Sharon Labreque, Acting Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

May 15, 2015

Dear Acting Supervisor Labreque,

Thank you for the opportunity to comment on the *Flathead National Forest Proposed Action – Forest Plan Revision* (Proposed Action) and the *Amendment of the Helena, Lewis and Clark, Lolo and Kootenai National Forest Plans to Incorporate Relevant Direction from the [Draft] Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy* (Grizzly Amendment). We submit the following comments on behalf of Sierra Club, Center for Biological Diversity, and Western Watersheds Project.

Sierra Club is the nation's oldest and most influential environmental organization with 2.4 million members and supporters across the country, and over 2,000 members in Montana.

The Center for Biological Diversity is a national, nonprofit conservation organization with more than 825,000 members and online activists dedicated to the protection of endangered species and wild places.

Western Watersheds Project is a non-profit organization dedicated to protecting and improving wildlife habitat, riparian areas, water quality, and other natural resources and ecological values of watersheds throughout the West. Western Watersheds Project has offices in Montana, California, Oregon, Arizona, Idaho, and Wyoming and over 1,500 members nationwide.

Sierra Club was a signatory on comments submitted to the U.S. Fish and Wildlife Service on the Draft Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy (CS), by Natural Resources Defense Council on July 30, 2013, and we are hereby including those comments by reference. We also support, and are including by reference, comments submitted by the Swan View Coalition and Friends of the Wild Swan on the PA and Grizzly Amendment.

Sierra Club's mission is to "explore, enjoy and protect the planet." Our members have spent substantial time on the Flathead National Forest (FNF), including rafting the Middle Fork Flathead, backpacking the Swan Crest and Jewel Basin, camping in the North Fork Flathead, and backpacking in the Bob Marshall Wilderness. However, our members also understand our national forest management transcends personal uses. They recognize the FNF holds some of the most spectacular and ecologically significant public lands in the continental United States, and represents a substantial portion of the Crown of the Continent ecosystem. They know its significance as the headwaters of major waterways leading to the Columbia

River. We value that the Flathead is home to rare and spectacular wildlife including grizzly bears, wolverines, mountain goats and Canada lynx. The Sierra Club has significant interest at multiple levels in the Flathead forest management plan revision and the Grizzly Amendment. We have been engaged in the forest planning process since 2006, providing formal comments on proposed forest plans and wilderness evaluation processes, participating in stakeholder meetings, and engaging in other public input opportunities. Sierra Club plans to actively engage throughout this NEPA process.

All of our organizations place great value on wilderness, wild lands and wild rivers. We also seek to maintain and restore soil and water quality; wildlife and fish habitat; wildlife, fish and plant species populations. The FNF is vital as a source population for a number of imperiled species and for connectivity between the Northern Continental Divide, Greater Yellowstone, Cabinet-Yaak, Selkirk and Selway-Bitterroot Ecosystems. The FNF is of significant importance due to populations of threatened and endangered species including the grizzly, lynx, and bull trout, candidate species including wolverine, species of concern including Westslope cutthroat trout and species of interest including mountain goat. As such, it holds utmost ecological value for threatened and endangered species and biodiversity, as well as its extensive wild lands and recreational opportunities.

During the collaborative meetings Sierra Club requested all Inventoried Roadless Areas (IRA) on the FNF be designated as Recommended Wilderness in the forest plan, consistent with the Northern Rockies Ecosystem Protection Act (NREPA). We also requested IRAs be managed to maintain wilderness character and non-motorized recreation year-round. Additionally, we urged the FNF to include meaningful and mandatory protective management standards for all resources, to prohibit road construction and logging/harvest in IRAs, and to confine off-road and over-snow motorized vehicle use to designated routes in non-IRA areas. We requested that inventoried and other roadless areas be managed for protection of threatened wildlife populations and to provide connectivity for grizzly bear recovery and other wide-roaming species in light of expected shifts due to effects of climate change. Unfortunately, with little exception we do not see our initial requests at the collaborative table or in our written comments reflected in the PA.

Please note that all comments below relating to the Grizzly Bear Conservation Strategy Amendment, in addition to the Flathead Forest Plan, are marked (GBCSA).

I. Concerns with the Public Participation Process

It is unclear where the opportunity for public comment on the PA fits in with the requirements for public notification in the 2012 planning rule, 36 CFR § 219.4 public participation or 219.16 public notifications. Requirements under 219.4 address developing a *plan proposal*. Section 219.16 (a)(2) requires notification, 'to invite comments on a *proposed plan* and *associated environmental analysis and a minimum of a 90-day comment period.'* The cover letter states that, "the decision to approve will be subject to the objection process under 36 CFR Subpart B (219.50 to 52), and that only those who have submitted substantive comments *beginning with this comment period* would be eligible to file an objection." Section 219.50-52 is referenced only under 219.16 and not 219.4. However, the PA did not include an environmental analysis or minimum 90-day comment period per 219.16. Please clarify where we are at in this process and that substantive comments received with notification and release of the proposed plan and associated environmental analysis, subject to CFR 219.16, would qualify the individual or entity to object, whether or not they filed formal comments on this PA.

We also question opportunities for public involvement prior to the Notice of Initiation (NOI) in the Federal Register (November 4, 2013). Press releases on July 19, August 20, September 5 and September 18, 2013 announced "Field Trips to Start Collaboration on Forest Plan Revision - Public Invited to Experience the Forest and Share Their Values" and listed the dates, destination and purpose of each field

trip. Under CFR 219.16 (c) (2) "How public notice is provided" states, "For a new or plan or plan revision, when an official other than the Chief, the Under Secretary, or the Secretary is the responsible official, notice must be published in the Federal Register and the applicable newspaper(s) of record." Our concern is that all field trips and the opportunity to participate occurred prior to publication of the Notice of Initiation in the Federal Register on November 4, 2013, and as a result may have contributed to exclusion of some constituencies from opportunities for public involvement during that period.

Sierra Club is concerned that the FNF is prematurely giving undue weight to the Whitefish Range Partnership Agreement (WRP). In a Montana Public Radio interview (March 17, 2015)[1] with Eric Whitney, project leader Joe Krueger stated, "We basically incorporated those [WRP] recommendations in our proposed action". The WRP agreement predated the FNF collaborative meetings and the outreach for public involvement consistent with 36 CFR 219.16, or even 219.4. Public displays of support for a single entity; so early in the process and outside of NEPA and 2012 planning rule undermines public involvement required by those laws.

II. Identification and Consistency with Distinctive Roles and Responsibilities

The planning rule (36 CFR 219.2(b)) explains what the responsible official considers when describing distinctive roles and contributions within the broader landscape:

. . . A plan reflects the unit's expected distinctive roles and contributions to the local area, region, and Nation, and the roles for which the plan area is best suited, considering the Agency's mission, the unit's unique capabilities, and the resources and management of other lands in the vicinity. . .

The plan area's distinctive roles and contributions serve as a context to define the vision for the plan area within the broader landscape. As stated on page 3 of the PA, "This description is important because it is a source of motivations or reasons behind desired conditions."

In this required section of the PA, the FNF does a very good job identifying its distinctive roles and contributions. It recognizes that it is 'uniquely positioned in the heart of the Crown of the Continent Ecosystem" and that "Its location among some of the largest wild areas in the lower 48 states enhances its importance as a connector of habitats and core populations of associated wildlife." It recognizes that due to its location and landscape, the Flathead stands apart and plays a critical ecological role in the region and beyond.

The FNF recognizes that its geographic position in the heart of the Crown of the Continent, coupled with its quality roadless and wildlands is a distinctive role and contribution unique to the Forest at the regional, national and international level. It recognizes that this landscape draws visitors from around the world and offers unparalleled recreational opportunities important to this growing economic sector, and as such is one of the premier national forests in the entire system. It also recognizes its role as serving as a source population of grizzly bears to other recovery areas.

However, while recognizing these roles, the FNF does not seem to actually honor the function its distinctive roles and contributions play within the broader landscape. These distinctive roles and contributions are either not reflected in, or conflict with, many plan components including Forest-wide, Geographic Area (GA) and Management Area (MA) desired conditions and subsequent objectives, standards and guidelines.

Instead of using its unique roles and contributions as a context on which to base its plan, the FNF proposes:

[1] http://mtpr.org/post/new-flathead-forest-plan-will-shape-policy-24-million-acres. Interview with Joe Krueger and Eric Whitney, at roughly 8:30 minutes.

- To maintain an oversized road system based on a Travel Analysis Report (TAR, 2014)[2] that identified only 55 miles of 'unneeded road out of a system of nearly 3500 miles;
- To expand regularly scheduled timber production nearly two-fold from the 2006 proposed forest plan, including in the Primary Conservation Area (PCA) for grizzly bear and critical habitat for lynx, while acknowledging the declining importance of this industry to the economy of the Flathead area;
- To increase motorized recreation opportunities including all-season and over-snow use in habitat that provide ecological conditions necessary to, "the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area" (36 CFR 219.9), even though winter motorized recreation/snowmobiling is not a primary activity on the Forest and according to Assessment Part 2 represents less than 5% of users;
- To propose only 188,000 acres as recommended wilderness to the National Wilderness Preservation System out of 650,000 acres of wilderness inventory area evaluated including nearly 480,000 acres of IRAs, while opening more than 177,000 acres of remaining roadless backcountry to motorized recreation year-round or seasonally.

We request that consistency with the FNF's unique roles and contributions be included as an evaluation criteria when comparing alternatives in the Draft Environmental Impact Statement (DEIS).

III. The Defined Economic Analysis Area Does Not Reflect the Area or Economy

In the Assessment of the FNF Part 2, page 2 for social, economic and cultural conditions, it states, "The land administered by the FNF is spread among six counties in Montana: Flathead, Lake, Lewis and Clark, Lincoln, Missoula and Powell. After a detailed look at commuting patterns, timber processing areas, and recreational visitation, we (the IDT leader, the Regional Economist and the Regional Social Scientist) decided that the area of influence (herein called the analysis area) for the social and economic analysis would consist of four counties: Flathead, Lake, Lincoln and Sanders. Although recreation ties suggest the inclusion of Glacier County, the extremely light commuting from Glacier County to the other counties led us to exclude Glacier County." On page 110, Timber Production, it states that early on, "The four county study area became strongly associated with timber production." We consider the described analysis area as artificially contrived to skew economic analysis to favor the logging industry over recreation and other ecosystem services, and other businesses that contribute to the economic base.

