come to our state because of federal lands.

Just a suggestion.

Will Hammerquist
406.885.9455 cell
whammerquist@gmail.com

From: William Mealer
To: Kolman, Joe
Subject: Transfer of Federal lands to state government
Date: Wednesday, July 23, 2014 1:10:17 PM

My family and I are strongly opposed to the transfer of federal lands to state control. There us not enough money in the various states to handle emergencies from natural causes such as floods and severe winds. There is not enough money to fight massive wildfires such as The Yellowstone Fire of 1988. There is not enough money I. These states to prevent prion disease or treat it if Chronic Wasting Disease were to expand. Why would the federal government help states if these problems develop at some future date

Then there is the issue if transfer of these federal lands to friends and families of state legislators for political favor done from their re-ections.
I trust less our Montana state government to do the right thing for non ranching families than I do the federal government. The ranchers are anti- tourism and anti - wildlife unless the rancher is earning a buck from the working class Montana citizen.
Let's keep our federal lands the way they are now and keep
The super rich one percent from owning our federal lands!!!!!!!!!

W R Mealer, MD
Bozeman

From: William Wall
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 11:27:20 AM

Hi Joe;
I have spent my entire career in natural resource management in the private sector, having worked for International Paper and Potlatch Corporation in their lands departments as a wildlife biologist. I have been in many partner relationships on projects between the private and public sectors including the USFS and USFWS. I will be the first to say that the private sector is more efficient and can focus on getting objectives achieved better than government. However, I do not want my public lands turned into the type of lands that would come out of a transfer to private sector. Profit driven motivations are not what we need to manage our public lands. It would be nice to unencumber them from wieldy and inappropriate regulation through our current NEPA process.

Thus I am absolutely apposed to transfer or federal lands to the private sector or even state ownership.
Sincerely;
Bill Wall

--
Bill Wall, PhD, CWB
Sustainability, Inc. President
Alaska Wood Energy Associates
907-343-9288 Cell
406-677-5006 Office

From: William/Margaret Casolara
To: Kolman, Joe
Subject: Transfer of public lands to the State of Montana
Date: Wednesday, August 13, 2014 4:18:14 PM

I am writing today to voice my opinion on the transfer of our federal lands here in Montana to the State of Montana. Please do not do this. There was great wisdom in the past when national parks were set up and land was set aside for everyone's use. Young and old, rich and poor, all had equal access. It seems as though money and greed always wins out but I hope not on this issue. This is the last great place and it can only remain that way if it is open to all citizens and managed federally. I will be watching this issue closely and vigorously defending public lands.

Thank you,
Margaret Casolara

From: wmclaugh@centurytel.net
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Friday, August 15, 2014 11:19:41 AM

Dear Mr. Kolman:

I am against any transfer of any kind, including management authority, from the federal to State Government of Federally owned lands within a state. These lands belong to all of the people, not just to the people of a state. I disagree with the theory of states rights over these lands.

Kindest regards,

William C. McLaughlin
34819 Snowberry Lane
Polson, MT 59860
406-887-2145

From: wwranch@3rivers.net
To: Kolman, Joe
Subject: SJ15 Federal Land Study....Montana NOT for Sale - EVER!
Date: Thursday, August 14, 2014 1:10:11 PM

As a cattle rancher and retired Army Lt. Colonel, I OBJECT to any suggestions to SELL federal land or give it over to states that would - without reservation
and at the encouragment of corporate lobbyists - SELL public lands to GLOBAL corporate interests.

NO WAY! President Teddy Roosevelt and fellow soldier would NEVER tolerate that, he was our Warrior on the battlefield and fought for our public lands, parks and monuments.

THE LAST BEST PLACE IS NOT FOR SALE - EVER!!

Richard D. Liebert
Lt. Colonel, Retired, US Army
289 Boston Coulee Road
Great Falls, MT 59405
406-736-5791

From: Jim Arney
To: Kolman, Joe
Cc: Jennifer Fielder; Roman Zylawy
Subject: Review comments on SJ-15
Date: Thursday, July 24, 2014 12:21:23 PM
Attachments: Assessment of USDA Forest Service.pdf
USFS Region Six Yield Capacity.pdf
Lolo Superior RD Forest Capacity.pdf

Hi Joe Kolman:

As requested in Jennifer Fielder's email, I am submitting a review of SJ-15 prior to August 16. I am providing a copy of this correspondence to Senator Fielder and Mineral County Commissioner – Roman Zylawy.

There is good information in the materials which you gathered for the bi-partisan EQC committee. I downloaded some of those data to incorporate into my previous analyses for the Mineral County Commissioners.

I have attached three reports in support of SJ-15. These include:

1) Assessment of USDA Forest Service – Management of Public Forests (two page summary with three-page details);
2) Forest Health Assessment and Sustainable Harvest Capacity of the Superior Ranger District of the Lolo Forest (background to Item #1); and,
3) Avenues to EcoSystem Balance in a Human World. A published report and analysis which I developed in 1999 on Region Six National Forests (background for item #1).

The two supporting documents provide more than adequate detail on the source, quality and methods of analysis of the US Forest Service management practices on these forests. If there are any comments or questions about these materials please contact me…

Best regards,

Jim Arney
552 Trestle Creek Drive
Saint Regis, MT 59866
(406) 649-2921 (home)
(406) 649-0040 (cell)

Live well, Laugh often and Love much. I believe life and death are finite, but character, integrity and love are forever.
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From: Jim Arney
To: Kolman, Joe
Cc: Jennifer Fielder
Subject: Review of SJ-15 draft report
Date: Friday, July 25, 2014 5:19:25 PM

Hi Joe:

I previously send along by email to you, an analysis of US Forest Service methods and procedures as a PDF attachment. This document with its supporting documents and the PDF which I left with you in Helena last month speak to the facts regarding US Forest Service lack of action on managing the public forests. There are only eight steps to responsible forest management and the US Forest Service has applied none of them. I would anticipate that these facts would be very solid evidence when preparing the SJ-15 report…

Best regards,

Jim

James D. Arney, Ph.D.
Forest Biometrics Research Institute
4033 SW Canyon Road
Portland, OR 97221
(503) 227-0622 (office)
(406) 649-0040 (direct)

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From: Jim Arney
To: Kolman, Joe
Cc: Jennifer Fielder; Laurie Johnston; Roman Zylawy; Duane Simons; Kevin Chamberlain
Subject: Comments on draft SJ-15 report
Date: Tuesday, August 12, 2014 10:46:05 AM

Hello again Joe Kolman:

This is my second response to the draft SJ-15 report request for comments…

Briefly:

Page 19 – Step 5: Recommendations – Items 1 to 10 are much too vague to provide measured change in current USFS practices. This will result in no definitive basis to invoke a change in direction as suggested in Item 11.

Much more attention in the report should be given to **"Montana laws relating federal land management" compiled by Joe Kolman**.

Article 76-13-115 The legislature finds and declares that: Item (9) catastrophic wildland fire in wildland-urban interface areas resulting from inadequate federal land management activities to reduce fire risk has the potential to jeopardize Montanan's inalienable right to a clean and healthful environment guaranteed in Article II, section 3, of the Montana Constitution.

Article 76-13-701 Sustainable management for economic and ecological potential for the benefit of all Montanans.

Article 76-13-702 Duties: Item (8) promote development of an independent, long-term sustained yield capacity on federal lands in Montana.

Article 77-05-222 Effective July 1, 2013 – Develop an independent, long-term sustained yield study of Montana State Lands.

Inventory Report on Federal Jurisdiction – dated June 30, 1962. The federal government has only a Code 4 federal jurisdiction over public domain lands in Montana as an interest only in government management, not exclusive jurisdiction.

Exhibit 13 on May 14, 2013 to EQC by James D. Arney – demonstrated sustained yield capacity far exceeds current practices by USFS resulting in extreme wildfire risk and negative economics on Mineral County.

It is an easy, important and time-efficient exercise for a knowledgeable forestry professional to calculate the actual sustainable yield capacity of the national forests in Montana. It would require approximately one month per forest. This is basic to forest planning and management. **It has not been done by the USFS in thirty years… How is this responsible land management as detailed in these Articles?**

Thanks for any consideration,

Jim Arney
552 Trestle Creek Drive
Saint Regis, MT 59866
(406) 649-2921 (home)
(406) 649-0040 (cell)

Assessment of USDA Forest Service – Management of Public Forests

James D. Arney, PhD – Forest Biometrics Research Institute

There are ***eight basic steps*** required for responsible and professional management of a Working Forest. In this discussion a Working Forest is an economically self-sustaining forest ownership. A Working Forest does not require external funding for infrastructure, staff or long-term sustainability of natural resources – healthy forest, watershed or wildlife.

A designated Wilderness Area or National Park does not meet these requirements for a Working Forest because:

a) they require external annual funding to remain in place; and,
b) they have only minimal safeguards against large perturbations in quality and quantity of forest, watershed and wildlife resources.

The ***eight basic steps*** are detailed in a following section of this report. These steps are based on fifty years of direct participation and observation in active management of working forests throughout six western States. Each of these forests support a small team of natural resource professionals, all college-educated and mostly from Society of American Foresters (SAF) accredited forestry schools. These working forests range in size from 40,000 acres to 1,300,000 acres, averaging about 450,000 acres.

Among other reviews and analyses, the results and discussion in this report are primarily based on two previous in-depth analyses. These are: (See charts on page 5)

a) Avenues to EcoSystem Balance in a Human World. James D. Arney. 1999. Journal of Sustainable Forestry, Volume 9: (1/2) pages 45-57. The Hawthorn Press.

   A 100-year analysis of the long-term sustainable management of all nineteen National Forests in Region Six of the US Forest Service (Washington and Oregon). A Forest by Forest assessment of sustainable economics and habitat.

b) Forest Health Assessment and Sustainable Harvest Capacity of the Superior Ranger District on the Lolo National Forest of Region One. James D. Arney. 2014. Report to Mineral County Commissioners. 32 pages. Forest Biometrics Research Institute.

   A 100-year analysis of the long-term sustainable management of the Superior Ranger District forest lands within Mineral County, Montana.

In summary, the results of all analyses, observations and direct interaction with US Forest Service staff and managers come to one conclusion – none of the eight basic steps are in place within current Forest Service organizational structures and operational procedures.

In 2014, the entire US Forest Service is operating on a net deficit economic basis requiring ongoing external funding to maintain staffing and infrastructure. The public forests of the Western States are locked up in federal control resulting in marginal or negative economic support to maintain local public services – roads, schools, hospitals, fire protection and overall economic sustainability. US Forest Service administration is using re-active planning approach to mitigate wildfire occurrence (i.e., Restoration Forestry) rather than a proactive planning approach to a desired future goal (i.e., Economically Sustainable Forestry).

Results of US Forest Service assessment using the eight basic steps:

1. **Inventory of Ownership Existing Vegetation**

   US Forest Service Districts do not maintain a stand-based inventory of vegetation composition, stocking, health, growth or history.

2. **Inventory of Growth Capacity (Annual Rate of Tree Growth)**

   US Forest Service Districts do not maintain a stand-based inventory of site growth capacity or primary components of site capacity.

3. **Inventory of GIS Characteristics**

   US Forest Service Districts maintain forest-wide GIS layers of roads, streams, wildlife and restricted areas, but these are not linked to stand-by-stand silvicultural decisions over a long-term planning horizon (such as 50 or 100 years).

4. **Decision-support Team – Any Forest ownership over 100,000 acres**

   US Forest Service Districts do not maintain positions for an Inventory Forester or a Planning Forester. These positions disappeared in the 1980s.

5. **Long-term Assessment of Stand Growth and Decline over Planning Horizon**

   US Forest Service Districts or Forests have never developed long-term stand-based assessments of the forest capacity for growth and decline in either products or economics.

6. **Quantitative Assessment of Broad Spectrum of Silvicultural Scenarios**

   US Forest Service Districts or Forests have never developed long-term stand-based assessments of alternative silvicultural regimes or their impact on sustainability in forest health, growth, decline or economics.

7. **Decision-support Output Matrix – Provided Annually from Management Team**

   US Forest Service Districts or Forests have never provided a range of silvicultural options to Forest Service decision-makers. Resulting decisions are based on beliefs rather than facts. Facts are not available if measurements are not made. Measurements imply an active ongoing forest inventory.

8. **Management / Decision-making Body (not the operational Management Team)**

   US Forest Service Districts and Forests are making long-term decisions based on short-term project-only (limited geographic portions of the forest) datasets. Without a full forest-wide stand-based inventory, resulting decisions are based on beliefs and limited knowledge rather than facts. Pro-active planning requires analysis and assessment of the entire forest resource. This type of planning requires an ongoing, active forest inventory. This type of planning requires a permanent core staff for inventory, silviculture and planning. This staff matrix does not exist in current US Forest Service structures.

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Eight Steps to Responsible Public Forest Management

Basics:

1. **Inventory of Ownership Existing Vegetation**
    a. Stratification of forest into stand polygons (5 – 100 acres each)
        i. Major tree species
        ii. Dominant tree size
        iii. Average tree density per acre
    b. Stand health and silvicultural history
    c. Annual inventory update sampling across all Strata of Forest
    d. Annual inventory status report including growth, depletions and losses
2. **Inventory of Growth Capacity (Annual Rate of Tree Growth)**
    a. Topography – elevation, aspect, slope
    b. Soils – rooting depth, available water content, drainage
    c. Climate – seasonal precipitation
3. **Inventory of GIS Characteristics**
    a. Streams, lakes, ponds, muskeg
    b. Road networks – travel corridors, updated annually
    c. Significant wildlife nest and den locations, updated annually
    d. Restricted areas (alternate silviculture regimes), updated annually
        i. Research trials
        ii. Human interface – cultural sites, parks, trails, recreation
        iii. Other resource use – mining, watershed, farming, grazing
4. **Decision-support Team – Any Forest ownership over 100,000 acres**
    a. Inventory Forester – required local permanent staff position
    b. Silviculture Forester – required local permanent staff position
    c. Planning Forester – required local permanent staff position
    d. Road & Logging Engineer – optional staff position (over 150,000 acres)
    e. Soils Specialist – optional staff position (over 200,000 acres)
    f. Hydrologist – optional staff position (over 250,000 acres)
    g. Wildlife Ecologist – optional staff position (over 300,000 acres)
    h. Public Resources Coordinator – optional staff position (over 400,000 acres)
5. **Long-term Assessment of Stand Growth and Decline over Planning Horizon**
    a. Planning Horizon at least 1-1/2 times the healthy life of native trees
    b. Assume maximum occupancy of healthy, local native tree species
6. **Quantitative Assessment of Broad Spectrum of Silvicultural Scenarios**
    a. Objective – Forest health and sustainability minimizing perturbations
        i. Basis – clearcut, site preparation and plantation regeneration
        ii. Basis – seed-tree, site preparation and fill-plant to minimum density
        iii. Basis – shelterwood, site preparation and natural regeneration
        iv. Basis – selection thinning removals only and natural regeneration
    b. Outputs – Forest products flow and value flows throughout plan horizon
    c. Outputs – Display of all management costs throughout plan horizon
    d. Outputs – Annual net operating revenue and return to local economy

e. Outputs – Watershed services and costs
    i. Quality and abundance of public water supply
    ii. Fisheries resources
    iii. Recreation – Traditional and New
f. Outputs – Wildlife services and costs
    i. Habitat diversity in space and time throughout planning horizon
    ii. Sustainable wildlife health and abundance, big-game hunting

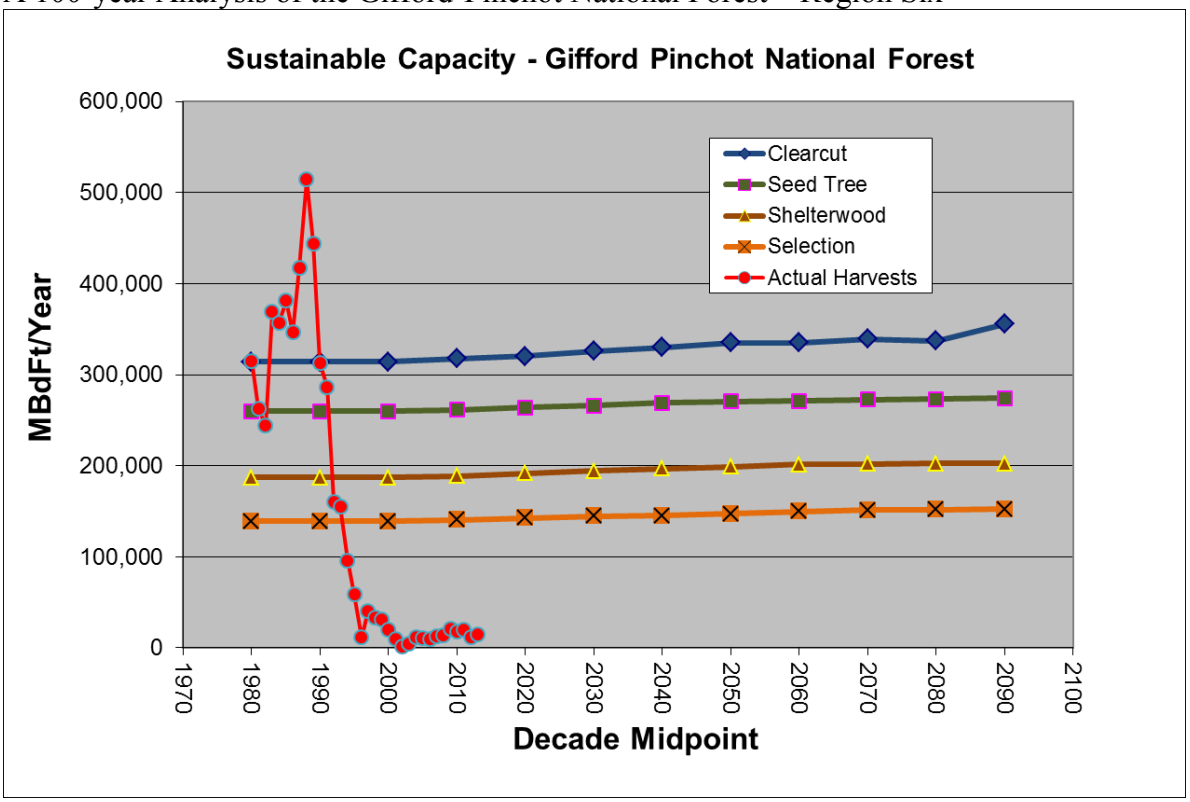
7. Decision-support Output Matrix – Provided Annually from Management Team

a. Evaluation of All Major Silvicultural Regime options
    i. Clearcut, site preparation and plantations
    ii. Seed-tree, site preparation and fill-planting to minimum stocking
    iii. Shelterwood, site preparation and fill-planting to minimum stocking
    iv. Selection thinning only, site preparation and natural regeneration
b. All long-term inputs and outputs defined and displayed
    i. Operating costs and revenues – all factors and resources
    ii. Forest health, sustainability and perturbations throughout plan
    iii. Sustainability by period throughout planning horizon
        1. Local economy – public services, employment, health
        2. Local watershed – quality and abundance – water & fisheries
        3. Local wildlife – diversity, abundance, big-game resources
        4. Local outdoor recreation – diversity, abundance

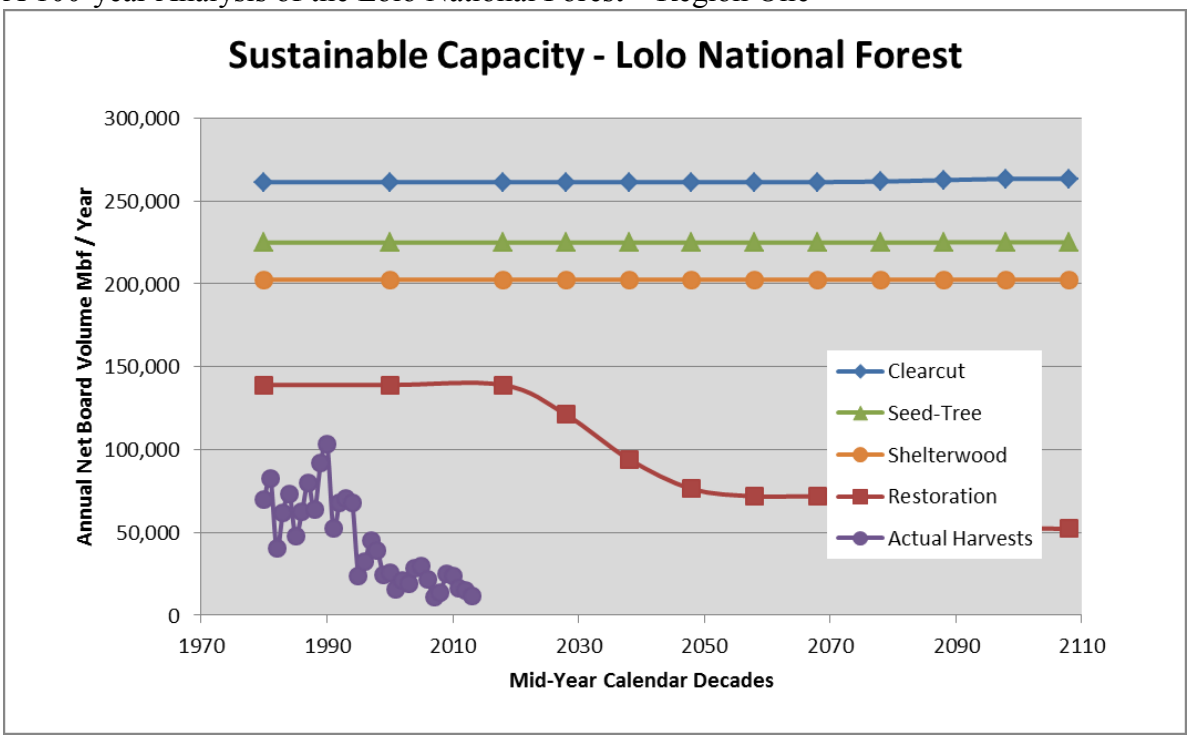
8. Management / Decision-making Body (not the operational Management Team)

a. Balance short-term goals within allowable perturbations of long-term goals
b. Maintain self-sustaining economics – both inputs and outputs
    i. Apply Working Forest principles of sustainable capacity
    ii. Minimize perturbations throughout planning horizon
        1. In-house forest management economic stability
        2. Local economic stability – short and long-term
        3. Forest health stability against insects, disease & wildfire
        4. Watershed stability and quality of resources
        5. Wildlife stability and quality of resources
    iii. Opposite of Wilderness and National Park management regimes
        1. Net negative economic basis which requires external funding
        2. Subject to high probability of major perturbations
            a. Abundance of over-mature forest structures
            b. Poor operational management access when required
            c. Susceptible to insect and disease infestations
            d. Susceptible to large wildfire impacts
c. Maximize primary long-term goals
    i. Healthy working forest (economically self-sustaining capacity)
    ii. Provide maximum positive economic returns to local communities
    iii. Sustainable capacity of watershed, wildlife and recreation resources

A 100-year Analysis of the Gifford-Pinchot National Forest – Region Six



A 100-year Analysis of the Lolo National Forest – Region One



Avenues to EcoSystem Balance In a Human World

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Avenues to EcoSystem Balance in a Human World

Introduction

Extending reserves for specific endangered species is a monocular view at least as destructive to humankind as an ever-expanding human population growth without regard to adequate food, shelter and quality of life. Harvests from forests and fields are necessary to sustain the human population. To curtail these harvests for wildlife needs most certainly has an impact on the human species depending on these resources. The world is made up of finite resources. It can sustain only a finite population of species.

This paper describes the development of a two-level analytical model as a pilot trial. The objective is to develop an understanding of the relative impacts of varying goals on human, wildlife and ecosystem dynamics assuming limited geographic dispersion and resources. Oregon and Washington in the United States may be considered a macro level in this trial. Nineteen United States National Forests within these two States may be considered micro models at the second level. Sustained yields of forest products and services are simulated for 100-year periods from each micro model. The sustained yields of these forests are affected by the kind of silvicultural systems being applied in order to meet the demands for ecosystem management.

If the geographic extent of the macro model is constrained, then what human population dynamics can be sustained given the outputs from the forest models. The attempt here is to determine what balance is necessary between the human species and its environment within a specific geographic area. Drawing additional resources from outside the model would be depleting someone else's balance.

The objective of this paper is to draw attention to the quantifiable aspects of ecosystem management and what is already known about demands for and production of forest resources.

Pacific Northwest National Forests

Visualize the forests of the United States Pacific Northwest. These forests are made up of mostly intolerant species primarily including Douglas-fir (Pseudotsuga menziesii) and Ponderosa pine (Pinus ponderosa). Associated species include Western white pine (Pinus monticola), Noble fir (Abies nobalis), Western larch (Larix occidentalis) and Lodgepole pine (Pinus contorta).

As these stands advance in time without management or catastrophic events, such as fire or disease, they evolve into mixtures including Pacific silver fir (Abies amabilis), Grand fir (Abies grandis), White fir (Abies concolor) and Sitka spruce (Picea sitchensis). Moist coastal forests develop more tolerant mixtures including Western hemlock (Tsuga heterophylla) and Western red cedar (Thuja plicata).

Tolerance is judged largely by crown density, ability to clean the bole, and the ability of reproduction to take hold and develop under fairly dense crown canopies (Baker, 1950). Prior to the arrival of Europeans to America, native tribes and lightning provided frequent, light fires throughout the forests of the Northwest. As the tribes declined (due to European diseases and invasion) and the U.S. Forest Service developed the Smokey Bear anti-fire campaign (early 1900s), the forests have been allowed to evolve into more tolerant mixtures of species. For these reasons most forests of the Northwest are made of trees less than a few hundred years of age and still contain mostly intolerant species.

While there are many other plant and animal species that live and die in these forests, the mixtures and magnitudes of all species are dependent upon and determined by the primary tree species which characterize each forest. Therefore, the principal silvicultural regime that is chosen for management of these forests will determine the future for all plant and animal species that make up the nature of these forests of the Western United States.

The U.S. Forest Service has divided the public forests of the Northwest into nineteen National Forests averaging approximately 1,200,000 acres (500,000 hectares) each. The databases for these forest inventories were downloaded from the Internet and loaded into Microsoft Access databases. Each database contains the complete, actual tree records from permanent plots distributed systematically across each National Forest. Each cluster of plots were compiled to produce species, age, size, structure tables that now characterize the variety of stand composition and distribution within each National Forest. After setting aside roads, stream buffers (following State regulations by class of stream) and lands not capable of at least 40 feet (12 meters) of height in fifty years (Site Index 40-feet), we have approximately 11.6 million acres (4.7 million hectares) of productive, sustainable forest. These nineteen forest databases are the basis upon which the analyses and comparisons are drawn for this paper (See Table 1.). They range from sea level to over 6,000 feet (2,000 meters) elevation and site productivity from 0 to 130 feet (40 meters) of height in fifty years. Productivity is inversely linear to elevation in this region. This fact increases in significance when we review the databases to find that current age class distributions reflect the impact of extensive, lower-elevation railroad logging in the early 1900s.

Methods of Analysis

As each database was compiled to develop the species, age, size, density structure of each cluster of plots, a few other indices were also computed. These include a *site productivity index* (dominant height in fifty years) and a *stand clumpiness index*. The stand clumpiness is a measure of the uniformity of stocking among plots in each stand or cluster. Tree dimensions (diameter and height) provide the means to estimate an index to vertical distribution while among plot variation provide the means to estimate an index to horizontal distribution. Plots in an even-aged plantation will produce low clumpiness indices while plots in all-aged, mixed species natural stands will produce high clumpiness indices. Both of these indices were compiled and stored for each cluster of plots in every database.

Each of these nineteen forests were then grown forward for 100 years with summaries produced at each decade (i.e., 2000, 2010, ….2090) written back to each database. The Forest Projection System (FPS Version 5.1) (Arney, 1996-97) was used to project these stands because it contains:

- Most recent and complete calibration against observed permanent growth plots;
- Calibrated for over twenty tree species of the Northwest;
- Uses an Individual Tree, Distant Dependent model driven by Site and Clumpiness;
- Directly reads and writes to Microsoft Access databases;
- Has facility to reflect survival and growth impacts from site preparation, brush control, planting, thinning and fertilization as well as from variation in site productivity and stand clumpiness; and,
- Applies a common tree taper volume function so that all species and forests may be compared on a standard set of merchantability and valuation specifications.

Volumes for all species on all National Forests were computed using 1-foot (0.3-meter) stumps, 32-foot (9.75-meter) logs, 6-inch (15-centimeter) minimum log diameters, 8-inch (20-centimeter) minimum tree diameter at breast height and 5% deductions for hidden defect and breakage. Logs were valued by the following (US$/1000 board feet):

Species	**6-inch logs**	**12-inch logs**	**16-inch logs**
Douglas-fir	$500	$607	$775
Red cedar	525	585	700
Western hemlock	420	505	700
True firs	314	405	620
Hardwoods	314	405	405

Management costs included $75/acre for site preparation, $185/acre for planting, $75/acre for brush control, $150/acre for spacing and $5/acre/year for overhead expenses. Logging costs were $170/Mbf (1000 board feet) for skidders, $200/Mbf for cable systems (over 40% slope) and $390/Mbf for helicopter (over 70% slope).

Four major silvicultural regimes were compared on each National Forest. These regimes are defined (Smith, 1962) and applied as follows:

Even-aged Stand Development

Clearcut Regime – removal of the entire stand in one cutting with reproduction obtained artificially through planting of species and densities defined by Forest and elevation;

Seed Tree Regime – removal of the mature timber in one cutting, except for a small number of seed trees (4-8 per acre or 10-20 per hectare) left singly or in small groups with fill planting to supplement natural seed fall;

Shelterwood Regime – the removal of the mature timber in a series of cuttings, which extend over a relatively short portion of the rotation. This encourages the establishment of essentially even-aged reproduction under the partial shelter (16-32 per acre or 40-80 per hectare) of seed trees through natural seed fall;

Uneven-aged Stand Development

Selection Regime – removal of the mature timber, usually the oldest or largest trees, either as single scattered individuals or in small groups at relatively short intervals (3-6 cuts per 100-years). These cuts are repeated indefinitely, by means of which the continuous establishment of reproduction is encouraged through natural seed fall and an uneven-aged stand is maintained.

In each of the Seed Tree and Shelterwood Regimes the residual seed trees were never included in the total harvested volumes because of the recent insistence from State and Federal wildlife staff that these trees should contribute to standing snags and down woody debris accumulations.

Plantations were stocked at 300 trees per acre (740 per hectare) on low site productivity (less than 24m Site Index) and 350 trees per acre (860 per hectare) on all higher sites. Seed Tree Regimes were fill planted to these same densities where natural seed fall was inadequate. Preferred species for planting varied by National Forest and elevation zone as detailed in the following table:

National Forest	**Low Zone**	**Elevation Limit (m)**	**High Zone**
Colville	Douglas-fir		
Deschutes	Ponderosa pine	1500	Douglas-fir
Fremont	Ponderosa pine	1500	Douglas-fir
Gifford Pinchot	Douglas-fir	1200	Noble fir
Mt. Hood	Douglas-fir	1200	Noble fir
Malheur	Ponderosa pine	1500	Douglas-fir
Ochoco	Ponderosa pine	1500	Douglas-fir
Okanogan	Douglas-fir	1400	Noble fir
Olympic	Douglas-fir	900	Noble fir
Rogue	Douglas-fir	1500	Noble fir
Siskiyou	Douglas-fir		
Siuslaw	Douglas-fir		
Snoqualmie	Douglas-fir	900	Noble fir
Umatilla	Ponderosa pine	1200	Douglas-fir
Umpqua	Douglas-fir	1500	Silver fir
Wallowa-Whitman	Ponderosa pine	1200	Douglas-fir
Wenatchee	Douglas-fir	1400	Noble fir
Willamette	Douglas-fir	1200	Noble fir
Winema	Ponderosa pine	1500	Red fir

A 100-year planning period was used in order to evaluate the alternative regimes as influenced by at least a one-third turnover to 2nd rotation yields under the plantation and natural stand development of each regime. This results in a slight, but general, increase in sustainable yield levels as the forest comes under a continuous, full-stocking implementation. Clearcuts were limited to 120 acres (48 hectares); but the average stand size is closer to 25 acres (10 hectares) on these forests with some as small as one acre.

Results

Table 5 and its associated chart show the results of each of the major silvicultural regimes on the Gifford Pinchot National Forest. Table 1 shows the summaries from all nineteen individual forests in cubic meters and hectares. Table 2 displays the same information in Scribner board feet and acres. A *potential sustainable forever,* annual harvest of approximately 3 billion board feet will be reduced by 23% under seed tree regimes, 44% under shelterwood regimes, 59% under selection regimes and over 90% under current USFS practices.

Table 3 presents the accumulative net income from harvests in US dollars from each of the regimes. The *potential sustainable forever,* annual harvest income is approximately $1 billion per year. Moving to a selection-type forestry practice will reduce this by about 58 percent. Current USFS practices and policies have created a net negative cash flow into the US Forest Service rather than any outflow. County school district budgets based on net income from these lands are severely and permanently impacted by these new practices.

Table 4 provides some insight into the trends in major species composition after 100 years if each of these major silvicultural regimes is applied consistently throughout the period. It is quite obvious that moving to a selection-type regime for the intolerant species mixes of the Northwest will result in the end of the Douglas-fir and Ponderosa pine forests. Applying the selection-type thinning treatments will hasten this transition because the larger Douglas-fir and Ponderosa pine will be removed first to make the thinnings viable economically. Neither of these species will re-establish themselves under forest cover at these density levels. The resulting species will be hemlock, spruce, cedar and true fir. All non-tree species and wildlife species common to the Douglas-fir and Ponderosa pine forests will be impacted by this new selection forestry practice. Population densities of these other species will undergo changes to levels for forest types that have never existed in this region in recorded history. To change from clearcut regimes to selection regimes in the Northwest is making a huge change in future non-tree species, wildlife species, insect dynamics, disease potentials and wildfire intensity. Douglas-fir and Ponderosa pine exist here in abundance because they are volunteer species on open ground after fire, volcanoes and clearcuts. The natural (undisturbed) transition is to more tolerant species of hemlock and true fir; but, as observed in the forests that Lewis and Clark found in 1804-6, the major species were Douglas-fir and Ponderosa pine. This is because periodic catastrophic events (fire, weather, earthquakes) throughout Northwest history have resulted in these forests returning to Douglas-fir on a regular basis.

If we have learned anything from observing Northwest natural history, it is that these forests have repeatedly returned to the intolerant species of Douglas-fir and Ponderosa pine on a regular basis. If we chose not to emulate fire by applying small clearcuts throughout the forest, then nature will apply fire over large contiguous areas in its own harvest. We may not be pleased with the result.

As is observed in these Tables, the tradeoff of moving away from Clearcut regimes in the U.S. Northwest toward Shelterwood and Selection regimes results in the following:

- Major impacts on long-term sustained yield of forest products (59% reduction)
- Major impacts on forest-provided School and Road revenues (58% reduction)
- Major impacts on tree species mixtures and associated wildlife (end of Douglas-fir)

Conclusions

Before we rush off in new directions with regard to managing existing intolerant-species forests, it would be worthy of our time and consideration to evaluate the consequences. In an effort to protect existing plant and animal species by a "kinder and gentler" forestry we may be causing more damage than good.

Using the results from the projection of these nineteen National Forest inventories and a reasonable set of silvicultural specifications, it is quite clear that:

- These impacts of the new silviculture regimes are not generally understood
- Current decisions to do away with clearcutting will have long-term impacts
- These decisions will most likely do away with Douglas-fir as a major species
- Intolerant species forests will be replaced with tolerant species forests
- About $1 billion annual revenue is severely reduced or lost
- More analytical analyses and discussions of impacts are needed

One obvious conclusion is that the U.S. public will continue to use wood products. If these products are not produced locally, then from where will they come? Currently the United States uses about 50.7 billion board feet of wood each year. That is equal to about 208 board feet per person per year. On that basis, the population of Washington and Oregon (7,262,000 persons) demands about 1.5 billion board feet of wood each year. These forests have the capacity to produce about twice that quantity.

Using one-half of the wood products demand per person (100 bdft/yr) of the U.S., it is also obvious that Italy with a population of 57.5 million people requires another 5.7 billion board feet annually forever! Italy provides nearly none of its own wood requirements. Which forests from which country will supply these needs?

As Curtis (1998) summarized so well in a recent Journal of Forestry article, "*Conflicts often arise between political and social pressures, economics, and inherent biological limitations, and compromise is often needed, within the bounds of biological feasibility.*" (This author provided the underlining.) As forestry professionals, we must provide the details and range of impacts of making various policy decisions. So far much decision-making has gone on with limited or no analyses of impacts. We have sufficient documented history to know that this is not a logical path to follow. The following summary is taken from the textbook, "The Practice of Silviculture", by David M. Smith.

> *"No account of the selection method would be complete without mention of the half-forgotten attempt to apply the economic-selection method in the virgin forests of the Douglas-fir and associated species in the Northwest. This policy proved disastrous because partial cuttings in these ancient forests opened the way for accelerated deterioration of residual stands under the attacks of insects, fungi, and atmospheric agencies (Munger, 1950; Isaac, 1956). Furthermore, the method was unsuitable for the regeneration of Douglas-fir, which is less tolerant than its competitors in this particular region. The selection method is applicable to Douglas-fir only in dry situations where it grows as a physiographic climax in relatively open stands.*
>
> *The failure of the selection method in West Coast Douglas-fir is an outstanding example of the difficulty of attempting to convert over-mature stands into productive units by selection cutting."* Smith, 1962, page 511-512

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Table 1. First Decade Annual Harvest Volume based on a 100-year Planning Period.

National Forest	Gross Hectares	Net Hectares	Cubic Meters (x1000) Clearcut	Seed Tree	Shelterwood	Selection
Colville	444,927	359,279	824	653	454	312
Deschutes	649,629	112,212	258	208	143	101
Fremont	449,844	27,803	47	45	29	18
Gifford Pinchot	555,218	428,022	1,929	1,592	1,147	837
Mt. Hood	371,252	293,137	1,378	1,087	784	571
Malheur	590,830	70,050	140	125	84	59
Ochoco	388,086	110,567	117	97	62	49
Okanogan	690,381	267,390	580	443	302	207
Olympic	255,888	195,535	936	759	564	405
Rogue	254,947	205,870	818	642	458	326
Siskiyou	442,819	356,128	1,311	1,067	765	548
Siuslaw	254,940	205,870	1,645	1,267	921	656
Mt. Baker-Snoqualmie	478,287	215,169	968	826	596	428
Umatilla	566,549	227,306	552	438	307	217
Umpqua	398,447	321,093	1,527	1,185	856	627
Wallowa-Whitman	994,072	225,377	521	420	288	205
Wenatchee	630,979	351,162	903	724	518	358
Willamette	678,000	533,976	2,944	2,311	1,661	1,216
Winema	445,145	182,785	340	282	186	121
Totals	**9,540,240**	**4,688,731**	**17,738**	**14,171**	**10,125**	**7,261**
% of Clearcut			**100%**	**80%**	**57%**	**41%**

Table 2. Mean Annual Harvest Removals over a 100-year Planning Period.

			Scibner BdFt		(x1000)	
National Forest	**Gross Acres**	**Net Acres**	**Clearcut**	**Seed Tree**	**Shelterwood**	**Selection**
Colville	1,099,460	887,814	145,481	102,286	74,641	52,200
Deschutes	1,605,297	277,287	42,892	33,318	24,014	17,559
Fremont	1,111,610	68,703	8,488	6,607	4,668	3,440
Gifford Pinchot	1,372,000	1,057,684	331,043	268,297	196,656	146,410
Mt. Hood	917,402	724,372	229,847	179,638	130,658	95,748
Malheur	1,460,000	173,100	23,025	20,143	14,753	10,747
Ochoco	959,000	273,223	22,411	18,223	12,592	10,341
Okanogan	1,706,000	660,747	90,571	70,143	50,821	36,866
Olympic	632,324	483,187	164,678	132,418	100,013	72,002
Rogue	630,000	508,725	143,779	112,698	81,246	59,214
Siskiyou	1,094,250	880,029	237,786	187,846	136,633	100,871
Siuslaw	630,000	508,725	339,812	243,779	175,870	127,818
Mt. Baker-Snoqualmie	1,181,894	531,704	166,511	140,529	102,568	73,462
Umatilla	1,400,000	561,695	89,508	68,356	49,161	35,684
Umpqua	984,602	793,454	276,914	209,038	152,051	111,952
Wallowa-Whitman	2,456,451	556,928	83,801	64,910	46,839	33,825
Wenatchee	1,559,213	867,757	144,190	113,635	81,777	59,022
Willamette	1,675,407	1,319,508	535,274	404,747	293,550	214,968
Winema	1,099,999	451,681	57,402	45,683	32,484	22,862
Totals	**23,574,909**	**11,586,323**	**3,133,413**	**2,422,294**	**1,760,995**	**1,284,991**
% of Clearcut			**100%**	**77%**	**56%**	**41%**

Table 3. First Decade Annual Harvest Income based on a 100-year Planning Period.

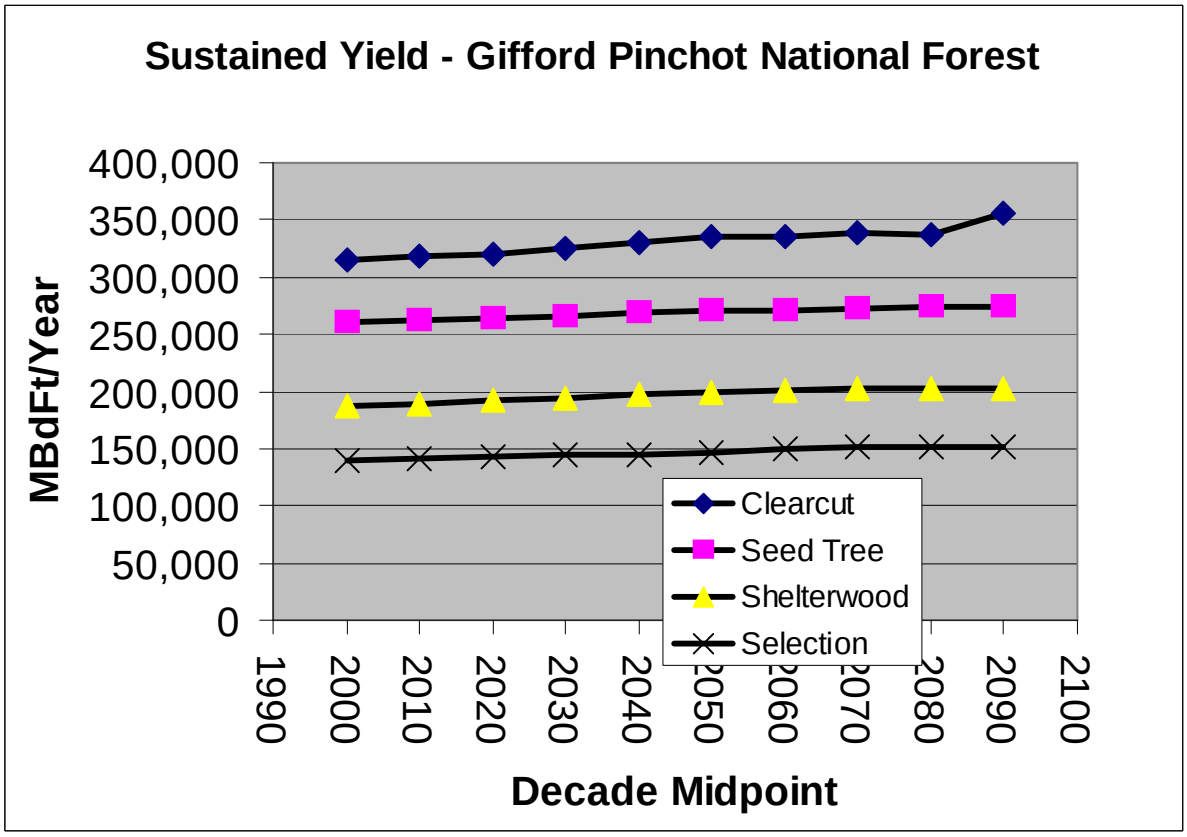
			US$ Values		(x1000)	
National Forest	**Gross Acres**	**Net Acres**	**Clearcut**	**Seed Tree**	**Shelterwood**	**Selection**
Colville	1,099,460	887,814	31,828	25,032	17,399	12,445
Deschutes	1,605,297	277,287	19,213	15,263	10,661	7,766
Fremont	1,111,610	68,703	2,708	2,534	1,737	1,063
Gifford Pinchot	1,372,000	1,057,684	103,341	84,469	60,948	43,938
Mt. Hood	917,402	724,372	75,463	60,524	43,653	30,883
Malheur	1,460,000	173,100	5,564	4,970	3,351	2,348
Ochoco	959,000	273,223	5,182	4,403	2,952	2,526
Okanogan	1,706,000	660,747	20,094	15,808	10,672	8,008
Olympic	632,324	483,187	48,837	39,894	29,260	21,560
Rogue	630,000	508,725	51,848	41,697	30,403	22,689
Siskiyou	1,094,250	880,029	79,738	64,405	46,684	36,208
Siuslaw	630,000	508,725	132,064	103,084	74,269	59,191
Mt. Baker-Snoqualmie	1,181,894	531,704	45,696	39,182	28,348	18,990
Umatilla	1,400,000	561,695	22,092	17,719	12,446	8,763
Umpqua	984,602	793,454	102,529	79,941	57,769	41,063
Wallowa-Whitman	2,456,451	556,928	21,772	17,811	12,419	8,957
Wenatchee	1,559,213	867,757	39,001	31,845	22,738	16,054
Willamette	1,675,407	1,319,508	184,230	142,872	102,611	73,487
Winema	1,099,999	451,681	13,568	11,085	7,668	5,543
Totals	**23,574,909**	**11,586,323**	**$1,004,768**	**$802,538**	**$575,988**	**$421,482**
% of Clearcut			**100%**	**80%**	**57%**	**42%**

Table 4. Ending Major Species Composition based on a 100-year Planning Period.

National Forest	Gross Hect.	Net Hectares	Major Species			
			Clearcut	Seed Tree	Shelterwood	Selection
Colville	444,927	359,279	DF	DF / PP	DF / GF	GF / WH
Deschutes	649,629	112,212	PP / DF	PP / DF	DF / GF	GF / WH
Fremont	449,844	27,803	PP / SF	PP / SF	PP / SF	SF / PP
Gifford Pinchot	555,218	428,022	DF / NF	DF / SF	SF / DF	SF / WH
Mt. Hood	371,252	293,137	DF / NF	DF / SF	WH / DF	WH /SF
Malheur	590,830	70,050	PP / DF	PP / DF	DF / GF	DF / GF
Ochoco	388,086	110,567	PP / DF	PP / DF	DF / PP	DF / GF
Okanogan	690,381	267,390	DF / NF	DF / SF	DF / GF	GF / WH
Olympic	255,888	195,535	DF / NF	DF / WH	DF / WH	WH / RC
Rogue	254,947	205,870	DF / NF	DF / SF	SF / DF	SF / WH
Siskiyou	442,819	356,128	DF	DF / WH	DF / SF	SF / WH
Siuslaw	254,940	205,870	DF	DF / WH	DF / WH	WH / SS
Mt. Baker-Snoqualmie	478,287	215,169	DF / NF	DF / SF	DF / WH	WH / SF
Umatilla	566,549	227,306	PP / DF	DF / PP	DF / GF	GF / DF
Umpqua	398,447	321,093	DF / SF	DF / SF	DF / WH	WH / SF
Wallowa-Whitman	994,072	225,377	PP / DF	PP / DF	DF / GF	GF / DF
Wenatchee	630,979	351,162	DF / NF	DF / WH	DF / WH	WH / SF
Willamette	678,000	533,976	DF / NF	DF / WH	WH / DF	WH / SF
Winema	445,145	182,785	PP / RF	PP / SF	PP / SF	SF / WH
Totals	**9,540,240**	**4,688,731**				

Table 5. Mean Annual Harvest Removals on the Gifford Pinchot National Forest

	Scribner BdFt		(x1000)	
Period	**Clearcut**	**Seed Tree**	**Shelterwood**	**Selection**
2000	314,218	259,908	187,126	138,936
2010	317,490	261,581	188,921	140,615
2020	320,445	263,870	191,586	142,674
2030	325,950	266,001	194,268	144,804
2040	330,024	269,194	196,986	145,381
2050	334,982	270,697	199,104	147,018
2060	335,117	271,261	201,351	149,739
2070	339,303	272,636	201,913	151,061
2080	337,368	273,373	202,626	151,604
2090	355,532	274,445	202,671	152,261
Average	**331,043**	**268,297**	**196,655**	**146,409**
	100%	**81%**	**59%**	**44%**



Superior Ranger District
Of the
Lolo National Forest

Forest Health Assessment
and
Sustainable Harvest Capacity

June 27, 2014

By

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Forest Health Assessment and Sustainable Harvest Capacity

Introduction

This analysis was developed using publicly-available forest inventory details from the Lolo National Forest web site current to May 1, 2014. The Project Leader for this current analysis was Dr. James D. Arney from the Forest Biometrics Research Institute (FBRI), Portland, Oregon.

The FBRI Forest Projection and Planning System (FPS) was used in these analyses to facilitate all aspects of stand-level and forest-wide factors and interactions. FPS was used in this analysis to summarize forest conditions (inventory, growth and mortality by species at the stand-level) based on USFS GIS Digital Elevation Models (DEM), regional weather data, USFS Covertype and soil polygons, streams, stream classes, roads and road classes, ownership and management classifications across the Superior Ranger District.

Forest inventory data, management objectives and major silvicultural regimes were used to calculate an annual sustianable harvest capacity and develop harvest scheduling alternatives. These alternatives focus on long-term sustainability using a broad range of management intensities. The Planning Horizon for these analyses was 100 years.

Objectives of this Analysis

In recent years, the methods and goals for management of public forest lands has become a pivotal issue among and between both local citizens and forestry professionals. Perhaps the general goals may be common among these groups, such as:

1) Establish and maintain a healthy, dynamic forest resource;
    a. Resistant to insects, disease and wildfire
    b. Provide a high vegetative diversity for wildlife and water resources
2) Manage the forest resource for long-term sustainability
    a. Minimize catastrophic perturbations due to disease and wildfire
    b. Manage for self-sustainability, both economically and biologically

The current status of the Lolo National Forest resource, especially Mineral County is:

a) A forest resource which is over-mature with mortality exceeding growth;
b) High incidence of insect and disease mortality throughout the forest;
c) High probability of catastrophic wildfire comparable to the 1910 wildfires;
d) A USFS management philosophy which is economically un-sustainable;
e) An increasing financial burden to Mineral County;
    a. Declining economic infrastructure to provide essential forestry services;
    b. Ongoing requirements to provide public education and road networks;
    c. Lack of Regional USFS proactive support for a self-sustaining forest.

These previous lists of items appear to be individual topics with different parameters and requirements for management decision-making. However, they all are common both in current status and method of creating a long-term sustainable solution.

Pivotal to biological and economical long-term sustainability is the health of the forest in Mineral County, the Superior Ranger District and all of the Lolo National Forest. The US Forest Service Handbook identifies and defines the timing when a forest begins to decline rather than grow. It is labelled as the "Culmination of Mean Annual Increment (CMAI)". In other words when mortality in cubic foot volume per acre exceeds growth.

In an April 17, 2014, meeting with the Mineral County Commissioners both the Region One Forester (Faye Krueger) and Lolo National Forest Supervisor (Tim Garcia) acknowledged that the forests of Mineral County and the Lolo National Forest are over-mature, declining and at an extreme risk of catatrophic wildfire. This was confirmed by USFS Fire Laboratory scientists in a later meeting at the Superior Ranger District office by displaying a map of all Mineral County at a state of high wildfire risk.

Planning for the Future

Prior to 1990 the US Forest Service in all Regions used to prepare and manage to long-term sustained yield plans. These were referred to as "Forest Plans" and "Annual Allowable Cut" analyses. The time frame (planning horizon) was typically 100 years.

As a reference to planning methods, Russell L. Ackoff (1981)[1] described the approaches to planning by any organization. The two most relevant to USFS planning approaches are:

1) **Proactive** – *create the future*. This involves designing a desired future and then inventing way to create that future state. Not only is the future a preferred state, but the organization can actively control the outcome. Planners actively shape the future, rather than just trying to get ahead of events outside of their control.

   This was the type of planning characterized in the 1986 Lolo National Forest Plan where the extent of forest inventory, health, growth and sustainability were key components to setting and managing to a long-term plan. The actual forest growth capacity, age class diversity, forest health and long-term sustainability were the primary factors in establishing a plan. Forest biology, soils, topography, watersheds, wildlife and local economy were all instrumental to the plan outcome.

2) **Reactive** – *past oriented*. Reactive planning is an attempt to turn back the clock to the past. The past, no matter how bad, is preferable to the present, and definitely better than the anticipated future. The past is romanticized and there is a desire to return to the "good old days". These people seek to undo the change that has created the present, and they fear the future, which they attempt to prevent.

[1] Ackoff, Russell L., 1981. Creating the Corporate Future: Plan or be Planned. John Wiley, New York.

This is the type of planning is currently being promoted by the Lolo National Forest under the title "Restoration Forestry". There is no forest inventory database involved to provide parameters for forest health, growth, mortality, disease, watersheds, soils or local economy. There is no planned expectation for the future, only a desire to turn backward. Planning is not Forest-wide, nor does it include a long-term view such as the 100-year planning horizons of previous plans. The only objective is to reduce wildfire hazard. This is expected to be accomplished by removing all small-sized trees from under a scattered over-story of a few large trees and burning all residual woody material. This provides a short-term economic spike to local forest contractors, but the whole plan requires a net negative cash flow from outside (Washington, DC). Once accomplished, no further forest regeneration is planned or desired. The desire is to convert a dynamic biological system of growth and mortality to a static, in-place state of existence. Since this is a biologically complex system this goal is not achievable.

The following charts and tables display the outcomes from these different approaches to forest planning as applied to the Superior Ranger District of the Lolo National Forest. The details of site growth capacity, forest inventory, forest growth and decline, riparian buffers, road networks, wildlife cooridors, tree volumes, values, operating costs and long-term economic factors are provided in the Appendix.

A healthy forest is a young forest. All biological and botanical components of the forest grow and die as time and environmental factors evolve. Most of this is predictable and within the scope of active management. In the current state of the forests of Mineral County, the evolution of change will be in large perturbations of insect and disease attacks and wildfire. The 1910 catastrophic wildfire acreage will be repeated.

Active forest planning and implementation has the capacity to offset the probability of catastrophic wildfire. This implementation requires investment of professional commitment and one or more alternative levels of silvicultural activity and cashflow.

Major Silvicultural Regimes Applied to the Superior Ranger District

All regimes were forecast for a 100-year planning horizon in order to compare long-term sustainable capacity under alternative silvicultural systems. The yield capacity being evaluated in this analysis is the total merchantable harvest volume and value over time.

Clearcut Regime – (CLRC) Each stand is grown forward without further treatment until time of final harvest. Site preparation and vegetation control are implemented to enhance plantation growth and survival. Planting density is 400 trees per acre.

Seed Tree Regime – (SEED) No treatments are applied other than a final harvest leaving 8 trees per acre as seed trees. These trees are selected from the upper diameter range of trees in the stand. Site preparation and vegetation control are applied to enhance the expectation of 300 trees per acre growth and survival.

Shelterwood Regime – (SHTR) No treatments are applied other than a final harvest leaving 20 trees per acre as a shelterwood canopy cover. These trees are selected from the upper diameter range of trees in the stand. Spot vegetation control facilitates 300 trees per acre regeneration expectation survival and growth.

Restoration Regime – (REST) No final harvest is applied as an even-aged regime. Only a thinning removal occurs once as a harvest entry. The residual stand is reduced to 75 trees per acre by thinning from below to remove all small trees and ladder fuels. All residual vegetation and logging debris are piled and burned. No planting is assumed.

This following table summarizes the harvested wood flow coming off of the Superior Ranger District on an annual basis over a 100-year planning horizon. All of these analyses are provided as a reference to the productive capacity of the forest based on soils, topography and climate. Only State standard stream-side riparian buffers have been excluded as detailed in the Appendix. No extra wildlife constraints have been excluded due to the fact that wildlife habitat would actually be increased by activation of the first three silvicultural systems. Volumes are Scribner board feet in 1,000s per year.

Mid-Year	Clearcut	Seed-Tree	Shelter	Restoration
2018	261,424	225,024	202,571	143,523
2028	261,424	225,024	202,571	143,525
2038	261,424	225,024	202,571	71,876
2048	261,424	225,024	202,571	71,876
2058	261,425	225,024	202,571	71,876
2068	261,423	225,024	202,572	71,876
2078	261,425	225,027	202,572	71,876
2088	261,981	225,053	202,596	71,877
2098	265,097	225,131	202,632	36,243
2108	262,872	225,133	202,596	56,192
Average	261,992	225,049	202,583	81,074

Figure 1. Harvest Volume Comparison of Alternative Silvicultural Systems.

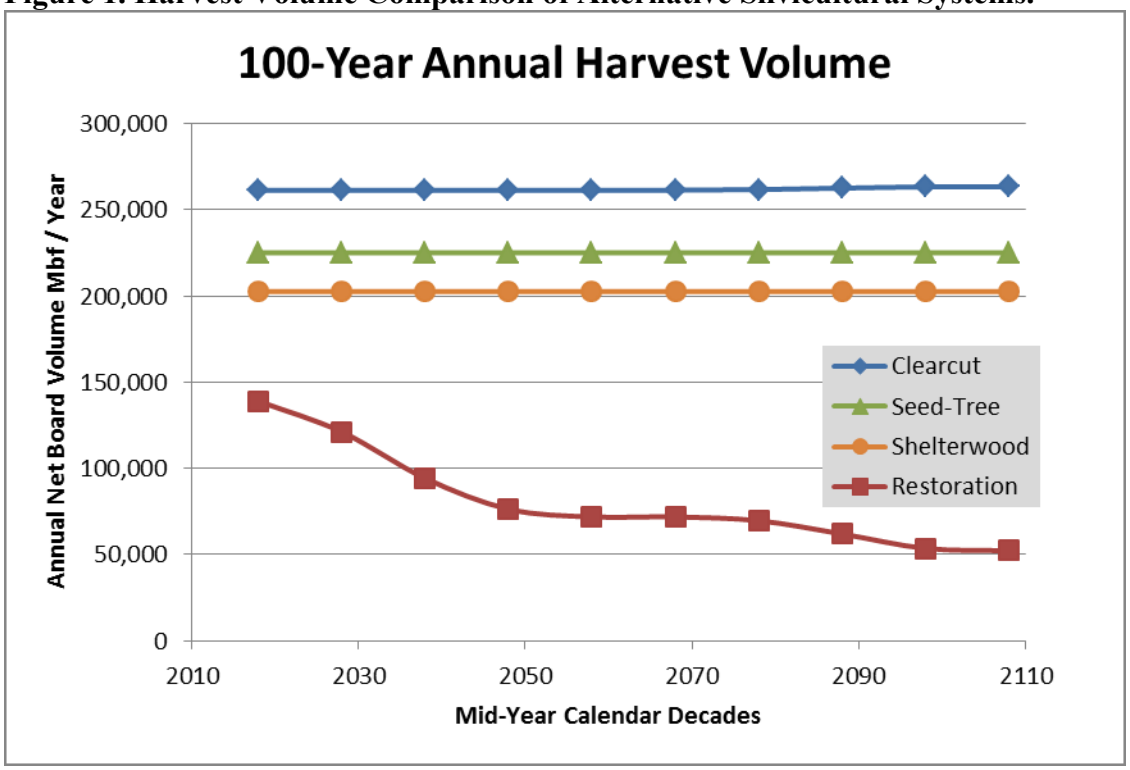


Figure 2. Harvest Net Value Comparison of Alternative Silvicultural Systems.

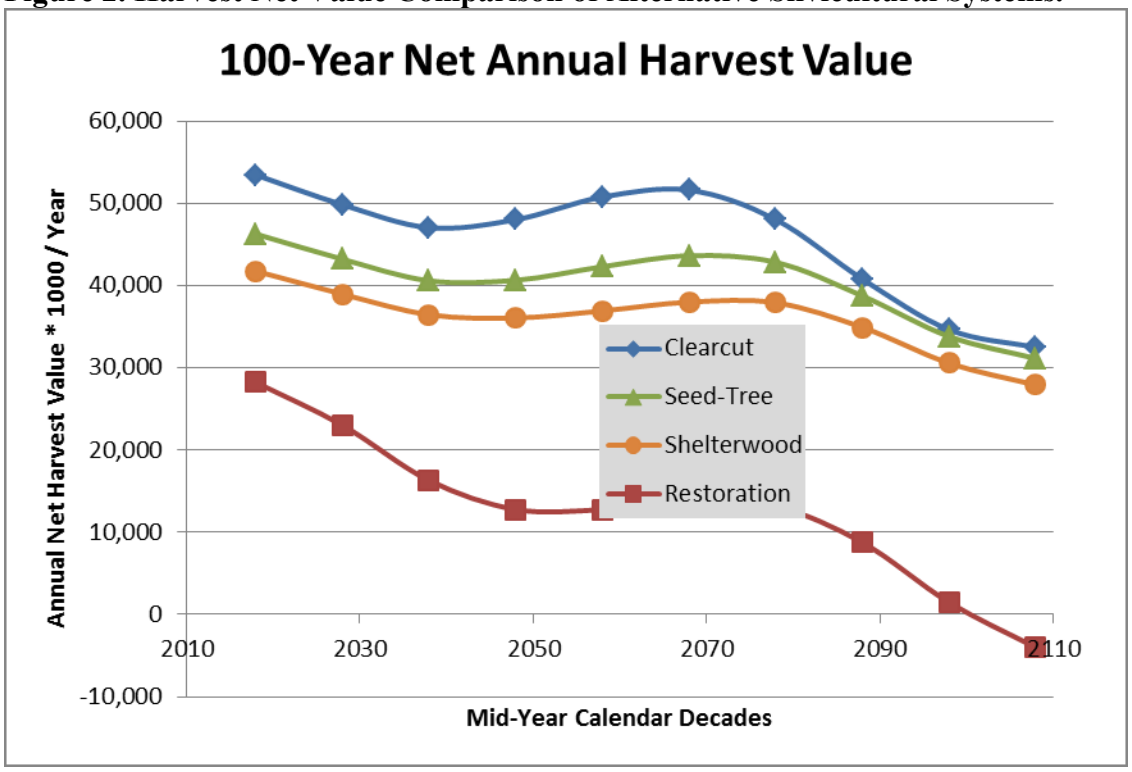


Figure 3. Harvested Acres Comparison of Alternative Silvicultural Systems.

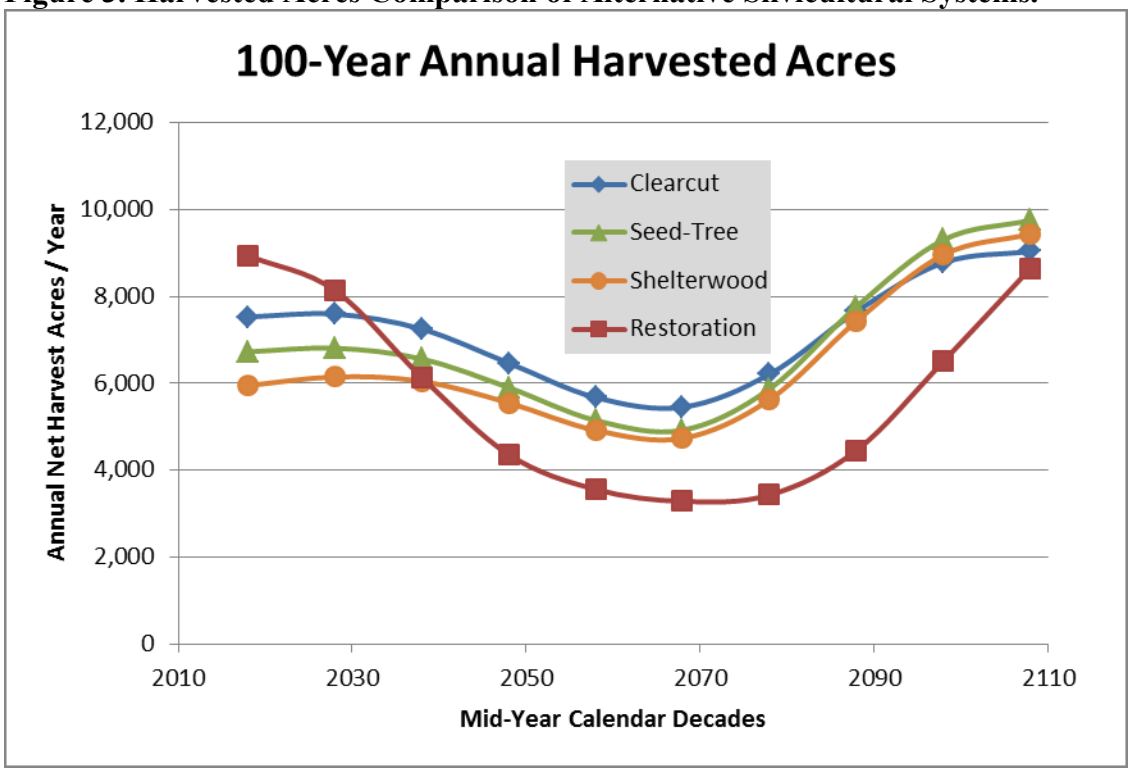


Figure 4. Harvested Acres Comparison Assuming a Constant Harvest Volume.

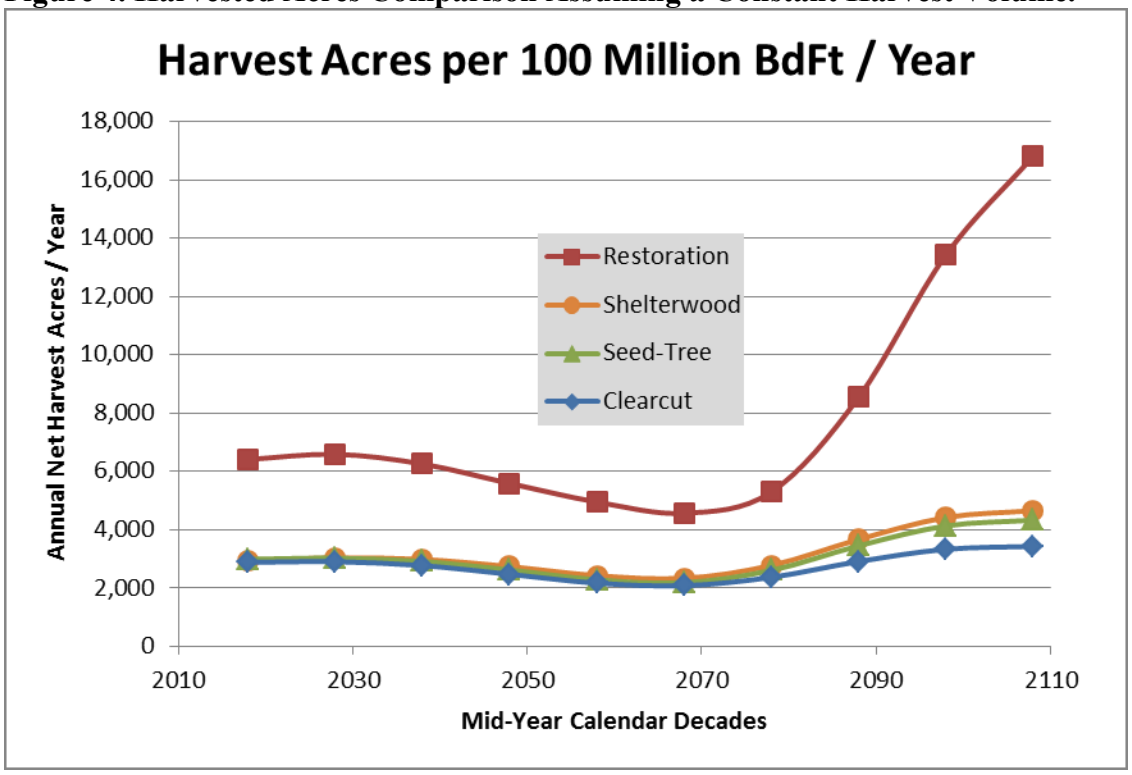


Figure 5. Residual Volume Comparison of Alternative Silvicultural Systems.

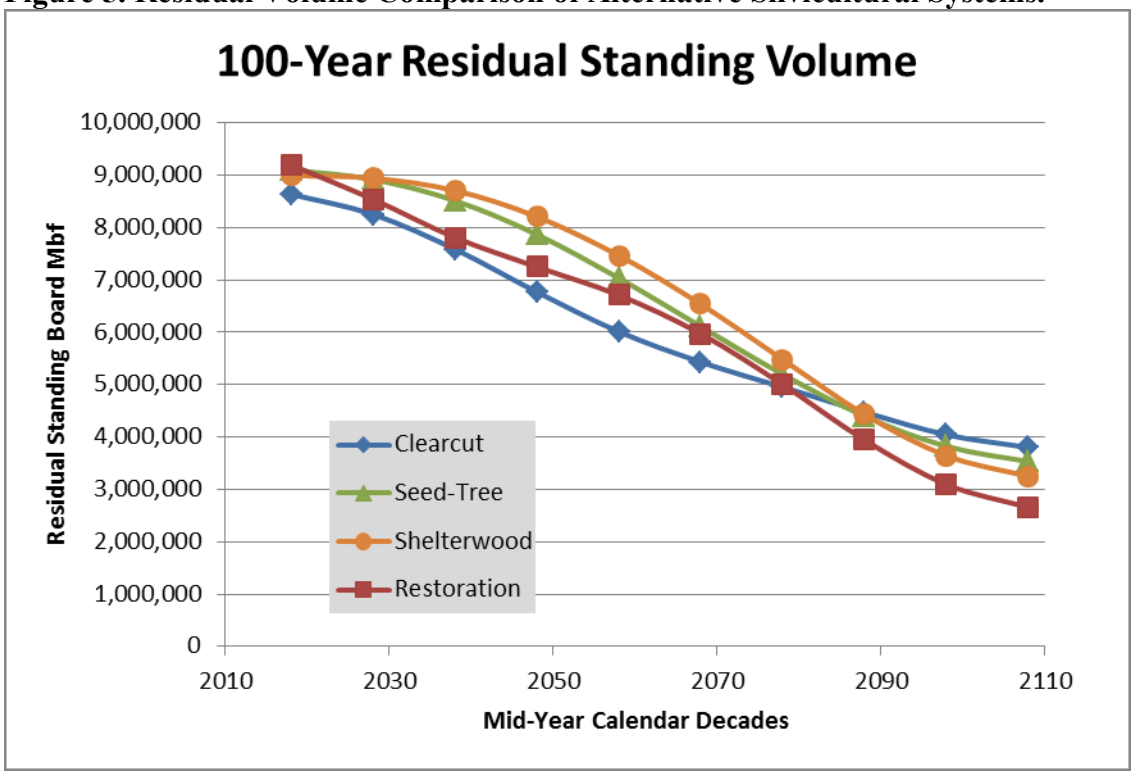


Figure 6. Vegetative Diversity Comparison of Alternative Silvicultural Systems.

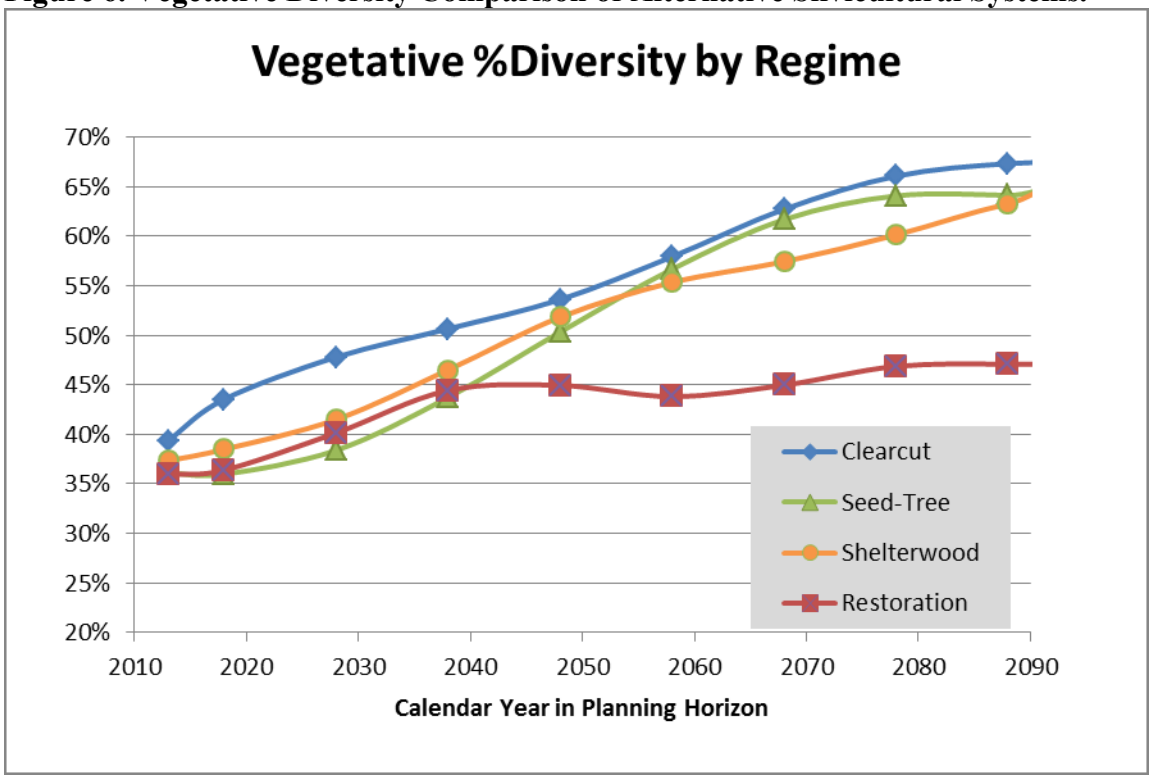


Table 1. Sustained Annual Harvest Capacity using Clearcut & Plant

```
==========================================================================
FOREST HARVEST REPORT                                   FOREST BIOMETRICS
2014-06-27                                     1st Run, Clearcut Regimes
Periodic harvest covering       717879.5 acres (with re-entries)
==========================================================================
 Mid   #  ...Averages/Year.....  ..........Totals per Year............
Year Stds Age Size  Cuft   BdFt  Acres    CuFt    BdFt   Value     NPV
      /Yr Yrs   Ac /Acre  /Acre          x1000   x1000   x1000   x1000
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------

2018  324  74   23  6804  35555   7352   50027  261424   55305   50297

2028  271  82   30  6149  32509   8041   49454  261424   52145   39508

2038  229 100   33  6882  34901   7490   51548  261424   39736   26133

2048  197  99   33  7386  39685   6587   48655  261424   50165   25555

2058  168 110   31  9139  49894   5239   47887  261425   50865   20494

2068  145 115   35  9201  51831   5043   46410  261423   53773   16943

2078  151 110   36  8663  48646   5373   46558  261425   52956   13261

2088  289  79   28  6749  32823   7981   53868  261981   38806    9983

2098  328  76   30  5933  26987   9822   58283  265097   30607    8528

2108  265  77   33  6372  29688   8854   56421  262872   32643    8500
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------
     Mean Annual Harvest:                 50911  261992   45701
      (over 100 years)        Total:                            2192072
```

Table 2. Sustained Annual Harvest Capacity using Seed-Tree Regimes & Fill-plant.

```
==========================================================================
FOREST HARVEST REPORT                                   FOREST BIOMETRICS
2014-06-27                                   2nd Run, Seed-tree Regimes
Periodic harvest covering       688890.3 acres (with re-entries)
==========================================================================
 Mid   #  ...Averages/Year.....  ..........Totals per Year............
Year Stds Age Size  Cuft   BdFt  Acres    CuFt    BdFt   Value     NPV
      /Yr Yrs   Ac /Acre  /Acre          x1000   x1000   x1000   x1000
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------

2018  290  50   23  6559  34312   6557   43017  225024   47857   43511

2028  246  69   29  5914  31264   7197   42567  225024   44867   33982

2038  206  80   33  6563  33458   6725   44141  225024   35477   23118

2048  181  90   34  6863  36650   6139   42137  225024   41946   21516

2058  155  95   31  8714  47141   4773   41595  225024   42482   17288

2068  137 105   33  9173  50456   4459   40911  225024   42979   13867

2078  148 108   31  8449  48463   4643   39233  225027   47666   11685

2088  300  85   28  5117  27295   8245   42192  225053   38685    8874

2098  339  84   31  4185  21361  10539   44115  225131   31136    6993

2108  269  86   36  4636  23433   9607   44544  225133   30502    6119
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------
     Mean Annual Harvest:                 42446  225049   40360
      (over 100 years)        Total:                            1869569
```

Table 3. Sustained Annual Harvest Capacity using Shelterwood Regimes & Fill-plant.

```
==========================================================================
FOREST HARVEST REPORT                                   FOREST BIOMETRICS
2014-06-28                                  3rd Run, Shelterwood Regimes
Periodic harvest covering       649532.2 acres (with re-entries)
==========================================================================
 Mid    #  ...Averages/Year.....  ..........Totals per Year............
Year Stds Age Size  Cuft   BdFt  Acres    CuFt    BdFt   Value     NPV
      /Yr Yrs   Ac /Acre  /Acre          x1000   x1000   x1000   x1000
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------

2018  268  74   21  6782  35522   5702   38678  202571   43263   39322

2028  242  83   27  5800  30666   6605   38316  202571   40230   30504

2038  194 101   31  6501  33203   6100   39666  202571   32393   21002

2048  179 101   33  6482  34459   5878   38105  202571   37067   19040

2058  152 109   30  8230  44247   4578   37679  202571   37396   15336

2068  136 121   31  8772  47351   4278   37530  202572   36039   11901

2078  151 116   30  7749  44336   4568   35407  202572   42602   10439

2088  296  90   26  4825  26450   7659   36963  202596   35542    7958

2098  342  90   30  3751  19697  10287   38590  202632   28156    6139

2108  263  94   35  4222  21798   9293   39243  202596   27196    5106
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------
     Mean Annual Harvest:                38018  202583   35989
      (over 100 years)        Total:                            1667528
```

Table 4. Sustained Annual Harvest Capacity using Restoration Forestry Regimes.

```
==========================================================================
FOREST HARVEST REPORT                                   FOREST BIOMETRICS
2014-06-28                                   5th Run, Restoration Regimes
Periodic harvest covering       574039.4 acres (with re-entries)
==========================================================================
 Mid    #  ...Averages/Year.....  ..........Totals per Year............
Year Stds Age Size  Cuft   BdFt  Acres    CuFt    BdFt   Value     NPV
      /Yr Yrs   Ac /Acre  /Acre          x1000   x1000   x1000   x1000
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------
2018  370  51   23  3198  16662   8613   27550  143523   30025   27317

2028  362  68   30  2475  13017  11025   27295  143525   28211   21409

2038  125  82   34  3437  17029   4220   14508   71876    9220    6440

2048  132  87   32  3238  16997   4228   13695   71876   12563    6509

2058  105  94   32  4037  21505   3342   13494   71876   12744    5288

2068   97 101   33  4152  22652   3172   13175   71876   13279    4332

2078   90 111   35  4015  23164   3102   12459   71876   15493    3736

2088   80 106   44  3659  20341   3533   12931   71877   13605    2721

2098  260  83   24  1217   5908   6134    7466   36243   -2605     798

2108  332  80   30  1184   5602  10029   11880   56192   -6126    1110
---- ---- --- ---- -----  -----  -----  ------  ------  ------  ------
     Mean Annual Harvest:                15446   81074   12641
      (over 100 years)        Total:                             796642
```

Appendix: Components to Building a Long-term Forest Plan

Project Steps in this Analysis

Steps to build the database for this analysis included:

- Acquire the existing aerial photo stratification of the entire Superior Ranger District forest landbase, including ownership, road layers, stream layers and public land survey.
- Acquire the current Forest Inventory Assessment (FIA) permanent plot database across the Lolo National Forest.
- Acquire all existing GIS layers for elevation, aspect, slope, precipitation and soils.
- Overlay the FIA plot summaries on the forest inventory photo stratification to provide direct estimates of species, size, stocking and volume within stratified polygons.
- Aggregate the aerial photo strata as minimally necessary to provide at least one FIA installation to represent each stratum.
- Use the Forest Projection & Planning System (FPS) software to extrapolate all stand parameters from sampled polygons to un-sampled polygons based on common aerial photo strata labels.
- Overlay all road networks with road widths defined by class of road to reduce stand polygons from gross acres to net-forested acres.
- Overlay all stream networks with riparian buffers defined by class of stream to reduce stand polygons from net-forested acres to net-harvestable acres.
- Regress field-sampled tree site index from FIA plots on elevation, aspect, slope, precipitation and soil depth to localize the Site Growth Capacity GIS layer.
- Use the regressed site index to extrapolate site productivity levels to each stand polygon across the Superior Ranger District based on these bio/geo/climatic parameters.
- Project all stands to year-end 2013 as a basis for analysis of recommended silviculture to be applied in future on the major forest types of the Superior Ranger District Inventory.
- Apply a full range of silvicultural regimes to stands in each of the major forest zones to evaluate the relative yield, income, forest structure and habitat created over time.