Over 215,000 acres of the FNF lie in Missoula County, second only to Flathead County itself. It is almost double the area in Lake County, and nearly 15 times the area in Lincoln County, both of which are included in the economic analysis area. Sanders County, with zero acres of Flathead National Forest, is also included in the economic analysis area. We request the economic analysis area be redefined to include all the counties that lie within the FNF, and that it be used to assess the economic effects of the PA and any alternatives analyzed in the DEIS.

The Seeley-Swan is a seamless regionally recognized corridor that connects Missoula-Flathead counties. Highway 83 connects the Seeley-Swan from the junction of Hwy 200 in Missoula County to Flathead Lake. Missoula County stretches about 45 miles into the Swan drainage, including over 200,000 of the Flathead National Forest. Movement along the corridor is fluid and residents regularly travel back and forth to jobs and for other services and activities, and forest visitation. The Assessment indicates recreational visitation from Missoula County is second only to Flathead County. Lewis and Clark is also an important hub for outfitter and guide operations that access the Bob Marshall from the Swan, bringing considerable recreation business to the area. We strongly urge the FNF to redefine the economic analysis

[2] USDA FS, Travel Analysis Report For Flathead National Forest, 2014

area to include Missoula County, which has the second greatest land area in the Flathead National Forest, and Lewis and Clark County.

IV. Need for Change and Consistency with 2012 Planning Rule Requirements

The 1982 planning rule was developed at a time when timber was king in the U.S Forest Service, when sustained yield was the focus and sustainability was not even defined. Times have changed, and the 2012 planning rule makes a good effort to reflect this change. A major change in the 2012 planning rule is its emphasis on ecological sustainability (36 CFR 219.8 (a)), which provides direction to incorporate connectivity considering ecological integrity within the broader landscape. By contrast in section 219.11 timber requirements based on the NFMA, timber harvest for the purpose of timber production (219.11 (b)) is deemphasized. Even in section 219.11 devoted to timber requirements, subsection (a) lands not suitable, subsection (c) timber harvest for purposes other than timber production, and subsection (d) limitations on timber harvest, all emphasize restraints on timber production.

The need for change section of the PA does not reflect the 2012 planning rule. It misses or dismisses major changes from the 1982 rule. Primary of these is ecological sustainability (36 CFR 219.8 (a)), to maintain or restore ecological integrity, connectivity, contributions to ecological conditions to the broader landscape, dominant ecological processes, fire adapted ecosystems, etc. Of a list of nine bullets, one addresses ecological sustainability. But even here the need for change focuses on 'changes in fuels and vegetation management strategies' and "Revised plan components are also needed that focus on maintaining or restoring vegetation to …… " [emphasis added]. These statements could easily have been examples of need for change for timber requirements under 219.11 (c). This language is more consistent with project leader, Joe Krueger's interview on MT Public Radio (March 17, 2015)[3], than with the 2012 planning rule. At about 1:28 minutes, Eric Whitney asked Mr. Krueger about sustainability, and immediately the response was framed in the context of timber harvest. He does not mention 'connectivity' until the last minute of the 24-minute interview.

We request that the FNF reframe its need for change to be more consistent with the 2012 planning rule ecological sustainability focus in 36 CFR 219.8 (a) and 219.9. We hope requirements for "connectivity" under the 2012 planning rule will be made clear and more prominent in the need for change and other components of the forthcoming proposed plan.

Another identified need for change is based on "social and economic sustainability, ecosystem services and multiple uses integrated with plan components for sustainability, and species diversity to provide a range of social and economic benefits for present and future generations" (36 CFR 298 (b)). We consider this an opportunity to develop an alternative around the Citizen's ReVision, submitted to the FNF and Meridian Consultants on March 26, 2014 by Swan View Coalition and Friends of the Wild Swan, which emphasizes wildland restoration. This is a concept that has come of age and is consistent with the 2012 planning rule. The Montana Chapter Sierra Club signed on to this citizen proposal and we urge the FNF to include and fully analyze it in the DEIS.

Overall, we suggest that you take the lead from the PA for the Nez Perce-Clearwater Forest Plan Revision (2014) and base the need for change "on the status of key ecosystem characteristics, the needs and opportunities for restoration or maintenance of these characteristics, and the potential for plan components to promote ecological integrity within the terrestrial, riparian, and aquatic ecosystems, relevant to the plan area. The assessment of ecosystem integrity and status of at-risk species in the plan area should be reviewed to identify and evaluate opportunities for the plan area to maintain ecological sustainability and the diversity of plant and animal communities."[4] We believe that preserving wildlands

[3] http://mtpr.org/post/new-flathead-forest-plan-will-shape-policy-24-million-acres.
[4] Proposed Action–Nez Perce/Clearwater National Forests Forest Plan Revision, 2014. Need for change, pg 4.

in their natural and undisturbed character is the best way to achieve this need and would help foster management practices that would emphasize not only the ecological integrity of habitat, connectivity within the plan area and across a broader landscape, but also would be an economic benefit to surrounding communities.

V. Need for Change Specific to Grizzly Bear Management

We understand that a key purpose of both the Flathead Forest Plan Revision and Grizzly Amendment on the Kootenai, Lolo, Helena, and Lewis & Clark National Forests is to incorporate elements of the Draft CS, thereby demonstrating the presence of "adequate regulatory mechanisms" to protect grizzly bear and allow delisting of the Northern Continental Divide Ecosystem (NCDE) population to move forward. However, we believe that the need for change based on post delisting grizzly management is premature and that reliance on the Draft CS will lead to long delays in finalizing and implementing a new forest plan. We request that the FNF take a more conservative approach in providing adequate regulatory mechanisms to assure continued recovery of the grizzly bear and to expedite a final plan revision.

Reliance on the Draft CS

The 2012 planning rule requires forest plans to be based on best available science and consistent with existing law (USDA 2012). The PA and Grizzly Amendment need for change regarding grizzly bear management is based on the assumption that the Draft CS is grounded in "best available science" and adherence to law. We have concerns that it is neither, as follows:

a) The U.S. Fish and Wildlife Service (FWS) bases its claim of a "recovered" population on the NCDE's 1000 grizzlies and 3% annual growth rate, yet:

   - Population numbers and growth rate are not one of the Endangered Species Act Section 4 Delisting Criteria (USFWS 1988).
   - Federal Judge Friedman has ruled that habitat quantity, quality, and sufficiency are the determining factors of recovery, not minimum population and distribution numbers. (Fund for Animals v. Babbitt, 903 F Supp. 96, 113,118(D.D.C. 1995)
   - Dr. Richard Harris[5], a contributor to the Draft CS, has stated that the 3% growth rate does not meet "the conventional level of statistical certainty" (USFWS 2013).

b) The ESA's first listing/delisting criteria is, "the present or threatened destruction, modification, or curtailment of its habitat or range." However, long-term, ecosystem-wide grizzly habitat studies have never been conducted in the NCDE, giving the agencies no baseline against which to measure these criteria. In addition, the required Habitat Based Recovery Criteria report has never been produced by FWS[6,7].

c) The only best available science on grizzly habitat security and motorized access route density is Amendment 19 to the Flathead Forest Plan (USDA 1995) which has been adopted by the other NCDE Forests (USFWS 2007). Yet the Draft CS, based on estimated population of 1000 bears and a 3% growth rate replaces this science with whatever road densities were present in the 2011 Baseline Year.

   Under the new 2011 Baseline Motorized Access "Standards" we would see the following (USFWS 2013, Appendix 3):

[5] Harris, USFWS 2013, NCDE Grizzly Bear Conservation Strategy
[6] Fund for Animals v. Babbitt, Civil Act. No. 94-1021 (PLF)
[7] National Audubon Society v. Babbitt, Civil Act. No. 94-1106 (PLF) (Consolidated) 1997

- 31 of 54 BMU Subunits (57%) would violate A19 scientific standards on the Flathead Forest.
- 1 of 3 BMU Subunits (33.3%) would violate A19 of Helena NF.
- 2 of 2 BMU Subunits (100%) would violate A19 on Kootenai NF.
- 8 of 8 BMU Subunits (100%) would exceed A19 on Montana Department of Natural Resources (DNRC) lands. Although DNRC does not technically fall under A19, it does manage more than 500,000 acres in the NCDE, making this lack of security of serious concern.
- Only the Lewis & Clark NF would meet A19 standards.

d) The Draft CS says its objective is "…maintenance of habitat conditions that are compatible with a stable to increasing grizzly bear population" which is questionable given the following:

- Given a complete lack of long-term habitat research ecosystem-wide, management agencies have no idea what current habitat conditions are.
- Although the current population estimate is 1000, the Draft CS goal is 800 – a 20% decline.
- The current survival rate of Independent Females is 95.2%, while the goal of the Draft CS is >90% survival.
- The current mean annual mortality rate of Independent Males is 13.8% - 15.6%, but the Draft CS would allow 20% with no scientific reference for this increase.

The Draft CS, and any Forest Plan based upon it, make the mistake of assuming that the current 3% growth rate, made possible by decades of Endangered Species Act protections and A19, will be possible after habitat standards are weakened, and hunting allowed. Nothing could be further from the truth.

e) The Draft CS designates a Management Zone 1 around the PCA with the following claimed characteristics:

- "The objective in Zone 1 is continual occupancy by grizzly bears but at expected lower densities than inside the PCA."
- "In these areas, habitat protections on Federal and Tribal lands will focus on limiting miles of open roads and managing current roadless areas as stepping stones to other ecosystems."
- Attractant storage rules would be implemented on Federal, Tribal, and most State Lands" (emphasis added) but doesn't specify whether this applies to the Swan River or Coal state forests.

These Objectives for Zone 1 make the objective of "continual occupancy" nearly impossible because, (1) open road limitations will be based on the new 2011 Baseline standard that has no basis in science; (2) under the new Kootenai Forest Plan to the west, IRAs are systematically denied Recommended Wilderness status with most designated Motorized Backcountry instead (USDA 2015a); and (3) Management control of food conditioned grizzlies (Attractants) is the #1 cause of NCDE mortality; the State manages over 500,000 NCDE acres, yet isn't required to control attractants on all of its lands.

f) The purpose of Management Zone 2 in the Draft CS is "…to provide the opportunity for grizzly bears, particularly males…to move between the NCDE and adjacent ecosystems…"

However, regarding Zone 2 the Draft CS also says, "…there are no habitat standards specifically related to grizzly bears because the objectives in these zones do not require them" and, "The Objective is to maintain existing resource management and recreational opportunities and allow agencies to respond to demonstrated conflicts…" – some of the very activities that imperiled the species to begin with.

We are concerned that the Draft CS, and any Forest Plan based on it, threatens to manage Zone 2 as mortality "sink", rather than a population "link." While the movement of males provides genetic connectivity, only female movement results in the demographic connectivity that the Draft CS claims to provide. The solution is to base the management of Zone 2 on known security requirements of grizzlies, and particularly female grizzlies – not on manager preferences.

g) Although the Draft CS Standard 3 says that Independent Female Mortality will not exceed 10 percent, it contains absolutely no timely consequences for doing so. In fact, despite the fact that grizzlies are one of the slowest reproducing mammals in North America, with female mortalities being especially serious, the Draft CS throws the Precautionary Principle completely out the window:

"As an example of the application of the management review triggers, if independent female survival was between .89 and .90 for 12 consecutive 6-year intervals such as 2014-2025, a management review would be triggered" (USFWS 2013) (emphasis added). That's 12 years before any investigation of causes is even triggered let alone corrected. This could result in population declines that the agencies are likely to miss until they're too late to correct.

h) If approved, the Draft CS would allow NCDE Forests to "temporarily increase" Open Motorized Route Density (OMRD) by 5%; increase Total Motorized Route Density (TMRD) by 3%, and reduce Security Core by 2%. This is based upon 6 National Forest projects – 5 on the Flathead, and 1 on the Lolo between 2003 and 2010. And since they occurred at a time when FWS says the NCDE grizzly population "is known to have been increasing" the FWS concludes that they must be fine for the entire ecosystem. We do not consider this proposal to be based on best available science:

- According to Dr. Richard Harris above, neither grizzly bear population nor trend was known at the time the Draft CS was developed.
- The 6 National Forest projects were not identified so data can't be checked, or impacts revealed.
- Five of the six projects occurred on just one forest, which is not representative of an entire ecosystem.
- Such "temporary increases/decreases" on projects can span 5 years, with another year for restoration – with "exceptions." The FNF currently has a backlog of 126 miles of road that it has committed to decommission in NEPA decision documents but has failed to fund. As a result the FNF has already damaged its credibility regarding its willingness to fulfill its obligations when it comes to road decommissioning. Until such obligations are met per existing NEPA decision documents, we strongly object to the inclusion of any "exceptions." The FNF has demonstrated that it recognizes "exceptions" rather than rules when it comes to removing roads. Based on this pattern, we believe that once on the ground many roads would become permanent roads by default.

i) At the recent NCDE Grizzly Subcommittee meeting (5/6/15) FWS Grizzly Bear Recovery Coordinator Chris Servheen reported that the Final NCDE CS won't be completed until the end of 2015. We question the wisdom of NCDE Forests adopting a Draft CS into their plans now with the Final CS at least 7 months away.

VI. Need for Change Specific to Bull Trout and Native Fish Habitat Management

We support and are including by reference the comments of the Friends of the Wild Swan related to bull trout, aquatic ecosystems, and native fish habitat. We do not support the FNF PA's need for change to replace the Inland Native Fish Strategy (INFISH) with new management standards and guidelines because:

1. The proposed plan components are not equivalent to the protections afforded aquatic habitat and species under the current plan as amended by INFISH. For example the PA:

   - Eliminates Riparian Management Objectives (RMOs) for key indicators of native fish habitat such as water temperature, large woody debris, bank stability, width/depth ratio and pool frequency that were in INFISH and does not provide a rationale for why RMO objectives, standards and guidelines were removed.
   - Does not retain a riparian Management Area (MA) allocation or designate a riparian protection zone around streams, rivers, lakes, ponds and wetlands. A guideline (FW-GDL-RCHA -01) referring to default Riparian Habitat Conservation Area (RHCA) widths in the 'glossary' is not equivalent to INFISH standards.
   - Lacks or has fewer and weaker standards and guidelines for timber, roads, grazing, recreation, minerals, fire/fuels, lands, and general riparian management and for watershed/ habitat and fisheries/wildlife restoration.

2. The PA disregards the large body of science regarding the impacts of roads on aquatic ecosystems and contains one guideline: "Project specific BMPs should be incorporated into road maintenance activities as principle mechanisms for protecting water resources." This is not equivalent to INFISH as the FNF claims on page 10 of the PA. The PA does not contain road density standards and other measures to protect native fish and water quality from known road effects:

   - Roads contribute more sediment to streams than any other land management activity.
   - Poorly planned, designed, located, constructed or maintained roads can degrade fish habitat.
   - Roads directly affect natural sediment and hydrologic regimes by altering streamflow, sediment loading, sediment transport and deposition, channel morphology, channel stability, substrate composition, stream temperatures, water quality, and riparian conditions within a watershed. These habitat alterations can adversely affect all life stages of fish, including migration, spawning, incubation, and emergence and rearing.
   - Concentration of surface and sub-surface water, inadequate maintenance, undersized culverts, and sidecast materials can lead to road-related mass movements.
   - Road/stream crossings can be a major source of sediment to streams resulting from channel fill around culverts and subsequent road crossing failures.
   - The 1998 USFWS Biological Opinion for bull trout stated: "there is no positive contribution from roads to physical or biological characteristics of watersheds. Under present conditions, roads represent one of the most pervasive impacts of management activity to native aquatic communities and listed fish species."
   - Roads in close proximity to streams (< 30 meters or 98 feet) are considered a primary factor resulting in reduced habitat conditions for bull trout (Meredith et al 2014). This study indicated that roads near streams could have the same effect on a stream reach as large changes in climate, geomorphology, and management.
   - The Forests in western Montana support 81 percent (or 1,462 miles) of the designated spawning and rearing habitat for bull trout. Given this high percentage, and the potential negative effects of roads on streams, the management of the road system is a principal concern for bull trout.[8]

[8] (Biological Opinion of the Effects to Bull Trout and Bull Trout Critical Habitat from Road Management Activities on National Forest System and Bureau of Land Management Lands in Western Montana, 2015)

- Roads closed with a recontour intersection or rock/earth barrier (closure level III) design criteria requires all stream crossing structures be removed at the time of closure or the mitigation actions for level II roads apply.

3. There is no indication from the PA that the revised Forest Plan will facilitate recovery. As noted above the PA removes Riparian Management Objectives, allows unmaintained roads to remain with culverts, doesn't comply with USFWS Biological Opinions, eliminates INFISH standards and guidelines, removes the riparian management allocation and overall allows the FNF more discretion and less accountability. The Forest Service's actions must lead to recovery of threatened and endangered species – not just survival.

    - Bull trout are protected under the Endangered Species Act and critical habitat has been designated on the Flathead. The FNF can tailor standards and guidelines to habitat features using the best available science from local studies. But it cannot eliminate the INFISH RMOs, standards and guidelines and not replace them with something at least comparable if not stronger.
    - Does not honor additional commitments required by the US Fish and Wildlife Service in its June 19, 1998 consultation.

VII. Need for Change Specific to Lynx Habitat Management

We support and are including by reference the comments of the Friends of the Wild Swan on the PA related to lynx habitat management. We are concerned that the need for change to drop the Northern Rockies Lynx Amendment, with claims to carry forward select standards while emphasizing exceptions is not supported by best available science and could result in degradation of lynx habitat.

1. **The PA changes the Northern Rockies Lynx Management Direction (NRLMD) without providing rational explanations for why there is a need for change and how the proposed changes facilitate Canada lynx (lynx) recovery. The PA:**

    - Modifies NRLMD VEG S5 & S6 to add an exception category and to allow more pre-commercial thinning (PCT) destructive to lynx and snowshoe hare habitat.
    - Eliminates many standards and guidelines in the NRLMD without explaining why changes are needed or how these improve the potential for lynx recovery.
    - Contains a new term, i.e. "mapped lynx habitat" that is not defined or explanation given as to why this term is needed.
    - Maps provided seem to be inconsistent with mapped lynx critical habitat (CH) designations.
    - Is confusing and difficult to understand because the lynx and vegetation standards are intertwined. Plan components related to lynx are scattered throughout the document and not organized under the logical Threatened, Endangered, Proposed and Candidate Wildlife Species section.
    - Does not clearly explain where NRLMD standards, guidelines and objectives would be retained and which would be eliminated, why they would be eliminated and how the change would benefit lynx recovery. The DEIS must clearly compare and analyze effects on lynx between the NRLMD and proposed action objectives, standards, and guidelines under each alternative.

2. **The PA's need for change does not provide for lynx travel habitat and connectivity:**

    - The Lynx Conservation Assessment and Strategy 2013 (LCAS) notes that lynx daily movements within their home ranges center on continuously forested areas and that ridges, saddles, and riparian areas are often used. The PA's need for change or plan components do not adequately address protection of movement paths or connectivity features that lynx prefer: continuous forest, ridges, saddles and riparian areas, and size and distribution of large openings.
    - Snow-tracking revealed that lynx avoid large openings; both natural and created. Lynx movement

varies by gender, and for females with cubs is more limited and less tolerant of inadequate cover, including in surrounding habitat. Needs for cover are significant factors that must be analyzed and addressed in the DEIS.

- The DEIS must analyze the effect of Wildland Urban Interface (WUI) treatments on lynx habitat connectivity. WUI projects at lower elevations may cumulatively create additional barriers for lynx attempting to cross the valley. This aspect of connectivity is not adequately addressed.
- The FNF must maintain or increase high horizontal cover and mature stands for connectivity as identified by Squires (2013). Connectivity corridors extend from Canada through the Whitefish Range, along the western front of the Swan Range, ending near Seeley Lake and the travel corridor along the east side of Glacier National Park to the Bob Marshall Wilderness Complex.
- The DEIS must analyze and assess how prior logging has affected the current distribution of lynx, and present the scientific basis for the proposed management strategies that include expansive logging and increased opening size limits.