Analytical steps for these silvicultural options include:

- Project all stands within each forest zone for 100 years into the future to evaluate a broad array of alternative silvicultural regimes relative to each zone.
- Use these stand projections to evolve the analyses from silvicultural options on existing stands into silvicultural options on future stands.
- Compute the costs and benefits of the full series of potential silvicultural regimes taking into account both current cash flow and the time value of costs and benefits;
- Work to identify, review and develop options that are silviculturally effective and operationally achievable within local staffing, contractual, marketing and accessibility thresholds; and,

- Utilize the results of these analyses to develop a series of recommendations for the USFS Region One Forester, Lolo National Forest Supervisor, Superior District Ranger and Mineral County Commissioners.

Project Development of Silvicultural Options

There were five major steps in the development of these silvicultural options.

Development of a forest inventory database.

It was necessary to identify and/or acquire specific detail about the species, size, taper, crown, defect and spatial distributions of each of the Superior Ranger District forest types in order to characterize the growth and mortality dynamics within each major forest zone. The productive capacity of each of these forest types was assessed and classified for input into the growth projections in later steps. The relative precision and accuracy of the silvicultural projections is dependent on adequate characterization of each forest type by species and diameter distributions; growth capacity (site); natural regeneration abundance or potential; and, spatial distributions (clumpiness).

The relative success (ranking) and precision of the various silvicultural regimes in volumes and values is dependent on good input information representing each forest type and on reliable, locally-calibrated growth models.

Part of the objective of setting up an FPS forest inventory database is to compile stand information from stands of each type in each forest zone. The FPS Cruise Compiler is readily adapted to filling in missing sub-sampled heights, taper, crown and defect observations by regression on available information within each stand and species. The FPS compiler also has the unique capacity to compute the degree of spatial clumpiness found within a stand, based on the variability among sample plots. This spatial variability has a large, significant impact on the results of various thinning alternatives and should not be overlooked in any analysis of this importance. As experienced field foresters can attest, clumpy multi-tiered stands have growth and mortality dynamics far different than well-distributed even-aged stands. This is true even if comparing the same species and site productivity capacities between stands of different structure and spatial distributions.

The FPS Growth Model was used for all of these silvicultural projections. It has the capacity to produce any merchantable specification alternatives, site productivity levels, species composition, natural regeneration, site preparation, brush control, animal control, thinning, fertilization, pruning, costs, values, net present values, tabular and visual outputs. The Forest Biometrics Research Institute (FBRI) latest Region 14 (North Idaho and Western Montana) Species Library (2005 Update) was used to provide accurate silvicultural response detail for all species and silvicultural options. This Regional Library was initially developed and calibrated in 1999-2000 incorporating all previous measurements from regional permanent plots (provided through written agreement with the USFS Experiment Stations, University of Idaho and University of Montana). It is the

most representative growth model and regional calibration available for Western Montana.

Details of the data sources for this analysis:

a) The complete 543,105 acre Superior Ranger District was previously timber stratified (species, size, stocking) with aerial photography into 15,742 stand polygons;
b) The Lolo National Forest provided 220 Forest Inventory & Assessment (FIA) plots which were previously field sampled between 1988 and 2009.
c) The FIA plots provided species, size, stocking and volume details for each of the forest types found on the Superior Ranger District;
d) Geographic information system (GIS) files were available for roads, streams, ownership, public land survey, elevation, slope, aspect and precipitation.
e) Forest Cover Type maps were available for previous timber stand improvement treatments, plantations and harvest units.

All tree and plot data loaded into the FPS inventory database were compiled with the following specifications:

- Unique Stand (polygon) numbers and Plot numbers within each Stand.
- All species were merchandized using 16-foot logs to a 6-inch minimum diameter.
- Minimum acceptable log lengths were 8-feet.
- USFS 20-ft multiples log rule Scribner Scale was used throughout the compilations.
- A standard 5% volume reduction was applied for hidden defect and breakage in addition to cruiser-called visible defect.
- Trees had to be greater than 6 inches at breast height to be merchandized for volume.
- Logs were sorted by small-end diameter inside bark into 3 – 5 log sizes for valuation.
- Log values were assigned uniquely by log dimensions and defect.
- Management, silviculture and harvest costs were assigned by stand, regime and logging system.

For this analysis, acreage in roads and stream buffers were removed from forested polygons (stands) using standard GIS tools. These were defined as follows (buffer widths in feet on one side of center-line):

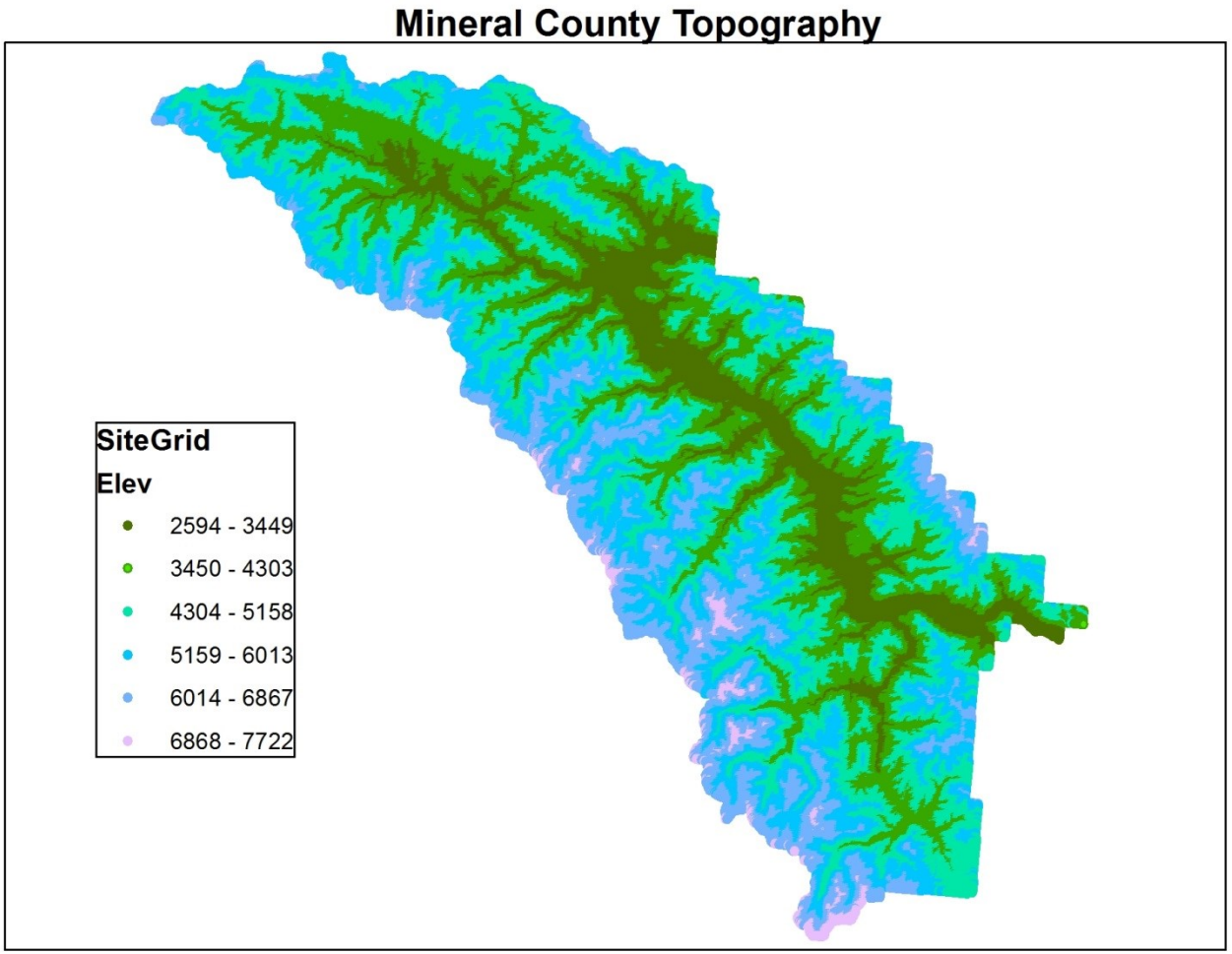
Riparian Class	Type	Buffer Width	Road Class	Type	One-Side Width
6	Lake	120	1	Railroad	30
5	River	100	2	Highway	24
4	Stream	80	3	Paved	20
3	Creek	60	4	Gravel-Main	18
2	Tributary	40	5	Gravel-Sec	16
1	Seasonal	20	6	Gravel-Spur	14
			7	Native-Active	12
			8	Trail	0

Once all of the FIA plots were compiled and the GIS layers were linked to the Inventory database, then the site index values from the FIA plots and the FBRI SiteGrid points were used to extrapolate site index to all 15,742 stands. This was accomplished by non-parametric regression of site index on growing season days, annual precipitation and soil depths.

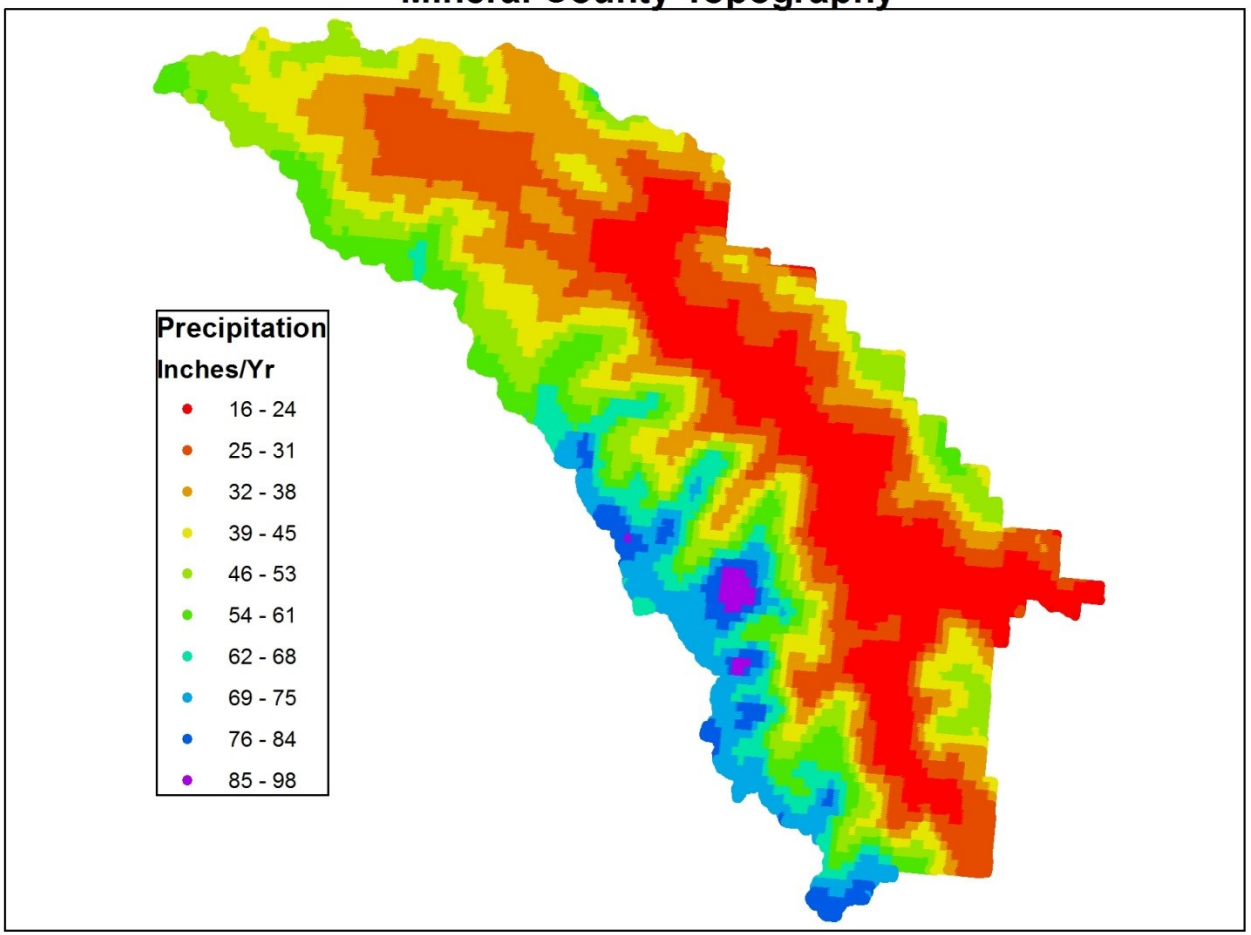
The following five charts display the elevation, precipitation, length of growing season, soils, and site capacity across the geography of Mineral County. These themes are generated from Digital Elevation Models (DEM), soil maps and Forest Biometrics Research Institute (FBRI) western regional site capacity field research trials.

The next chart displays the distribution of major species composition across the USFS Superior Ranger District within Mineral County. These charts demonstrate the gradual shift in species composion and growth capacity as the observer pans from the lower and drier northeastern elevations to the higher and wetter western mountains.

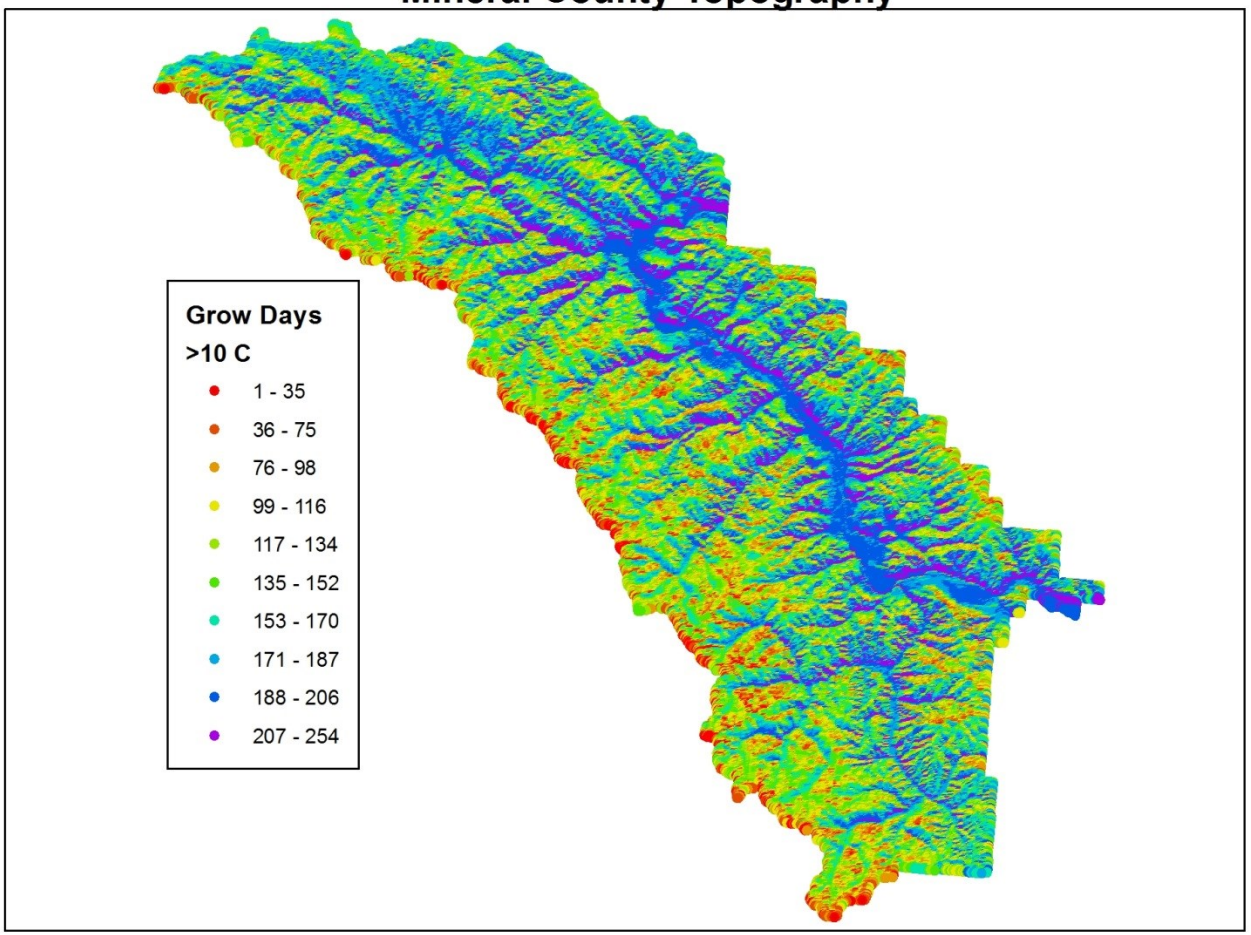
The last two charts display individual stand polygons within the Superior Ranger District for approzimatly a two-mile square area with color and label themes:
a) depicting species, size and density classes at year-end 2013; and,
b) depicting the potential schedule of harvest periods of a 100-year sustainable harvest.


Mineral County Topography
SiteGrid
Elev
2594 - 3449
3450 - 4303
4304 - 5158
5159 - 6013
6014 - 6867
6868 - 7722

Mineral County Topography

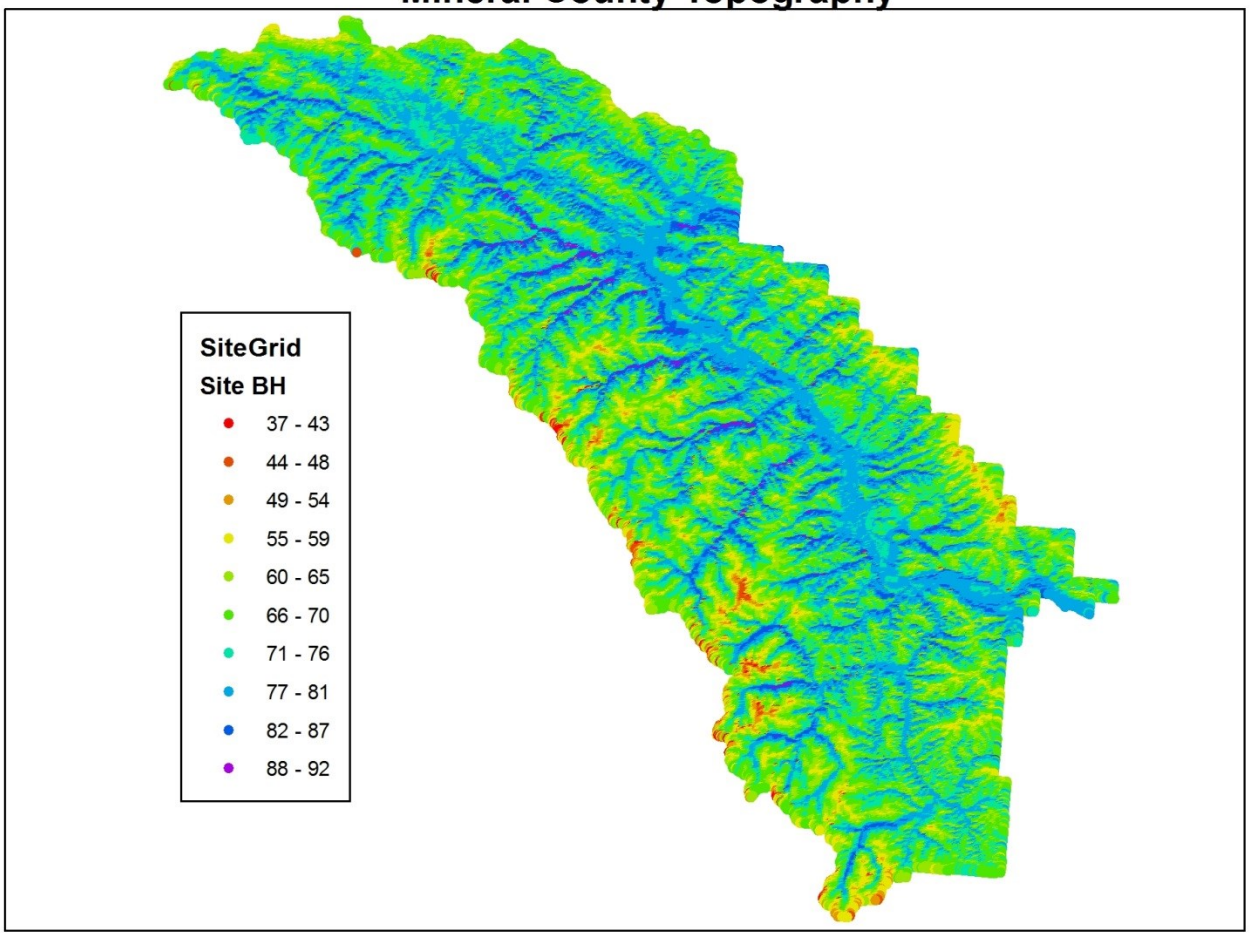


Mineral County Topography

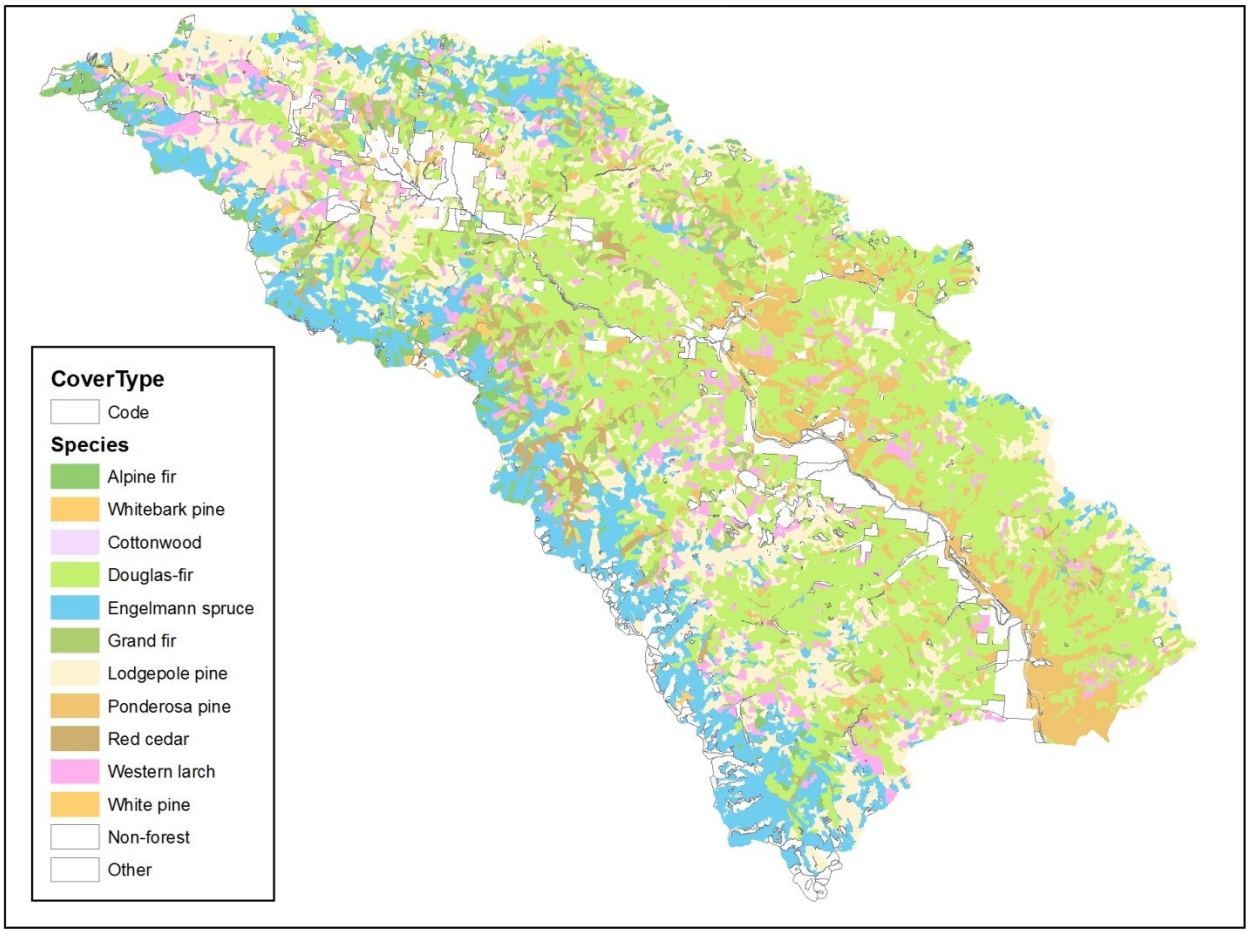


Mineral County Soils

Mineral County Topography

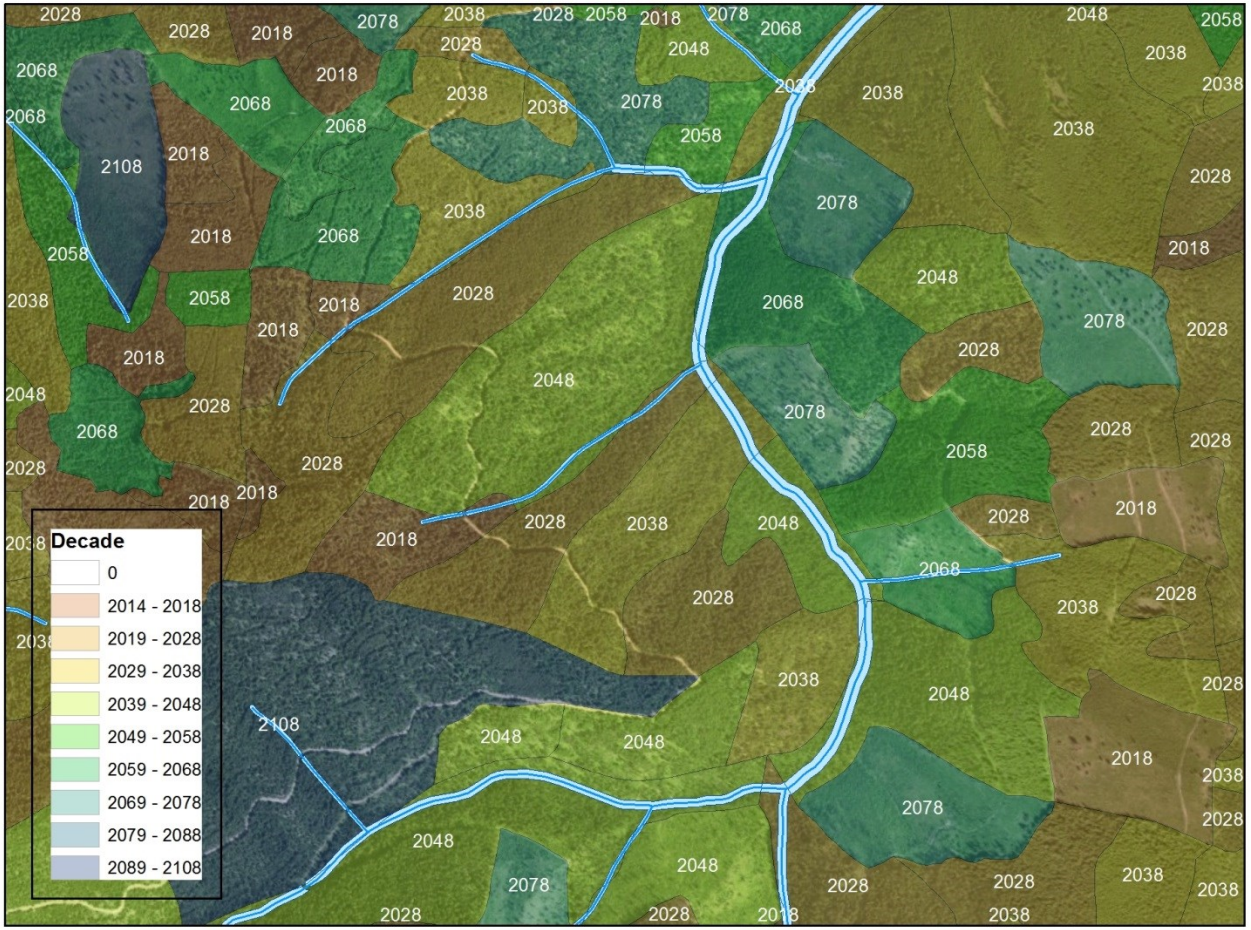


Superior Ranger District Vegetation



Forest Type Stands (Example)

Forest Type Stands (Harvest Periods)



Timber Types on Superior Ranger District

Compiling the FIA plots individually and summarizing the total number of stands and acres by aerial phototype strata (species, size and density) results in Table 1 of acreages, both cruised and un-cruised for each stratum across the District (all Habitats).

Table 1. Existing Inventory Status of Superior Ranger District
Summarized Strata Label for Expansion of FIA plots

Type	....Cruised....		...Un-cruised..		....%Sample....	
	Tally	Area	Tally	Area	%Tally	%Area
AF11	1	100.0	0	0.0	100	100
AF12	1	100.0	1	61.8	50	62
AF22	8	800.0	0	0.0	100	100
AF23	2	200.0	1	76.8	67	72
AF32	3	300.0	189	6397.2	2	4
AF33	2	200.0	76	2330.6	3	8
BC41	1	100.0	0	0.0	100	100
CW32	0	0.0	1	4.3	0	0
CW3X	0	0.0	1	11.2	0	0
CWBX	0	0.0	2	35.7	0	0
CWxx	0	0.0	5	178.9	0	0
DF11	10	1000.0	11	244.6	48	80
DF12	9	900.0	440	12579.0	2	7
DF21	6	600.0	0	0.0	100	100
DF22	34	3400.0	259	9378.2	12	27
DF23	4	400.0	0	0.0	100	100
DF31	4	400.0	280	10339.9	1	4
DF32	16	1600.0	272	10273.0	6	13
DF33	2	200.0	0	0.0	100	100
DF41	5	500.0	596	21632.8	1	2
DF42	4	400.0	4366	140649.9	0	0
ES11	1	100.0	5	439.2	17	19
ES12	1	100.0	108	3814.3	1	3
ES22	4	400.0	127	4962.2	3	7
ES33	4	400.0	1715	59040.3	0	1
GF12	1	100.0	65	1373.0	2	7
GF22	1	100.0	28	745.4	3	12
GF31	1	100.0	22	792.3	4	11
GF33	2	200.0	519	15245.7	0	1
LP11	2	200.0	12	340.4	14	37
LP12	6	600.0	267	4967.8	2	11
LP21	5	500.0	0	0.0	100	100
LP22	8	800.0	66	2443.9	11	25
LP31	1	100.0	186	6573.5	1	1
LP32	2	200.0	27	946.0	7	17
LP33	2	200.0	2548	80433.6	0	0

MH22	1	100.0	0	0.0	100	100
MH33	1	100.0	0	0.0	100	100
NONE	2	200.0	0	0.0	100	100
PP11	2	200.0	202	4795.2	1	4
PP21	3	300.0	0	0.0	100	100
PP22	1	100.0	79	2342.0	1	4
PP31	3	300.0	95	4855.9	3	6
PP32	3	300.0	31	1303.4	9	19
PP41	6	600.0	124	4455.7	5	12
PP42	1	100.0	533	20756.6	0	0
RC12	1	100.0	23	502.5	4	17
RC22	5	500.0	0	0.0	100	100
RC23	1	100.0	6	203.7	14	33
RC32	2	200.0	11	396.3	15	34
RC33	6	600.0	57	2078.7	10	22
RC43	1	100.0	190	6036.0	1	2
WH22	1	100.0	0	0.0	100	100
WH33	1	100.0	0	0.0	100	100
WL11	2	200.0	4	122.6	33	62
WL12	3	300.0	125	2755.6	2	10
WL21	2	200.0	0	0.0	100	100
WL22	4	400.0	0	0.0	100	100
WL23	1	100.0	48	1232.9	2	8
WL32	2	200.0	905	30261.1	0	1
WP22	2	200.0	93	2729.1	2	7
XF00	0	0.0	284	11760.1	0	0
XF2x	0	0.0	1	67.6	0	0
XF31	0	0.0	2	96.5	0	0
XF32	0	0.0	3	57.6	0	0
XF3X	0	0.0	5	62.2	0	0
XF41	0	0.0	6	113.0	0	0
XF42	0	0.0	15	409.5	0	0
XF4x	0	0.0	11	240.2	0	0
XFBX	0	0.0	33	2531.0	0	0
XFBx	0	0.0	11	258.6	0	0
XFGx	0	0.0	4	353.1	0	0
XFxx	0	0.0	462	13892.8	0	0
XX1x	0	0.0	1	15.4	0	0
XXxx	0	0.0	183	32109.1	0	0
Total:	210	21000.0 +	15742	543105.5 =	15952	564105.5
Percent:					1	4

FPS report tools apply the weighted by acres average volume from all sampled stands within a stratum to each of the un-sampled stands within that stratum. Each stand is then

fully populated with estimates of species, size, stocking and volume. All stands are then summed to generate forest-wide statistics. This process is documented in the FBRI – FPS Guidebook.

Size classes represent the following stand conditions:

Size Class	Description
1	Seedling & Sapling stands 0 – 5 inch diameter
2	Pole timber stands 6 – 11 inch diameter
3	Small Sawtimber stands 10 – 20 inches
4	Large Sawtimber stands 21+ inches

There now exists a complete forest inventory for the Superior Ranger District forest lands. It is based on the forest-wide phototype stratification and the FIA permanent plot grid. It provides a good basis for evaluating the proportion of acres by major forest habitat zone, elevation, precipitation and site productivity class. These are the essential ingredients necessary to this analysis of silvicultural options across the forest.

Silvicultural Regimes of Existing Stands.

With the FPS database loaded with all FIA information and stand polygons, a standard set of merchantability, silvicultural and logging costs, and log value specifications are documented and all stands are compiled and reported to those specifications. It was then possible to develop a range of silvicultural treatment regimes for all forest zone/stand type combinations. These regimes provide the ability to assess alternative management intensities under various major silvicultural system approaches (such as clear-cut harvest, seed-tree harvests, shelterwood harvests, and various intensities of selection harvests).