3. The PA's need for change does not provide for landscape-wide desired future habitat conditions, that include climate change related factors:

- Does not consider climate change related factors such as diminished snowfall area and duration of season, or changes in snow conditions on:
    - Diminished area of suitable habitat.
    - Increased competition for dwindling habitat between lynx and other snow dependent species including wolverine.
    - Increased competition for dwindling snow-covered habitat and connectivity areas between lynx and motorized over-snow recreationists, which the FNF is retaining and increasing in its need for change under Amendment 24.
- Does not provide measurable standards to protect lynx from snow compaction and snowmobile interactions. Snowmobile use increases snow compaction, which in turn enables competing carnivores, such as coyotes, wolf, and bobcat access to areas they were previously unable to access, or to access only with greater expenditure of energy. This results in increased competition with lynx for prey and further reduces the potential for lynx recovery.

- Does not limit late season snowmobiling or provide for enforcement of snowmobile use necessary to deter off trail or out of area use.

4. PA need for change includes exceptions from the NRLMD that allow more pre-commercial thinning (PCTs) and could reduce snowshoe hare winter habitat.

- The PA's need for change to include exemptions for PCTs is not based on the best scientific information available (16 USCA 1851 (a)(2). The PA must have a clear scientific basis and should not depend on an untested hypothesis. It should not be implemented until there have been adequate scientific studies to support this concept.
    - Considering lynx status, plan components should not be based on unproven management strategies. Currently, no data are available to quantify the re-establishment of snowshoe hare habitat after a PCT and there is no information about how much time is needed to re-establish suitable habitat or snowshoe hare responses, compared to sites that were not subject to PCT, so this is not a proven management strategy.
    - As discussed in the LCAS, while Bull et al. (2005) reported that slash and coarse woody debris remaining after PCTs provides forage and cover for snowshoe hares up to a year post-treatment, Homyack et al. (2007) found that snowshoe hare densities decline after PCTs for 1–11 years post-PCT, and suggest that stands do not regain structural understory complexity needed to support snowshoe hare densities to the level present at pre-treatment.
    - As an alternative to standard PCTs, Griffin & Mills (2007) suggest retaining at least 20% of

each patch in untreated clumps of about ¼ ha (½ ac) to maintain hare habitat in the short term. However, Lewis et al. (2011) found that landscapes with patches of high-quality habitat surrounded by similar vegetation supports far more hares than more fragmented landscapes that are composed of high-quality patches scattered across a matrix of poorer-quality habitat. Long-term studies of modified thinning methods are needed.

5. The PA's need for change allows exceptions to NRLMD VEGS5 for natural range of variation that effect existing mature multi-story stands and increase habitat fragmentation.

- The PA allows the USFS to claim that logging will improve lynx habitat without providing any scientific research or monitoring data to support this claim. If logging does not ultimately improve lynx habitat, then lynx conservation is clearly not one of the intents of any logging practices.
- Older, closed-canopy forests provide red squirrel habitat. These must not be logged under the false guise of "creating" winter snowshoe hare habitat, or increasing the understory. The LCAS defines red squirrel habitat as dense older forests. The lack of adequate habitat descriptions and protection for the red squirrel, a species that is an important alternate prey species for lynx, is a severe shortcoming.

6. The PA's need for change and plan components based on it do not consider whether maintaining 30% unsuitable habitat in a LAU will adequately protect and recover lynx.

New science indicates that the 30% threshold for unsuitable habitat is inadequate to protect lynx and that 10-15% unsuitable habitat is much more protective. Furthermore, a 30% unsuitable habitat standard is stretched to allow 36% unsuitable habitat; There can be 30% unsuitable habitat in an LAU, plus another 6% unsuitable habitat in mapped lynx habitat across the entire forest. This does not include all of the unsuitable habitat that may exist within LAUs that contain private land. Therefore, the 30% standard, which is too high, is already being exceeded.

VIII. Landscape Connectivity and the 2012 Planning Rule

The 2012 National Forest Planning Regulations has created a new set of planning obligations for the National Forest units to fulfill. In particular, the new regulations have substituted two provisions §219.8 and §219.9 for the 1982 regulations' "maintain viable populations of forest vertebrates" standard. These new sections seek to meet the mandate of NFMA that forest plans "provide for the diversity of plant and animal communities…" 16 USC §1604(g)(3)(B). In relevant part §219.8 states:

> (a) *Ecological Sustainability*. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure function, composition, and connectivity, taking into account:
> …
> (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area.
> (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.

In parallel language §219.9 Diversity of plant and animal communities, in relevant part, states:

> (a) Ecosystem plan components. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity.

It is plain from the language of these regulations that connectivity planning is central to the forest plan revision process. Indeed, it is so central that "plan components, including standards or guidelines" addressing connectivity must be included in the forest plan.

A review of the Proposed Flathead Forest Plan shows that very few standards and/or guidelines are proposed to address connectivity and that those that are deal with threatened species under the Endangered Species Act (lynx and grizzly bear). The standards or guidelines we could find that relate to connectivity are as follows:

> **Standards (FW-STD-TE&V)**
> **02** New or expanded vegetation management projects and other activities affecting mapped Canada lynx habitat or designated critical habitat, shall maintain habitat connectivity for Canada lynx, as determined through project level analysis. Also see desired conditions specified in individual GAs, which apply to lynx as well as other wide-ranging wildlife species.
>
> **Standards (FW-STD-WL)**
>
> **01** Grizzly bear habitat on National Forest System lands in the NCDE is delineated and managed as the Primary Conservation Area (PCA) and Zone 1 (including the Salish DCA) (see figure C-1).
>
> **02** Within the NCDE PCA and Zone 1 (including the Salish DCA), Food/Wildlife Attractant Storage Special Order(s) shall apply to all National Forest System lands in the NCDE.

Essentially, the lynx standard defers any analysis to the project level where landscape level planning is generally not done and the grizzly bear standards defer to the Draft CS zones and food storage (an important component of an overall connectivity strategy but far from a complete connectivity plan). In addition, the proposed plan fails to address the several unlisted meso-carnivore species with connectivity needs such as American marten, fisher or wolverine or large ungulates like moose, deer and elk or even representative birds, amphibians, or reptiles. This omission represents a failure to meet the standards of the §219.8 Sustainability and §219.9 Diversity of plant and animal communities provisions.

The National Forest Management 2012 Planning Rule clearly requires plan components, including standards or guidelines, to maintain or restore connectivity. Yet, the proposed plan is largely silent on this issue. The final forest plan must include more detailed and extensive standards and guidelines that serve as a framework for connectivity maintenance and restoration for terrestrial wildlife and ecosystems, whether they are listed under the Endangered Species Act (ESA) or not. In fact, the FNF has recognized the existence of information and criteria that would serve as the basis for developing such plans and the plan's manifestation in standards and guidelines.

Using lynx as an example, the FNF Assessment Wildlife chapter makes several references to habitat necessary for lynx connectivity yet these habitat standards make no appearance in the proposed plan as even a guideline. For instance the FNF Assessment makes the following statements regarding lynx and other species:

> "Movement paths: Habitat linkage has been assessed for the grizzly bear, Canada lynx and wolverine, with some similar findings. Squires (2013) identified travel corridors for Canada lynx in northwest Montana based upon least-cost path modeling. Squires showed a primary corridor for connectivity from Canada to the Northern Rockies that extended from the Whitefish Range in the north, along the western front of the Swan Range and ended near Seeley Lake, Montana. A second modeled corridor extended along the east side of Glacier NP to the Bob Marshall Wilderness Complex. The majority of least cost paths crossed the Highway 2 transportation corridor to the north of the Hungry Horse reservoir near the town of Hungry Horse, Montana. The

existing NLRMD management direction provides for maintenance of conditions providing habitat connectivity (USDA FS 2007)."

Note that NLRMD management direction is not a forest plan standard or guideline. In addition NLRMD management direction does not create plan components tailored to the conditions of the Flathead NF conditions or potential linkage areas. The Flathead Forest Plan must contain such provisions, incorporating information already cited by the agency.

On page 161 of its Assessment Part 1, the FNF refers to general and species-specific measures to address climate change, including securing and restoring refugia and movement paths.

> "While the Forest Service cannot control climate change, general measures, as well as some species- specific measures, have been identified to help reduce species vulnerability to climate change (Shoo et al. 2013). General measures include: 1) secure and restore "refugia" that are within the species current range, 2) secure and restore "refugia" that are outside the species current range, 3) secure and restore movement paths so that species can migrate and/or interbreed, 4) develop assisted colonization plans. The Flathead NF is within the current range of the species listed above. Refugia outside the current range of these species are not addressed in this document, nor is assisted colonization. The USFWS or MTFWP are responsible for developing and implementing assisted colonization plans if needed. (Refer to the Terrestrial Wildlife and Plant Species section, "Wildlife Species", "Threatened, Endangered, Proposed and Candidate Species" and "Potential Species of Conservation Concern" subsections for more details)."

On page 179, the FNF Assessment Part 1 refers to habitat needs for species movement:

> "Some species, such as Canada lynx or marten, may temporarily avoid areas that lack coniferous cover (e.g., due to recent fires or regeneration harvest), but will use these areas again once trees grow back and cover is restored. Figure 53 shows areas with at least 25 percent cover of trees greater than 5 inches d.b.h. On the Flathead NF, trees in this d.b.h. category are generally at least 40 feet tall and are able to provide shade, cover, and substrates for nesting and feeding. Areas lacking in trees over 5 inches d.b.h. (displayed in white on figure 53) are considered temporary because they are due to recent wildfires or tree harvest. Persistent grass/shrub/non-forest openings (displayed in yellow on figure 53) are considered more permanent because they are due to biophysical factors (such as presence of rocky ridges) or human development".

It would seem logical to develop a guideline or standard that incorporated the level of cover and size class of trees that support lynx or marten connectivity. Such standards or guidelines could include:

- Define terrestrial upland connectivity areas on the FNF in the plan.
- Provide that 25% cover in the >5 inch dbh size class be maintained within the connectivity areas identified by researchers.
- Provide that in the event of wildfire or windthrow that substantially reduces the area of cover below 25% within connectivity areas no further commercial management shall occur in the affected watershed until that cover is restored.

Similar information is available for other species. These must also be incorporated in an overall connectivity plan for the forest embodied in standards and guidelines.

Indeed, the FNF Assessment recognizes that much work has been done to define connectivity areas within the planning area and that connect the plan area to the broader landscape as required by §219.8 Sustainability. This includes the connectivity mapping pictured in Figure 56 of the Wildlife Assessment chapter reproduced below:

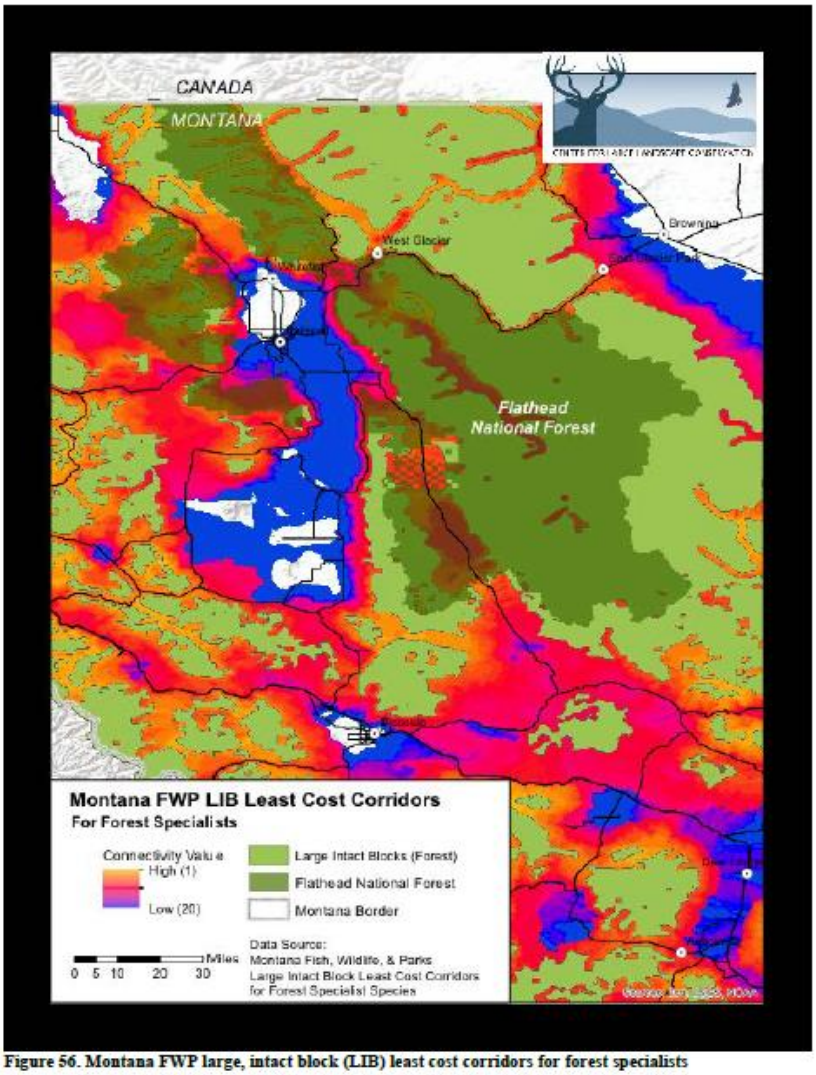

Figure 56. Montana FWP large, intact block (LIB) least cost corridors for forest specialists

Nowhere in the overall Proposed Flathead Forest Plan standards and guidelines are these least-cost paths defined or otherwise required to be a focus or consideration within management despite the mandate of the planning rules. Needless to say, there are many other sources (Claar et al 2004; Weaver 2013; Inman et al 2013; McRae et al 2015; Pierce 2013) ready to contribute to the development of locations and standards and guidelines for use within those locations to govern activity to benefit terrestrial connectivity. This is a large gap in the current proposed plan.

Connectivity and Grizzly Bear Recovery

Clearly, the FNF has a tremendous responsibility to provide for connectivity for grizzly bear and other wide-roaming species. Requirements need to be strengthened in both the PA and the Grizzly Amendment. In his pivotal report, "Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana" Dr. John Weaver (2014) found that:

> "The community of carnivores (17 species) on the Flathead National Forest appears unmatched in North America for its variety, intactness, and density of species that are rare elsewhere (P: 114)…". And that, "Consequently, many scientists advocate the need for conservation corridors or linkages between habitats (existing and future) to support necessary movements and greater

viability (P: 5)…" These findings echoed the earlier conclusions of Weaver (2001) that, "Due to these unique characteristics and its strategic position as a linkage between National Parks in both countries, the transboundary Flathead may be the single most important basin for carnivores in the Rocky Mountains.

The challenge is to develop and implement a transboundary conservation plan that honors these outstanding values. Key principles for carnivore conservation include to: (1) maintain food resources with management of habitat and prey populations, (2) provide security from excessive mortality with networks of core reserves and other precautionary measures, and (3) maintain regional connectivity with landscape linkages."

As discussed earlier, the FNF initially embraced its unique roles and contributions (pp. 3-4) when it noted that: "The Flathead National Forest is uniquely positioned in the heart of the Crown of the Continent Ecosystem, with a complex of wilderness and unroaded areas that border Glacier National Park and a remote portion of British Columbia. This location, among some of the largest wild areas in the lower 48 states, enhances its importance as a connector of habitats and core populations of associated wildlife…"

The PA then goes on to note that the 2.4 million acre FNF supports 1.8 million acres of lynx critical habitat, one of the largest wolverine populations in the lower 48, and the highest density of grizzly bears in inland North America.

Unfortunately, as detailed above the FNF has confused repeatedly mentioning "habitat connectivity", with providing meaningful management decisions to actually accomplish it. The PA as currently written fails to provide landscape connectivity for grizzly bears both north-south and east-west in the following ways:

a) By relying on the Draft CS, the Flathead and other forests would abandon Amendment 19 to the Flathead Forest Plan on motorized access – the only science-based standards in the ecosystem, replacing it with a 2011 Baseline "Standard" firmly grounded in nothing but agency preferences.

   A key purpose of A19 was to reweave the Forest's ecological web by lowering excessive motorized route densities and restoring habitat security based on known grizzly bear needs. By abruptly dumping A19, with numerous Bear Management Units (BMU's) still failing to meet their bear-based standards, the Draft CS, PA, and Grizzly Amendment leave gaping holes in the security network and connectivity of grizzly habitat ecosystem-wide, with impacts for other wide-ranging carnivores as well.

b) As noted earlier, the FNF proposes to ramp up Suitable Timber Acres from the 328,000+ acres of the 2006 Plan, to the unjustified 500,000 – 637,419 acres in the current PA and published reports – an increase of 172,000 acres to 277,000 acres and +52% to +94% - all with no demonstrated increase in the land's ecological capacity to support such excessive harvests.

   A survey of the PA's Geographic Area (GA) maps (Appendix C) and their Management Area (MA) designations, show that the FNF intends to inflate the Suitable Timber Base by illegally entering grizzly bear Core areas, compromising lynx critical habitat as shown in its own Biological Assessment (USDA 2014), repeatedly breaching the north-south lynx corridor demonstrated by Squires (2013), and intruding on wolverine maternal habitat.

   The NCDE cannot be managed as an island. It is connected to populations in other grizzly recovery ecosystems including the neighboring Cabinet-Yaak where due to high mortality the population is stagnant and below objectives. The 1993 Grizzly Recovery plan states, "It is widely accepted in conservation biology that island populations of any species are subject to high rates of extinction and that these rates are directly related to the size of the island. Wide ranging mammals are particularly sensitive to the detrimental effects of insular distribution" and "Grizzly bear habitat and populations were once continuous and contiguous throughout the Rocky Mountains. Grizzly numbers, habitat, and

distribution were reduced through the actions of humans." (USFWS 1993) The PA's increase in regularly scheduled timber harvest area and levels, increase in developed recreation sites even though campground occupancy rates do not support this need, increase in over-snow use even though the Assessment shows this user group represents 2% of visitation with low projected growth for this activity, and removal of A19 standards, all indicate that the FNF is ignoring best available science and any real commitment to preserving threatened and endangered species and their habitat. It is again setting up a scenario for grizzly numbers, habitat, and distribution to decline.

We caution against overenthusiasm for premature delisting until grizzly bear populations have recovered to objectives in designated recovery ecosystems across the broader landscape.

IX. Recommended Wilderness & IRA's

a) The PA shows that the Flathead has 25 IRAs totaling 478,754 acres. Yet despite the fact that we are in the earliest stage of Issues Scoping, it indicates that the Forest has already eliminated 15 of those IRA's (60%) from further consideration as Recommended Wilderness, advancing only 34-35% and 188,206 acres (although our math suggests 39%).

Unfortunately, the PA provides no specific documentation as to how or why these decisions were reached – despite the requirement in the Forest Service Handbook (FSH 1909.12, Chapter 70 – Wilderness) that they do so, as follows:

"Based on the evaluation and input from public participation opportunities, the Responsible Official shall identify which specific areas, or portions thereof, from the evaluation to carry forward as recommended wilderness in one or more alternatives in the plan EIS…

For each evaluated area or portions thereof that are not included in an alternative in the applicable NEPA analysis, the Responsible Official shall document the reason for excluding it from further analysis."

Since the Forest has clearly established criteria and employed them to eliminate 60% of IRAs from Wilderness consideration, citizens should not have to wait until the Draft EIS comes out many months from now to be let in on that process. We recommend that this decision-making process be released immediately on the Forest Plan website.

b) We are concerned that FSH Chapter 70 on Wilderness (p.12, #5) appears to stress management and "manager preferences" in the Wilderness evaluation process when it says:

"Evaluate the degree to which the area may be managed to preserve its wilderness characteristics."

Factors to consider include shape and configuration; presence and amount of non-federal land in the area; and management of adjacent lands. These suggest a focus on ease of access, ease of management, and ability to manipulate the landscape as inappropriate criteria to eliminate Wilderness consideration.