Silvicultural Regime Development

The major emphasis within each forest stand type was evaluation of timing, frequency, intensity and kinds of thinning prescriptions. These prescriptions were developed to achieve alternative residual stand conditions for species composition, health and value. Other prescriptions could also be developed over time to achieve maximum thinning goals of piece size, species composition, defect removal, hazard reduction, habitat development, riparian management, volume production and cash flow. Part of the consideration differing among regimes are administrative objectives for long-term trends in species diversity, habitat composition, watershed health, wildlife and cultural environments. All of these silvicultural regimes were developed using the Forest Projection and Planning System (FPS) software and libraries. It was the goal of this analysis to determine the specific silvicultural treatments and regimes most representative to meet the administrative goals and forest capacities of the USFS Superior Ranger District land base as it exists today and in the foreseeable future. This is readily achievable from the information database developed for this report.

Standard Merchantability

- **All Yield Tables and Inventory Reports**

  - Scribner Board Foot Log Rule
  - 16-foot Logs using USFS 20-ft Standard
  - Minimum 12-foot Piece Recovery
  - Minimum 6-inch Small-end Log Diameter
  - Minimum 8-inch Tree Dbh for Harvest
  - Values Assigned by Species & Log Size

Silvicultural Regimes – Even-aged

- **Clearcut and Plant**

  - Slash, Pile and Burn Residual Material
  - Plant Container Stock Species Mix (400 tpa)
  - Spot spray Vegetation Control at Planting
  - No Active Pest Control
  - Expect 60-80% Survival after 5-Years
  - Single Final Harvest at Rotation Age

- **Seed Tree Regime – 8 Trees/Acre**

  - Leave 8 Well-formed & Distributed Trees/Acre
  - Slash, Pile & Burn Residual Material
  - Plant 400 Trees in 1st Year (Optional, but preferred)
  - Spot spray Vegetation Control at Planting
  - No Active Pest Control
  - May Require Pre-Harvest Thinning
  - Leave New 8 Seed Trees/Acre at Final Harvest

- **Shelterwood Regime – 20 Trees/Acre**

  - Leave 20 Well-formed & Distributed Trees/Ac
  - Slash, Pile & Burn Residual Material
  - Interplant 300 Trees at 3rd Year (Optional, but preferred)
  - Spot spray Vegetation Control at Planting
  - No Active Pest Control
  - May Require Pre-Harvest Thinning
  - Leave New 20 Trees/Acre Canopy at Final Harvest

Silviculture Costs (When Applied)

- Site Preparation – $115/acre
- Planting Stock – $250/acre – 400 trees
- Pre-commercial Thinning – $150/acre
- Pruning – $85/acre
- Commercial Thinning – $110/Mbf

Logging & Administrative Costs Applied

- **Logging Systems**
  - Skidder Operations – $170/Mbf
  - Cable Systems – $200/Mbf
  - Helicopter Removal - $390/Mbf
- **Administration**
  - Facilities, Roads, Staff - $17.50/acre /year
  - 3.0% Annual Inflation Assumed
  - 0.5% Real Wood Appreciation Included
  - 7.0% Discount Rate Applied for NPV

Table 2. Assumed Rotation Ages (Even-aged Silviculture)

Site Class	Rotation Age
40	100 Years
50	90 Years
60	80 Years
70	70 Years
80	60 Years
90	60 Years

Taking the volume per acre, average log size and logging system combinations provides a basis to identify the harvest cost applied in each stand.

Delivered Log Values are used in this analysis in order to apply real wood appreciation rates separately from inflation rates over time. Delivered log values are a much more definitive value basis since Stumpage values may have an unknown array of costs assigned that confound any ability to compute net present values of future harvests.

Table 3. Delivered Log Values Applied

Dimensions	Delivered Log $/Mbf
Residuals > 1" Dib Logs	55.00
Pulp 2-5" Dib Logs	125.00
Chip-N-Saw 5-8" Logs	235.00
Small Saw 8-12" Logs	375.00
Large Saw 12+" Logs	480.00

Once again, it is important to define Delivered Log Values completely separate from all costs in order to apply real wood appreciation rates to value only while applying inflation rates to both log values and to all harvest, silvicultural and adimistrative costs.

Using stumpage values tends to confuse the results of most economic analyses because only part of the cost has been removed from the net revenue values. Comparison of alternative silvicultural regimes over time involves choice of logging systems and impacts of real wood appreciation and inflation rates. These factors all work independently from one another and thus should not be aggregated too early in the analyses.

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
5001 Southgate Drive
Billings, Montana 59101-4669
www.blm.gov/mt

In Reply Refer To:
1615 (912.ML)

August 14, 2014

RECEIVED
AUG 15 2014
LEGISLATIVE ENVIRONMENTAL POLICY OFFICE

Environmental Quality Council
P.O. Box 201704
Helena, Montana 59620-1704

Dear Environmental Quality Council:

The Montana Bureau of Land Management very much appreciates the opportunity to provide comments on the Montana legislative interim Environmental Quality Council's study of federal land management in the state.

We have actively followed the issues raised by the EQC and its SJ 15 work group since the study began. We have had a BLM representative at all interim EQC meetings and at nearly every SJ 15 work group meeting. We have engaged with the EQC not as a proponent, or an opponent, of the study but instead with the desire to help inform the discussion about federal land management issues. We have, on numerous occasions, testified before the EQC and provided requested background information to council members.

The BLM manages more than 8 million acres of public land and 41.4 million acres of subsurface mineral estate in Montana for the benefit of not only Montanans but also the citizens of the United States as a whole. These lands provide habitat for wildlife, forage for domestic livestock, forest products ranging from Christmas trees to commercial timber, and a wide range of recreational opportunities. The federal mineral estate, which includes oil, natural gas and coal, is a critical source of energy as our nation works to develop domestic resources while creating jobs.

We currently enjoy our relationship with the State of Montana, working collaboratively on management issues such as the Governor's Advisory Council on Sage Grouse Management, Fire and Aviation, and public land access. We have in the past been an active participant in the Montana State Legislature's Interim Fire Committee.

As you are aware, the BLM works with a checker-boarded land pattern intermingled with tribal reservations as well as state- and privately-owned land here in the Treasure State. We have been entrusted with the role of responsible stewardship and conservation of natural resources like timber, grazing, minerals, coal, oil and gas, water, and wildlife, and the economic and public-safety impacts from each of those resources. The BLM manages for multiple use and sustained yield, and we take that role and those responsibilities seriously. We are continually striving to improve the way we manage and maintain the land under federal regulations and laws mandated by Congress. To put it simply, we are a small agency with a big and complex mission: to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations.

Our employees are an integral part of Montana's communities and the work they do every day contributes to the overall health of the state—both in terms of its natural resources and its economic health. From the college-age intern to the managers of our field offices, our BLM family adds to the quality of life for all Montanans and those who visit our Big Sky state. Each time a hiker finds peaceful solitude in the shadows of the Humbug Spires or a family traveling west from New Jersey pulls off the interstate to visit Pompeys Pillar, you are seeing the fruits of our employees' labors. Though it's hard to put a price tag on this kind of outdoors experience, I can tell you that recreational activities on BLM lands have an estimated total economic impact of more than $300 million annually; of that, more than $200 million contributes to local economies in terms of employment and other economic benefits directly associated with BLM-managed lands and resources. In Fiscal Year 2013, energy and mineral production brought in royalties of more than $77 million to the state.

Even though the management of our public lands is guided by federal laws and regulations, I consider our working relationships with local government to be of vital importance. Our managers and the employees who work for them, invest significant amounts of time into establishing and maintaining a working relationship with their county commissioners. We strive every day to work across land jurisdictions in a collaborative and seamless way with our Montana partners.

Through Cooperating Agency status, we are able to invite state, local and tribal governments, along with other federal agencies, to share their insights so that we can formulate plans that better reflect the needs and conditions of the communities we serve. In particular, Resource Management Plans are our foundational documents and we place emphasis on building them to be consistent with county land-use plans. We have a commitment to interacting with community stakeholders as we conduct planning activities as guided by the National Environmental Policy Act.

The BLM has led the way in establishing a culture of cooperation, collaboration, and partnership in its land use planning process by implementing regulations that establish a consistent role for cooperating agencies. State and field offices are required to engage their government partners consistently and effectively in the preparation or revision of land use plans. In 2008 the Department of the Interior broadened its regulations to require every Interior agency to offer cooperating agency status to all eligible intergovernmental partners for all environmental impact statements. The Department also indicated that cooperating agency procedures could be used to support efforts conducted under environmental assessments. We believe that by working closely with our state, local, tribal, and federal government partners, we improve communication and understanding, identify common goals and objectives, and enhance the quality of our management of the public lands.

I look forward to continuing to work with the State of Montana in the direction of -- as stated in your primary recommendation of the study -- a "partnership with federal land managers to help meet forest management goals and objectives." Thank you for this opportunity to share my thoughts on the EQC's draft report on federal lands management and the role the BLM plays in managing this beautiful state's resources. As we like to say here in Montana, it's "Your Land. Your Treasure."

Sincerely,

Jamie E. Connell

Jamie E. Connell
State Director

Dear jkolman, SJ15 Group and EQC: 8/14/14

Since 1905 or over one hundred nine years the USFS has been managing public lands in our area Region One of 13 forests. They have had one hundred years to get it right but instead we find ourselves in the present miserable condition of disuse. The USFS has become a rogue agency that cannot be reasoned with and that really isn't "Caring for the land and serving people". It is serving the interests of the WO in concert with Executive Branch politics. Because of this the responsibility over federal lands in the state of Montana should be given to the state via the Enabling Act of 1889 and the lands manged by the people of the state rather than the people in Washington.

I take issue with the EQC on two items. One is the statement, " 11. The Legislature should not pursue the transfer of federally-owned lands to the state of Montana until all other options are investigated." I think that there will never be an end to the investigating of options and the status quo will be the rule.
This statement implies that the state should not go forward with transfer of public lands legislation to acquire what the Federal Gov. promised the state of Montana through the Montana Statehood agreement document "Enabling Act of 1889". That being granting unreserved lands to the state that the Federal Gov. now holds in trust for Montana. Montana must go forth and ask to have the promise kept now especially before the Federal Gov. is too broke to live up to it.

The second is, "1. In cooperation with SJ15 work group members, the governor's office shall establish Federal Lands Committee that works to coordinate, collaborate, and assist federal, state, county, public, and private land managers to resolve problems and expedite project planning and implementation."
It has been proven that the logging industry, sportsmen, environmental groups cannot work together without conflict and stagnation as there are elements in the groups that are really intent on bringing chaos and angst and want to stop all resource activities. An end to the public involvement must begin and trust be put in the Forest Managers of the State of Montana.
Thank you for listening.

Sincerely, Dave Ensign
USFS Retired

MISSOULA COUNTY

BOARD OF COUNTY COMMISSIONERS
200 W BROADWAY ST
MISSOULA MT 59802-4292

PHONE: (406) 258-4877
FAX: (406) 721-4043

BCC 2014-102
August 5, 2014

Environmental Quality Council
ATTN: Joe Kolman, SJ15 Survey
Room 171B, Capitol Building
P.O. Box 201704
Helena, MT 59620-1704

Dear Mr. Kolman:

Missoula County is committed to efforts to improve land management on federal and non-federal lands. We previously responded to the survey the Environmental Quality Council (EQC) sent to selected counties regarding public land management, as well as a request about priority forest management projects. We appreciate the numerous opportunities to provide input on such matters. We have taken the opportunity to review the SJR 15 Evaluating Federal Land Management in Montana draft report. Our suggestions and comments are detailed below.

The report outlines the process through which the SJ-15 working group collected information on federal land management issues, the relevant information collected, and a list of findings and recommendations based on their efforts. We have a few suggestions on how to strengthen the report. First, it is important to add citations to statements in the list of findings. This would clarify which statements are fact and which are opinions, and if opinions were from survey results, testimony, or another source. This would create a clearer connection between the information gathered and the findings. Second, the list of recommendations consist of a variety of approaches to solving the identified problems, but it is not always clear which problem the recommendation pertains to and what objective or goal it would achieve. Specific goals should be added to the report, and each recommendation should be more clearly linked to the findings and the goal that it would achieve or work towards.

In terms of the specific actions and solutions recommended in the report, we support approaches that rely on collaboration and result in more effective partnerships between local government and federal land managers. We have had positive experiences working with federal, state, and local land managers through our Rural Land Manager's Memorandum of Understanding. This quarterly meeting of land managers working in Missoula County provides opportunities to hear about current and future projects and allows for Missoula County to convey our objectives early in the process. The recommendation in the report to form a Federal Lands Committee would likely have similar benefits. Additionally, this group could foster a more comprehensive solution to problems that are not unique to federal land, such as hazardous fuels reduction and noxious weed management, which need to be addressed across jurisdictional boundaries. Related to this, we think it would be very beneficial for local governments to be given some assistance in building strong partnerships with federal land managers, as suggested in the recommendations.

We also support recommendations that will make it easier for local government and rural communities to solve problems they are experiencing. One such recommendation in the report is to find a way for volunteers to help carry out projects on federal lands, which is currently difficult due to liability issues. Our rural communities could really benefit from the ability to organize themselves and help with projects such as hazardous fuels reduction, facility maintenance, and weed management. Missoula County supports the recommendation to

enable legislation that would allow local jurisdictions to adopt Wildland Urban Interface (WUI) building codes that increase a structures fire resistance in the WUI. Without changes at the state level, local governments have fewer options when trying to improve safety for our residents, their property and the safety of emergency responders. Finally, recommendations to identify funding sources for fuels reduction, habitat enhancement, and other projects would be very beneficial to counties that would like to participate in cost-share agreements with federal land management agencies or other partnership agreements in order to accomplish shared goals.

We do not support the recommendation for legislators to pursue transferring federal lands to state ownership. This suggestion lacks legal and economic feasibility and we do not think it should be considered even as a final option.

We recognize that counties can experience conflicts regarding land management on private, state, tribal, and federal lands. We support solutions that focus on building partnerships and collaborating with all land management agencies. Many natural resource management issues affect multiple landowners and agencies, and through these partnerships, problems that are shared by multiple jurisdictions can be solved to the benefit of our citizens.

If you have any questions, please contact us, or our Chief Planning Officer, Patrick O'Herren (406-248-4981), at your earliest convenience.

Sincerely,
BOARD OF COUNTY COMMISSIONERS

Jean Curtiss

Jean Curtiss, Chair

Bill Carey

Bill Carey, Commissioner

NOT AVAILABLE FOR SIGNATURE

Michele Landquist, Commissioner

cc: Tim Garcia, Forest Supervisor, Lolo National Forest
Chip Weber, Forest Supervisor, Flathead National Forest
Julie King, Forest Supervisor, Bitterroot National Forest
Faye Krueger, Regional Forester, USFS Region 1
Bob Harrington, Administrator, DNRC Missoula Forestry Division
John Thompson, Acting Field Manager, BLM Missoula Field Office
Senator Cliff Larsen

File Code: 1560
Date: August 15, 2014

Honorable John Brendan
Chair
Montana Legislative Environmental Quality Council
P.O. Box 201704
Helena, MT 59620-1704

Dear Mr. Brendan:

The Northern Region of the United States Forest Service appreciates the opportunity to provide comments related to the Montana legislative interim Environmental Quality Council's ("EQC") study of federal land management in Montana.

As with other legislative interim topics pertinent to the Northern Region, we have engaged with the EQC and its SJ15 work group since the inception of the study. We have engaged not as a proponent, or an opponent, of the study but instead with the intent to help inform the dialogue. We have appreciated the time spent by the EQC in touring the Tenmile watershed with Forest Supervisor Avey and his staff to discuss the Red Mountain Flume/Chessman Reservoir project. Since the inception of the study, the Region has provided numerous subject matter experts to speak to the SJ15 working group on a wide array of subjects from contracting to volunteers to implementation of the Farm Bill.

The USFS Northern Region manages more than 17 million acres in Montana for the benefit of not only Montanans but also the rest of the citizens of the United States. I value collaborative solutions that recognize the current framework of laws and management complexities associated with these lands in Montana. These 17 million acres are spread across nine National Forests and managed under a complex framework of Acts of Congress (Organic Act, MUSYA, ESA, APA, NFMA) and applicable case law. However, our partnership with the State of Montana dates back to before it was forged during the Great Burn of 1910. As your work group has heard, State-USFS issues on which we are currently engaged include but are not limited to fire suppression, fish and wildlife management, law enforcement, forest health protection, providing and managing recreation opportunities, and protecting soil, air, and water resources. The master stewardship agreement between the USFS and the State of Montana is an example of the continuing evolution of this partnership, and we are already seeing the agreement mature into site specific stewardship projects such as the Red Mountain Flume/Chessman Reservoir project in Montana.

Similarly, even though the constituency of National Forest System lands is national in scope, I consider our working relationships with local government to be of great importance. During my time as Regional Forester I have worked to establish and maintain a relationship with the Montana Association of Counties, particularly MACO's Public Lands Committee. In addition, the Forest Supervisors of the National Forests in Montana, and the District Rangers who work for them, as well as their employees, invest significant time into maintaining a working

relationship with their county commissioners. It is my understanding that at an earlier EQC the topic of a memorandum of understanding with the Montana Association of Counties was broached. My staff has drafted a preliminary proposal based on FS/State County Association MOUs already in existence and I anticipate we will be in discussions on this matter with MACO's public lands committee in the very near future. However, consistency between Forest service plans or projects and state/county laws and ordinances is not always going to be possible given our mandate by Congress to manage National Forest System lands for the benefit of the citizens of the United States, nor is it required unless specifically provided for by law.

It is my desire that, whatever form the study itself finally takes, that EQC recognizes that working together we can achieve so much more between the State and the Forest Service. This spirit of partnership is inherent in countless activities, projects, and initiatives that happen across the state each year on National Forest System lands in Montana. I look forward to continuing to work with the State of Montana in the direction of - as stated in your primary recommendation of the study - a "partnership with federal land managers to help meet forest management goals and objectives."

Sincerely,

/s/ Faye L. Krueger
FAYE L. KRUEGER
Regional Forester

Enclosure

<u>SJ15 Comments provided by US Forest Service Region One (please see accompanying cover letter from Regional Forester Faye Krueger)</u>

Applicable throughout document

- Please change "Forest Service lands" to "National Forest System lands"
- The term "multiple use access" is used in several points in the study. It appears that the general meaning is a system road or trail which is open for motorized travel, but this is a somewhat ambiguous term that could be clarified. Multiple use means managing resources under the best combination of uses to benefit the American people while ensuring the productivity of the land and protecting the quality of the environment. Not all potential uses of these Federal lands are carried out on every acre, but a balance is determined through professional judgment and public opinion.

Specific citations in non-matrix portion of report

- (Page 14) – "Is federal lands consistent with county objectives?" While it is an important function of National Forest Systems lands to provide services to communities, these lands are reserved by Congress as National Forests. Region One's Forest Supervisors and District Rangers spend significant time considering the interests and concerns of local counties. We are also preparing a memorandum of understanding for discussion with representatives of the Montana Association of Counties. However, as was stated in the memo which was shared with the SJ15 work group, while we strive to be a good neighbor, management of National Forest System lands is not subordinate to local ordinances nor are we required under law to be consistent with county objectives unless it is provided for in federal law.
- (Page 14) "What is influence of special interests on federal land management?" The terminology used here is vague and difficult to understand. It is conceivable that nearly all "interests" who express concerns or desires with regard to management of National Forest System lands could view either themselves or those who they disagree with as being "special interests." We are required by law to consider all comments submitted by citizens or organizations of the United States, whether local or nonlocal, although we do strive to meet and discuss issues with local government as needed or requested.
- (Page 16) Supervisor Avey did not testify that "95% of the trees within the watershed are dead from a bark beetle infestation that proliferates in dense, even aged stands of timber like this." His actual comments were "…specific to the Tenmile watershed, we are dealing with an infestation which has impacted 95% of the watershed." An acre may be impacted without every tree being killed, although the mortality is closer to 90%.
- (Page 16) "Shortly after the field trip, the Forest Service's proposed fuel reduction project was met with formal objections and, although the agency now considers the objections resolved, the project is subject to litigation under the Equal Access to Justice Act." This statement is incorrect. Every project the Forest Service implements could be subject to litigation under our system of government, just as with a state-implemented project. However the project is not being litigated under the Equal Access to Justice Act, but instead the Endangered Species Act, National Forest Management Act, National Environmental Policy Act, and Appeals Reform Act. In 1980, Congress passed the Equal Access to Justice Act to allow parties that prevail in cases against federal agencies to seek reimbursement from the federal government for attorney fees, where doing so was not previously authorized.

- (Page 18) Finding 5c: "Economic productivity needs to be substantially increased where appropriate and desired by Montana citizens." This statement lacks any specifics, but appears to refer to the opportunities available to the public to help determine which uses are most appropriate in which areas of the National Forest by way of participating in the forest plan revision process.
- (Page 18) Finding 7 "Increase accountability: State and local entities should ensure laws favorable to state and local priorities are being followed." As mentioned earlier, with management of National Forest System lands, while it is our intent to strive for compatibility with state and local laws, we are obligated to comply with applicable laws whether or not they are viewed as "favorable" to state and local priorities.
- (Page 20) Good neighbor authority: the 2nd paragraph incorrectly states the provisions of Good Neighbor Authority, and instead appears to confuse it with Stewardship Authority.

Matrix comments

- (Throughout matrix) a number of the statements in the matrix are value-laden and therefore somewhat difficult to respond to in comment (for example what is meant by "unfavorable laws, rules, policies")
- Matrix –1. Infrastructure.D.5: It is unclear what is meant by "employ HSW jurisdiction" and therefore we are unable to respond appropriately.
- Matrix – 1.Infrastructure.D.15: The Forest Service does not recognize "coordinating agency status" but rather "cooperating agency status" as has been stated in workgroup meetings.
- Matrix – 1.Infrastructure.D.15: Per federal law, resource plans are not required to be "consistent with local plans."
- Matrix –4. Fish & Wildlife.F: The "Smoked Bear Report" is referenced here as well as elsewhere. This report purports to calculate the actual number of wildlife which are burned, by state, by year since 2002. The report's assumptions appear to be reliant (for all western states regardless of habitat type) on a standard mortality/acre figure (3), with acknowledgement that "insufficient research has been done to develop a definitive factor." The conclusions do not appear to be based on scientifically robust methodology.
- Matrix – 4.Fish & Wildlife 4: Some of the statements contradict the presentation to the 2013-2014 water policy interim committee regarding the effects of fire on fish population by Mike Jakober (USFS), Chris Clancy (FWP) and Chris Eby (U of MT). We ask that you provide additional information from their presentation to better inform the dialogue on the relationship between fire and aquatic ecosystems in Montana.
- Matrix – 6.Multiple Use D.5: See previous comment related to "multiple use access"
- Matrix – 10.Scientific Integrity B: Unable to provide specific comments on this item as it is unclear what is meant by "Remove bias, concentrate on facts instead of philosophy. Require minority report."
- Matrix – 20.Hesitancy: This topic lacks specifics and it is unclear when this was actually discussed during SJ15 work group when searching the record for context.
- Matrix-31.Contractors: Detailed presentations were given on this issue. Please include links to the documents provided by the Forest Service during the presentation we gave on this topic (by Preite, Reckley, et al) to better address statements made in this section of the matrix.

From: Keith Hammer
To: Kolman, Joe
Subject: Comments on SJ15 Federal Land Study Draft Report
Date: Tuesday, August 05, 2014 11:27:12 AM
Attachments: Annotated_Bibliography.pdf
FFP FEIS 1974 Timber Base.pdf

We have read the draft Evaluating Federal Land Management in Montana report called for in SJ15 and offer the following comments:

1. We are disappointed to find that the surveys reported in the opening pages of the report read more like a "push poll," wherin the phrasing of the questions solicit a desired/biased response.

2. The survey results and other information in the draft report are at odds with the majority of the scientific research that has been focused on these issues, including the exhaustive Interior Columbia Basin Ecosystem Management Project. This and other research has found that ecosystems are most resilient where they have not been roaded and managed, and least resilient where they have. These studies and the EIS written for what became President Clinton's Roadless Rule also found that managed lands were of greater risk of fire, especially human-caused fire, than unmanaged roadless lands - due both to the human access provided by roads and the removal of the most fire-resistant trees by logging being replaced by smaller fuels and logging slash.

The draft report instead is headed down the path of building more roads, keeping all old roads, opening closed roads, and increasing logging and other management activities. This will make matters worse instead of better and there is good reason that federal land management has over past decades removed roads, closed roads and decreased logging in order to help restore ecosystems and safeguard the American taxpayer from the unwarranted costs of inflated road and logging programs. We attached to this email a copy of our Annotaded Bibliography for Conserving Native Ecosystems, which summarizes relevant findings of the ICBEMP, Roadless EIS and other research relevant to the draft report. We ask that this Bibliography be reviewed in its entirety and included in the resources listed in the report.

3. Federal agencies have found the American taxpayer cannot afford to continue with inflated road building and logging plans. It is a great error for State and County governments to think they can better afford to put federal lands back on a path of increased road access and logging. In its final EIS for the 1986 Flathead Forest Plan, the Flathead noted it had attempted in 1974 to slow down its road building and logging of old growth forests to better protect its watersheds and because "taxpayers couldn't afford road building costs necessary to cut old growth" that fast. We've attached the relevant pages of the FEIS, which notes a number of timber mills sued the Flathead to "keep up the cut" and the road building.

The lesson learned here is that, even in its logging hey day of cutting the biggest old growth trees, Flathead National Forest timber sale revenues did not pay for the necessary road access. The American taxpayer was paying for it and continues to pay for the costly maintenance of an inflated road system and industry continues to flex its muscle in order to retain these taxpayer subsidies.

We urge you to correct the bias inherent in the draft report and find that transferring control and/or ownership of federal lands in Montana to State or County government is a very bad and flatly unaffordable proposition that will most certainly spell disaster for all concerned, including fish and wildlife inhabitants of these public lands.

In the event that the attachments to this email become disassociated from it, our Annotated Bibliography can be found at:
http://www.swanview.org/reports/Annotated_Bibliography.pdf

The pertinent pages of the Flathead Forest Plan FEIS can be found at:
http://www.swanview.org/reports/FFP_FEIS_1974_Timber_Base.pdf

Thank you for the opportunity to comment on the draft report,

Keith

Keith Hammer - Chair
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http://www.swanrange.org
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http://www.youtube.com/user/swanviewcoalition

"Nature and human nature on the same path."

Annotated Bibliography
For
Conserving Native Ecosystems

Swan View Coalition and Friends of the Wild Swan
March 6, 2014

Scientific Findings on Roads and Roadless Lands

Virtually without exception, science is finding that ecological integrity remains highest in areas that remain unroaded and unmanaged and is lowest in areas that have been roaded and managed. As the density of roads increases, aquatic integrity and wildlife security decreases, while the risk of catastrophic wildfire and the occurrence of exotic weeds increases. The simplest and most cost-effective thing the Forest Service can do to maintain and restore aquatic and ecosystem integrity is to stop building roads and to obliterate in an environmentally sound manner as many roads as possible. This conclusion is supported by the following:

"Areas that are more highly roaded actually have a higher potential for catastrophic wildfires than inventoried roadless areas. Other national assessments have arrived at the same conclusions. [] The fire occurrence data revealed the following key points:

- Nationally, the average size of a large wildfire is greater on NFS lands outside of an inventoried roadless area;

- Nationally, the average size of a large wildland fire started by humans is greater on land outside of inventoried roadless areas;

- Regardless of the cause, a wildland fire ignition was nearly 2 times as likely to occur outside of an inventoried roadless area;

- A human ignited wildland fire is nearly 4 times as likely to occur outside of an inventoried roadless area." (Forest Service Roadless Area Conservation DEIS, page 3-157; hereafter USFS 2000).

"The U.S. Fish and Wildlife Service [] found that bull trout are exceptionally sensitive to the direct, indirect, and cumulative effects of roads. Dunham and Rieman [] demonstrated that disturbance from roads was associated with reduced bull trout occurrence. They concluded that conservation of bull trout should involve protection of larger, less fragmented, and less disturbed (lower road density) habitats to maintain important strongholds and sources for naturally recolonizing areas where populations have been lost." (USFS 2000, page 3-82, parenthesis in original).

"Hitt and Frissell [] showed that over 65% of waters that were rated as having high aquatic biological integrity were found within wilderness-containing subwatersheds. [] Trombulak and Frissell [] concluded that [] the presence of roads in an area is associated with negative effects for both terrestrial and aquatic ecosystems including changes in species composition and population size." (USFS 2000, pages 3-80-81).

"High integrity [forests] contain the greatest proportion of high forest, aquatic, and hydrologic integrity of all [] are dominated by wilderness and roadless areas [and] are the least altered by management. [] Low integrity [forests have] likely been altered by past management [] are extensively roaded and have little wilderness." (USFS 1996a, pages 108, 115 and 116).

"Much of this [overly dense forest] condition occurs in areas of high road density where the large, shade-intolerant, insect-, disease- and fire-resistant species have been harvested over the past 20 to 30 years. [] Fires in unroaded areas are not as severe as in the roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in the unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. [] In general, the effects of wildfires in these areas are much lower and do not result in the chronic sediment delivery hazards exhibited in areas that have been roaded." (USFS 1997a, pages 281-282).

"Increasing road density is correlated with declining aquatic habitat conditions and aquatic integrity [] An intensive review of the literature concludes that increases in sedimentation [of streams] are unavoidable even using the most cautious roading methods." (USFS 1996b, page 105).

"This study suggests the general trend for the entire Columbia River basin is toward a loss in pool habitat on managed lands and stable or improving conditions on unmanaged lands." (McIntosh et al 1994).

"The data suggest that unmanaged systems may be more structurally intact (i.e., coarse woody debris, habitat diversity, riparian vegetation), allowing a positive interaction with the stream processes (i.e., peak flows, sediment routing) that shape and maintain high-quality fish habitat over time." (McIntosh et al 1994).

"Although precise, quantifiable relationships between long-term trends in fish abundance and land-use practices are difficult to obtain (Bisson et al. 1992), the body of literature concludes that land-use practices cause the simplification of fish habitat []." (McIntosh et al 1994).

"Land management activities that contributed to the forest health problem (i.e., selective harvest and fire suppression) have had an equal or greater effect on aquatic ecosystems. If we are to restore and maintain high quality fish habitat, then protecting and restoring aquatic and terrestrial ecosystems is essential." (McIntosh et al 1994).

"Native fishes are most typically extirpated from waters that have been heavily modified by human activity, where native fish assemblages have already been depleted, disrupted, or stressed []." (Moyle et al 1996).

"Restoration should be focused where minimal investment can maintain the greatest area of high-quality habitat and diverse aquatic biota. Few completely roadless, large watersheds remain in the Pacific Northwest, but those that continue relatively undisturbed are critical in sustaining sensitive native species and important ecosystem processes (Sedell, et. al 1990; Moyle and Sato 1991; Williams 1991; McIntosh et al. 1994; Frissell and Bayles 1996). With few exceptions, even the least disturbed basins have a road network and history of logging or other human disturbance that greatly magnifies the risk of deteriorating riverine habitats in the watershed." (Frissell undated).

"[A]llocate all unroaded areas greater than 1,000 acres as Strongholds for the production of clean water, aquatic and riparian-dependent species. Many unroaded areas are isolated, relatively small, and most are not protected from road construction and subsequent timber harvest, even in steep areas. Thus, immediate protection through allocation of the unroaded areas to the production of clean water, aquatic and riparian-dependent resources is necessary to prevent degradation of this high quality habitat and should not be postponed." (USFWS et al 1995).

"Because of fire suppression, timber harvest, roads, and white pine blister rust, the moist forest PVG has experienced great changes since settlement of the project area by Euroamericans. Vast amounts of old forest have converted to mid seral stages." (USFS/BLM 2000, page 4-58).

"Old forests have declined substantially in the dry forest PVG []. In general, forests showing the most change are those that have been roaded and harvested. Large trees, snags, and coarse woody debris are all below historical levels in these areas." (USFS/BLM 2000, page 4-65).

"High road densities and their locations within watersheds are typically correlated with areas of higher watershed sensitivity to erosion and sediment transport to streams. Road density also is correlated with the distribution and spread of exotic annual grasses, noxious weeds, and other exotic plants. Furthermore, high road densities are correlated with areas that have few large snags and few large trees that are resistant to both fire and infestation of insects and disease. Lastly, high road densities are correlated with areas that have relatively high risk of fire occurrence (from human caused fires), high hazard ground fuels, and high tree mortality." (USFS 1996b, page 85, parenthesis in original).

In simpler terms, the Forest Service has found that there is no way to build an environmentally benign road and that roads and logging have caused greater damage to forest ecosystems than has the suppression of wildfire alone. These findings indicate that roadless areas in general will take adequate care of themselves if left alone and unmanaged, and that concerted reductions in road densities in already roaded areas are absolutely necessary.

Indeed, other studies conducted by the Forest Service indicate that efforts to "manage" our way out of the problem are likely to make things worse. By "expanding our efforts in timber harvests to minimize the risks of large fire, we risk expanding what are well established negative effects on streams and native salmonids. [] The perpetuation or expansion of existing road networks and other activities might well erode the ability of [fish] populations to respond to the effects of large scale storms and other disturbances that we clearly cannot change." (Reiman et al 1997).

The following quotes demonstrate that trying to restore lower severity fire regimes and forests through logging and other management activities may make the situation worse, compared to allowing nature to reestablish its own equilibrium. These statements are found in "An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins, Volume 3 (ICBEMP):

"Since past timber harvest activities have contributed to degradation in aquatic ecosystems, emphasis on timber harvest and thinning to restore more natural forests and fire regimes represent risks of extending the problems of the past." (ICBEMP page 1340).

"Proposed efforts to reduce fuel loads and stand densities often involve mechanical treatment and the use of prescribed fire. Such activities are not without their own drawbacks -- long-term negative effects of timber harvest activities on aquatic ecosystems are well documented (see this chapter; Henjum and others 1994; Meehan 1991; Salo and Cundy 1987)." (ICBEMP page 1340).

"Species like bull trout that are associated with cold, high elevation forests have probably persisted in landscapes that were strongly influenced by low frequency, high severity fire regimes. In an evolutionary sense, many native fishes are likely well acquainted with large, stand-replacing fires." (ICBEMP page 1341).

"Attempts to minimize the risk of large fires by expanding timber harvest risks expanding the well-established negative effects on aquatic systems as well. The perpetuation or expansion of existing road networks and other activities might well erode the ability of populations to respond to the effects of fire and large storms and other disturbances that we cannot predict or control (National Research Council 1996). (ICBEMP page 1342).

"Watersheds that support healthy populations may be at greater risk through disruption of watershed processes and degradation of habitats caused by intensive management than through the effects of fire." (ICBMP page 1342).

"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity. If not accompanied by adequate reduction of fuels, logging (including salvage of dead and dying trees) increases fire hazard by increasing surface dead fuels and changing the local microclimate. Fire intensity and expected fire spread rates thus increase locally and in areas adjacent to harvest". (USFS 1996c, pages 4-61-72).

"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes...As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. Even though these hazards diminish over time, their influence on fire behavior can linger for up to 30 years in dry forest ecosystems of eastern Oregon and Washington". (Huff et al 1995).

The answer, therefore, is not to try managing our way out of this situation with more roads and timber harvest/management. In summary:

• Roads have adverse effects on aquatic ecosystems. They facilitate timber sales which can reduce riparian cover, increase water temperatures, decrease recruitment of coarse woody debris, and disrupt the hydrologic regime of watersheds by changing the timing and quantity of runoff. Roads themselves disrupt hydrologic processes by intercepting and diverting flow and contributing fine sediment into the stream channels which clogs spawning gravels. High water temperatures and fine sediment degrade native fish spawning habitat.

According to the U.S. Forest Service 82% of all bull trout populations and stream segments range-wide are threatened by degraded habitat conditions. Roads and forest management are a major factor in the decline of native fish species on public lands in the Northern Rockies and Pacific Northwest.

• An open road density (ORD) of one mile per square mile of land reduces elk habitat effectiveness to only 60% of potential. When ORD increases to six miles per square mile, habitat effectiveness for elk decreases to less than 20%. (Lyon 1984).

• Black bears in southern Appalachia begin avoiding Forest Service roads when the density exceeds 0.8 miles per square mile. (Brody 1984). Grizzly bears use habitats less than expected when ORD exceeds one mile per square mile and total road density (TRD) exceeds two miles per square mile. (Mace and Manley 1993). Open roads contribute to grizzly bear mortality by poaching and, especially during the black bear hunting season, by mistaken killing. (Holland 1985).

• Roads have a similar, devastating effect on wolves. Studies show that wolves fail to survive in areas where ORD exceeds 0.93 miles per square mile. (Thiel 1985).

• Sediment from roads, both open and closed, damages the environment. In northwest Montana, for instance, 80-90% of the sediment produced by logging and road construction generally is attributable to the road (USFS 1985). The Flathead National Forest estimates that, on one of its most pervasive and sensitive land types, one mile of road produces 98 tons of sediment, 80% of which reaches the stream bed (USFS undated).

In addition, the Forest Service estimates that only a 10% increase in fine sediment deposition in spawning gravel decreases the spawning success of bull trout by 50%. (USFS 1986). A road cut across a hillside intercepts subsurface water flow and runs it down ditches and through culverts. There it is joined by sediment-laden runoff from

the roadbed and cut banks before running into a stream. Hence, subsurface water which would have once welled up from below a stream to clean bull trout spawning gravels now carries sediment from the road and land surface and deposits it onto the spawning gravels, where it smothers the eggs and fry.

"Rehabilitation of road-miles cannot be accomplished alone by gating, berming, or otherwise blocking the entrance to a road permanently or temporarily, or seasonally closing roads, but will require obliteration, recontouring, and revegetating." (U.S. Fish and Wildlife Service Regions 1 and 6. 1998a).

"Reduction of total miles of forest roads is an important component of watershed restoration. . . Many miles of roads must be 'put to bed', by pulling culverts, resloping road beds, pulling fill and replanting." (U.S. Fish and Wildlife Service. 1998b).

“Recontoured and abandoned sites displayed similar aboveground properties but exhibited notable differences in belowground properties, including soil hydraulic conductivity, organic matter, total carbon, and total nitrogen, among others. Our findings suggest that recontouring can dramatically accelerate recovery of above- and belowground properties so they resemble never-roaded reference conditions. In contrast, abandoning roads generates above- and belowground properties that follow a different path to recovery.” (Lloyd et al 2013).

“Roots on A30 [abandoned] roads were constrained to the upper 15 cm (10 ± 0.45 cm). In contrast, never-roaded sites and recontoured roads had rooting depths that extended below the limits of soil pit excavations (>60–75 cm).” (Lloyd et al 2013).

“The simulated time to runoff generation after a 1-hour storm event was significantly different between treatments, with runoff occurring in the first 0.2 hours of the storm on A30 [abandoned] roads and never on R10 [recontoured] roads.” (Lloyd et al 2013).