In clear, simple language, the Wilderness Act (1964) lays out the ground rules under which areas are to be judged for Wilderness:

"A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and the community of life are untrammeled by man, where man himself is a visitor who does not remain."

"In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States…leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the

policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

The conditions that Congress clearly intended to discourage or disallow were human dominance, settlement, overuse, or mechanization of wild landscapes. Conditions to be encouraged and guarded were untrammeled and uncontrolled landscapes and ecological processes, with areas protected and preserved in their natural condition. Finally, humans were to be temporary visitors only – not managers or manipulators of the landscape.

c) Given the increasing scarcity and ecological value of IRAs, we recommend that all FNF IRA's be classified as Recommended Wilderness or Backcountry Non-motorized Year-round. For specific recommendations on Wilderness and Backcountry, see the GA analysis below.

Standards and Guidelines for Wilderness Management

We are concerned that the PA is silent on minimal or traditional skills and tools. We believe the FNF must maintain this skill set in order to be consistent with provisions of the Wilderness Act. We request that Designated and Recommended Wilderness (MA 1a and MA 1b) contain a standard that specifies all work, including maintenance on trails, airstrips and other infrastructures within Wilderness be done with minimal or traditional skills and tools. The Forest Service has a rich and proud history in 'traditional skills', one that is more than capable of supporting all necessary work consistent with the Wilderness Act. Please don't diminish Wilderness or this history. Working with minimal or traditional skills and tools is also popular with volunteers and partnering organizations.

X. Wild and Scenic Rivers

We were pleased to see in the PA that the FNF has determined that 22 deserving rivers and streams are eligible for Wild and Scenic River designation.

We urge the FNF to grant 'eligible' status to 36 other streams, identified below, as well. The majority of these streams were evaluated by the FNF and found to have at least one Outstandingly Remarkable Value (ORV) that was ranked 3, i.e. "one of a few" and "regionally significant." As noted by the FNF in its PA on page G-4, in order to qualify as an ORV and thus be eligible for WSR designation, "…a river-related value must be a unique, rare or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale." If a feature of a stream is considered "one of a few" and "regionally significant" then these rivers and streams logically should be considered eligible.

Additionally, many of these streams and their riparian corridors harbor important populations and/or habitat for native fish and/or wildlife, including threatened and endangered species. Many of these streams contain critical habitat for bull trout and have genetically-pure populations of westslope cutthroat trout. As noted by the FNF in its PA, on page G-6, criteria for determining whether a stream is eligible for WSR designation for an outstanding value for fish include whether "…the river is nationally or regionally an important producer of resident and/or anadromous fish species," as well as "…the presence of wild stock and/or Federal or State-listed or candidate threatened, endangered or species of conservation concern are of particular significance" and "The river provides uniquely diverse or high-quality habitat for fish species indigenous to the region of comparison. Exemplary habitat for wild stocks and/or Federal or State-listed or candidate threatened, endangered, or species of conservation concern is of particular significance." Similar criteria for wildlife, especially in regard to important populations of/habitat for threatened or endangered species, or species of conservation concern, are listed on page G-5 as key criteria to be considered in the eligibility determination process.

For these reasons, we believe the following streams should be determined eligible for WSR designation.

Middle Fork

Basin Creek – Fish

Dolly Varden Creek – Fish, Prehistory/History

Granite Creek – Fish, Wildlife, Prehistory/History

Lake Creek – Fish, Wildlife, Scenery

Unnamed Fork Lake Creek – Fish, Wildlife, Scenery, Geology

Morrison – Wildlife, Prehistory/History

Essex Creek – Wildlife (high value for grizzly bear and wolverine, Weaver 2014), Fish

Dickey Creek – Wildlife (high value for grizzly bear and wolverine, Weaver 2014)

Bear Creek – Fish, Wildlife

North Fork

Big Creek – Wildlife, History

Coal Creek – Wildlife

South Fork Coal Creek – Wildlife

Cyclone Creek – Wildlife

Hallowat Creek – Wildlife

Matthias Creek – Wildlife

Moose Creek – Wildlife, Fish

Red Meadow Creek – Wildlife, Fish, Prehistory/History

Shorty Creek – Wildlife

South Fork

Bunker Creek – Fish (critical habitat for bull trout, genetically pure WCT, Weaver 2014), Wildlife (documented wolverine use of creek bottom, Weaver 2014)

Addition Creek – Fish (genetically-pure WCT, Weaver 2014), Wildlife (documented wolverine use along creek, Weaver 2014)

Gordon Creek – Fish, Prehistory/History

Gorge Creek – Fish, Wildlife, Scenery, Geology, Recreation

Lower Twin Creek – Wildlife, Scenery

Twin Creek – Wildlife

Quintonkin Creek – Fish, Wildlife (especially grizzly bear and wolverine at higher elevations, Weaver 2014)), Prehistory/History

Sullivan Creek – Fish, Wildlife (especially grizzly bear and wolverine at higher elevations, Weaver 2014)

Wheeler Creek –Fish, Wildlife (especially female grizzly bear, Weaver 2014)

Lost Johnny Creek – Wildlife (especially grizzly bear, Weaver 2014)

Doris Creek – Wildlife (especially grizzly bear, Weaver 2014)

Wildcat Creek – Fish, Wildlife

Wounded Buck Creek – Fish, Wildlife

Swan River

Upper Swan River – Wildlife

Goat Creek – Wildlife

Lost Creek – Fish

North Fork Lost Creek – Wildlife

South Fork Lost Creek - Wildlife

As the Forest Service well knows, the Flathead National Forest is one of the last and largest strongholds for key species including grizzly bear, wolverine, lynx, bull trout and westslope cutthroat trout. These species have largely disappeared from all but a small sliver of their historic habitat in the lower 48. We have the opportunity now to protect these important streams and riparian corridors, and we urge the FNF to be proactive in protecting them now before it is too late.

XI. General Forest/Suitable Timber Base

a) We note that the Flathead's figures on "Suitable Timber Production" differ throughout the PA, All are increased from the Draft 2006 Plan suitable timber acres of 328,328 (USDA 2006), as follows:

- PA page 74 shows the total lands suited for timber production (MAs 6b, 6c, and portions of MA7) as 500,733, with no explanation for the 172,405-acre – 52% increase from the 2006 plan.
- PA page 104, Table 30 shows the General Forest acres in 6b Moderate harvest as 435,773, and 6c High harvest as 169,068 acres. This is a total of 604,841 acres not including MA 7 – suitable for timber production and presumably in the "Suitable Timber Base", an 84% increase over 2006.
- A chart provided to the Flathead Beacon (2015) as part of their article on the Forest Plan Revision, shows 637,419 acres Suitable for Timber Production – a number which we've found nowhere in the Proposed Action – and which represents a 94% increase over the 2006 Draft Plan.

The Flathead Beacon chart also shows a "2006 Draft Plan –Modified" number of 529,000 acres, when we're aware of no such "modification" in 2006 that was open to public review. If the 529,000-acre number was part of the reference materials presented to the 2014 collaborative, it was not disclosed to all participants. Furthermore, it should not be shown as a scientifically supported number, since it arbitrarily inflates the 2006 timber base by 200,672 acres and 61%.

The Flathead must settle on one scientifically and legally grounded number for Suitable Timber Acres and stick to it throughout all future documents. Currently, that seems to be 328,328 acres.

b) A review of the PA's Geographic Area maps and the Biological Assessment (2014) suggests that these arbitrary inflations of the timber base come from entering grizzly bear core areas – illegal under current law, and from "relaxing" lynx critical habitat protection – also not permitted in many/most situations.

In terms of entering grizzly bear core, it's clear that the Forest is assuming that the Draft CS will be quickly approved, found to be legal, with delisting of the NCDE population sailing through. As discussed above, neither assumption has any basis in logic, law, precedence, or science, and doesn't serve as a stable foundation on which to develop a Forest Plan.

c) The introduction to MA 6 on Page 104 states, "Though landscape level output levels may differ between these designations, at the site specific project level, timber outputs may be similar. For example, a 500 acre timber sale in MA 6a (Low) may result in similar total timber volume as a 500 acre sale in MA 6c (High)." This statement is inconsistent with MA6a-DC-01 that emphasizes treatment through use of fire "and to a lesser extent through other methods (e.g. timber harvest)."We

also find this statement undermines the purposes for determining lands suitable or unsuitable for timber production, including restrictions in roadless, grizzly core, etc., as well as the expectation of a lighter relative resulting effect, whether at the project or landscape scale.

We can guarantee that the grizzlies, lynx, bull trout, and water quality won't care whether the logging going on around them is "timber production" or "timber harvest". We recommend that, rather than implying that 6a logging is somehow more ecologically benign when that's not necessarily the reality, that the FNF presents a plan truly based on ecological sustainability.

d) PA pages 74-75 refer to PTSQ (Potential Timber Sale Quantity) and PWSQ (Potential Wood Sale Quantity) noting that PTSQ during the first decade is projected at 28.3 MMBF, while PWSQ would be 30.3 - 34.3 MMBF.

The more important disclosure, however, is that these numbers are based on the "fiscal capability and organizational capacity" to achieve them, which is "based on current budget levels." Given recent statements in the Kalispell Daily Interlake by Chief Tidwell that the Flathead could easily triple its cut, and statements by Montana's Congressional delegation that they'll help with funding in that regard (Kalispell Daily Inter Lake 2015), it's disingenuous of the FNF to imply that the 28.3 MMBF number is set for the next decade.

In the upcoming DEIS, it's vital that the Flathead lay out the increased funding levels likely to be pursued and the PTSQ numbers that would accompany them. This is particularly important given the Forest's clear intent to enter grizzly bear Core areas and lynx critical habitat – restrained only by the Threatened listing of these species under the ESA.

In addition, given the PA's admission that the Forest only receives 43% of the funding to maintain its current roads, the EIS needs to explain how the Flathead would pay for the significant additional roads that would accompany Chief Tidwell's tripled harvest level – and the implications for water quality, bull trout, elk habitat, and landscape connectivity.

e) In the PA's Forest Vegetation Products section p. 76 – 77, Standards 01 through 09 - theoretically designed to constrain logging and protect habitat – there are so many exceptions that it's clear these would be protective measures in name only. The Forest cannot repeatedly pretend to offer protection with its right hand only to snatch it away in the next sentence with its left.