“In our study, the trajectory of plant succession on abandoned roads and recontoured roads followed similar trends to other research conducted on passively restored roads (Madej 2001; Foltz et al. 2009), although our data suggest that vegetation succession to shrubs and trees may be slower on abandoned roads as compared with recontoured roads. However, ecosystem recovery belowground differed markedly from that aboveground. The strong differences in belowground properties following road abandonment result in an effective decoupling of the recovery trajectories of above- and belowground ecohydrological properties (Figure 3). Together, these findings support the prediction that recontouring accelerates the rehabilitation of key ecohydrologic properties toward reference dynamics.” (Lloyd 2013).

“After treatment, we conservatively estimate soil TC [carbon] storage increased sixfold, to 6.5 x107 g C per road kilometer (to 25-cm depth). The same trends are seen for soil N [nitrogen]. Abandoned roads have approximately 6.96 x 105 g N per road kilometer, and this amount increases by an order of magnitude to 7.16 x 106 g N (to 25-cm depth). These major differences in soil C and N storagexhave potentially important implications for climate-changexmitigation.” (Lloyd et al 2013).

"Although more expensive as compared with road abandonment, recontouring may be the only way to restore both above- and belowground ecosystem processes, accelerating the recovery of these forest ecosystems by decades to millennia. . . Restoration techniques that fail to restore above- and belowground properties and processes may lead to an altered ecosystem with different functional processes and potential (Kardol and Wardle 2010)." (Lloyd et al 2013).

Comprehensive Management of Human Access

The following citations show that all human access to fish and wildlife habitat has negative impacts, including the existence of roads and trails regardless of use levels. The magnitude of impacts from human use generally occurs in descending order from motorized use of roads and trails to use by bicycles and finally foot or horse use. While many of these citations contend with research and opinions on Flathead Forest Plan Amendment 19, similar methods of quantifying the impacts of motorized and high levels of non-motorized use have been applied to other National Forests via guidance from the Interagency Grizzly Bear Committee.

"We have . . . created technologies that make virtually every place on this planet accessible to us. With our curiosity, money, leisure time, and motorized contraptions, we can invade any corner of the earth with impunity. . . That we can alter human behavior to protect wildland ecosystems and wild animals is reason for hope." (Salwasser 1997).

"The simplicity of A19 [Flathead Forest Plan Amendment 19] and its ability to permanently secure areas for grizzly bears makes it a powerful tool in the conservation of the grizzly bear in the NCDE." (McLellan et al 2000, page 11).

"Private roads were excluded from road density calculations and, if federal land was <75% of the sub-unit, 'no net loss' rather than the numerical guideline values was used. These, and other rules that relaxed road density guidelines were established in sub-units with private lands even when it was shown that a bear's level of risk was 30.27 times as great in rural areas as in backcountry areas. It would appear that in sub-units with private holdings that stricter, not reduced, access controls would be necessary to offset higher levels of mortality." (McLellan et al 2000, page 11).

"Based on the best information available, the current and planned distribution of roads and core area, large portions of roadless areas, and known grizzly bear distribution within the recovery zone portion of the [Flathead National] Forest reveal a pattern and trend in access management that is improving, is based on ecosystem-specific information, and will be conducive to supporting grizzly bears at numbers that promote recovery." (USFWS 2005, page 132).

"The Service believes that grizzly bears in the NCDE would benefit from continued application of the [Flathead National] Forest's access management strategy, as proposed. Efforts to reduce open road density, especially in seasonally important resource areas, and reducing roads to provide core habitat in subunits with high road

densities should be pursued and included in all project planning." (USFWS 2005, page 139).

"As human population centers expand and increased dispersed human activity and development ensues, risks to grizzly bears may increase. Public lands will remain important to the recovery and sustainability of the NCDE grizzly bear population." (USFWS 2005, page 140).

The northern Swan Range population of grizzly bear is likely decreasing at over 2% per year, enough to halve the population in about 30 years. (Mace and Waller 1997, errata to page 112).

"[The northern Swan Range] population was semi-isolated because of human development including hydroelectric development. . . until effective management programs are developed on private lands, federal lands should be considered invaluable source areas and managed to reduce man-caused mortality. This would be accomplished by establishing effective areas of high security that transcend seasonal habitats, and where access is regulated." (Mace and Waller 1997, Chapter 9).

"Additional road restrictions and reductions required by A19 [Flathead Forest Plan Amendment 19] are important to reduce displacement (and indirect mortality) and ensure adequate habitat available for continued reproduction and population growth over the long term." (USFWS 2005, page 145).

"It is the Service's biological judgment that 'harm' of grizzly bears is likely to occur in the following conditions: 1. The precise open motorized access densities exceeds 1 mile per square mile in over 19 percent of a subunit. . . 2. The precise total motorized access density exceeds 2 miles per square mile in over 19 percent of a subunit. . . 3. Security core is less than 68% of a subunit." (USFWS 2005, page 150).

"Security core area . . . is at least 0.3 miles from open roads and high-intensity, non-motorized trails. . . The number of restricted roads in security core should be minimized . . . and may not receive high levels of non-motorized use . . . defined as receiving 20 or greater parties per week . . . reclamation of roads [is] the preferred treatment. (USFS 1995).

"Habitat security conditions cannot be defined entirely by motorized access route density. . . heavily used non-motorized trails and areas of high levels of dispersed human use will also influence the effectiveness of area in regards to habitat security." (IGBC 1998).

"[W]e determined that grizzly bears were significantly further than expected from [hiking only] trails, and from lakes with camp-sites during spring, summer, and autumn. . . Therefore, while in the JBHA [Jewel Basin Hiking Area], grizzly bears minimized their interaction with recreationists by spatially avoiding high use areas." (Mace and Waller 1997, Chapter 7.2).

"Direction [is] for reclaiming/obliterating roads including removal of culverts which greatly reduces the risk of future sedimentation problems resulting from culvert failures

on reclaimed roads. . . the long term effect of implementing this direction should be beneficial to fish [due] to reduced sediment and routing of surface water once reclaimed and restricted roads have stabilized, and greatly reduced risk of future impacts from culverts left in place and inadequate treatment of closed or reclaimed roads." (Hair 1995).

"The Forest Service estimates a $10 billion backlog in needed road reconstruction and maintenance. . . Fewer roads will be built and those that are built will minimize environmental impacts. Roads that are no longer needed or that cause significant environmental damage will be removed. (Dombeck 1998).

"[T]his points to a smaller road system than our current one . . ." (Holtrop 2010).

The Flathead National Forest needs $6.2 million each year to maintain its road system, but receives less than $1 million. (USFS 2004).

"Roads that are not maintained can become an environmental liability on the watershed. . . It's not a matter of if a culvert is going to fail, it's a matter of when. . . It is cheaper to reclaim a road than to maintain it." (Rowley 1998a and 1998b).

"Reduction of total miles of forest roads is an important component of watershed restoration [but] cannot be accomplished by gating, berming, or otherwise blocking the entrance to a road. . . Many miles of roads must be 'put to bed' by pulling culverts, resloping road beds, pulling fill and replanting." (USFWS 1998a and 1998b).

"The management of roads is the most powerful tool available to balance the needs of bears and all other wildlife with the activities of humans. . . Roads closed to public use through the use of only signs or gates are often not effective. . . The optimum situation to maintain grizzly bear habitat effectiveness and minimize mortality risk is to obliterate the road." (USFWS 1993).

"Roads are the single biggest problem on the landscape for elk. It's well documented, and everything else pales in comparison. . . The more roads you have, the less elk you have." (Stouder 2002).

"Elk travel time [displacement] was highest during ATV exposure, followed by exposure to mountain biking, hiking, and horseback riding. . . A comprehensive approach for managing human activities to meet elk objectives should include careful management of off-road recreational activities, particularly ATV riding and mountain biking, which caused the largest reductions in feeding time and increases in travel time." (Naylor et el. 2009).

Old Growth Forests

Old-growth forest habitat is a diminishing resource on public lands due to many factors. Maintaining existing old-growth stands and providing for recruitment of future old growth is necessary to provide for the viability of old-growth associated wildlife

species. While not perfect, the Old-Growth Forest Types of the Northern Region (Green et al, 1992) is probably the best reference available for these forests and should be used as a guide to determine old-growth forest habitat.

We strongly caution though that the minimum characteristics in Green et al, are not the recommended standards, but merely the starting point by which to determine whether a stand is classified as old growth. It is NOT to be used to "manage" old growth down to these minimum characteristics. Also, it is important to note that old-growth attributes such as decadence, large trees, old trees, snags, canopy structure, coarse woody debris, etc. are critical components of old-growth forest habitat. Stands that may not have the minimum number of large trees but contain these other important attributes should be considered "recruitment" or future old-growth and allowed to progress towards meeting the Green et al definition.

Old-growth stands function best as habitat when they are connected to other stands. Connectivity can be achieved by corridors of actual old growth or by suitable closed-canopy or mature condition of the matrix between old-growth stands (Thomas, et al. 1990, Bennett, 1999). Stands designated as future old growth that are presently mature may be suitable (Pfister, et al 2000). Linkages, should whenever possible, contain a large fraction of interior forest (i.e., 100 meters from a high contrast edge, Bennett 1999).

Interior old growth habitat (>100 meters from edge of an opening or stand of lesser age or a road) is the most important component of old-growth habitat (Baker and Knight 2000). In general larger stands are more effective as habitat than smaller stands (Pfister 2000). Fragmentation of existing patches of old growth by roads, timber harvesting or other created openings will decrease effectiveness of the patch as habitat due to the reduction in amount of interior old-growth conditions (Baker and Knight 2000).

Stands that met the Green et al definition of old growth but are burned in a forest fire do not cease to provide a valuable function to wildlife and the forest ecosystem and should not be salvage logged. This burned old growth may function differently but it is still important habitat because burned snags stand much longer than beetle-killed trees, and the fact that it burned does not change its age and age is a primary factor in old growth habitat (Pers. comm. R. McClelland).

Management Recommendations to Protect Old Growth

To protect remaining old growth, provide for recruitment of future old growth, and link these currently small and isolated patches, we suggest the following management standards.

• Use the Old-Growth Forest Types of the Northern Region as a first step in identifying old growth stands.

• All existing old growth must be preserved. Historically old-growth habitat was 15% to 60% (source Amendment #21). Current old growth averages 11.6% across the Forest and ranges between 6.9% to 12.7% (source 1999 – 2007 Forest Plan Monitoring Report). Old-growth forest habitat must be increased to the historical range by allowing mature

stands to develop old growth characteristics (snags, down woody material, decadence and age). The Forest Service must calculate how much old growth there is on a watershed (i.e., approximately 10,000 acres) and forest-wide basis. Recruitment old growth must be identified on a watershed and forest-wide basis. Recruitment old growth is subject to the same protections as designated current old growth.

• Designate the existing old growth and future old growth, map it and connect these stands with linkages as described above.

• Place longer-rotation or less intensive uses adjacent to designated old growth, so that a lower-intensity managed zone serves as a buffer for the old-growth system (Noss and Cooperrider 1994). Avoid placing high intensity land uses (e.g. clearcuts, roads) next to designated old growth (Pfister 2000).

• Integrate future recruitment old growth into the network. Where otherwise equivalent replacement stands exist, choose those adjacent to designated old growth as future old growth.

• No logging should take place in old growth stands. Under limited and extraordinary circumstances some thinning of sapling and pole-sized timber less than 6 inches in diameter may be appropriate but only in ponderosa pine habitat type, without using heavy equipment, and when there are no adverse effects to old-growth dependent, management indicator, sensitive, threatened or endangered species.

Native Fish and Water Quality

The best available scientific information on bull trout supports the following specific, numeric and measurable standards for protection of the Primary Constituent Elements of bull trout habitat. Protecting these PCEs in all watersheds will provide benefits for westslope cutthroat trout and other native aquatic species.

Clean- The bull trout is virtually synonymous with water quality. Bull trout require very clean water and favor streams with upwelling groundwater for spawning (Fraley & Shepard 1989; Baxter & Hauer 2000). Of the many threatened and endangered fish species, bull trout are the most sensitive to changes in water quality, particularly from fine sediments generated by logging and grazing activities. Fine sediments can smother spawning beds and degrade other habitat components. A key determinant is the level of fine sediment ≤ 6.35 mm (Weaver & Fraley 1991) and protecting upwelling groundwater. Protection of critical habitat includes standards to maintain and improve water quality and control lethal sediments. For example, fine sediments < 6.4 mm in diameter must be limited to less than 20% in spawning habitat (Espinosa 1996) and standards must be developed to maintain groundwater.

Cold- Bull trout also require colder water than other native fish. Rieman & McIntyre (1993) reported that researchers recognize temperature more consistently than any other factor influencing bull trout distribution (see also, Pratt 1992). Habitat protection efforts must seek to maintain or reacquire natural cold water conditions. Specifically, stream

temperatures in current and historic spawning, rearing and migratory corridor habitats should not exceed 6-8 C for spawning, with the optimum for incubation from 2-4 C (McPhail & Murray 1979); 10-12 C for rearing habitat, with 7-8 C being optimal (Goetz 1989); migratory stream corridors should be 12 C or less.

Complex- Critical habitat for bull trout isn't just a set of places, but rather a complex arrangement of environmental conditions. Noting that "watersheds must have specific physical characteristics to provide habitat requirements for bull trout to successfully spawn and rear," in its 1998 listing rule the Service listed the habitat components: "water temperature, cover, channel form and stability, valley form, spawning and rearing substrates, and migratory corridors." Implicit in this list of habitat requirements is the understanding that habitat critical to bull trout viability consists of a specific set of physical conditions in addition to particular places. For example, the Service explained that "[m]aintaining bull trout habitat requires stream channel and flow stability." And further explained that "[a]ll life history stages of bull trout are associated with complex forms of cover, including large woody debris, undercut banks, boulders and pools." Bull trout not only need clean, cold water, they need places to rest, hide, feed and travel.

Intact forests, which provide bank stability, shade and woody debris for formation and maintenance of pool habitat, are essential. Climate change will have implications for species such as bull trout because they require cold, clean water. Isaak et al (2010) state: "Riparian vegetation, for example, strongly affects near stream microclimates and minimizing near-stream disturbances associated with grazing, roadbuilding and timber harvest, or facilitating rapid vegetative recovery after these disturbances, could help buffer many streams from additional warming."

Climate change will also increase rain on snow events resulting in stream scour. Shelburg et al's (2010) study of bull trout redd scour emphasized the importance of habitat heterogeneity and refugia availability in sustaining salmonid populations at multiple spatial scales. Loss of complex fluvial spawning habitat such as large woody debris contributes to redd scour after rain on snow events. They conclude: "Processes that form complex habitat in association with LWD may partially mitigate against unfavorable discharge regimes, water and sediment yield alterations due to land-use, or future climate change."

Espinosa (1996) recommends that all streams should average ≥ 90% bank stability and that cobble embeddedness in summer rearing habitat should be < 30% and < 25% in winter rearing habitats. Additional indices include channel morphology including large woody debris, pool frequency, volume and residual pool volumes.

The Flathead Lake Biological Station has been studying the aquatic environment in the Crown of the Continent ecosystem for decades. Hauer et al (2007) found that:

> "Streams of watersheds with logging have increased nutrient loading, first as SRP and NO3, which is rapidly taken up by stream periphyton. This leads to increased algal growth that is directly correlated with the quantity of logging within the watershed. The increased periphyton increases particulate organic matter in transport as the algal biomass is sloughed into the stream. We observed this as increased TP and TN in logged watershed streams. Other studies in the CCE

> have shown that increased sediment loading and an incorporation of fines into spawning gravel, especially during the summer and fall base flow period, has a dramatic effect on the success of spawning by bull trout (Salvelinus confluentus). Experiments have shown that as the percentage of fines increases from 20% to 40% there is >80% decrease in successful fry emergence."

Hauer, et al. (1999) also found that bull trout streams in wilderness habitats had consistent ratios of large to small and attached to unattached large woody debris. However, bull trout streams in watersheds with logging activity had substantial variation in these ratios. They identified logging as creating the most substantive change in stream habitats.

> "The implications of this study for forest managers are twofold: (i) with riparian logging comes increased unpredictability in the frequency of size, attachment, and stability of the LWD and (ii) maintaining the appropriate ratios of size frequency, orientation, and bank attachment, as well as rate of delivery, storage, and transport of LWD to streams, is essential to maintaining historic LWD characteristics and dynamics. Our data suggest that exclusion of logging from riparian zones may be necessary to maintain natural stream morphology and habitat features. Likewise, careful upland management is also necessary to prevent cumulative effects that result in altered water flow regimes and sediment delivery regimes. While not specifically evaluated in this study, in general, it appears that patterns of upland logging space and time may have cumulative effects that could additionally alter the balance of LWD delivery, storage, and transport in fluvial systems. These issues will be critical for forest managers attempting to prevent future detrimental environmental change or setting restoration goals for degraded bull trout spawning streams."

Wherever possible, critical habitat protection should extend to the entire hydrologic watershed. Frissell (1999) reported complex interactions between near-surface groundwater and surface waters in bull trout streams, suggesting a more comprehensive approach to watershed protection. Baxter and Hauer (2000) reported that geomorphology and hyporheic groundwater exchange have a strong influence on bull trout redd locations.

Connected- The sciences of conservation biology and conservation genetics show that bull trout have naturally occurred throughout the Northern Rockies and Pacific Northwest in a system of connected watersheds comprising migratory meta-populations of bull trout (Rieman & McIntyre 1993). Blockages to historic migration routes, both physical and thermal, must be addressed to provide access to spawning streams and protect the genetic integrity of the bull trout. Historically occupied, but currently unoccupied habitat must be protected and reoccupied to reconnect bull trout populations throughout their range.

In addition to these standards, roadless and low road density watersheds deserve special protection measures. Numerous scientific studies and reviews have consistently reported that bull trout strong populations, presence and biomass are inversely related to road densities (Huntington 1995; Quigley, et al. 1996; Rieman, et al. 1997). Bader (2000) found that 78% of bull trout "strong populations" were in roadless area with

most of the remainder directly downstream from roadless area. Quigley, et al. (1996) reported that roadless and wilderness areas can provide "strong anchors" for salmonid recovery. In recognition of this strong body of scientific evidence, the U.S. Fish & Wildlife Service (1998) recommended that remaining roadless areas within bull trout range be maintained in roadless condition.

Muhlfeld, et al. (2009) evaluated the association of local habitat features (width, gradient, and elevation), watershed characteristics (mean and maximum summer water temperatures, the number of road crossings, and road density), and biotic factors (the distance to the source of hybridization and trout density) with the spread of hybridization between native westslope cutthroat trout *Oncorhynchus clarkii lewisi* and introduced rainbow trout *O. mykiss* in the upper Flathead River system in Montana and British Columbia.

They found that hybridization was positively associated with mean summer water temperature and the number of upstream road crossings and negatively associated with the distance to the main source of hybridization. Their results suggest that hybridization is more likely to occur and spread in streams with warm water temperatures, increased land use disturbance, and proximity to the main source of hybridization.

Lynx

The Fish and Wildlife Service designated critical habitat for lynx that includes the Flathead National Forest. They determined the physical and biological features that are the primary constituent elements (PCEs) or, in other words, the elements of physical or biological features that, when laid out in the appropriate quantity and spatial arrangement to provide for a species' life-history processes, are essential to the conservation of the species. They determined that the PCE specific to lynx in the contiguous United States is:

1) Boreal forest landscapes supporting a mosaic of differing successional forest stages and containing:

(a) Presence of snowshoe hares and their preferred habitat conditions, which include dense understories of young trees, shrubs or overhanging boughs that protrude above the snow, and mature multistoried stands with conifer boughs touching the snow surface;

(b) Winter conditions that provide and maintain deep fluffy snow for extended periods of time;

(c) Sites for denning that have abundant coarse woody debris, such as downed trees and root wads; and

(d) Matrix habitat (e.g., hardwood forest, dry forest, non-forest, or other habitat types that do not support snowshoe hares) that occurs between patches of boreal forest in close juxtaposition (at the scale of a lynx home range) such that lynx are likely to

travel through such habitat while accessing patches of boreal forest within a home range.

Lynx in the Rocky Mountains of Montana selected mature, multistoried forests composed of large-diameter trees with high horizontal cover[1] during winter. These forests were composed of mixed conifers that included lodgepole pine, Douglas-fir, and western larch, but predominately consisted of Englemann spruce and subalpine fir in the overstory and midstory. (Squires et al. 2010)

Squires et al. (2010) studied den selection in western Montana. They found that lynx denned in preexisting sheltered spaces created by downed logs (62%), root-wads from wind-thrown trees (19%), boulder fields (10%), slash piles (6%) and live trees (4%). Lynx overwhelmingly prefer preexisting sheltered spaces created by downed logs in mature forests.

Squires also found that lynx generally denned in mature spruce-fir forests with high horizontal cover and abundant coarse woody debris. Eighty percent of dens were in mature forest stands and 13% in mid seral regenerating stands; young regenerating (5%) and thinned (either naturally sparse or mechanically thinned) stands with discontinuous canopies (2%) were seldom used.

Maintaining mature and mid-seral regenerating spruce-fir forests with high horizontal cover and abundant woody debris would be most valuable for denning when located in drainages or in concave, drainage-like basins. Management actions that alter spruce-fir forests to a condition that is sparsely stocked (e.g. mechanically thinned) and with low canopy closure (<50%) would create forest conditions that are poorly suitable for denning.

Squires et al. (2006) results also indicate that lynx preferentially forage in spruce-fir forests with high horizontal cover, abundant hares, deep snow, and large-diameter trees during winter. The high horizontal cover found in multistory forest stands is a major factor affecting winter hare densities. Lynx tend to avoid sparse, open forests and forest stands dominated by small-diameter trees during the winter.

They also sampled vegetative characteristics at kill sites and compared these to other locations along lynx travel routes. Lynx killed prey in areas of even higher horizontal cover than they generally encountered along their snow-tracks.

During winter, lynx preferentially foraged in mature, multilayer forests with Engelmann spruce (Picea engelmannii) and subalpine fir (Abies lasiocarpa) in the overstory and midstory, but these forests also included lodgepole pine, Douglas-fir, and western larch. Forests used during winter were composed of larger diameter trees with higher horizontal cover, more abundant snowshoe hares (Lepus americanus), and deeper snow compared to random availability; multilayer, spruce–fir forests provided high horizontal cover with tree branching that touched the snow surface. During

[1] Horizontal cover is low hanging conifer boughs that touch the snow, small trees that are tall enough to protrude through the snow and herbaceous vegetation in the understory.

winter, lynx killed prey at sites with higher horizontal cover than that along foraging paths. Lynx were insensitive to snow depth or penetrability in determining where they killed prey.

During summer, lynx broadened their resource use to select younger forests with high horizontal cover, abundant total shrubs, abundant small-diameter trees, and dense saplings, especially spruce–fir saplings. Based on multivariate logistic-regression models, resource selection occurred primarily at a fine spatial scale as was consistent with a sight-hunting predator in dense forests. However, univariate comparisons of patch-level metrics indicated that lynx selected homogenous spruce–fir patches, and avoided recent clear-cuts or other open patches. Given that lynx in Montana exhibit seasonal differences in resource selection, we encourage managers to maintain habitat mosaics. Because winter habitat may be most limiting for lynx, these mosaics should include abundant multistory, mature spruce–fir forests with high horizontal cover that are spatially well-distributed.

Montana is near the southern extent of the lynx's current North American distribution. Here, boreal forests are fragmented into patches of suitable habitat at higher elevations, separated by valleys of open grasslands and dry forest types. Southern lynx populations tend to be small and relatively isolated. Therefore, movement and connectivity among groups is particularly important to maintain persistent populations and to recolonize unoccupied habitat.

Research by Dr. John Squires et al. (2012) modeled movements that indicated lynx selected home ranges at mid-elevations with low surface roughness, high canopy cover and little open grassland vegetation. They found that connectivity between lynx habitat in Canada and the conterminous U.S. is facilitated by only a few putative corridors that extend south from the international border.

They identified a primary lynx corridor from Canada that extends from the Whitefish Range, along the western front of the Swan Range ending near Seeley Lake. And a second corridor along the east side of Glacier National Park to the Bob Marshall Wilderness Complex.

Snowmobile trails may facilitate coyote movements into areas with deeper snow during the winter. (Gese et al. 2013) While direct impacts of snowmobiles on lynx were not documented, the potential impacts of a main competitor, the coyote, are worth mentioning. Due to their use of snowmobile trails, coyotes have the potential to access areas of habitat that might normally be too energetically difficult to access in deep snow. Lynx, with their superior body mass to footload, can access habitats containing deep snow that coyotes might typically avoid. In addition, expansion of current winter recreation use areas may create persistent travel corridors that could be utilized by coyotes. Since coyote use of snowmobile trails was related to how much was available, coyote movements could possibly be altered by limiting snow compaction. Researchers suggest the use of snowmobiles may result in consistent compacted trails within lynx conservation areas which may be detrimental to local lynx populations in the Intermountain West. (Id.)

Threats to lynx and their habitat

Excerpts from the 2013 Lynx Conservation Assessment and Strategy

Climate Change

Several possible effects of climate change on lynx can reasonably be anticipated. These include:
1) potential upward shifts in elevation or latitudinal distribution of lynx and their prey;

2) changes in the periodicity or loss of snowshoe hare cycles in the north;

3) reductions in the amount of lynx habitat and associated lynx population size due to changes in precipitation, particularly snow suitability and persistence, and changes in the frequency and pattern of disturbance events (e.g., fire, hurricanes, insect outbreaks);

4) changes in demographic rates, such as survival and reproduction; and

5) changes in predator-prey relationships. In addition, it is possible that interactions between these variables may intensify their effects.

Timber Harvest

Commercial timber management of conifer forests traditionally has been designed to: reduce tree density and promote tree growth (e.g., precommercial thinning), especially in young regenerating forests; improve growth and vigor of mature trees (e.g., commercial thinning, thinning from below); reduce the vulnerability of commercially-valuable trees to insects and disease (e.g., commercial thinning, group selection); and harvest forest products (e.g., regeneration harvest). Timber management practices may mimic natural disturbance processes but often are not an exact ecological substitute. Some practices, such as use of herbicides to suppress hardwood regeneration, do not have an historical analogue. Timber harvest may differ from natural disturbances by:

• Removing most standing biomass from the site, especially larger size classes of trees, and down logs, which alters microsite conditions and nutrient cycling;

• Creating smaller, more dispersed patches and concentrating harvest at lower elevations in mountainous regions and on more nutrient rich soils, resulting in habitat fragmentation;

• Causing soil disturbance and compaction by heavy equipment, which may result in increased water runoff and slower tree growth at the site; or

• Giving a competitive advantage to commercially-valuable tree species and reducing the structural complexity of the forest through the application of harvest, planting, thinning, and herbicide treatments.

Precommercial thinning has been shown to reduce hare numbers by as much as 2- and 3-fold due to reduced densities of sapling and shrub stems and decreased availability of

browse. Researchers believe that the practice of precommercial thinning could significantly reduce snowshoe hares across the range of lynx.

There are anecdotal examples of precommercially thinned stands that subsequently "filled in" with understory trees. Some have suggested this could be a technique to extend the time that understory trees and low limbs provide the dense horizontal cover that constitutes snowshoe hare habitat. At this time, no other data are available to quantify the re-establishment of snowshoe hare habitat and over what time period, or the response by snowshoe hares, as compared with sites that were not precommercially thinned, so this remains an unproven management technique.

Uneven-aged management (single tree and small group selection) practices can be employed in stands where there is a poorly developed understory, but have the potential to produce dense horizontal cover for snowshoe hares. Removal of select large trees can create openings in the canopy that mimic gap dynamics and help to maintain and encourage multi-story attributes within the stand.

If removal of large trees opens the canopy to the extent that the patch functions as an opening, this may discourage use by lynx. Removal of larger trees from mature multi-story forest stands to reduce competition and increase tree growth or resistance to forest insects may reduce the horizontal cover (e.g., boughs on snow), thus degrading the quality of winter habitat for lynx. Similarly, removing understory trees from mature multi-story forest stands reduces the dense horizontal cover selected by snowshoe hares, and thus reduces winter habitat for lynx.

Lynx habitats in higher-elevation spruce-fir forests have been less affected by past fire suppression and are mostly within the historical range of variability.

In much of the Rocky Mountains, the fire regime was more variable in lynx habitat, with both frequent (35–100 years) stand-replacing or mixed-severity fires, and infrequent (200+ years) stand-replacement fires (Hardy et al. 1998).

Fragmentation

Fragmentation of the naturally patchy pattern of lynx habitat in the contiguous United States can affect lynx by reducing their prey base and increasing the energetic costs of using habitat within their home ranges. Direct effects of fragmentation on lynx include creation of openings that potentially increase access by competing carnivores, increasing the edge between early-successional habitat and other habitats, and changes in the structural complexities and amounts of seral forests within the landscape. At some point, landscape-scale fragmentation can make patches of foraging habitat too small and too distant from each other to be effectively accessed by lynx as part of their home range. Maintaining preferred habitat patches for lynx and hares within a mosaic of young to old stands in patterns that are representative of natural ecological processes and disturbance regimes would be conducive to long-term conservation.

Recommendations

• Increase the amount of old growth and mature multi-story habitat on the Flathead. Historically old-growth habitat was 15% to 60% (source Amendment #21). Current old-

growth averages 11.6% across the Forest and ranges between 6.9% to 12.7% (source 1999 – 2007 Forest Plan Monitoring Report). Old-growth forest habitat must be increased to the historical range. Winter habitat may be most limiting for lynx, so maintaining and recruiting abundant multistory, mature forests with high horizontal cover is especially important.

• Reduce fragmentation of mature multi-story habitat. Forest patch size in late successional forest structure has been significantly reduced from historical levels. Horizontal cover is especially important for snowshoe hare habitat and winter lynx habitat.

• Pay special attention to maintaining or recruiting high horizontal cover and mature stands in the corridors identified by Dr. Squires that extend from Canada through the Whitefish Range, along the western front of the Swan Range ending near Seeley Lake. And the second corridor along the east side of Glacier National Park to the Bob Marshall Wilderness Complex.

Fisher

New research shows that the Rocky Mountain Fisher selects for large, old trees, snags and dense overhead cover more than had been previously thought. Research also shows that Fisher do not select and use riparian areas as much as biologists had hypothesized. Retention and recruitment of connected old-growth forest habitats is very important to maintain viability of fisher; relying on riparian buffer zones is not adequate.

From: Meta-analysis of habitat selction at resting sites by fishers in the pacific coastal states and provinces (Aubry et al. 2013)

Thus, throughout their Pacific coastal range, fishers exhibited clear and remarkably consistent selection for resting sites that had steeper slopes; cooler microclimates; denser overhead cover; greater volume of logs; greater basal area of large conifers, hardwoods, and snags; and larger diameter conifers and hardwoods than were generally available.

That is, fishers appear to be selective of relatively dense overhead cover and large forest structures at resting sites simply because they use relatively large trees, snags, and logs for resting, and the forest conditions around such structures differ from those that occur randomly in the forest.

Even with this sampling design, however, they were able to demonstrate selection of denser canopy cover and larger trees and snags at resting sites than were generally available, indicating that fishers are actively selecting specific environmental conditions around resting structures.

From Conservation of Fishers (Martes pennanti) in South-Central British Columbia, Western Washington, Western Oregon, and California–Volume III: Threat Assessment (Naney et al. 2012)

All known fisher reproductive dens are in cavities in live trees or snags. Reproductive dens are typically in the oldest and largest trees available. These den trees require extensive time periods to develop, because of size and time for ecological processes to occur that create cavities (Volume I, Chapters 7 and 8). Structural elements (e.g., large trees with cavities and platforms) are also used extensively by males and females for resting (Volume I, Chapter 7). There are no reported empirical thresholds at which reduction of structural elements may begin to negatively affect fishers.

Moderate to dense canopy closure provides key habitat features, and overstory trees provide one of the key components of this cover. They also contribute to the structural diversity of forested environments. Overstory trees also contribute to current and future structural elements and prey species abundance and diversity. One of the most consistent predictors of fishers appears to be expanses of forest with moderate to high canopy cover (Volume I, Chapter 7).

Evaluating the effects of fragmentation on any species is a function of several interacting factors: 1) the scale of fragmentation in relation to the scales at which an animal interacts with its environment, 2) the pattern and extent of fragmentation within a given scale, and 3) the degree of contrast between the focal habitat and the surrounding areas (Franklin et al. 2002b). Fishers have relatively large home ranges, use habitat at multiple spatial scales, and typically avoid areas with little or no contiguous cover (Volume I, Chapter 7). Fragmented landscapes may affect landscape permeability, either permanently through vegetation type conversion or temporarily until vegetation recovery occurs (Green et al. 2008). Anthropogenic (e.g., urban development) and natural features (e.g., large rivers; Wisely et al. 2004) can also act as filters to fisher movements. We concluded that fragmentation can affect fishers' use of the landscape because moderate to high amounts of contiguous cover are a consistent predictor of fisher occurrence at large spatial scales (Volume I, Chapter 7).

From Biology and conservation of martens, sables, and fishers: a new synthesis (Raley et al. 2012)

However, available evidence indicates that the incidence of heartwood decay and cavity development is more important to fishers for denning than is the tree species. Other characteristics, such as the size and height of the cavity opening and the interior dimensions of the cavity, may also influence females' choice of natal and pre-weaning den structures. The cavity must be large enough to accommodate an adult female and 1–4 growing kits, and have a relatively small opening (just large enough for a female to fit through) high off the ground (15–26 m on average; e.g., Aubry and Raley 2006; Weir and Corbould 2008; Thompson et al. 2010). These characteristics may be important for excluding potential predators and aggressive male fishers.

Presumably, the cavity must also have adequate thermal properties to protect kits from weather extremes. Compared with ambient temperatures, tree cavities provide stable microclimates with narrow temperature fluctuations (Sedgeley 2001; Weir and Corbould 2008; Coombs et al. 2010). Most (75%) of the dens used by reproductive female fishers were in live trees. Cavities in relatively large live trees appear to have more stable temperatures during the day, and stay warmer at night, than those in relatively small snags (Wiebe 2001; Coombs et al. 2010). Other factors, such as the

orientation of the cavity and exposure to sunlight (i.e., amount of canopy cover), may also influence the thermal properties of cavities, but quantitative evidence is lacking.

Fisher resting habitat in western North America is also strongly tied to forest structure. Fishers typically rest in large deformed or deteriorating live trees, snags, and logs, and forest conditions around the rest structures (i.e., the rest site) frequently include structural elements characteristic of late-seral forests.

Fishers rested primarily in deformed or deteriorating live trees (54–83% of all rest structures identified in individual studies), and secondarily in snags (6–26%) and logs (3–20%; e.g., Weir and Harestad 2003; Zielinski et al. 2004b; Aubry and Raley 2006; Purcell et al. 2009). The species of trees and logs used for resting appeared to be less important than the presence of cavities, platforms, and other microstructures. In live trees, fishers rested primarily in rust brooms in more northern study areas (Weir and Harestad 2003; Weir and Corbould 2008; Davis 2009) and mistletoe brooms or other platforms elsewhere (e.g., Self and Kerns 2001; Yaeger 2005; Aubry and Raley 2006). In contrast, fishers primarily used cavities when resting in snags (e.g., Self and Kerns 2001; Zielinski et al. 2004b; Purcell et al. 2009). Fishers used hollow portions of logs or subnivean spaces beneath logs more frequently in regions with cold winters (e.g., Weir and Harestad 2003; Aubry and Raley 2006; Davis 2009) than those with milder winters (e.g., Yaeger 2005; Purcell et al. 2009; Thompson et al. 2010). These results suggest that fishers use structures associated with subnivean spaces to minimize heat loss during cold weather (Weir et al. 2004; Weir and Corbould 2008).

When engaged in active behaviors (e.g., foraging, traveling), fishers in western North America were frequently associated with complex forest structure. In general, active fishers were associated with the presence, abundance, or a greater size of ³ 1 of the following characteristics: logs, snags, live hardwood trees, and shrubs (e.g., Carroll et al. 1999; Slauson and Zielinski 2003; Weir and Harestad 2003; Campbell 2004).

Fisher habitat in western North America is intricately linked to a complex web of ecological processes that include natural disturbances (e.g., wind, fire), tree pathogens, and other organisms (e.g., primary excavators) that create and influence the distribution and abundance of microstructures (e.g., cavities, mistletoe brooms) in live trees, snags, and logs. Because female fishers rely exclusively on tree cavities for reproduction, we conclude that heartwood decay by heart-rot fungi, the process by which most reproductive den cavities are created, is an essential component of fisher denning habitat in western North America. This ecological process is also important for creating the microstructures that fishers use for resting (cavities in live trees and snags, and hollows in logs).

In western North America, a moderate to dense forest canopy is one of the strongest and most consistent predictors of fisher distribution and habitat use or selection at all spatial scales. The association of fishers with high amounts of canopy cover is further demonstrated by their avoidance of open environments.

Similarly, fisher occurrence in the Rocky Mountain region was positively correlated with canopy cover up to an apparent threshold of 60% (Carroll et al. 2001).

Previously, it was thought that fishers in western North America may favor riparian forests (Buskirk and Powell 1994; Powell and Zielinski 1994); however, results from recent studies do not support this hypothesis. Although riparian forests were important to fishers in some locales (e.g., black cottonwood [Populus balsamifera trichocarpa] forests provided denning habitat in British Columbia; Weir and Corbould 2008), consistent use or selection for riparian forests has not been demonstrated.

From Stand- and landscape-scale selection of large trees by fishers in the Rocky Mountains of Montana and Idaho (Schwartz et al. 2013)

Perhaps the most compelling result from this study was the consistent selection by female fishers for large trees at both stand and landscape scales

Thus, we recommend that silvicultural treatments of stands consider not only the retention of large trees, but consider the larger landscape when managing for fishers.

These results are similar to Jones and Garton (1994) who found fishers selecting mature and old growth forests during the summer in Idaho. Yet, during the winter, they found fishers using a wider array of habitats, although still selecting for the larger diameter trees compared to random (Jones and Garton, 1994). Zielinski et al. (2004) studied West Coast fisher habitat selection at resting locations in the Coastal Mountains and Sierra Nevada of California. They found that standing trees of California black oak and Douglas-fir of the largest diameter available were used in each area, respectively. In their Sierra study area their resource selection function showed that fishers selected sites nearby water, on steeper slopes, with larger maximum DBH trees at sites with more variable tree DBH than random. They interpreted these results to suggest that managers can maintain fisher resting habitat by retaining large trees and using forest management practices that aid in the recruitment of trees that achieve the largest sizes. They also recommend increasing structural diversity at these sites. We concur with these forest management recommendations in reference to NRM fishers as well.