This becomes even more imperative when we read the definition of "Sustained Yield Limit" (SYL) on PA page 74:

"Per the National Forest Management Act (NFMA) and planning rule regulations, the quantity of timber that may be sold must be less than or equal to the potential sustained yield limit (SYL). The SYL is the amount of timber, meeting applicable utilization standards, 'which can be removed from a forest annually in perpetuity on a sustained-yield basis…It is the volume that could be produced in perpetuity on lands that <u>may be suitable</u> for timber production. Calculation of the limit includes volume from lands that <u>may be deemed not suitable</u> for timber production after further analysis during the planning process. <u>The calculation of the SYL is not limited by land management plan desired condition, other plan components, or the unit's fiscal capability and organizational capacity"</u>(emphasis added).

On page 75, it states, "Initial Spectrum modeling efforts calculates a PTSQ of approximately 58 MMCF in the first decade of the plan period (28.3 MMBF average annual volume), which would move vegetation toward desired conditions while considering multiple resource objectives. The PWSQ is estimated at approximately 62 to 70 MMCF in the first decade of the plan period (30.3 to 34.3 MMBF average annual volume). These timber volume outputs are less than the SYL." How do we know this since SYL is not specified in the PA?

The FNF should commit to "ecological sustainability of the landscape" as its prime directive, with the "sustainability of its timber operation" of secondary importance. It's also vital that the EIS justify its attempt to dramatically ramp up the Suitable Timber Base from the 2006 Draft with no biological basis to do so.

Lands Suitable for Timber Production

Comparison with current 1986 Plan, 2006 analysis, and 2015 Revision-Proposed Action
(Note: Acres are from existing MA layers for 1986 and 2006, and from the final MA layer for the 2015 proposed action)

1986 Forest Plan	Approx. Acres	%	2006 Proposed Forest Plan - Modified - Approx. Acres	%	2015 Revised Forest Plan Proposed Action	%
Suitable	707,000	30%	529,000	23%	637,419	27%
Unsuitable	1,688,000	70%	1,866,000	77%	1,755,935	73%
TOTAL ACS	**2,395,000**		**2,395,000**		**2,393,354**	

f) The maximum opening size in Table 21 on page 77 may not be consistent with 36 CFR 219.11 (c) (4), "Where plan components will allow clearcutting, seed tree cutting, shelterwood cutting, or other cuts designed to regenerate an even-aged stand of timber, the plan must include standards limiting the maximize size for openings that may be cut in one harvest operation, according to geographic area, forest types or other suitable classifications". Given many interplaying factors, we believe the FNF should limit opening size to 40-acre limit set in the 2012 planning rule.

We question the 'lumping' of biophysical settings the FNF made between the Assessment and the PA Appendix A. The PA lumps Cool moderately dry and Cool moist, as well as Cold and Cold wet biophysical settings. Table 21 further lumps Warm dry and Warm moist. As a result, of six biophysical settings presented in the Assessment, Table 21 proposes to exceed the 40-acre limit in all biophysical settings on the FNF. We are concerned that in such broad over reach you are relinquishing opportunities for more cautious, ecologically driven management in project analysis and design. We request you change Standard FW-STD-ECOS TIMB-07 and as reflected throughout the plan, to be consistent with the 40-acre maximum opening size defined in 36 CFR.11 (c) (4), until such time as site-specific analysis demonstrates a need to exceed.

XII. Motorized Access Management

Roads are the most destructive, invasive and high-impact form of infrastructure on our public lands. Roads contribute to forest fire intensity and frequency, spread of noxious weeds and other invasive plants such fauna, a decline in species diversity, increased runoff and sediment delivery to critical streams and riparian habitat, fragment the landscape needed for wildlife, and contribute to overall decline in ecosystem health. Still, roads have invaded most corners of our national forests. The time for road removal is here.

In 2014, the FNF released its Travel Analysis Report (TAR, 2014)[9]. The background of the TAR states, "The Travel Management Rule (Rule) was published in the Federal Register on November 9, 2005[10]. … Subpart A requires each unit of the NFS to: 1) identify the minimum road system (MRS) needed for safe and efficient travel and for protection, management, and use of NFS lands (36 Code of Federal Regulations (CFR) 212.5(b)(1)); and 2) identify roads that are no longer needed to meet forest resource management objectives (36 CFR 212.5 (b)(2)). In determining the MRS, the responsible official must incorporate a science-based travel analysis at the appropriate scale."

[9] USDA FS Flathead National Forest, 2014. Draft Travel Analysis Report For Flathead National Forest.
[10] Travel Management; Designated Routes and Areas for Motor Vehicle Use (Federal Register Vol. 70, No. 216, pg. 68264)

We are disappointed that the FNF did not use the Transportation Analysis Report as an opportunity to take a critical look at its road system and come up with some meaningful objectives. While the TAR arrived at an unacceptable 55 unneeded miles, Objectives for the 2006 PLMP for the Flathead National Forest (pg. 89) included, "Decommission 100 to 500 miles of road within ten years following Plan implantation." Subsequently, the PA and Grizzly Amendments fail to provide the integrated road and travel management required by law and lacking in the FNF's TAR. Instead, the PA and Grizzly Amendment provide a flawed template by which water, fish and wildlife will suffer as the agencies and Forests neglect their responsibilities to manage these resources in an environmentally sound and legal manner.

We appreciate that the FNF has decommissioned 749 miles of road since 1995. This trend should continue, but the PA indicates that road decommissioning is pretty much done. There has been a disturbing downward trend in road decommissioning on the FNF. Until the past few years under Supervisor Weber, the average annual decommissioning under former Supervisor Barbouletos was about 45 miles. In comparison, only 4 miles on the FNF were decommissioned in 2013.

The FNF remains fragmented by over 3,500 miles of roads, enough to cross the USA. Despite direction in Subpart A of the 2012 Rule to identify the MRS based on science-based travel analysis, the TAR and subsequently the PA would remove very few of these roads. The TAR identifies only 55 miles of roads as "not needed for future use" and 3,465 miles as "likely needed for future use." The majority of these roads would be mothballed under Management Level 1 (ML 1) leaving a wide network of unmaintained roads to crumble into the Flathead's vast watersheds. Only just over one mile of road is actually recommended for removal!

The draft TAR Financial Analysis (Appendix D) is flawed in that it concludes it is cheaper to store roads at ML-1 forever than it is to decommission them. A very minimum amount of maintenance is allowed for and does not include the cost of maintaining culverts. The TAR acknowledges, "The real benefits from road decommissioning are ecological, not financial." However, ecological benefits almost always provide economic benefits as well.

People come to Montana and visit public lands to see pristine landscapes, abundant wildlife and clean rivers and lakes. According to the Outdoor Industry Association, outdoor recreation in Montana generates $5.8 billion in consumer spending and $1.5 billion in wages and salaries annually. Seventy one percent of Montanans participate in outdoor recreation, frequently on national forests. People don't come to the FNF to see roads.

Roadless areas provide many services at little to the taxpayer and require little or no maintenance other than protection from development and enforcing restrictions. The Wilderness Society reported in 2011 "Roadless areas provide social and economic benefits worth billions of dollars each year. An economic study completed in 2000 found that roadless lands nationwide can be expected to generate almost $600 million annually in recreation benefits -- including activities such as hiking, hunting, fishing, camping, wildlife watching and biking – and nearly 24,000 jobs. The study also estimated up to $1 billion in carbon sequestration services and $490 million in waste treatment benefits." (The Roadless Rule: A Tenth Anniversary Assessment, Michael Anderson, 2011).

Funding for road maintenance is on a downward trend due to changing federal priorities. In preparation for the 2006 Proposed Land Management Plan - Flathead Forest Plan (PLMP), the Assessment of the Management Situation, at page 4-2, finds the Flathead needs over $6 million annually for its road maintenance and backlog, but receives less than $1 million. Indeed, the 2006 PLMP, at 89, finds the Flathead needs more than its current budget to maintain even 1/8 of its 3,500 miles of system roads, a minimum annual maintenance goal. Still, the 2006 PLMP set an objective to "Decommission 100 to 500

miles of road within ten years following Plan implementation." This is two to ten times the miles proposed to be decommissioned in the current PA.

Unnecessary roads should be prioritized for decommissioning through the Legacy Roads and Trail program, through partnerships with conservation groups and through any other means available.

Specific Roads for Decommissioning

The Sullivan Creek, Quintonkin Creek and Bunker Creek roads should be a top priority for decommissioning, with Sullivan and Bunker already permanently closed but falling apart.

We recommend that the road in lower Bunker Creek be de-commissioned from the junction with the spur road to Gorge Creek (present location of gate) up to forks of Bunker Creek and Middle Fork Creek (approximately 5.8 miles).

Roads and Riparian Ecosystems

According to studies by Trout Unlimited, roadless areas represent most of the last best coldwater fish habitat left in the United States. Undamaged by roads and other development, the headwater streams and rivers that flow through them offer some of the last refuges for many of the West's native fish. As a result of road-related impacts elsewhere, the vast majority of remaining healthy populations of native trout are found on unroaded public lands, including wilderness areas, national parks and roadless areas. For example, over 60 percent of remaining strong populations of westslope, greenback and Colorado River cutthroat trout are found in roadless areas. Over 76 percent of remaining strong bull trout populations are similarly found in roadless areas. (The Roadless Rule: A Tenth Anniversary Assessment, Michael Anderson, 2011).

One of the biggest problems associated with roads is culverts and their impact on native fish populations such as threatened bull trout. With tens of thousands of culverts on the FNF road system, many if not most inevitably become barriers to fish travel. Culverts left to sit unattended for years on closed roads can easily become blocked and result in impassable barriers to fish migration. Blocked culverts also can lead to road washouts and failures and downstream siltation.

The FNF already has about 2,500 miles of roads demoted by the PA to ML 1 where they will not receive the annual maintenance they need to keep ditches and culverts from plugging and washing the roads into trout streams, smothering spawning habitat and fish food sources. Another 1400 miles of FNF roads are to remain open to motor vehicles and have their own costly maintenance issues.