Fishers likely avoid the ponderosa pine stands as they reflect the drier environments in the study area and generally have less understory cover to offer protection (Graham and Jain, 2005; Keeling et al., 2006). Avoidance of lodgepole pine is likely related to the relatively small diameter of even the oldest trees (i.e., mature sizes of lodgepoles in the Northern US Rocky Mountains is between 18 and 33 cm DBH; Burns and Honkala, 1990). This is consistent with evidence for fisher's selection for western red cedar stands, a species with large DBH and associated with wetter, more structure filled environments.

We recommend retention of large decadent trees and snags in areas with large trees to provide denning habitat for female fishers. While we identified univariate patterns of selection for variables that indicate structure, we also found avoidance of variables such as landscapes with a high proportion of grass, suggesting the corollary – avoidance of open areas - is also true. This is similar to results from Weir and Corbould (2010), where fishers avoided open areas, non-forested ecosystems, and areas with recent logging.

In this study, we found that females are indeed selecting habitat at two scales: a stand scale as indicated by stands that have large mean and maximum DBH trees (as well as a

large variation in tree size) and a landscape scale as indicated by the preference for landscapes with a high proportion of large trees. Thus, it appears that while fishers can be detected in riparian stringers that bisect open landscapes, this habitat may not be sufficient for persistence. The converse is also likely true. Landscapes that do not have variation in large trees, snags, and cavities, and drier landscapes (i.e., landscapes with ponderosa and lodgepole pine) are probably not sufficient for fisher persistence either. Forest activities that promote the growth of multi-stage stands with ample structure and variation in tree widths and ages will provide the best habitat for fishers. Retaining trees that have decadence, disease, or defects will help provide some of this habitat.

From Factors affecting landscape occupancy by fishers in north-central British Columbia (Weir and Corbould, 2010)

Fishers showed strong selection for where they established home ranges within the landscape, avoiding establishing home ranges in areas with high densities of open areas. Being that fishers establish home ranges only where there is a sufficient concentration of suitable habitat (Powell 1994), our observation that fishers excluded wetland ecosystems and recently logged stands from their home range may be linked to the low densities of resources found in these areas. Wetlands and recently logged areas typically have little overhead cover, which likely exposes fishers to greater risk from aerial predators (Powell and Zielinski 1994). Further more, escape cover, such as trees for climbing, is farther apart in these environments, making fishers further susceptible to terrestrial predators.

The relationship between the extent of open areas and probability of home range occupancy suggests that past and proposed forest harvesting can strongly affect the ability of the landscape to support fishers, especially in landscapes in which wetland ecosystems are common. Landscapes with previous widespread and intensive forest harvesting may lose their ability to support fishers until these harvested areas regenerate sufficiently. Depending on the residual density of fishers in the harvested landscape, fishers need to disperse from adjacent areas with less forest harvesting for these landscapes to support resident fishers again. Intensive forest harvesting in the future may exacerbate the already diminished ability of modified landscapes to support fishers, particularly in forests that are slated for salvage harvest of diseased or damaged trees.

Because salvage harvest of beetle-killed trees typically involves clear cut harvesting, whereby all tree species (including spruce and fir) and secondary structure within the harvest unit are felled or cleared, our results suggest that this expedited harvest will gravely affect the ability of these landscapes to be occupied by fishers.

Soils

Soils are the foundation of terrestrial life. Forest productivity is directly tied to soil conditions. Soil takes thousands of years to develop and is not 'renewable' on a human time scale. Soil is an ecosystem in itself that must be healthy in order to provide for healthy forests, grasslands, and aquatic systems. Actions impacting such complex

systems are prone to unintended consequences. Given the life-support role soils play, special care and prudence are essential.

The National Forest Management Act (NFMA) prohibits "irreversible damage" to soils as well as "substantial and permanent impairment of productivity of land". Loss of soil (erosion) and displacement clearly cause "irreversible damage" and "permanent impairment of productivity of land". Loss of coarse woody debris causes soil damage that can last a century or more. Soil compaction negatively impacts soil productivity, overland flow, erosion, stream sedimentation, and late season flows. Soil compaction from logging can persist 50 – 80 years. (ICBEMP, Assessment of Ecosystem Components, 1997)

Avoiding soil damage is the only option; full restoration of soil damage is not generally possible. Compacted soils are not completely mechanically restorable. Mechanized decompaction is only partially effective at decompacting and can compound problems by mixing rock and mineral soil with topsoil resulting in long term reduced productivity. Replacing eroded or displaced soil is problematic. Artificial coarse woody debris replacement is not practical over large areas such as burned clearcuts.

Timber harvest practices including road building, log skidding and slash disposal have caused most soil damage on forest lands.

Nutrient recycling is a critical function of soils that historically has been damaged by treatments that negatively affect the amounts, types, and distribution of organic matter retained on site. (Graham, R. T., 1990) Many years of piling and windrowing of slash using dozer blades has removed not only the litter plus duff layers but also the thin layer of organic rich mineral soil (A horizon) from large acreages of forested lands. (McBride, personal communication) Guidelines for retaining adequate coarse woody debris should be developed based on the site potential and be within the historic range of variability for the fire regime of the site. Coarse woody debris needs to be maintained at natural levels in the interface zone, with exception granted immediately around structures and residences. (Harvey, 1987).

Control of livestock concentration, especially in sensitive riparian areas is essential to maintaining soil porosity and bulk density. The moist soils in these areas become compacted by concentrations of cattle in only a few days. (Warren, S.D., 1986; BNF soil monitoring reports) Gentle upland ridge tops and swales are other "gathering places" for cattle that require special efforts to control their distribution to protect soils from detrimental compaction.

The process of nutrient cycling on the forest lands is primarily effected through fire; this recycling is key to forest and grassland ecosystem health. Therefore, the use of fire when treating vegetation should be in accordance with the natural fire regime for the site, and organic matter left on site should be within the natural historic range of variability for the site type. (Fischer, W. C., 1987)

Mycorrhizal fungi are an essential component of productive soil. (Amaranthus, M. P., 1996) Most regeneration failures may be due to problems with mycorrhizae. Monitoring

mycorrhizae needs to be part of soil condition assessments. Mycorrhizae are very temperature sensitive, so soil temperatures need to be monitored.

Monitoring of detrimental soil disturbances needs to include: compaction, displacement, rutting, severe burning, erosion, loss of surface organic matter (especially coarse woody debris), soil mass movement, soil temperature, and damage to micro-biological components of soil (especially mycorrhizal fungi).

Given that monitoring has demonstrated an extensive legacy of soil damage, it is time to include that information in watershed health assessments. There needs to be an inventory of where these highly damaged soils occur and the extent to which they are damaged. The Forest Plan needs to quantify the acreages by watershed and do cumulative effects analysis, including the road systems to understand the full impact management has had on watershed health.

Elk

Elk and other big game require secure habitat, low road densities, winter and summer thermal cover and special features such as wet sites, riparian habitat, licks, and movement corridors.

From Defining Elk Security: The Hillis Paradigm. 1991 Proceedings of a Symposium on Elk Vulnerability, Montana Chapter of the Wildlife Society (Hillis et al. 1991)

• Guidelines for elk security are a minimum of 250 acres for providing security under favorable conditions; under less favorable conditions the minimum must be >250 acres. Effective security areas may consist of several cover-types of the block is relatively unfragmented. Among security areas of the same size, one with the least amount of edge and the greatest width generally will be the most effective. Wallows, springs and saddles may require more cover than other habitats.

• Generally, security areas become more effective the farther they are from an open road. The minimum distance between a security area and an open road should be one half mile. The function of this ≥ one half mile "buffer" is to reduce and disperse hunting pressure and harvest that is concentrated along open roads. Failure to accomplish this function will reduce the effective size of the security area and may render it ineffective. When cover is poor and terrain is gentle, it may require > one half mile from open roads before security is effective.

• Roads may be closed to motorized travel to provide security and a buffer between security areas and open roads. However, the minimum distance between open roads and security areas increases as closed-road densities increase within both the security area and buffer.

• To be biologically meaningful, analysis unit boundaries should be defined by the elk herd home-range, and more specifically by the local herd home-range during hunting

season. Elk vulnerability increases when less than 30% of analysis unit is comprised of security area.

• These guidelines represent minimums and do not necessarily justify reducing security to meet these levels (i.e., if 50% of an analysis unit is security, do not assume that 20% of the unit is excess security).

Hillis, J. Michael, Michael J. Thompson, Jodie E. Canfield, L. Jack Lyn, C. Les Marcum, Patricia M. Dolan, David W. McCleerey; Defining Elk Security: The Hillis Paradigm. 1991 Proceedings of a Symposium on Elk Vulnerability, Montana Chapter of the Wildlife Society.

From Elk Management in the Northern Region: Considerations in Forest Plan Updates or Revisions (Christensen et al. 1993)

• Considerations for Forest Plans Related to Habitat Effectiveness

- Roads: density (miles/square mile), construction standards, seasons of use, method of closure. Roads are undoubtedly the most significant consideration on elk summer range. Any motorized vehicle use on roads will reduce habitat effectiveness (including administrative use).
- Special features: wet sites, riparian habitat, licks, movement corridors. These sites are highly desirable for forage, water, temperature regulation, movement or a combination. Such sites should be recognized and protected; avoid damaging these features where elk are a benefiting resource.
- Cover: extent, shape, size, connectiveness. Cover analysis includes maintenance of security, landscape management of coniferous cover and monitoring elk use. Cover unit size, patterns on a landscape basis, connectiveness with other cover, the amount of cover available to elk and know use patterns by elk should be considered in prescriptions.
- Scale of analysis: site specific, herd unit, habitat analysis unit
- Spatial relationships: intermingled ownerships, adjacent administrative units, district or forest "averaging"
- Domestic livestock: forage and spatial competition.

• Levels of habitat effectiveness:

a. For areas intended to benefit elk summer range and retain high use, habitat effectiveness should be 70% or greater.

b. For areas where elk are one of the primary resource considerations habitat effectiveness should be 50% or greater.

c. Areas where habitat effectiveness is retained at lower than 50% must be recognized as making only minor contributions to elk management goals.

d. Reducing habitat effectiveness should never be considered as a means of controlling elk populations.

• Considerations for Forest Plans Related to Elk Vulnerability

- Roads: season of use, density.
- Security areas: distance from roads, size, cover characteristics, closures (area), topographic characteristics.
- Cover management: description, connectiveness, scale, terrain relationships.

- Mortality models: demonstrated predictors of elk mortality based on habitat quality, hunter density, or other factors.

Wildfire And Salvage Logging

Salvage logging after wildfires has significant detrimental impacts to soils, wildlife habitat, birds, water quality and fish.

From Wildfire and salvage logging: Recommendations for ecologically-sound post-fire salvage management and other post-fire treatments on federal lands in the West (Beschta et al 1995):

POST-FIRE PRINCIPLES

We recommend that management of post-fire landscapes should be consistent with the following principles:

1) Allow natural recovery and recognize the temporal scales involved with ecosystem evolution.

Human intervention on the post-fire landscape may substantially or completely delay recovery, remove the elements of recovery, or accentuate the damage. In this light there is little reason to believe that post-fire salvage logging has any positive ecological benefits, particularly for aquatic ecosystems. There is considerable evidence that persistent, significant adverse environmental impacts are likely to result from salvage logging, based on many past cases of salvage projects, plus our growing knowledge of ecosystem functions and land-aquatic linkages. These impacts include soil compaction and erosion, loss of habitat for cavity nesting species, loss of structurally and functionally important large woody debris. Human intervention should not be permitted unless and until it is determined that natural recovery processes are not occurring.

2) No management activity should be undertaken which does not protect soil integrity.

Soil loss and soil compaction are associated with both substantial loss of site productivity and with off-site degradation. Decreased infiltration, increased overland flow, and excess sedimentation all directly contribute to the degradation of forest soils and the off-site degradation of aquatic systems and reduced survival of aquatic species, including salmonids. Reduction of soil loss is associated with maintaining the litter layer. Although post-burn soil conditions may vary depending upon fire severity, steepness of slopes, inherent erodibility, and others, soils are particularly vulnerable in a burned landscape. Soil and soil productivity are irreplaceable in human timescales; therefore, post-burn management activities that accelerate erosion or create soil compaction must be prohibited.

3) Preserve species' capability to naturally regenerate.

From an ecological perspective, there is frequently no need for artificial regeneration. Artificial reintroduction of species will circumvent natural successional changes, are often unsuccessful and will have unanticipated side effects even if successful. If native species are failing to reestablish naturally, that failure will frequently be associated with other reasons than the absence of seed sources or colonists. If warranted, artificial regeneration should use only species and seed sources native to the site, and should be done in such a way that recovery of native plants or animals is unhampered.

4) Do not impede the natural recovery of disturbed systems.

Delays in recovery may increase the likelihood of extirpation of stressed populations, or may alter the pathway of recovery altogether. As a practical example, areas that have experienced the effects of a severe burn and are likely to exhibit high erosion should not be subjected to additional management activities likely to contribute to yet more sedimentation. Efforts should focus on reducing erosion and sedimentation from existing human-caused disturbances, e.g., roads, grazing, salvage logging.

RECOMMENDATIONS ON POST-FIRE PRACTICES

1) Salvage logging should be prohibited in sensitive areas.

Logging of sensitive areas is often associated with accelerated erosion and soil compaction (Marston and Haire 1990), and inherently involves the removal of large wood which in itself has multiple roles in recovery. Salvage logging may decrease plant regeneration, by mechanical damage and change in micro-climate. Finally, logging is likely to have unanticipated consequences concerning micro-habitat for species that are associated with recovery, e.g., soil microbes. Salvage logging by any method must be prohibited on sensitive sites, including:

- in severely burned areas (areas with litter destruction),
- on erosive sites,
- on fragile soils,
- in roadless areas,
- in riparian areas,
- on steep slopes,
- any site where accelerated erosion is possible.

2) On portions of the post-fire landscape determined to be suitable for salvage logging, limitations aimed at maintaining species and natural recovery processes should apply.

Dead trees (particularly large dead trees) have multiple ecological roles in the recovering landscape including providing habitat for a variety of species, and functioning as an important element in biological and physical processes (Thomas 1979). In view of these roles, salvage logging must:

• leave at least 50% of standing dead trees in each diameter class;
• leave all trees greater than 20 inches dbh or older than 150 years;
• generally, leave all live trees.

Because of soil compaction and erosion concerns, conventional types of ground-based yarding systems (tractors and skidders) should be generally prohibited. . .

3) Building new roads in the burned landscape should be prohibited. . .

4) Structural post-fire restoration is generally to be discouraged.

Frequently, post-fire restoration efforts involve the installation of hard structures including sediment traps, fish habitat alterations, bank stabilization, hay bales, weirs, check dams, and gabions. Such hard structures are generally not modeled or sited on the basis of natural processes, and their ability to function predictably may be particularly low in dynamic post-fire landscapes. Hard structures have high rates of both failure and unanticipated side effects. Therefore, structures are generally an undesirable and unsuccessful method for controlling adverse environmental impacts. . .

5) Post-fire management requires reassessment of existing management.

For example, the condition of a transportation system (i.e., pre-existing roads and landings) should be reassessed after a fire. By increasing runoff, erosion, and sedimentation, fires may increase the risks posed by existing roads. Therefore, post-fire analysis is recommended to determine the need for undertaking road maintenance, improvement, or obliteration.

6) Continued research efforts are needed to help address ecological and operational issues.

There is a need to research certain questions in order to guide post-fire management decisions. For example, some argue that salvage logging is needed because of the perceived increased likelihood that an area may reburn. It is the fine fuels that carry fire, not the large dead woody material. We are aware of no evidence supporting the contention that leaving large dead woody material significantly increases the probability of reburn." (Beschta et al 1995)

From Forest Service report PNW-GTR-486 "Environmental Effects of Postfire Logging: Literature Review and Annotated Bibliography" (USFS 2000) which reviewed the literature on salvage logging after fire focusing on environmental effects of logging and removal of large woody structure. Following are some of the references used and conclusions drawn:

a) Working on the Entiat burn of 1970 (Wenatchee National Forest), Klock (1975) and Helvey and others (1985) compared five different log retrieval systems (after hand felling) with respect to soil disturbance and erosion: tractor skidding over bare ground (<30 percent slope), tractor skidding over snow (<40 percent), cable skidding over bare ground, skyline (Wyssen skycrane), and helicopter. Klock (1975) found that tractor

skidding over bare ground caused the greatest percentage of area of severe soil disturbance (36 percent), followed by cable skidding (32 percent), tractor skidding over snow (9.9 percent), skyline (2.8 percent), and helicopter (0.7 percent).

b) Evidence that logging can affect vegetative production in the absence of significant ground disturbance was collected by Sexton (1994) in a study in central Oregon in postfire ponderosa pine stands, logged over snow. Sexton found that biomass of vegetation produced 1 and 2 years after postfire logging was 38 percent and 27 percent of that produced in postfire unlogged stands. He also found that postfire logging decreased canopy cover, increased exotic plant species, increased graminoid cover, and reduced overall plant species richness. Pine seedlings grew 17 percent taller on unlogged sites in this short-term study.

c) Postfire logging normally removes a great percentage of large dead woody structure and thus has the potential for significantly changing postfire habitat for wildlife (Lindenmayer and Possingham 1995, 1996). These changes include "structural" effects, such as removal of existing and future snags and large woody material, and "functional" effects, such as reduction in insect populations that serve as food for various wildlife species (Blake 1982, Saab and Dudley 1998, Sallabanks and McIver 1998).

d) In four recent independent studies conducted in the intermountain West, postfire logging caused significant changes in abundance and nest density of cavity-nesting birds, although the effect differed somewhat by location (Caton 1996, Hejl and McFadzen 1998, Hitchcox 1996, Saab and Dudley 1998). Most cavity-nesters showed consistent patterns of decrease after logging, including the mountain bluebird and the black-backed, hairy, and three-toed woodpeckers; abundance of the Lewis' woodpecker increased after logging.

e) No studies have specifically looked at how postfire logging alters the size distribution of fuel and the concomitant changes in future fire risk. Work examining fuels on harvested green tree stands suggests that postfire logging may increase short-term fuel loads and fire risk, owing to increased fine activity fuels, but reduce intermediate and long-term fire risk through removal of larger dead structure (Brown 1980).

f) Proper recovery and rehabilitation techniques by managers may be capable of mitigating soil loss and erosion problems associated with postfire logging (Simon and others 1994). For example, ground disturbance caused by postfire logging could disrupt water-repellent layers, increase infiltration, and thus decrease overland flow and sediment transport to streams, which could be a benefit during severe hydrological events. This hypothesis, however, has not been tested experimentally.

From Toward Meaningful Snag-Management Guidelines for Postfire Salvage Logging in North American Conifer Forests (Hutto 2006):

a) Birds in burned forests have very different snag-retention needs from those cavity nesting bird species that have served as the focus for the development of existing snag-management guidelines. Specifically, many postfire specialists use standing dead trees

not only for nesting purposes but for feeding purposes as well. Woodpeckers, in particular, specialize on wood-boring beetle larvae that are superabundant in fire-killed trees for several years following severe fire. Species such as the Black-backed Woodpecker (Picoides arcticus) are nearly restricted in their habitat distribution to severely burned forests. Moreover, existing postfire salvage-logging studies reveal that most postfire specialist species are completely absent from burned forests that have been (even partially) salvage logged. I call for the long-overdue development and use of more meaningful snag-retention guidelines for postfire specialists, and I note that the biology of the most fire-dependent bird species suggests that even a cursory attempt to meet their snag needs would preclude postfire salvage logging in those severely burned conifer forests wherein the maintenance of biological diversity is deemed important.

b) The ecological cost of salvage logging speaks for itself, and the message is powerful. I am hard pressed to find any other example in wildlife biology where the effect of a particular land-use activity is as close to 100% negative as the typical postfire salvage-logging operation tends to be.

c) Existing science-based data suggest that there is little or no biological or ecological justification for salvage logging. McIver and Starr (2000) note that because of this, the justification for salvage logging has begun to shift toward arguments related to rehabilitation or restoration, but those sorts of justifications also reflect a lack of appreciation that severe fires are themselves restorative events and that rehabilitation occurs naturally as part of plant succession (Lindenmayer et al. 2004). Interference with the natural process of plant succession by planting or spraying to speed the process of succession toward narrow timber-producing or old-growth goals, as some suggest (e.g., Sessions et al. 2004), is also incompatible with a holistic public-land-management goal of working within the constraints of a natural system. All things that characterize a severe disturbance event, including soil erosion and sometimes insufferably slow plant recovery, are precisely the things that constitute “rehabilitation” for those organisms that need those aspects of disturbance events at infrequent intervals to sustain their populations.

d) The profound failure of many decision makers to appreciate the ecological value of burned forests stems from their taking too narrow a view of what forests provide. The general belief that “dead and dying timber ought to be harvested and put to use” (Schwennesen 1992) prevailed prior to the infamous salvage rider of 1995 (U.S. Congress 1995), and it apparently still prevails today in many management circles. Land managers, politicians, and the public-at-large need to gain a better appreciation of the unique nature of burned forests as ecological communities, how sensitive the process of succession is to conditions immediately following the disturbance event (Platt & Connell 2003), and how important the legacy of standing deadwood is to the natural development of forests (Franklin et al. 2000). Nowhere are soils, special plants, or wildlife more sensitive to the proposition of tree harvesting than in a burned forest. And nowhere is the consideration of ecology more blatantly absent than in decisions to salvage log.

From Wildlife and Native Fish: Issues of Forest Health and Conservation of Sensitive Species (Rieman and Clayton 1997):

a) Although wildfires may create important changes in watershed processes often considered harmful for fish or fish habitats, the spatial and temporal nature of disturbance is important. Fire and the associated hydrologic effects can be characterized as "pulsed" disturbances (*sensu* Yount and Niemi 1990) as opposed to the more chronic or "press" effects linked to permanent road networks. Species such as bull trout and redband trout appear to have been well adapted to such pulsed disturbance. The population characteristics that provide for resilience in the face of such events, however, likely depend on large, well-connected, and spatially complex habitats that can be lost through chronic effects of other management. Critical elements to resilience and persistence of many populations for these and similar species will be maintaining and restoring complex habitats across a network of streams and watersheds. Intensive land management could make that a difficult job.

From Reducing Fire Risks to Save Fish – A Question of Identifying Risk. A position Paper by the Western Montana Level I Bull Trout Team (Riggers et al 2001):

a) Habitat conditions are another factor that has changed significantly. In general, fish habitat quality is much less diverse and complex than historic, and native fish populations are therefore less fit and less resilient to watershed disturbances. Roads, more than any other factor, are responsible for the majority of stream habitat degradation on National Forest Lands in this area (USDA 1997). Historically roads were not present in watersheds and did not affect hydrologic or erosional patterns. Now, however, extensive road networks in many of our watersheds contribute chronic sediment inputs to stream systems and these effects are exacerbated when fires remove the vegetation that filters road runoff.

b) … the real risk to fisheries is not the direct effects of fire itself, but rather the existing condition of our watersheds, fish communities, and stream networks, and the impacts we impart as a result of fighting fires. There, attempting to reduce fire risk as a way to reduce risks to native fish populations is really subverting the issues. If we are sincere about wanting to reduce risks to fisheries associated with future fires, we ought to be removing barriers, reducing road densities, reducing exotic fish populations, and re-assessing how we fight fires. At the same time, we should recognize the vital role that fires play in stream systems and attempt to get to a point where we can let fire play a more natural role in these ecosystems.

c) Salvage of burned trees is often proposed to reduce future fuel loading. While salvage can be accomplished with minimal impacts in some areas, many burned areas are already extremely sensitive to ground disturbance due to the loss of vegetation. Further disturbance can result in increased erosion, compacted soils and a loss of nutrients from these areas (USDA 2000, Beschta et al. 1995).

d) …we believe, in most cases, proposed projects that involve large-scale thinning, construction of large fuel breaks, or salvage logging as tools to reduce fuel loadings with the intent of reducing negative effects to watersheds and the aquatic ecosystem are

largely unsubstantiated. Post-fire activities such as these that increase the probability of chronic sediment inputs to aquatic systems pose far greater threats to both salmonid and amphibian populations and aquatic ecosystem integrity than do fires and other natural events that may be associated with undesired forest stand condition (Frissell and Bayles 1996).

From Factors Influencing Occupancy of Nest Cavities in Recently Burned Forests (Saab et al 2004).

a) Recently burned forests in western North America provide nesting habitat for many species of cavity-nesting birds. Year after fire had the greatest influence on occupancy of nest cavities for both groups, while site of the burn was secondarily important in predicting occupancy by strong excavators and less important for weak excavators. Predicted probability of cavity occupancy was highest during the early years (1–4) after fire, declined over time (5–7 years after fire), and varied by site, with a faster decline in the smaller burned site with a greater mosaic of unburned forest.

From Postfire Management on Forested Public Lands of the Western United States (Beschta et al 2004):

a) Scientific assessments of the current condition of forested systems in the western United States consistently yield the same broad conclusions: a century or more of road building, logging, grazing, mining, fire suppression, and water withdrawals, in conjunction with the loss of key species and the introduction of exotic species have degraded watersheds, modified streamflows and water quality, altered ecosystem processes and decreased biological diversity. Past and present actions limit the capacity for ecosystem recovery and reduce the range and abundance of many native species. Although postfire landscapes are often portrayed as "disasters" in human terms, from an ecological perspective they are the result of vital disturbance processes in forests.

b) Following a wildland fire, a common assumption is that immediate actions are needed to rehabilitate or restore the "fire-damaged" landscape. Yet abundant scientific evidence suggests that commonly applied postfire treatments may compound ecological stresses. Perhaps the most critical step in undertaking ecological restoration in the postfire environment is to forgo those activities and land uses that either cause additional damage or prevent reestablishment of native species, ecosystem processes, or plant succession.

c) To protect aquatic ecosystems in areas with moderate to high-severity burns, postfire management should not increase soil erosion or reduce soil productivity. Furthermore, onsite impacts to early successional native plant species during postfire logging, where such species are nitrogen fixers, can significantly affect a major pathway of nutrient replenishment in the postfire environment. Evidence continues to mount of a direct relationship between mechanical disturbance to the postfire environment and accelerated erosion. Soil compaction can persist for 50-80 years in many forest soils.

d) Postfire salvage logging has sometimes been justified on the assumption that >50% crown scorch results in tree mortality. However, trees within low and mid-elevation forests of the western United States possess a suite of adaptations that facilitate fire survival. Stephens and Finney (2000) found that the probability of conifer mortality is low when the percentage of the crown scorch was <60%. For trees greater than or equal to 50 cm dbh, they determined that the probability of mortality of ponderosa pine, incense cedar and white fir was <40% when crown scorch was as high as 80%. The multiple ecological roles of large trees and their high probability of survival supports the need to retain them in burned areas. Postfire salvage logging, based primarily on economic values, typically removes only the largest trees and…

e) Both ground-based yarding systems (tractors and skidders) and, to a lesser degree, cable systems can cause significant soil disturbance and compaction. Such practices should be prohibited in burned areas whenever they are likely to accelerate onsite erosion.

f) Accelerated surface erosion from roads is typically greatest within the first years following construction, although in most situations sediment production remains elevated over the life of a road. Thus, even "temporary" roads can have enduring effects on aquatic systems. Similarly, major reconstruction of unused roads can increase erosion for several years and potentially reverse reductions in sediment yields that occurred with disuse.

g) It is perhaps widely accepted that "best management practices" (BMPs) can reduce damage to aquatic environments from roads. Time trends in aquatic habitat indicators indicate, however, that BMPs fail to protect salmonid habitats from cumulative degradation by roads and logging. Ziemer and Lisle (1993) note a lack of reliable data showing that BMPs are cumulatively effective in protecting aquatic resources from damage.

From other sources, as noted:

"[S]everely burned forest conditions have probably occurred naturally across a broad range of forest types for millennia. These findings highlight the fact that severe fire provides an important ecological backdrop for fire specialists like the Black-backed Woodpecker, and that the presence and importance of severe fire may be much broader than commonly appreciated." (Hutto 2008).

"Whether forests that have been 'restored' through nontraditional harvest methods still retain the characteristics needed by Black-backed Woodpeckers after they burn severely under extreme weather conditions is currently unknown.

The second reason why we cannot assume that suitable postfire habitat will always be ample is that, even though severely burned forests will always be plentiful, postfire logging (a common postfire management practice) also reduces the suitability of burned forests to fire specialists like the Black-backed Woodpecker (Kotliar et al. 2002, Hutto 2006, Hutto and Gallo 2006, Koivula and Schmiegelow 2007, Saab et al. 2007)." (Hutto 2008).

"In contrast, the patterns of distribution and abundance for several other bird species (black-backed woodpecker [Picoides arcticus], buff-breasted flycatcher [Empidonax fulvifrons], Lewis' woodpecker [Melanerpes lewis], northern hawk owl [Surnia ulula], and Kirtland's warbler [Dendroica kirtlandii]) suggest that severe fire has been an important component of the fire regimes with which they evolved. Patterns of habitat use by the latter species indicate that severe fires are important components not only of higher-elevation and high-latitude conifer forest types, which are known to be dominated by such fires, but also of mid-elevation and even low-elevation conifer forest types that are not normally assumed to have had high-severity fire as an integral part of their natural fire regimes. . .

The ecology of selected species (in the present case, fire-dependent species) should be used to understand and embrace the natural processes that prehistorically produced conditions necessary for their maintenance, and not be used to devise artificial means to circumvent those natural processes." (Hutto et al 2008).

"An appreciation of the biological uniqueness of severely burned forests is important because if we value and want to maintain the full variety of organisms with which we share this Earth, we must begin to recognize the healthy nature of severely burned forests. We must also begin to recognize that those are the very forests targeted for post-fire logging activity. Unfortunately, post-fire logging removes the very element — dense stands of dead trees — upon which many fire-dependent species depend for nest sites and food resources.

With respect to birds, the effects of post-fire salvage harvesting are uniformly negative. In fact, most timber-drilling and timber-gleaning bird species disappear altogether if a forest is salvage-logged. Therefore, such places are arguably the last places we should be going for our wood." (Hutto 2013).

"Although the Black-backed Woodpecker is the most extreme species in terms of its restriction to, and evolutionary history with, burned forests, many additional bird species reach their greatest abundance in burned forests (15 of 87 species detected in burned forests, as I noted above). These include the Three-toed Woodpecker, Hairy Woodpecker, Olive-sided Flycatcher, Clark's Nutcracker, Mountain Bluebird, American Robin, Townsend's Solitaire, Cassin's Finch, Dark-eyed Junco, Chipping Sparrow, and Red Crossbill." (Hutto 2011).

"One of the most common management activities following forest fires is salvage logging (Figure 8). Perhaps we need to change our thinking when it comes to logging after forest fires. With respect to birds, no species that is relatively restricted to burned-forest conditions has ever been shown to benefit from salvage harvesting. In fact, most timber-drilling and timber-gleaning bird species disappear altogether if a forest is salvage-logged. Therefore, if we want our land-use decisions to be based, at least in part, on whether a proposed activity affects the ecological integrity of our forest systems, burned forests should be the LAST, rather than the first places we should be going for our wood.

For birds, standing dead trees are one of the most special biological attributes of burned forests. They house equally unique beetle larvae that become abundant because they feast on the wood beneath the bark of trees that have died and are, therefore, defenseless against attack. If we value and want to maintain the full variety of organisms with which we share this Earth, we must not only recognize that burned forests are quite "healthy," but must also begin to recognize that post-fire logging removes the very element — standing dead trees — upon which each of those special bird species depend for nest sites and food resources. "(Hutto 2011).

"Patches of high-intensity fire (where most or all trees are killed) support the highest levels of native biodiversity of any forest type in western U.S. conifer forests, including many rare and imperiled species that live only in high-intensity patches. Even Spotted Owls depend upon significant patches of high-intensity fire in their territories in order to maintain habitat for their small mammal prey base. These areas are ecological treasures." (Hanson 2010).

Beetle-Killed Trees

Beetle killed trees are a natural part of forest ecosystems and promote development of habitat attributes necessary for many other species.

"'But beetle kill is very different. Change induced by beetles is less abrupt, and, unless beetle-killed trees are cut, they remain part of the overstory for years.' Both of these traits have important implications for how a stand regenerates and how watersheds respond." (USFS 2012, quoting Research Biogeochemist Chuck Rhoades).

"'But the sick and dead trees are also losing needles that fall to the ground and help retain soil moisture. And, as trees decay, they release nutrients back into the system.'" (Id., quoting Research Biogeochemist Chuck Rhoades).

"[R]esearchers are already finding that beetles may impart a characteristic critically lacking in many pine forests today: structural complexity and species diversity." (Id.)

"As these infested trees die their diminutive competitors respond vibrantly. Healthy understory plants stand poised, like a carpet of dry sponges, ready to soak up the water, sun, and fertility liberated by the assault around them. Uptake by the surviving understory strongly dampens runoff and nutrient input into waterways downslope." (Id.)

"[T]otal understory plant cover declined in treated sites compared to those where no cutting took place. The difference was apparently driven by the negative responses of several key native species to mechanical harvest. 'Species in the genus Vaccinium declined markedly in our clearcut sites,' she said. 'That genus includes shrubs related to blueberries that are important to some wildlife. They generally suffer in response to disturbance and copious direct sunlight.'" (Id., quoting researcher Paula Fornwalt).

Aside from promoting mixed age structure and helping to maintain native understory communities, retention of the dead [lodgepole] overstory favors a shift in tree species composition. . . 'Those include lodgepole pine, subalpine fir, and aspen, with subalpine fir as the most abundant species of new recruit. (Id., quoting researcher Paula Fornwalt).

Although an increase in subalpine fir may elevate fire risk in forests recovering from beetle infestation, untreated beetle-killed stands may be of great benefit to non-human forest inhabitants. The prevalence of fir following beetle outbreaks could be a boon for wildlife species that rely on the complex vertical structure that is generally lacking in lodgepole pine-dominated stands. The same low fir limbs that can carry fire into the canopy provide food, thermal cover, and protection from predators for a host of wildlife including snowshoe hare, favorite prey for the Canada lynx. Species of conservation concern ranging from Mexican spotted owls to the Canada lynx could respond positively to the structural complexity induced by mountain pine beetles. By driving these shifts at a huge spatial scale, beetles might even be viewed as a biological mechanism for creating the habitats that now limit some of the species we care most about. (Id.)

"[T]he most informative and striking lesson thus far may be the response that occurs in our absence. Apparently without posing serious threats to water quality or long-term ecosystem viability, mountain pine beetles may increase the structural complexity and species diversity of high elevation forests. These characteristics could have substantial benefits in the near term and, perhaps more importantly, they are the keys to improved resilience in our future forests." (Id.)

"A model of nitrate release from Colorado watersheds calibrated with field data indicates that stimulation of nitrate uptake by vegetation components unaffected by beetles accounts for significant nitrate retention in beetle-infested watersheds." (Rhoades et al 2013).

"The lack of a large streamwater nitrate response after extensive canopy mortality caused by bark beetles may be explained by some combination of two factors. Heterogeneous mortality (spatial and temporal) would be expected to reduce the amount of nitrate loss at any given time over the progression of infestation. In addition, compensatory responses by residual live vegetation are likely to respond to the increased resources available following overstory mortality. . . A second step in adaptation of the model is to assume that beetle-induced mortality, although killing much or most of the original canopy, does not disturb beetle-resistant overstory trees and the understory vegetation that would be lost or damaged during tree harvest." (Id.)

"While research is ongoing and important questions remain unresolved, to date most available evidence indicates that bark beetle outbreaks do not substantially increase the risk of active crown fire in lodgepole pine (Pinus contorta) and spruce (Picea engelmannii)- fir (Abies spp.) forests under most conditions. Instead, active crown fires in these forest types are primarily contingent on dry conditions rather than variations in stand structure, such as those brought about by outbreaks. Preemptive thinning may reduce susceptibility to small outbreaks but is unlikely to reduce susceptibility to large, landscape-scale epidemics. Once beetle populations reach widespread epidemic levels,

silvicultural strategies aimed at stopping them are not likely to reduce forest susceptibility to outbreaks. Furthermore, such silvicultural treatments could have substantial, unintended short- and long-term ecological costs associated with road access and an overall degradation of natural areas." Black et al 2013.

Post-disturbance harvest is common practice on forest lands and is designed to remove trees or other biomass in order to produce timber or other resources. This type of resource extraction has the potential to inadvertently lead to heightened insect activity (Nebeker 1989; Hughes and Drever 2001; Romme et al. 2006). In particular, snags and fallen logs contribute to the protection of soils and water quality and provide habitat for numerous cavity and snag-dependent species (Romme et al. 2006), many of which prey on bark beetles and other economically destructive insects. Therefore, outbreaks could be prolonged because of a reduction in the beetle's natural enemies (Nebeker 1989), including both insects and bird species that feed on mountain pine beetles (Koplin and Baldwin 1970; Shook and Baldwin 1970; Otvos 1979). Furthermore, post-disturbance harvest can damage soil and roots by compacting them (Lindenmayer et al. 2008) leading to greater water stress in trees, which may reduce conifer regeneration by increasing sapling mortality (Donato et al. 2006) and, in general, may cause more damage to forests than that caused by natural disturbance events (DellaSala et al. 2006). (Id.)

"Ton for ton, dead trees ('snags') are far more important ecologically than live trees, and there are too few large snags and logs to support native wildlife in most areas. Recent anecdotal reports of forest 'destroyed' by beetles are wildly misleading and inaccurate." (Hanson 2010)

Helicopters

Helicopter logging can negatively affect grizzly bears and other wildlife.

"Activities Generally Resulting in a 'Likely to Adversely Affect' Determination: The available scientific literature suggests that high frequency helicopter use, particularly at low altitudes, in habitat occupied by grizzly bears can negatively affect the bears . . . These effects may include disturbance resulting in behavioral changes, such as fleeing from the disturbance; physiological changes, such as increased heart rate; displacement to lower quality habitat; and increased energetic demands." (Summerfield et al 2006).

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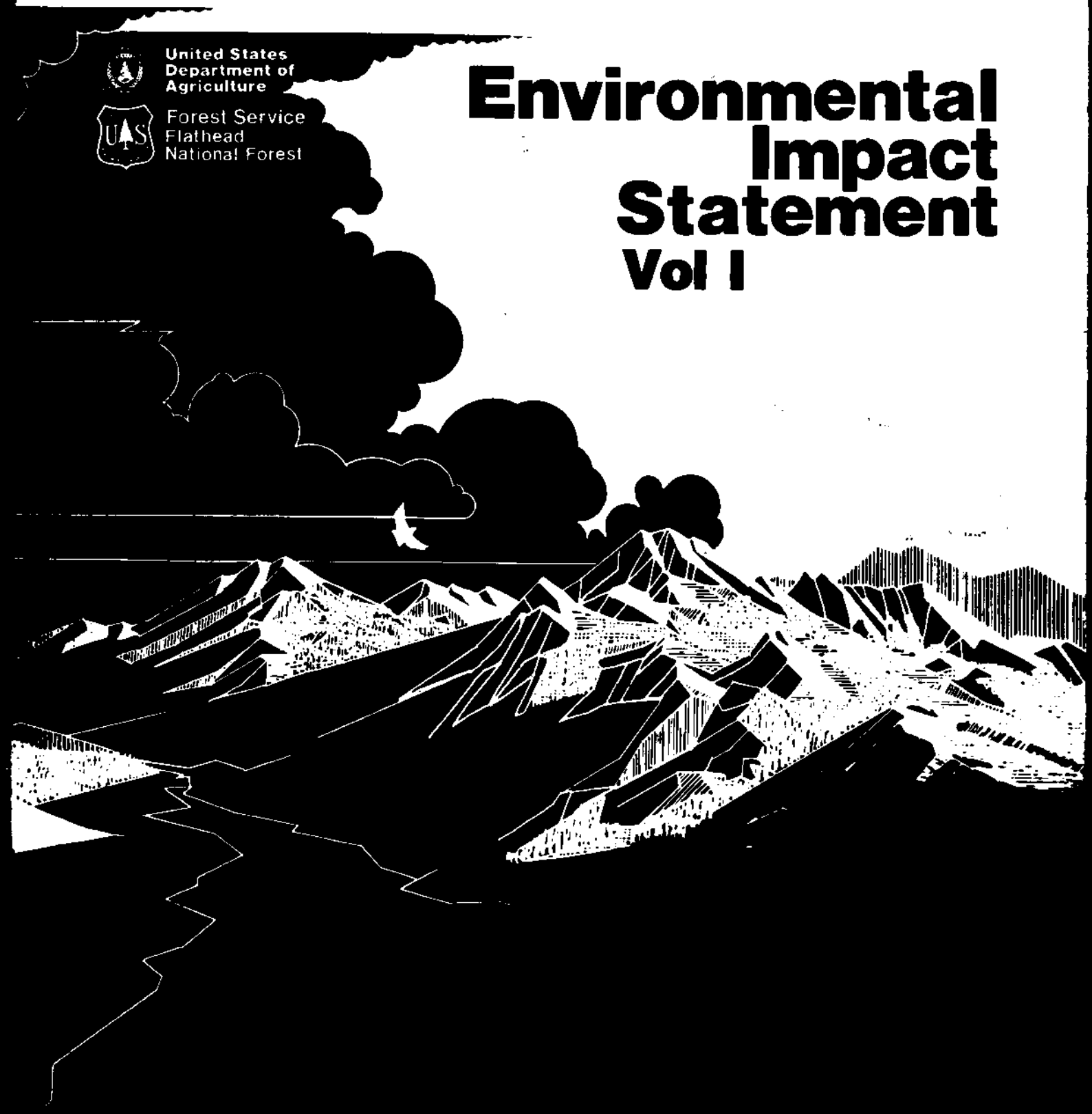
United States
Department of
Agriculture

Forest Service
Flathead
National Forest

Environmental Impact Statement

Vol I



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APPENDIX G

1974 TIMBER MANAGEMENT PLAN DEFICIENCIES AND PROCEDURES TO CORRECT THEM - FLATHEAD NATIONAL FOREST

A. BACKGROUND

In May 1974, the Flathead National Forest issued an Environmental Impact Statement for an interim revision of the Timber Management Plan.

In October 1976, American Timber Co., Stoltze Lumber Co., Louisiana Pacific Corp., Rudolph B. Hoecker, George Stearns, Harold McLaughlin, and Richard G. Stearns filed civil complaint vs. the Secretary of Agriculture, U.S.F.S. Chief, Northern Region Regional Forester, and Flathead National Forest Supervisor alleging the Draft and Final "interim" Timber Management Plan EIS failed to adequately assess social, economic, and natural environmental consequences of the proposed Forest Plan, did not analyze and consider reasonable alternatives to the Forest Plan, and did not comply with the NEPA (National Environmental Policy Act).

On July 16, 1979, U.S. District Judge Russell Smith in Civil Action CV-76-115-M found the 1974 EIS was not proposed under the "procedures required by law" and held the 1974 TM (Timber Management) Plan was invalid.

On August 15, 1979, the Forest Service proposed to treat the areas the Court found deficient under NEPA in a "Forest Plan," developed under the auspices of the National Forest Management Act.

B. AREAS OF DEFICIENCY

In Judge Smith's opinion the following deficiencies needed to be corrected.

1. THE CHANGE IN THE STRATIFICATION OF THE LAND BASE

Sixty to eighty percent of the reduction in potential yield from the 1969 TM Plan to the 1974 proposal was due to a change in commercial Forest base. An additional 194,568 acres were placed in the high noncommercial Forest zone. This classification was done by a team of foresters and others with no documentation in the 1974 EIS for the reasons for the reduction of 118,034 acres from the 1969 commercial Forest base.

2. LENGTH OF CONVERSION PERIOD FOR REMOVAL OF OLD-GROWTH SAWTIMBER

The justifications for lengthening the conversion period from 34 years in the 1969 TM Plan to 42 or 50 years in the 1974 EIS were aesthetics, road costs, and watershed. The 1974 EIS stated the decision to change the conversion period was that the 34-year period specified in the 1969 TM Plan would cause the Forest to have a significantly modified visual appearance and that taxpayers couldn't afford road building costs necessary to cut old growth in that time period. The 1974 EIS set the conversion period at 42 years with a temporary lengthening to 50 years

to allow for hydrologic stabilization with the understanding that adjustments would be made as more specific watershed information became available. The court found no analysis of tradeoffs, road construction costs, etc., in changing the conversion period to 42 years instead of 24 years. The temporary lengthening to 50 years was also faulted due to the blanket rather than separate watershed appraisal. In addition, conflicts of opinion among hydrologists were not dealt with.

3. MANAGED STANDS WOULD NOT YIELD AS MUCH AS HAD BEEN PROJECTED IN EARLIER PLANS

The 1974 EIS stated the basis for the yield projections was due to "improved information" but did not show what the information consisted of.

C. PROPOSED PROCEDURES TO DEAL WITH DEFICIENCIES

The following procedures have been used to address the deficiencies identified by the Court.

1. COMMERCIAL TIMBER LAND BASE

The major deficiency of the 1974 proposal was corrected through the Forest planning process by presenting and analyzing costs and benefits, and selecting from several land designation alternatives. The process for making the basic timber capability screen for the Forest Plan has been spelled out in a Flathead National Forest planning procedures document (219.12b dated 11/18/80). The process is analogous to the noncommercial Forest stratification for the 1974 TM Plan proposal. The criteria for classification of lands not suitable (noncommercial) of receiving consideration for timber management are plainly documented, and are measurable and mappable. The criteria are supported by scientific literature and experienced data.

2. LENGTH OF CONVERSION PERIOD

In previous timber management plans such as the 1969 and proposed 1974 revision, the major factors analyzed in determining alternative harvest levels were the length of conversion period for old growth and management intensities as reflected by yield projections. The Forest planning process deals not only with factors affecting growth, yield, and mortality. The major emphasis is on the economic consequences resulting from the interaction of management alternatives and biological growth and mortality. In Forest planning, the most cost effective combination of land designation, management intensities, and harvest schedule has been determined to achieve the objectives set for each alternative. Thus the rate of conversion of old growth is set for each stratification of the Forest necessary to achieve objectives and maximize economic benefits. Conversion of all old growth is no longer considered a given that is necessary or desirable to achieve in managing a Forest. Cutting of old growth or any other condition class has been scheduled with current

analysis methods only to the extent that it is necessary and/or economically desirable. Evaluation of alternative conversion periods on old growth is not necessary under the integrated planning methodology. The ecological and social costs and benefits associated with old-growth timber quantity over time has been considered in structuring and evaluating alternatives.

3. MANAGED STAND YIELDS

Procedures for projected yields are documented by Flathead National Forest FORPLAN Timber Yield Coefficients. The procedures are well documented, referenced, and summarized in the Forest Plan EIS thus correcting the 1974 deficiency.

From: Carolyn Hopper
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Tuesday, August 05, 2014 2:21:58 PM

Dear Mr. Kolman,

We all love the outdoors. Whether hiking the Bob Marshall Wilderness, camping in Glacier National Park, or driving the Beartooth Pass in the Custer and Gallatin National Forests our public lands are what is best about Montana.

Unfortunately, some Members of Congress and state legislators in Montana have proposed selling off some public lands, such as National Forests or Bureau of Land Management (BLM) areas, as a way to help reduce the budget deficit. This appears to be a smokescreen for selling our lands to the highest bidder, taking them out of the public's hands forever.

In 2013, the Montana Legislature passed SJ15 to have the Environmental Quality Council (EQC) study to evaluate the management of federal public lands with a focus on Forest Service and BLM lands.

Among the recommendations in EQC's draft report <http://mtvoters.org/sites/all/modules/civicrm/extern/url.php?u=31653&qid=1303174> is that the Legislature should eventually explore a takeover of federal lands in Montana. I don't think this should even be an option.

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Points to make:

* Remove recommendation #11 from the draft report and any other reference to pursuing a transfer or sale to states, private landowners, or any other entities.

* Montanans overwhelmingly oppose having the state of Montana assume full control of managing federal lands inside the state and having Montana taxpayers pay all resulting costs to manage those lands and fight fires.

* Protecting public lands in Montana has been a good thing for Montana and has led to opportunities for children to explore and learn, protected clean water, provided opportunities for hunting, fishing, and outdoor recreation, and improved our quality of life.

* The possibility that states might sell-off these lands is too great. While there needs to be improvements in federal-local relations in managing federal public lands, we need to ensure that those lands are protected for future generations.

Sincerely, Carolyn Hopper

From: Carolyn Hopper
To: Kolman, Joe
Subject: SJ 15 Federal Lands
Date: Monday, July 28, 2014 6:41:31 PM

Dear Mr.Kolman,
As I slowly make my way through the proposals in the draft report concerning land use several questions come to mind. Of which I include a few here. More to follow
later.
1. How did the committee select the individuals it interviewed?
2. How does your committee propose to have the state pay for all you ask for? Increase taxes?
3. Why do you leave out under "wildfire" all the smoke that comes here over Montana skies from around the country? the world? How do you propose that
Montana money control this?
4. How do you propose to help all the elderly so often referred to by Mr. Kerry White into the forests on ATV's if they are not fit? What will happen when
there is an accident?
5. While ATV's are necessary for some forest work, they are not necessary to the general health of the streams, birds, animals, and air quality of the forests.
Could you explain how an ATV benefits all concerns outside of the desire for human pleasure?
6. How has grazing by cattle benefited the land? Health of all wild animals and plants?
7. Where in your study/draft do you show recognition of all hard facts related to how much money comes into Montana coffers by visitors who come to
enjoy and relax in the land that is more wild than paved and roaded? And there are facts if you choose to include them.
8. How does the increased mining which does result in polluted air and water benefit all life in our state?
9. Are you aware that what happens in Montana does not stay in Montana? - Water flows, air flows...etc.
10. Are you aware that an ATV or motorcycle requires some strength? skill? How do you propose to address this?
11. Why is the noise of the cities important in the forest?

I would appreciate specific answers to these questions.

I would also appreciate recognition from your "committee" that there is a large percentage of the population of Montana that is opposed to the tactics of Mr. Cliven
Bundy, the outlaw commissioners in Utah, including Mr. Lyman, and opposed to the taking of federal land by a new sagebrush rebellion in Montana.

And your concern about "whose science is it" and that it is only tied to whomever pays for the research? Where does that information come from?

Sincerely,
Carolyn Hopper
Bozeman, MT

From: Carolyn Hopper
To: Kolman, Joe
Subject: SJ 15 Federal lands
Date: Monday, July 28, 2014 9:01:49 PM

Dear Mr. Kolman - and the rest of your committee.

I am commenting on the proposal of your committee. I vote an emphatic NO for your proposal to have the State of Montana (which means at least in part, me) to take federal lands in Montana away from the Federal Government. In part my decision concerned with - the State of Montana does not and will not have sufficient funds to pay for wildfire fighting.
It is not true that you and your committee and any other member of the State Legislature are well up to the task of providing and maintaining clean air and clean water for the residents of Montana. Nor are you prepared to understand that it is not mines that bring visitors to our state but its wild and scenic beauty. In short, they come for beauty -- quiet hiking on trails, fishing in clean water, rafting in clean water, canoing in clean water, views unimpeded by city smog, ATV and motorcycle smoke, backpacking in beautiful forests and meadows of wildflowers where they can hear birds sing and, with luck, see a bear or moose or wolf.

No member of your committee represents me and my understanding of what beauty and wildlife and clean rivers, streams, air, mean. You seek to take it over to mine, and are not proposing any sort of other industry to help ensure that what we have -- beauty -- is here tomorrow. Millions of dollars are not being spent by visitors for anything ugly or polluted. You and your committee do not understand that jobs can come from clean technology. You are part of a party in this state that refuses to help thousands who will uninsured medically due to your refusal to accept money from the Federal government already collected by it and which it is prepared to give back. You will be personally responsible for more ill health in our Montana residents if you help pollute more air and water and decrease by one acre the beauty of wild and scenic places.

SJ 15 - NO. You should not be proposing any breaking of any law -- whether it is to refuse to pay taxes like the criminal Mr. Cliven Bundy or ride rough shod over my land like Mr. Lyman and his ilk. No lawbreaker should hold office. No lawbreaker should collect a salary. No one helping criminals in Montana should be part of my government. Not now. Not ever. And whether a citizen of Montana moved here yesterday or tries to claim he or she is better than anyone because his or her family has been here several generations (thereby being part of the criminal activities promoted against Native Americans or slaughter of wolves or bison or extirpating thousands of other predators--at least possibly) I say to that "phooey." We are all as good as anyone else.

Sincerely,

Carolyn Hopper
Bozeman

MONTANA WILDERNESS ASSOCIATION
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Montana Environmental Quality Council
P.O. Box 201704
Helena, MT 59620-1704
Re: SJ15 Draft Report

August 15, 2014

Mr. Chairman and Members of the Environmental Quality Council,

Please include the following comments from the Montana Wilderness Association in the public record for the draft report titled "Evaluating Federal Land Management in Montana: An identification of significant risks, concerns, and solutions."

The Montana Wilderness Association (MWA) was founded 56 years ago by hunters and conservationists to safeguard Montana's wilderness heritage and public lands. We represent over 5,000 dues-paying members statewide.

Last year, the Montana State Legislature passed Senate Joint Resolution 15 (SJ15), which called for a study to "evaluate" and identify "measures that would help ensure public lands are managed responsibly." The duty of generating this study fell to the Environmental Quality Council (EQC). As an organization that has been actively engaged in federal and state land management for 56 years, we're writing to express serious concerns with the poor quality of this report and to request that the committee permanently table the report at the next opportunity.

Of primary concern to MWA is the poor quality of the survey of 35 of Montana's 56 County Commissions, as required by SJ15. Upon reading the report, it appears that the responses of 28 counties (7 Counties declined to return the survey) to this survey form the primary basis for the report's findings and recommendations, yet the report does not include a methodology or even a thorough explanation detailing how the survey was designed or conducted.

The survey appears to have been constructed without regard for best practices to ensure objectivity and to avoid biased results. Upon review of the survey, it seems clear to us that it was designed to generate pre-determined outcomes. For example, section one, titled "Public Health, Safety, and Welfare" contains just six questions. Question four reads:

> *How important is it for people of your county to have motorized access to public lands for sustenance activities such as gathering wood, picking berries, harvesting wild game, etc.?*

This question is narrowly focused on "motorized access", yet the survey contains no questions about public land access by foot, horse, or bicycle use for so-called "sustenance" activities. Question six under the same section of the survey adopts a similarly narrow scope. It reads:

> *Regarding multiple-use recreational access routes on federal lands, does your county desire: increased multiple-use access, reduced multi-use access* [or] *keep access as is?*

This question is narrowly focused on "multiple-use" access; a term that is left undefined but is often used to refer to management policies that include or prioritize motorized use. Once again, the survey question and the survey in general, fail to reference hiking, cycling, horseback riding, hunting, fishing, or a wide range of other recreational activities or modes of travel that Montanans enjoy on public lands.

Another example of bias found in the survey is the repeated emphasis on certain land management challenges or issues and the conspicuous exclusion of other challenges or issues. For example, section two, titled "Environmental Quality", contains just four questions that focus on wildfire, noxious weeds, and bark beetles. The heading of this section appears to be a good fit for questions concerning a wide range of additional issues such as watershed restoration, wilderness conservation, or the removal non-system roads that represent an economic and environmental liability. Yet, these issues are excluded in favor of questions that focus the participant narrowly on the challenges of reducing fuel loads and increasing timber harvest.

The examples above are just a sampling of the type of bias that is clearly evident in the survey questions. However, this isn't the only concern we have with the survey. We are also disappointed to note that several of the questions deal with highly technical land management issues such as the impact of wildfire on endangered species or whether "the economic productivity and number of related private sector jobs [is] commensurate with the resource production capacity of the federally managed lands within your county?"

These questions would represent significant challenges for trained wildlife biologists, foresters, and economists, yet the opinions of experts with decades of knowledge in these fields are not considered in the report. Indeed, there seems to be an underlying assumption in the report that the responses of County Commissioners from 28 Montana counties to 20 narrowly focused questions are sufficient to establish findings and recommendations for future federal land management on 27 million acres of federal land in Montana despite the fact that Montana counties have no management experience or jurisdiction over federal lands.

To be clear, the opinions of County Commissioners on questions of federal land management are very important, yet the aggregate opinions of 28 County Commissions cannot determine whether "high intensity wildfire" *actually causes* "significant loss of wildlife habitat or harm endangered species." Indeed, scientific research shows that the long-term effects of fire on birds, fish and wildlife are often beneficial.

A second concern we have with the report pertains to the lack of exploration and recognition of programs, projects, and legislative efforts intended to improve federal land management across our state. Here are a few examples:

- Over the last 10 years, many Montana businesses, government agencies, trade associations, and non-profit organizations, including MWA, have worked together through the Montana Forest Restoration Committee to increase the usage of stewardship contracting to achieve forest management objectives and create jobs. This work ranges from cooperative lobbying efforts at the federal level to expand stewardship contracting authority as well as time-intensive work on the ground with forest managers to ensure best project outcomes.

- Recently, a variety of new national forest management tools were created through the passage of the Farm Bill with support from MWA and many other organizations and commercial interests. Forest managers are just beginning to apply these new tools, which will expedite urgently needed forest restoration and fuels mitigation projects across Montana.

- Over the last five years, a wide variety of stakeholders have worked together to design legislation – the Forest Jobs and Recreation Act – to protect wildlife habitat, ensure access to federal land for a wide variety of recreational uses, and dramatically increase timber harvest and restoration on three national forests in Western Montana. This bill received a bipartisan vote in the U.S. Senate last fall and remains a viable solution to many federal land management challenges in our state.

While the Farm Bill is addressed in the report, its forestry provisions are not recognized in report as a replicable model for increasing forest restoration and timber harvest. The other two solutions mentioned above are not addressed in the report at all.

A third concern we have with this report is the contradiction between the remarkably broad direction given to the EQC by SJ15 and the very narrow focus of the report's findings and recommendations on a handful of federal land management challenges or concerns. To summarize, the report identifies a need to increase motorized use and "economic production", reduce wildfire, and increase opportunity for local input in federal land management decisions. After reviewing these findings, the reader would have to conclude that the EQC did not consider numerous other important needs.

A short list of these needs include the need to ensure robust populations of native fish and wildlife; the need to protect endangered flora and fauna that may be threatened by resource development; the need to adequately fund federal agencies to maintain recreational trails; and the need for congressional action on longstanding recommendations within national forest management plans across Montana.

Our fourth concern, and also our greatest concern, with this report lies with recommendation 11, which states that, "The Legislature should not pursue the transfer of federally-owned lands to the state of Montana until all other options are investigated." This recommendation suggests that the Montana state legislature could, at some point in the future, pursue the transfer of federal lands to the state, and that such a transfer is a plausible legal option to resolve federal land management challenges.

In fact, state legislative efforts to transfer federal lands to individual states are neither legal nor plausible. The Constitution vests in Congress the power of disposition of federal lands and of making all needful rules and regulations. Congress has the absolute right to prescribe the times, the conditions, and the mode of transferring this property and to designate the persons to whom the transfer shall be made.

Moreover, proponents of transferring federal lands to Montana fail to recognize that a state with a 2015 revenue estimate of $2.1 billion cannot effectively manage an additional 27 million acres of land, which amounts to five times the amount of land that the state manages today. If federal lands in Montana were transferred to the state, the only possible away to avoid an enormous new tax burden on Montana residents would be to sell a significant percentage of those federal lands. The sale of these publicly owned lands represents the single greatest threat to our outdoor heritage and to our hunting and fishing traditions in Montana. Indeed, the very notion of transferring federal lands to individual states threatens the rights and privileges of all Americans to access our country's federal lands within Montana's borders.

In conclusion, the survey results at the heart of the report were generated using biased questions that ignored best practices for generating meaningful public input to inform public policy decisions. The report ignores important projects and programs currently proposed or already underway in Montana to meet critical federal land management challenges. The report addresses a very narrow range of management challenges and opportunities despite the broad mandate granted to the EQC by SJ15, which is to "identify measures that will help ensure that public lands within Montana are managed responsibly and prudently for present and future generations". The report also suggests that the transfer of federal lands to the state is a viable option for the Montana state legislature, when it is emphatically not a plausible legal or financial option. Moreover, the transfer of federal lands to the state and/or their sale would threaten the outdoor access and traditions of American citizens.

We believe the flaws apparent in this draft report are too numerous and substantial to be addressed between now and September 15, 2014, the deadline established for this report by SJ15. Therefore, we encourage the EQC to permanently table the report at the first opportunity. If the EQC decides to move forward with a final draft of this report then we request that all references to the transfer, sale, or disposal - including any reference to change in ownership - of our National Forests and Bureau of Land Management lands be removed from the final report.

MONTANA WILDERNESS ASSOCIATION

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Thank you for your consideration,

Gabriel Furshong
State Program Director
Montana Wilderness Association

Cc: Governor Steve Bullock, USFS Regional Forester Faye Krueger, U.S. Senator Jon Tester, U.S. Senator John Walsh, and U.S Congressman Steve Daines.

MONTANA CONSERVATION VOTERS

August 16, 2014

RE: Comments on SJ15 Federal Lands Study

To: Joe Kolman jkolman@mt.gov

Dear Members of the Montana Environmental Quality Council:

Montana Conservation Voters (MCV) and the Montana Conservation Voters Education Fund (MCVEF) understand that much improvement needs to be made on land management practices of federal public lands. However, MCV and MCVEF are opposed to any proposal to sell-off, transfer, giveaway, or effort that would results in the privatization of our federal public lands.

Montanans overwhelmingly oppose having the State of Montana assume full control of managing federal lands within our borders, which would force Montana taxpayers to pay all the resulting costs to manage those lands, including the high cost of fighting fires.

Montana public lands have been an incredibly great asset, providing opportunities for children to explore and learn, for family recreation, hunting, fishing and hiking, as well as an overall high quality of life. Polls show very strong support by Montanans for protecting public lands and ensuring access to them.

Furthermore, according to a National Park Service (NPS) report from earlier this year, 4.5 million people visited Montana in 2012 and spent $400 million in communities surrounding Montana's federal public lands. Any effort leading to privatization of those lands would mean loss of some or all of those tourism dollars. Should the lands be sold off to the states, including Montana, the NPS report shows an $11 billion backlog on maintenance projects due. Montana and other states would be saddled with the burden of those costs.

We all love the outdoors. Whether hiking the Bob Marshall Wilderness, camping in Glacier National Park, or driving the Beartooth Pass in the Custer and Gallatin National Forests, our public lands are what is best about Montana.

Montana Conservation Voters and Montana Conservation Voters Education Fund urge the EQC not to travel down the road that would jeopardize these treasures by selling them off to the highest bidder.

Thank you for the opportunity to comment.

Sincerely,

Theresa M. Keaveny

Theresa M. Keaveny
Executive Director

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Montana Wildlife Federation ◆ Montana Bowhunters Association ◆ Montana Sportsmen Alliance ◆ National Wildlife Federation ◆ Public Land and Water Access Association ◆ Ravalli County Fish and Wildlife Association ◆ Gallatin Wildlife Association ◆ Hellgate Hunters and Anglers ◆ Bearpaw Bowmen ◆ Big Sky Upland Bird Association ◆ Conrad Sportsmen Association ◆ Park County Rod and Gun Club ◆ Russell Country Sportsmen Association ◆ Helena Hunters and Anglers ◆ Anaconda Sportsmen's Club ◆ Flathead Wildlife Inc.

August 15, 2014

Montana Environmental Quality Council
P.O. Box 201704
Helena, MT 59620-1704

Dear Environmental Quality Council,

Our organizations represent tens of thousands of conservation-minded hunters, anglers and outdoors enthusiasts. We are members of our communities, taxpayers and Montanans from all walks of life who care about our state, its economy and our way of life, including our incredible outdoors heritage. We closely followed the work of the Environmental Quality Council (EQC) to implement the recommendations of SJ15. We have serious concerns with the report that came out of the EQC as it pertains to the future of our federal public lands and the use of sportsmen's dollars.

Montana's federal lands are a crucial natural, cultural, and economic resource for the Treasure State. The outdoor recreation industry pumps $5.8 billion into Montana's economy and supports more than 64,000 jobs, according to a 2012 study conducted by the Outdoor Industry Association. That entails the entire range of outdoors recreation – not just hunting and angling – but also hiking, skiing, ATV riding, wildlife watching and numerous other activities. The majority of those activities take place on federal lands. The legacy of federal public lands that Theodore Roosevelt left us is vital to that industry. It is vital these lands remain public for future generations.

State Takeover of Federal Lands

First and foremost, the report should drop any and all references to efforts to "take over" federal lands by the state of Montana. All Americans own these lands and many enjoy coming to Montana– and spending their money here – to share in our national heritage. There is no state claim to these lands – the issue has been tested in court several times, and it is well-established law that the federal government holds these lands in trust for the benefit of all Americans.

If the state of Montana somehow did take over these lands, the management costs would break the state budget. One bad fire year would bankrupt our state, requiring massive tax increases to cover the costs. This would leave the only option of putting the lands up for sale. That is exactly what the proponents of this agenda want: the entire effort is aimed at ultimately

selling off these lands and closing off public access. The organizations that advocate for this agenda have longstanding records of support for privatizing public resources; they are also funded by deep-pocket donors with an anti-public lands agenda.

We urge the EQC to completely remove any reference to the takeover of federal lands, even as "a last resort" *(on page 19 of draft report)*. Including this language serves no purpose but to fuel the further waste of taxpayer money and legislative time discussing this unrealistic, unconstitutional, unneeded proposal.

Alternative Funding for Federal Land Management

During the discussion on the study, the subcommittee proposed diverting hunter license dollars to pay to open up roads on public land to motorized access and to implement logging projects. Both of these proposals are substantively flawed and potentially represent an illegal diversion of hunting license funds under state and federal law.

That proposal was removed during discussion. We urge a statement in the section on alternative funding for land management that explicitly states that no funding earmarked for wildlife management go toward other purposes.

Under state and federal law, hunting license funds are to be used only for wildlife management activities. Diverting license funds would aggravate the financial problems at the Department of Fish, Wildlife and Parks. In addition, diverting license dollars would risk sacrificing millions of dollars in federal funding under the Pittman-Robertson and Dingell-Johnson Wildlife and Sportfish Restoration Programs.

There are many real issues facing the management of national forests and other public lands in Montana. Our organizations are ready and eager to work together with diverse interests to improve federal land management. The subcommittee that worked on this report never reached out to Montana's hunters, anglers and outdoor recreationists. That's unfortunate, because we have shown our constructive approach to bring realistic solutions to the real problems we face on our federal public lands.

Sincerely,

Skip Kowalski, President
Montana Wildlife Federation

Jerry Davis, Board Member
Montana Bowhunters Association

John Borgreen, Board Member
Montana Sportsmen Alliance

Tom France, Senior Director for Western Wildlife Conservation
National Wildlife Federation

John Gibson, President
Public Land and Water Access Association

Glenn Hockett, President
Gallatin Wildlife Association

Tony Jones, President
Ravalli County Fish and Wildlife Association

Casey Hackathorn, President
Hellgate Hunters and Anglers

Nick Siebrasse, President
Bearpaw Bowmen

Ben Deeble, President
Big Sky Upland Bird Association

Joe Perry, President
Conrad Sportsmen Association

Hayes Goosey, President
Park County Rod and Gun Club

George Golie, President
Russell Country Sportsmen Association

Stan Frasier, President
Helena Hunters and Anglers

Chris Marchion, Representative
Anaconda Sportsmen's Club

Chuck Hunt
President
Flathead Wildlife, Inc.

THE FUTURE OF PUBLIC LANDS IN MONTANA
HELENA HUNTERS AND ANGLES ASSOCIATION
Comment to MT EQC on SJ 15
Prepared by Jim Posewitz, Secretary
August 5, 2014

When addressing the future of public lands it is essential to be aware of how those lands found their way into public retention and/or ownership. There are important truths held by the land and Montana's landscape is certainly no exception. Thus, it is imperative that any deliberation about the future of public land ownership in Montana include recognition, and respect for the history of the land under discussion. We are but a passing generation on a landscape that has sustained many generations and is destined to be relied upon by those generations still, in the words of America's greatest conservation president, *"… within the womb of time."*[1] We need to keep our 'moment in the sun' in a respectful context by addressing our public land's history as the future of these places is once again deliberated.
.

What follows is but a single example of the kind of historical perspective that needs to be included as part of the analysis being conducted in response to SJ 15 of the 2013 State Legislature. One hundred and thirty years ago, Montana was the bone-yard of the wildlife abundance chronicled by Lewis and Clark as *"… an aggregation of wildlife … that for number and variety exceeded anything the eye of man had ever looked upon …"*[2] Seventy years later buffalo hide shipments down the Missouri River from Fort Benton peaked at 80,000 and eight years after that they collapsed to zero.[3]

A conservation ethic for the entire nation was borne out events that occurred during and following the decimation of wildlife on the Montana landscape. Those events included the conservation epiphany of a young Theodore Roosevelt in the 1880s, and the creation of the Boone and Crockett Club formed in that same decade for the introduction of the sporting code and the restoration of wildlife. The Club immediately focused on an amendment to the *Sundry Civil Service Act* of March 3, 1891 that authorized the President of the United States to create forest reserves by executive order. From that authority the national forest system evolved and no president used it with more vigor than Theodore Roosevelt (TR). [4]

Those who then desired to take private possession of unclaimed federal lands were vigorous in their opposition to preservation and conservation as they are now. A century has passed and history has now judged them, their motivations and actions labeling them America's "Robber Barons." During TR's second term they used their political influence in an effort to block the creation of any more forest reserves in Montana and five other western states in 1907. William A. Clark was one of Montana's senators at the time. TR outmaneuvered them and their 'robber baron' associates. As a result, Montanans were endowed with public lands brought

[1] Theodore Roosevelt. From *Theodore Roosevelt Wilderness Writings* Gibbs M. Smith, Inc. Peregrine Smith Books Salt Lake City, 1986.
[2] F.A. Silcox. *Remarks of Chairman, Proceeding of the North American Wildlife Conference,* mimeo 1936.
[3] Picton and Picton. *Saga of the Sun,* Montana Department of Fish and Game, 1975.
[4] James B. Trefethen, *An American Crusade for Wildlife,* The Boone and Crockett Club, 1975.

under national forest protection in the Big Hole, Big Belts, Little Rockies, Cabinets, Lewis and Clark, and Otter (now the Custer) National Forests. These forest creations or additions came to be known as TR's "Midnight Forests."

The "Midnight Forests" were but a single episode in the saga of how portions of the West were protected and the wildlife restored. In his autobiography TR wrote of the "Midnight Forests" episode noting: *"The opponents … turned handsprings in their wrath; and dire were their threats against the Executive; but the threats could not be carried out, and were really only a tribute to the efficiency of our action."* [5] With the passage of time the "Robber Barons" have faded to the footnotes of Montana and American history, while the people relegated TR's likeness, legacy and memory to the granite of Mount Rushmore.

The point of this commentary is to urge in the strongest way possible that any deliberation on the future of Montana public lands, as called for by the 2013 Montana State Legislature in SJ 15, include a comprehensive review of the history of those places. It would indeed be a tragedy to deliberate the future of any place without a proper respect for its past. There is more out there than acres and dollars, it is an American conservation legacy and heritage – and it is worthy of consideration.

Jim Posewitz, Secretary
Helena Hunters and Anglers Association

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[5] Theodore Roosevelt, *Theodore Roosevelt, An Autobiography,* (A DaCapo paperback) originally published: New York; Macmillan, 1913.

MT Environmental Quality Committee
PO Box 201704
Helena, MT 59620-1704

Attn: Mr. Joe Kolman

RE: SJ 15 Federal Land Study

Chairman Senator John Brenden and members of the EQC;

The following comments are offered on behalf of the Montana Wood Products Association (MWPA). The MWPA is a trade organization established in 1972 representing Montana's mill manufacturing industry, its employees and the many businesses that are directly and indirectly affected by state and federal management of Montana's timberlands and the long-term sustainability of the industry.

The MWPA supported the legislation passed during the 2013 legislative session, authorizing the undertaking of a study and report-out on the management of federal lands within the state's borders and appreciate all the work that has gone in to this effort.

We do agree with the study's premise that "The management of Forest Service and Bureau of Land Management lands in Montana has a significant and direct bearing on Montana's environment, education funding, economy, culture, wildlife, and the health, safety and welfare of our citizens."

Even though the study includes BLM lands, their timber management is a small and efficient program. Since the majority of the federal ownership in Montana is under the jurisdiction of the US Forest Service, and the USFS struggles to achieve their timber targets, we will focus our comments on the relationship between the USFS, and the state and counties.

National Forest System lands cover 193 million acres in 43 states. These lands were created in large part to support recreation, wildlife habitat, watersheds, and timber management to benefit the country. Nationally, 23 percent of the National Forest System lands are designated for timber production. Twenty-seven percent are in roadless areas, 36.1 percent are in designated wilderness and 30 percent are designated as other.

Unfortunately, due to aggressive tactics by a small number of environmental activists, precedence-setting court decisions, declining budgets and a myriad of federal laws, rules and regulations, timber outputs have declined substantially over the past 25 years, leading to decline in forest health and rural timber-reliant communities.

Forest Service management is in crisis. Over 73 million acres of National Forest System lands are at elevated risk of catastrophic wildfires, insect, or disease outbreaks. Increased fire suppression costs and lack of management are mutually reinforcing negative trends. In 1991, 13 percent of the Forest Service budget was spent on fire suppression and related programs. The percentage grew to 21 percent in 2000 and jumped to 53 percent in 2013.

National forests in Montana cover about 15 million acres or roughly 60 percent of the total forested acres. About one in five acres, of our national forest lands, are designated wilderness. Over the past six years, national forests in Montana have only sold about 35 percent of the allowable sale quantity called for in their forest plans.

Since 1990, 28 Montana mills shuttered their facilities costing 3,252 people their jobs. Employment numbers went from 12,646 to roughly 7,000 direct jobs in the forest products industry today. Labor income was $347,202,000, compared to $295,000,000 today. Decline in timber production closes mills, increases unemployment, impacts education and county infrastructure funding.

Therefore, the members of the MWPA support the EQC's effort to develop a strategy that seeks to assist our federal land management partners. We support the study's priority findings to reduce fuel loads, increase or maintain multiple-use access, increase economic production, and to strengthen local involvement.

We also support the study's recommendations that encourage better communication and interaction between agencies, but recognize this may require a long-term financial commitment in program staffing.

New opportunities now exist, due to the passage of the 2013 Farm Bill, which opens the door for partnerships between the Forest Service, the state, city and county governments to focus efforts on management of Forest System lands.

However, even though the study's recommendations are a good start, without a national commitment to comprehensive federal forest reforms including: injunctive relief, fire suppression and timber program funding, and judicial, NEPA and ESA reforms, state and local government efforts to assist the USFS will likely suffer.

SJ 15 serves to bring multi-agency jurisdiction together to address forest health. The strength in this partnership will be needed as the nation collectively moves forward to enact national federal forest reforms.

On behalf of the Montana Wood Products Association, we appreciate this opportunity to comment and look forward to working with the members of the EQC in the future.

Sincerely,

Julia Altemus
Executive Vice President

Dear Environmental Quality Council,

I would like to comment on SJ15 the study currently being conducted to “demand” transfer of Federal lands to the states.

While everyone can agree that there are certainly problems with Federal management the current proposal for the states to control these lands is a horrible idea. Foremost, the state cannot afford these lands. There seems to be some belief that this would be a silver bullet and that logging will alleviate current forest fires. One bad fire season and the state would be bankrupt forcing the sale of land and a loss of the special places that make Montana the envy of the nation. Furthermore, there is differing science showing that timber harvest may have very little effect on fires. Climate is a much stronger driver but that is an argument for another time.

I also fear there is an underlying agenda to this study. The privatization of public lands is the one that comes to mind. Deep pockets and industry are probably drooling at the prospect of being able to purchase what is currently everyone’s getaway. Calling for the succession of these lands to state control while the state cannot afford them is the underlying “sagebrush rebellion” at work.

Federal lands currently provide thousands of jobs in Montana as well as contributing millions into our economy. I find it highly unlikely that the industrial wasteland that these forests will become under state or private management will attract nearly the visitors. This doesn’t even take into account the loss of recreational opportunity and wildlife habitat as well as the exponential increase in invasive species that would also be a part of this package.

If this pipe dream was ever to come true, the state takes over management, and is then forced to sell to private individuals, we would be the most vilified generation in history. Selling our children’s and grandchildren’s legacy and birthright because of greed, short-sightedness, and hidden agendas is not a story I want to have to explain to future generations.

In the interest of common sense and preserving Montana’s outdoor legacy please drop the ridiculous waste of time and money that is SJ15.

Sincerely,

Anthony Smith

Helena, MT

Subject: SJ 15 Federal Land Study

To whom it may concern,

As someone who has worked as an Ecologist in forest ecology research and data gathering on State, private, US Forest Service, BLM, Park Service and Native American tribal lands for 15 years, I am writing to express my grave concerns for the idea of changing ownership of Federal Lands in Montana to State control. There are so many problems with this idea, and should not even be considered a logical study or discussion.

Among the most concerning is that this idea seems to be based on the premise that the US Forest Service and BLM won't manage their lands so therefore it is better for the State and/or corporate interests to take over management. The very premise is flawed and there seems to be a larger more insidious agenda at play than just the need for proper management of our forests.

It is becoming obvious from several years of data gathering on Montana's forests that the beetle infestation has run its cycle. The Spruce bud worm has also dissipated. There is a lot of mortality left from these outbreaks, but many trees survived and it is not the desperate situation some pushing this agenda would have you believe.

The federal government would indeed like to manage their lands appropriately, but are constantly under litigation for common sense management such as thinning and cleaning up insect and fire prone areas. It is not due to mismanagement but a misunderstood notion by environmental organizations that these lands should simply be left alone and sue the Government anytime a project to manage our forests is proposed.

While doing nothing may have worked in a natural system, humans have manipulated the landscape creating a forest urban interface that has led to an uncontrollable situation with 100 years of fire suppression on top of shutting down any logging projects. This has caused great harm to our forests and in order to get our forests to a manageable situation we need to utilize both fire and harvest management to increase the health of our forests. Our forests need to burn where it is possible and does not threaten private land and structures in order to return the forest to a manageable ecosystem. Our forests need to be harvested in a responsible manner that would increase the health of the forests, the wildlife and provide some jobs that would come along with harvest projects.

Federal Land is PUBLIC land and not just for Montanans. It is for the enjoyment of all Americans. Montana has a vibrant history and our economy is intricately tied to the land. Many towns survive off of tourist dollars. People from all over the world come to enjoy the vast Federal lands in Montana, from the various US Forests to two of the most popular National Parks in the nation. They do not come just to visit Montana's State land but to enjoy the Nation's PUBLIC LANDS.

One of the most flawed notions of this discussion is that the State could manage the forests better than the Federal Government under the current situation. The State too would be litigated constantly with proposed projects because of the lack of information various environmental groups base their decisions on. There needs to be better information based on science for the public to understand the need for proper forest management and it is up to State and Federal Agencies to educate the public.

Furthermore, the State does not have the funds to manage all of the Federal lands in Montana and would likely be pressured into selling off this public land to private and corporate interests. This seems to be the real motive behind this push for the State to control Federal lands and why I am very concerned about the current discussions taking place.

This ploy to turn over Federal land to State control is cropping up in various western states and those who are pushing this agenda are really not interested in the idea of proper land management but a philosophical debate of States vs Federal control. I believe this is no more than an attempt to turn OUR PUBLIC land - State and Federal land - over to private corporate interests to exploit our natural resources for profit with no regard for what is important to Montanans or how forest ecosystems work. We would see much more push for privatization of our resources from our forests and wildlife to our water and our minerals. This is wholly unacceptable. This land is not State land nor Federal land - but PUBLIC lands for ALL of us to enjoy, not a few oligarchs and corporatists with only profit driven motives.

My concerns are not as much with the State managing forests in Montana as I have been impressed with and proud of the current forest management of State lands in Montana. However, I am afraid that the State is making bad decisions with management of our minerals. With a push for oil and gas development the State is not taking proper steps to ensure oil and gas development is being done responsibly nor is the Board of Oil and Gas operating in an open and transparent way.

The September 2011 *Board of Oil and Gas Conservation Regulatory Program Performance Audit*, performed by the Legislative Audit Committee, identified various areas where the BOGC's needs to be improved. The legislative audit division audit reviled there is a lack of oversight and enforcement in the state of Montana.

The audit states:

Our review of the Oil and Gas Information System records found:
- The division has not inspected 58 percent of active wells in at least five years.
- Four wells were inspected more than 20 times.
- Twenty percent of wells with an identified inspection deficiency or violation did not get a follow-up inspection.
- The division relies on a staff of six (now 7) to conduct field inspections and monitor 17,600 active wells.

http://leg.mt.gov/content/Publications/Audit/Report/11P-04.pdf

Unlike the State's forest management, our mineral management is allowed to occur with little oversight and regard to our most valuable resource - our clean water. I do not believe that if Federal Lands were to fall to the State that there would be honest management as the stated goal of State land is to make money for schools, and is would be profit driven with a push for more oil and gas development. While there are areas that could be profitable and good for Montana if done in appropriate areas based on sound hydrogeology studies prior to drilling, currently there is not enough done to safeguard our water resources, nor is there any scrutiny to where oil and gas activity is allowed to occur.

While the State has taken steps to improve mining activities from problems Montana has experienced for over 100 years by testing local hydrology and geology of areas proposed for mining, there is little scrutiny and oversight of where oil and gas wells are being drilled.

A current example taking place are exploration on State minerals and land in the Judith Basin. There have recently been exploration wells drilled into the Heath shale which is a mere 600-1000 feet above the Madison Aquifer, and about the same depth below the Kootenai formation aquifer. The Madison aquifer provides Lewistown residence untreated drinking water from the Big Spring. The Kootenai and Madison Aquifer are proposed to provide drinking water to various rural towns along the Musselshell valley under the Central Montana Water Authority. This is a vast undeveloped ground water resource for the future needs of Montana's water and much more valuable than any minerals, or oil and gas that could be found in this area. Yet the State of Montana is ignoring the complex hydrology and geology of this area and the risks that oil and gas development are posing to this future water resource. If there is even a 0.1% chance of an accident, in the Judith Basin we could be putting Montana's future water resources at risk.

We obviously need oil and gas resources. But it is not whether we drill for them or not, rather looking at where it is appropriate to drill and where the risks outweigh the benefit. Oil and gas activities should be done similar to how decisions are made with a proposed mine or timber harvest. Given the risks to Montana's future water resources I would suggest drilling for oil and gas anywhere in the Judith River Watershed cannot be considered responsible development of State minerals.

While the State has been conducting proper management of our State Forests, given the current situation with management of oil and gas development, I have little hope that the State will make proper decisions with Federal lands if given the opportunity to manage them. There are already bad decisions being made on State, Tribal and Federal land allowing exploration to take place along the Rocky Mountain Front and Beartooth Front within vast natural ecosystems putting Montana's heritage at risk. With States taking control of Federal land, corporations will be lining up to exploit our

treasured mountains for any mineral resources they can take, leaving behind more superfund sites for the taxpayer to clean up.

Rather than debate over which agency or if it should be State or Federal management of our public lands, the State of Montana should be working hand in hand with the US Forest Service, BLM and Park service on solutions to the problems our forests are facing. We need to educate the public about proper forest management and help convey that forest management has come a long way, and thinning and harvest can contribute to a healthy forest ecosystem.

There is room for multiple use, and solutions should be balanced. We cannot make decisions based on either a do nothing mentality nor can we cut, mine and drill anywhere without proper assessment to determine if it is the most appropriate area to exploit our resources. The solution is balance resource management that improves the environment, provides local economy for tourism and industry and protects Montana's resources for future generations.

Whatever decisions are made, they CANNOT include a transfer of Federal or State land into private or corporate ownership or control of PUBLIC LAND. Because in the end that seems to be what is really about. Our Federal or State PUBLIC LAND are not for sell. !

In closing I will remind you of your duty as State officials under the Constitution of the State of Montana

ARTICLE IX
ENVIRONMENT AND NATURAL RESOURCES

Section 1. PROTECTION AND IMPROVEMENT. (1) The state and each person shall maintain and improve a clean and healthful environment in Montana for present and future generations.
(2) The legislature shall provide for the administration and enforcement of this duty.
(3) The legislature shall provide adequate remedies for the protection of the environmental life support system from degradation and provide adequate remedies to prevent unreasonable depletion and degradation of natural resources.

Thank you for your time and opportunity to comment.

Sincerely

Eric VanderBeek
PO Box 811
Lewistown, MT 59457

Thomas L. Pick
28 Golden Trout Way
Bozeman, MT 59715

Montana Environmental Quality Council
PO Box 201704
Helena, MT 59620-1704

To: EQC Members

I am writing to submit my comments regarding the SJ15 work group report and related issues. I am aware of recent comments submitted by the Montana Backcountry Hunters and Anglers (dated July 21, 2014) and wholeheartedly concur with their comments respective to the component elements of the SJ15 Report.

The survey sent to Montana counties is as biased a survey as I have read. The questions were structured to elicit an anti-federal land management response. To their credit, a number of counties refused to take the bait. Unfortunately, most did. The resulting compilation of responses does not reflect the sentiments of the residents of Montana, most of whom live here because of the availability of a quality, publicly owned landscape and which produces a significant share of the Montana economy. These lands are held in trust for all of us and constitute our western heritage; a heritage that is not trivial to those of us who recreate or make a living on these lands or simply feel satisfied that they are there. This is not to say that there are policy and procedural issues associated with public lands that could be improved; the same can be said, however, for private lands, as well.

Rather than take the approach that could have identified how the state and local governments can assist in ushering in a new era of appropriate federal land management practices and policies, the report focuses on criticisms and second guessing federal land management decisions. This tact represents a serious waste of state finances and resources which could have been spent much more proactively.

The not so sublime suggestion that the state or local government can do a better job of managing public lands (in the interests of all Americans) is far from reality. From my own experience, I can say that state management of public trust lands is woefully short, primarily because they are not given the financial and human resources to do their job. One can only image the disaster, financially, culturally, and ecologically, if the state were to be tasked with the duty to manage the federally owned landscape which constitutes some 29% of the state.

Just the firefighting liability would break the state's bank with the current wildfire season now twice as long and burning twice the acres as recently as two decades ago (Headwaters Economics data). To suggest that this scenario is somehow the sole fault of federal management is to ignore common sense and science. Drier weather, a longer fire season, and the proliferation of local government policies that place more homes in harms way has created the unsustainable fire management scenario that we face

today. The SJ15 report fails to acknowledge any local or state government complicity in creating or addressing this dire situation.

The report also fails to acknowledge the importance of federally managed public lands in attracting and retaining taxpaying businesses and citizens in Montana. Indeed, I came to Montana over 30 years ago and continue to reside here because of the availability of public lands on which to recreate and that provide a clean air and water environment, that is, a healthy place to raise a family. I believe that a combination of public and private land ownership and attendant businesses, along with effective local, state, and federal government provides a dynamic and resilient economic engine that gives us a vibrant (but not boom and bust) economy and culture that most of the world covets. To suggest or even imply that federal stewardship is the source of our problems is just plain wrong.

The report also suggests that most Montanans' want to see more motorized access. I don't believe this is true and most non-partisan polls don't agree either. Increasing motorized access means more roads and motor-ready trails. Science has clearly shown that motorized routes create more water quality (sediment delivery to streams) and wildlife security problems, not to mention noxious weed dispersal which is currently a multi-million dollar expense for public and private land management. Maintenance and development costs, if accounted for, make this motorized expansion idea an economic blackhole. If the proposed demand for recreational motorized access is valid, why don't we see private landowners opening up their lands for such use for a fee? Because they recognize the inherent downside from a natural resource management and public safety liability standpoint.

The SJ15 report suggests that federal land management is not consistent with local policies and objectives. I doubt that a majority of local residents would agree. The questions posed to local county officials sought and obtained a politicized response from a few county officials. This attitude doesn't represent most Montanans who use public lands. Granted, there are those who would like to see every stick of timber harvested, every acre-foot of water diverted, and all wildlife eliminated from federally managed lands, but not most of us. Some, indeed a very few, would like to ride roughshod over our streams and mountains as amply demonstrated in the ORV advertisements. But not most of us. Most of us believe in multiple use, but not multiple abuse. We need to let science, economics, and reasoned decisions and not just public interest (local or otherwise) guide management of public trust lands, not the vested interests who skewed the 'findings' of the SJ15 work group. The report could have made concrete suggestions as to how to balance competing demands on federal lands but instead just wasted paper and the legislature's valuable time. No real alternatives were identified; just the same old federal government bashing that we have come to expect from a biased legislative committee. We pay for, expect, and deserve better.

I believe that the dysfunction that is often cited in federal land management agencies' capacity to carry out on-the-ground activities is but a mirror of the current polarization we see in our society today…from many of our politicians at every level to every day citizens' attitudes on just about everything that relates to government. Until we can again learn to work together for the common good; to agree that public trust lands provide valuable commodities and resources that deserves our support and search for

far-sighted proactive solutions, no amount of finger pointing and blame slinging will give us a fix…for public land management or our own society.

Thank you for this opportunity to provide my comments on SJ15. I generally value the contributions and insight provided by the members of the Environmental Quality Council, but in my opinion, SJ15 does not do justice to its namesake nor the citizens of the State.

Sincerely yours,

/s/ Thomas L. Pick

August 15, 2014
Subject: SJ15 Federal Lands Study

Please accept the following comments on SJ15 Federal Lands Study.

• The County Survey questions were biased in that they were worded so that they elicited the desired response and outcome, i.e., federal lands would be better managed by the state.

• The state of Montana cannot afford to manage federal lands. Montana receives more money from the federal government than it pays in. For every dollar in federal taxes paid Montana receives approximately $1.77 back. This extra money is coming from people who live in other states. Federal lands belong to these Americans too.

• Federal lands are property of all citizens of the United States. They do not belong to Montana just because they happen to be located there.

• Federal lands provide clean water, fish and wildlife habitat that is important for people. Ramping up logging and road building damages the amenities that these lands provide. There is ample science to support protection over extraction.

• Federal lands are also an economic asset to Montanans. Glacier National Park alone provides millions of dollars to local economies; yet when the park was proposed local Montanans opposed it. Just because we live near federal lands doesn't mean we can manage them any better.

• Nobody can predict when or where a fire may occur – conditions such as drought, wind, and weather play a bigger role in fire conditions than fuels. It is folly to believe that the state has the ability and the funds to "reduce fire hazard" over millions of acres. Emphasis should be placed on educating homeowners to reduce fire hazard near their homes.

We urge the legislature to reject this report and its findings. Our tax dollars are better spent on other important matters.

Arlene Montgomery, Program Director
Friends of the Wild Swan
P.O. Box 103
Bigfork, MT 59911
arlene@wildswan.org

Montana Chapter

Adventure Begins Where the the Roads End

1295 Lena Lane
Missoula, MT 59804
July 21, 2014

Montana Environmental Quality Council
PO Box 201704
Helena, MT 59620-1704

Attention: EQC Members:

As a statewide hunting and angling organization, Montana Backcountry Hunters and Anglers (MT BHA) consists of over 300 engaged Montana men and women. The following is our response to SJ 15 and the recent survey of counties re SJ15 by EQC.

Resident hunters and anglers in Montana are increasingly dependent on public lands to hunt and fish, as most private lands have become much more difficult to access. In fact, approximately 68 percent of resident hunters hunt on public land. This is important to note as only 29% of the state is held in federal ownership. To attempt to accommodate hunters and anglers on less than a third of the state will require very careful management of habitat for both wildlife and fish. Hence to retain huntable and fishable populations, protecting and enhancing habitat to support these species should be the core element considered for the management of public land.

The undertone of SJ 15 suggests that the Montana Legislature thinks its management skills and abilities are better than the current federal land management professionals. While all of us would like to see changes in public land management, at MT BHA we also believe that science based decisions should be at the core of any successful long term management policies. We also believe that the various ideas for managing public lands are easy to talk about, but implementation takes money that Congress, and we fear the Legislature of Montana, would be unable or unwilling to allocate.

We also believe that well cared for federal public lands, will allow Montana to attract and retain businesses because of the relatively abundant outdoor opportunities and our wildlife, fish, scenery, clean air and clean water. Without well cared for public lands, Montana will not be competitive with other states for new businesses, given our distance from markets, expensive air travel, and continental climate, i.e. cold winters. Seventy percent of businesses recently surveyed stayed or located here due to outdoor

opportunities. To try to depend upon expanded industrial forestry, mining, and oil and gas developments will only take us backwards economically in the long run, not forward.

MT BHA read the following on page 7 of Evaluating Federal Land Management in Montana: An identification of significant risks, concerns, and solutions. Environmental Quality Council 2013-14

"During the summer of 2013, the SJ-15 Working Group developed and mailed a series of questions to ask of all the Boards of Commissioners representing Montana Counties that where 15% of the county's land is managed by the U.S. Forest Service (USFS), the Bureau of Land Management (BLM) or a combination of the two. "

"Twenty-eight of the 35 counties surveyed responded, although every county did not answer every question. The survey questions along with the number and percentage of county commission responses directly pertaining to each question are noted in the following summary."

MT BHA Response: Unquestionably, the survey questions sent to counties were collectively designed to be leading questions to obtain a skewed response from county officials to portray federal land management in a negative light.

MT BHA offers our response the following "findings":

Page 7, SECTION 1 - PUBLIC HEALTH, SAFETY, AND WELFARE: More than 20 counties said wildfire conditions on federal lands pose a significant threat and the hazard should be reduced to protect public health and safety.

MT BHA Response: Due to 100 years of fire suppression, the present condition of most of Montana forests have resulted in the unintended accumulation of high loads of forest fuels. While we support sensible and careful forestry on some previously roaded public lands, we believe eventually nearly all forests will burn. These burns under extreme conditions will burn forests in all age classes and regardless of previous land management actions. In addition, today's forestry practices need to be designed and executed to meet the needs of all resources, not just the single objective of fuel reduction. To reduce risk of fire to existing residential structures, research has shown vegetation management funding and efforts are best spent on reduction of fuels in the immediate vicinity of residential structures. New structures should be discouraged in the wildland and wildland urban interface and should include the adoption of requirements to use fire resistant building materials and mandatory vegetation management. Taxpayers are currently subsidizing fire protection for private structures in the wildland urban interface.

Page 13, Pie Chart: IS THERE AN ADEQUATE SUPPLY OF MOTORIZED ROADS ON FEDERAL LAND?: Most respondents responded that motorized access to public lands is very important and the amount of motorized access should be increased or at least maintained.

MT BHA Response: According to Forest Service reports, there is currently an eight billion dollar backlog in Forest Service road maintenance needs. To suggest that motorized access should be increased ignores the current dilemma of too many roads for the maintenance funding Congress is willing to allocate. This road maintenance backlog results in more sediment to streams and creates unsafe driving conditions. In addition, the current motorized trail network is not being maintained sufficiently, also resulting in sediment to streams, noxious weed spread, and unsafe conditions. The Legislature would also likely have difficulty in finding State funding to properly maintain these roads and trails. To suggest that more roads and trail access be increased or even maintained is not viable when additional funding is not available. In addition, more motorized routes would further fragment wildlife habitat, add sediment to streams, and conflict with non-motorized activities.

In addition, the State of Montana has few federal lands of substantial size without existing roads. Outside of Wilderness and National Parks only 6.8% of Montana is in a Roadless condition. Only 2% of the lower 48 states is roadless, and therefore these Roadless lands are also valued by non-Montanans as well as us here in Montana. Most Roadless lands are too steep and rugged to economically road, and they offer some of the best remaining hunting, wildlife habitat and non-motorized recreation. It should be noted that even some of the "roadless lands" already contains some roads and motorized access.

Page 8, Question 11. Is the Payment in Lieu of Taxes (PILT revenues) your county derives from federally managed lands equivalent to the amount that actual land taxation of these lands would bring? : Most respondents said federal funds intended to offset the impacts of federal lands are not equivalent to amount of revenue earned if the lands were privately taxed or funds generated by responsible harvest and resource extraction.

MT BHA Response: The wording of this finding suggests that perhaps EQC believes federal lands should be privatized to raise tax revenue. We note the previous drafts by EQC on SJ15 did indeed encourage transfer of federal lands to the State of Montana. We believe that 78% of Montanan's would object to eventual privatization as the vast majority of Montanan's support retention of Montana's public lands.

"Responsible harvest" is an ambiguous term. Does this mean federal clean water, air and threatened and endangered species laws should be circumvented? How about protections for elk security, adequate stream crossings to provide fish passage, or landscape considerations to retain scenic value? We believe lands managed only for forestry production or to maximize net economic return generally compromises these values. And it cannot be ignored that the timber harvest in the 1960-2000 period was unsustainably high and liquidated the best and most easily accessible forests, leaving steep lands and small timber for future timber management. This reality makes it difficult for future Montana forest management

to economically compete against better timber growing sites on the West Coast or South.

"Resource Extraction" suggests mining. Montana certainly has a long history of mining, for which the public has time and time again picked up the long term costs of environmental remediation. Butte-Anaconda and Zortman-Landusky are quick examples. As a result and despite long term remedial efforts, those mined drainages lands only marginally support huntable wildlife and fishable fish.

Ranchers across Montana currently benefit from the extremely low grazing rates on federal lands which are about 15% of what the State of Montana charges and far less than private land grazing, Does the EQC propose that to generate more revenue for counties, that grazing fees be raised to current State or private land levels? We suggest an open dialogue with the federal public land grazing permittees before pursuing this issue.

Page 14, Pie Chart: Is Federal Land Management Consistent with County Objectives Eighteen counties said federal land management actions are inconsistent with county objectives. Twelve counties said they want state assistance incorporating local objectives into federal management plans.

MT BHA Response: Federal lands belong to all Americans, not just the residents of the counties in which they reside. Given there are many federal policies, requirements and laws, it should not be a surprise that there is some inconsistency with local plans. To our knowledge, all projects and plans of any Forest or BLM lands are required by NEPA to offer opportunity for public comment, including those of representatives of the Counties. Our experience is that federal agencies document all these comments and offer responses.

Page 14, Pie Chart, What is the Influence of Special Interests on Federal Land Management?: Twenty-three respondents said special interests have significant influence on the ability of federal agencies to develop and implement effective land and resource plans.

MT BHA Response: Federal laws, policies and regulations guide federal land management plans and activities. All Americans can participate in the formulation of this guidance. Certainly some special interests are more successful in influencing federal agencies more than others, as is also the case of State government.

For example, during the 1970-2000 period, the timber industry was THE <u>special interest</u> had perhaps the greatest influence on Montana's national forest lands. This influence resulted in unsustainable and rapid liquidation of the best timber in Montana. Improvements in industrial efficiency gradually meant more wood harvested with less people, and sawmills that could be operated with fewer workers. That trend of fewer jobs per volume of timber continues today. Much of this timber did not generate value-added products. In contrast, log home construction, mostly

using bug or fire killed timber, created many more jobs per timber volume than high speed mills. It is doubtful that, given current relatively high logging costs and relatively poor remaining timber, that Montana timber industry could be significantly revitalized. A reduced timber program focusing on value-added products would generate more jobs for local communities.

You can trust Montana hunters and anglers will remain deeply involved in the future management of Montana's federal lands. These lands will continue to be what makes Montana different than other states and attractive for businesses to locate and grow here in Montana. Montana's hunting and fishing on public lands is of vital importance both culturally and economically to our state. There are hundreds of thousands of Montanans who participate in outdoor activities, including hunting and fishing. Montana's $5.8 billion outdoor economy generates 64,000 jobs. We are watching carefully how the Legislature proceeds regarding management of federal lands.

Sincerely,

s/greg l munther

Greg L Munther, Co-chairman
Montana Backcountry Hunters and Anglers

From: Nike Stevens
To: Kolman, Joe
Subject: transfer of federal lands to state and private ownership
Date: Wednesday, August 13, 2014 5:16:38 PM

I oppose the transfer of federal land to state and private ownership. I hike, camp, hunt, watch wildlife, fish and otherwise enjoy federal lands. Loss of federal lands would totally change the character of Montana and destroy its major economic draw.

I urge you to end your efforts to transfer federal land to state, county and private ownership. These efforts are against the interests of Montanans and the millions of Americans who visit federal lands each year to renew themselves. Like most Republican ideas it would benefit a few (who are rich already) and harm everyone else including all Montanans who recreate on federal land.

Of course you can list problems with federal management - one reason is because the land management agencies budgets are inadequate and management priorities are affected by politics. However, transfer to states would worsen not improve the situation since states are also strapped for funds and local politics that favor the few would have an even greater impact.

Lets improve public management by following existing law and using available science. Federally owned lands are Montana's greatest assest - if they were transferred to the state and counties they would be sold off and lost to Montanans and the millions of other Americans who visit Montana for the freedom of public land.

I grew up in Louisiana a state with very little public land - do you want Montana to be like Louisiana with no federal land to hike, camp, fish, hunt on???? orlike Texas Do you want our public lands sold to the highest bidder for short term profit and incalculable long term loss?

Nike G Stevens
15300 Horse Creek Road
Bozeman, MT 59715

From: Nike Stevens
To: Kolman, Joe
Subject: SJ 15 Federal Lands study
Date: Thursday, July 24, 2014 11:03:17 AM

We are opposed to any transfer of federal lands to the state of Montana or any other state or to any county. We love our federal lands recreate on them frequently they are the reason we live in Montana they make the West the West - there are no guarantee of public use on lands owned by the state or county and they can be transferred to private ownship for development.

We oppose use of our tax dollars to further any efforts to transfer ownership of federal lands to Montana or Montana counties.

David and Nike Stevens
15300 Horse Creek Rd
Bozeman, MT 59715

Comments on SJ 15 Study of Federal Land Management:

My comments are made from 35 years experience as a resource specialist (Geologist, engineer, fire rehab specialist, manager) with the USFS in 4 regions. I am now retired but continue recreating and using our National Forest Lands. I am a licensed private pilot, member Greenfields irrigation district, farmer, member CM Russell Backcountry horseman, Montana Snowmobile Association, volunteer in the national forests, wilderness user and camper, hunter, fisherman, hiker, and boater.

Thank you for addressing the management of our national forest lands.

1st I would like to say that I fully support Governor Bullocks Priority Forest Landscapes for treatment in the Farm Bill. Active management has been a long time coming. The Forest Service issued at every corner for proposals involving timber harvest. This **needs to change**.

As an example, Montana Wilderness Association, John Gatchell does not speak for all Montanans**. I believe that Finding 4 and Recommendation 4 of your report, maintaining multiple use access, is critical to healthy forests.** The Badger-Two Medicine Travel Management decision of 2013 prohibited motorized use in this huge tract of land. Snowmobiling, 4 -wheeling had been historic use in this area since the 1960's. This was a decision made in isolation by the forest management and its select partners: some the Blackfeet Tribal Business Council, the Montana Wilderness Association and Earth Justice. Many users of the area: The grazing permittees, members of the tribe, hunters, snowmobile clubs, and ATVer's were left out of the equation. They were ignored in the decision made on travel management.

I support your Finding 3: Reducing the risk of catastrophic wildfire. High intensity wildfire does harm wildlife species and habitat. Yes, wildfire results in more hydrophobic soils, increase runoff, and sediment to the river. Uncontrolled wildfire raises stream temperature, decreasing survivability of the northern cutthroat trout as well as the sedimentation smothers their eggs. (T. Isakson's, Cutthroat Trout Reintroduction, 2/2014) Grazed areas are proven more immune to high intensity wildfire.

County Commissioners are to be consulted and involved in the forest service's fire management decisions, not merely informed like the Teton county commissioners were in the 2007 catastrophic fires on the Rocky Mountain Front.

I read your survey and believe that its findings are credible. There needs to be increase motorized access to spray and fight weed infestations that take hold after the burns, to fight fire, to harvest bug-killed trees.

I support Finding 7: increasing accountability to state and local entities, during decision making and not after the fact.

I support your recommendation 11 in the draft as the State needs to force the US Forest Service to listen and to actively manage lands in true consultation and collaboration with state interests. We need a lot less public land not more. The Heritage Act would create huge areas of more restricted use. Less motorized weed spraying, fewer permittee improvements, and more Wilderness with let-burns for the favored few in power. Out of frustration, we are asking for a closer look at federal land management. **The Forest Service Mission is: Caring for the Land, Serving the People**. The land is public land.

I support Recommendation 7: Irrigation and municipal watersheds need to be protected. Over 50% of the Sun River Watershed in the wilderness has been burnt in the last 25 years. This water is impounded by Gibson Reservoir, the sole purpose being for irrigation use. With de-forested landscapes the water runs off quicker, less for late season use, and dirtier, filling the reservoir. This watershed needs protection from more fire.

A comment on increased Forest Fire Fighting costs. A significant factor is that fires in the Wilderness are let-burn as a rule. Fire-use for resource benefit is used in the Wilderness. Many fires are not put out immediately when they are small, but are monitored or managed over months as they grow until the snows put them out. This results in higher, longer term costs. Initial attack of small fires has can be inexpensive, monitoring and managing season long fires with highly paid overhead is expensive. Other detrimental impacts are the carbon release and smoke health hazard.

Thank you for the opportunity to comment.

/s/ *Linda Brandvold*

Kolman, Joe

From: Trevor Bras <trevorbras@hotmail.com>
Sent: Thursday, September 11, 2014 12:12 AM
To: Kolman, Joe
Subject: SJ15 Land Survey

Howdy Mr. Kolman

Although I may be late on giving you a comment for joint resolution 15, I'd like to think you would give my thoughts consideration. I am a Montana native through and through, and am very concerned with this piece of legislation.
I've looked over the survey, and am wondering how the officials that enacted this survey could believe 28 county commissioners could give accurate statistics for all of the Federal and BLM land in Montana? A much larger sample and many more trials need to be taken. There is just too much bias that could occur using 28 county commissioners.
With talk being thrown around that this legislation may result in privatizing public lands, I would like Montana's elected officials to take a long hard look at this piece of legislation and determine it is not in the best interests of Montana and it's citizens to reduce or eliminate federal control of its public lands.

Kolman, Joe

From: Matt McDonald <rhodes19er@yahoo.com>
Sent: Thursday, September 04, 2014 3:28 PM
To: Kolman, Joe

I am writing to object to a national political campaign which is moving to rob Americans of our public lands and outdoor heritage. Over the past two years, legislatures in Utah, Arizona, Wyoming, New Mexico, Colorado, Nevada, Idaho and Montana have passed or considered passing legislation "demanding" that Congress "transfer" national forests and American public lands to individual states for management or disposal as those states see fit.

These initiatives, led by radical groups like the American Lands Council, Americans for Prosperity, are seeking to undo the democratic conservation of Teddy Roosevelt. President Theodore Roosevelt called national forests and public lands "essential democracy", lands owned and managed not to enrich the few but "for the people as a whole."

The objective to transfer public lands into private hands must fail! Our national forests and public lands are not for sale, transfer or disposal - not today, not as a last resort, not ever.

No court has ever found permanent reservation of national parks, national forests, wildlife refuges and BLM lands for the "benefit and enjoyment of the people" to be illegal, as some private interests claim.

Montanans, and indeed citizens from across the US, continue to cherish the priceless blessings of our public lands. Please help block these radical moves to privatize land belonging to all citizens.

-- Matt McDonald
rhodes19er@yahoo.com

From: Stockwell, Hope
To: Kolman, Joe
Subject: FW: Protecting Public Lands -- SJ15
Date: Monday, August 25, 2014 7:08:18 AM
Attachments: MWF Sportsmens Group SJ 15 sign on.pdf

From: Harold Hoem [haroldandjan@gmail.com]
Sent: Sunday, August 24, 2014 10:15 AM
To: Stockwell, Hope
Subject: Protecting Public Lands -- SJ15

Dear Members of Environmental Quality Council,

We urge you to remove from SJ15 any reference to "takeover of Federal lands". That could ultimately lead to our loss of use of those public lands in Montana, which would be a great disservice to the many people who enjoy their use. (Please see attached letter.)
Thank you.
Harold and Jan Hoem
Montana Elders for a Livable Tomorrow

From: Rox
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Thursday, August 21, 2014 11:47:59 AM

I know it is past the due date for public comment, but I am submitting this anyway.

I strongly disagree with the notion of moving federal lands in Montana back into state control.

The federal approach is more likely to conserve the forests and rivers, etc., with consideration of the whole ecosystem of which they are a part

Also, I know at least one state senator on this report committee that has personal interest (conflict of interest) in getting federal restrictions off of lands adjacent to his own, for his own future use.

Thank you,
Roxanna McLaughlin
Bozeman MT

Sent from my iPhone

From: Barbara Geller
To: Kolman, Joe
Subject: sj15 Federal Land Study
Date: Thursday, August 21, 2014 7:36:34 AM

I've just received a copy of the **EQC SJ15 WORK GROUP REPORTS** and would like to registrer a couple comments.

I support recommendation #9 to create more restrictive building codes in the WUI. I also think insurance companies should be required to have higher rates for home in the WUI, as an additional way to discourage development.

I support recommendation #11…. No land transfers from the federal to the state government. Period.

I disagree with the comments about increased access. We should NOT increase motorized access. We all need to accept that, as we age, there comes a time when we can no longer do all the physical activities that we used to; creating motorized access to accommodate disabled people is not acceptable. Motorized access has negative impacts on the wildlife and on water quality and on the solitude aspect of wilderness. Don't create sound pollution in the forest!

Barbara Geller
Bozeman

From: Mary Gerlach
To: Kolman, Joe
Subject: Just Say NO!
Date: Wednesday, August 20, 2014 11:52:13 AM

We Montanan's treasures our public lands and forests and want to save our lands for future generations!
Mary Gerlach Danhof

From: Mary & Pat Schelle
To: Kolman, Joe
Subject: SJ 15 Federal Land Study
Date: Monday, August 18, 2014 1:37:25 PM

KEEP PUBLIC LAND PUBLIC !!

****

Patrick L. Schelle
710 Castle Butte Rd.
Lewistown MT 59457
406-538-8837

From: Jerry OConnell
To: Kolman, Joe
Subject: Proposed sale of public lands
Date: Monday, August 18, 2014 1:22:37 PM
Attachments: image001.png
image002.png

Mr. Kolman,

I vigorously object to the concept of selling federal lands to any entity, private or public. These lands should remain in the hands of the federal government, which means they belong to ALL citizens of our country. Do not let this irreplaceable asset be turned over to groups that represent only a small portion of us.

Sincerely,

Jerry O'Connell
Big Blackfoot Riverkeeper, Inc.
Greenough, MT 59823
406-360-3092

BIG BLACKFOOT RIVERKEEPER

www.bigblackfootriverkeeper.org

WATERKEEPER® ALLIANCE MEMBER

From: David & Carolyn Villa
To: Kolman, Joe
Subject: SJ15 Federal Land Study
Date: Monday, August 18, 2014 10:00:33 AM

To whom it may concern:

I am responding to the current legislative committee study regarding the transfer of our federal public land to the state. As most of us who live here know, during some of our worst fire seasons,
The costs for trying to control and contain fires is prohibitive. There is no doubt in my mind that the taxpayers in the State of Montana can't afford the liability of state ownership. Nor could any single
individual afford the tax increases to cover firefighting costs. It is doubtful if Montana taxpayers could cover the costs involved in trying to stop the Pine Bark Beetle infestation. Thus…

When it becomes obvious that the State of Montana, can't afford to maintain the roads, fight the fires, handle the costs of maintenance of the pristine nature of our National Forest lands, that it will be proposed to sell
It off to the highest bidders! This Can Not Happen!!! Remember the difficulties when Ted Turner and Jane Fonda bought up large tracts and posted no trespassing sides, blocked access roads to other areas,
Fenced it off and didn't care about the other ranchers running cattle, when they brought in buffalo with brucellosis. Arrogant wealthy potential buyers would limit the primary reason so many of us return to
This state, or stay in this state, which is for the pleasure of enjoying our unspoiled outdoors. You don't have to be wealthy to enjoy the rivers and streams, the mountains and the valley's. You just have to be here.

I am opposed to the Republican Agenda on this issue. I think it is indicative of their overall agenda to hand all wealth in this country to only the wealthiest individuals. It is already apparent that America is being
returned to a Lord and Serf regime in numerous methodologies. Apparently, redistricting and limiting voters rights to disqualify the Americans who do not approve of their tactics is being done. The abundance and wealth of our country,
and our state, is not up for grabs, and if enough of us would take the time to get angry and send a letter, make a call, send an email, maybe this ridiculous power play would not have even come up.

I am opposed to any move by any faction of our State Legislature to make any changes without a vote of ALL the People in this state.

The Federal Land belongs to ALL the PEOPLE…and no small group, specific political party, group of industrialists or wealthy American's has the right to Change it.

We do not want to relinquish our access to all Federal Land, so a few wealthy nabobs can build their enclaves for only their benefit, or clear cut the mountains, or pollute the streams and rivers, or tear up and Rape the soil. This should never have even become an issue.

Thank you, for allowing my opinions on this topic to be given. It is time to STOP the GOP Bullies, in our State Legislature and Our Congress. Enough alright Already!

Carolyn M. Villa
3907 Lasso Lane
Billings, MT 59105

Kolman, Joe

From: Gail Richardson <envirogail@q.com>
Sent: Saturday, August 30, 2014 1:51 PM
To: Kolman, Joe
Subject: Evaluating Federal Land Management in MT (EQC) delayed public comment

I was out of state when the comment period expired and indeed did not know it had expired until I visited the website and viewed the document today. There has been little publicity about this document or the comment period expiration date. As a conservationist who enjoys traditional quiet recreation (hiking, backpacking, wildlife and bird watching, cross-country skiing, canoeing) on our precious national public lands I find this document offensive and regressive. You all must understand that these lands belong to the people of the U.S. to be managed for the people of the U.S., not for local ranchers, timber and mining companies who only see our public lands as an economic resource; not for motorized special interests which want total access, even though they have access to most public lands already. Cannot some lands remain pristine, natural and wild to remind us of what the West was like before ”manifest destiny.”? The American public has long supported conservation of our precious national public lands; indeed, so do most Montanans. We live here and recreate on these public lands; indeed, they are often why we live here. This committee is obviously made up mostly of anti-public lands zealots who want management of our national public lands to reflect their narrow extractive views. Most Montanans on the other hand love our national public lands as places of quiet beauty and solitude, vast, wild, and yes, accessible, that truly make Montana “the last best place.” These are places where we can renew our spirit, spot a grizzly bear, walk to a pristine mountain lake, or maybe up the mountain. Visitors come here from around the world because of our vast, unique and extraordinary landscapes and wildlife which are harbored by our national public lands. Tourism and recreation is MT’s second largest industry. I notice not much is said about this important fact. No one is creating wild lands anymore. Indeed, they are mostly gone. That is why we must hold fast those few wild places that remain, so that future generations of Montanans, Americans and international visitors can experience wild and primitive America. These lands harbor our biodiversity. They must not be carved up by economic special interests, but must remain, managed by the U. S. government for all of its people. The EQC has done a disservice to the people of Montana with this biased and unscientific document.

Gail Richardson
5263 Cimmeron Drive
Bozeman, MT 59715

Kolman, Joe

From: John Stephenson <jstephenson@jardinelaw.com>
Sent: Thursday, September 04, 2014 12:35 PM
To: Kolman, Joe
Subject: keep public lands public

Please keep public lands public! They belong to all of us, not to the states in which they are situated, nor to the private interests which adjoin public lands.