Failing to fund and maintain roads amounts to abandonment. Given climate instability and the potential for extreme runoff events such as November 7-8 2006, when Glacier National Park received heavy rains and snowmelt, washing out many roads, failure of unmaintained roads leading to washouts and landslides are a near certainty.

Merely excluding motor vehicles from ML-1 roads, while a start in the right direction, does not qualify as stabilizing inherently damaging infrastructure nor does it meet either the requirements nor intent of Amendment 19, which requires the removal of stream-bearing culverts from decommissioned roads to protect water quality and grizzly bear habitat.

Amendment 19 and Grizzly Bear Recovery

The 1993 Grizzly Bear Recovery Plan (USFWS 1993) page 21-22 says:

"Roads probably pose the most imminent threat to grizzly habitat today…The management of roads is one of the most powerful tools available to balance the needs of people with the needs of bears. It is strongly recommended that road management be given the highest priority within all recovery zones.

The impacts of logging, mining, livestock grazing, and many forms of recreation in grizzly habitat can be mitigated through well-designed management programs. But the presence of open roads in grizzly habitat often leads to increased bear-human contact and conflict, and can ultimately end in grizzly mortality. Accidental shooting, poaching, and habituation through direct human contact and/or food reward all increase with the use of even secondary, unpaved roads by humans."

And the Draft CS, at p. 20-21, echoes this basic scientific principle – "Open motorized route density is a predictor of grizzly bear survival on the landscape (Schwartz et al. 2010, emphasis added) and is useful in evaluating habitat potential for, and mortality risk to, grizzly bears (Mace et al. 1996).

The only motorized access standards based on a decade of grizzly research in the NCDE (Mace and Waller 1997) are those of Amendment 19 (A19) to the Flathead Forest Plan (USFS 1995) which have been examined and approved in FWS Biological Opinions (USFWS 1995, 2014).

a) (GBCSA) All existing provisions under Amendment 19 to the current Flathead Forest Plan, and as adopted by other NCDE Forests, must remain in place, and the Forests must effectively designate, fund, and complete all remaining closure & restoration projects for the following reasons:

   - (GBCSA) A19 is the only motorized access management framework in the NCDE that is firmly based upon the Best Available Science as required by law. Neither that science, nor that law, have changed despite the attempt by the U.S. Fish and Wildlife Service (FWS) to substitute a politically contrived 2011 Baseline system in the Draft CS.
   - (GBCSA) There is nothing in the Draft CS that prevents the Flathead and other NCDE Forests from taking more protective actions, with a stronger scientific base, than the 2011 Motorized Access Baseline – and A19 is that more protective action. While the PA says that A19 will remain in force pending consultation with USFWS on the Conservation Strategy, this does not solve the problem since it only temporarily delays the unscientific 2011 Baseline from going into effect.
   - (GBCSA) The current grizzly population of the NCDE, estimated at approximately 1000 bears, reached that milestone due in large part to the increased security provided by Amendment 19 and related measures in other forests. It makes no sense to snatch defeat from the jaws of victory by abandoning this proven success story before it's completely implemented ecosystem-wide.
   - (GBCSA) Without a firm grounding in the Best Available Science – or any science at all – the Draft CS is likely to be challenged in court; delayed for a significant length of time; and to emerge only after major changes. By blindly linking the Forest Plans to a flawed Draft CS, the NCDE Forests guarantee their management will be drifting in the same legal and scientific limbo for years, and may have to undergo those same major revisions before they can be implemented. It's sensible, prudent and efficient to avoid this by grounding the Grizzly Amendment in science and law.

b) P: 67 of the PA under Objectives says that the FNF intends to:

   - "Decommission or place into intermittent stored service 30 to 60 miles of roads." If this means 30-60 miles "per year" then that's a positive move, and one we would applaud. If, however, it means "over the life of the plan", that would be biologically and legally unacceptable, and symptomatic of the foot-dragging we've seen over the last three years with decommissioning of 12, 13, and 4 miles annually out of a road system exceeding 3500 miles.
   - We are concerned that the FNF's PA allows "intermittent stored service (ISS) roads" to remain in the Forest's inventory, but doesn't count them as part of its Total Motorized Route Density (TMRD) as required by A19. This is both illegal and unwise. Such roads can only be removed from TMRD totals if they are fully decommissioned – permanently closed, stabilized, with all

bridges and culverts pulled. Furthermore, having such a "stealth network" of ISS roads that's "off the books" is a recipe for little maintenance, blocked culverts, and blow-outs into bull trout streams.

- "Complete 100 to 300 miles of reconstruction or road improvement projects." The FNF needs to provide specifics regarding the type of reconstruction and improvements referred to here. If these are projects to stabilize failing roads or culverts on key Open roads, reducing siltation into streams, that would be important. However, if this involves roads that should have been closed long ago to meet Amendment 19 objectives, they should be closed, stabilized, and decommissioned. We remind the FNF of its existing 126 mile backlog of roads approved for decommissioning but still not funded.
- "Maintain up to 1200 miles of operational maintenance level 2 through 5 roads." Nationally, the Forest Service has a $2.9 billion backlog when it comes to maintaining the current system roads and has repeatedly committed to finally "right-sizing" its road network to match current and expected budgets (Dombeck 1998[11], 2015b[12]). Yet we see no such commitment in the PA.
- As noted in the FNF's 2014 Assessment Part 2, the FNF currently receives only 43% of the funds needed to maintain its road system to standards, yet is still trying to keep over 3500 miles. To make matters worse, Table 176, p. 200 shows that in the two most recent years, the FNF only maintained 690-691 miles or 19.6% of its system roads, leaving the rest to deteriorate, blow out into bull trout streams, or provide excessive "administrative use" into grizzly bear and lynx habitat.
- Directives (FSH 1909.12, ch. 20, § 23.23l(2)(a)) for the 2012-planning rule require desired conditions for roads that "…describe a basic framework for an appropriately sized and sustainable transportation system that can meet [identified access and other] needs." Yet the Travel Access Report for the FNF (USDA 2014a) claimed that of over 3,500 miles of FS road, 3465 miles were "likely needed", while only 55 miles were identified as "likely unneeded" and could be removed. The time is long past for the Flathead to downsize its bloated road network to a level that is fiscally and ecologically sustainable, and the new Forest Plan is the place to start.
- "Maintain up to 2260 miles of NFS trails." Does this mean over 5 years, or 10 years, or the life of the Plan? And here again, does the Forest have the budget to do so? How does the FNF propose to pay for the ill-advised snowmobile "trail" additions called for in the North Fork Geographic Area that are right in the middle of a lynx corridor (Squires 2013)?

c) P. 67 of the PA under Standard 01 says the following:

- (GBCSA) "Within the NCDE PCA, motorized use of roads with public restrictions shall be permitted for administrative use (see glossary), as long as it does not exceed either 6 trips (3 round trips) per week OR one 30-day unlimited use period during the non-denning season (see glossary)."

  The above-motorized loophole has no basis in grizzly bear science in the NCDE or anywhere else, and is well beyond the documented security habitat tolerance of the species. Mace & Waller's research (1997), shows that motorized use on their restricted roads was "less than one vehicle per day – essentially zero."

  Grizzlies repeatedly or continuously displaced during the non-denning season will suffer impaired feeding, breeding, and denning, with potential consequences for their survival, and the survival of their cubs (USFWS 2014). Grizzlies do not distinguish between agency, contractor,

[11] Dombeck 1998,
[12] USDA 2015b

and public vehicles, and will be displaced by all of them – causing "harm" to them and their habitat.

- (GBCSA) "Note: Administrative use is not included in baseline calculations and is not included in calculations of net increases or decreases."

  First, this provision is in direct conflict with Interagency Grizzly Bear Committee (IGBC 1998) motorized route provisions, which say that any road open for any portion of the non-denning season is to be considered an Open Road, and counted as such.

  Second, since grizzlies don't distinguish between agency and public vehicles, they won't give agency vehicles a "pass" when it comes to impairing otherwise secure habitat.

d) (GBCSA) P. 67, Standard 02 says:

"In each bear management subunit within the NCDE PCA, there shall be no net decrease in the baseline level (see glossary) for secure core and no net increase in baseline levels for OMRD or TMRD on NFS lands during the non-denning season (see glossary) with the following exceptions:

- Temporary use of a motorized route for a project (see 'project' in grizzly bear habitat in the NCDE' in the glossary)."

  First, the "no net decrease/increase" provision means that these changes actually <u>are</u> allowed, as long as they're mitigated/compensated for elsewhere. The problem here is that it assumes that grizzlies – particularly females with cubs – can be shuffled about their home ranges whenever it suits the Forest, with no adverse consequences. Years of grizzly research suggests otherwise (USFWS 2014[13]).

  Second, numerous significant exceptions are allowed, here and throughout the entire PA.

  Third, the "temporary use for a project" wording is simply another loophole/exception. It essentially says that the Forest can adversely impact grizzly bear habitat security with unlimited use for 30 days before the intrusion even counts as a "Project" involving "Temporary Use." And even after those 30 days, the use could extend for years. A more flagrant and intentional case of "Harm" to a listed species and its habitat is difficult to imagine. (GBCSA) P. 68 of the PA under Standard 03 says:

"In each bear management subunit within the NCDE PCA, temporary changes in the OMRD, TMRD, and secure core shall be calculated for projects…The ten-year running average for OMRD, TMRD, and secure core numeric parameters shall not exceed the following limits per bear management subunit:

- 5% temporary increase in OMRD
- 3% temporary increase in TMRD
- 2% temporary increase in secure core"

First, these changes have no scientific basis as noted earlier; are based on an Draft CS that has similar flaws; and are illegal under current law (A19).

Second, such 10-year averages are used to artificially "average" the true impacts of projects out of existence. Grizzlies don't have to survive the 10-year "average" of a project, but the actual changes to security during the 4-year project shown in Example -1a, Page 68. When this is calculated, we see that the true damage to habitat is as follows:

- OMRD increases +12% (from 19% to 31%)
- TMRD increases +3% (from 19% to 22%)

[13] USFWS 2014

- Core decreases -6% (from 69% to 63%)

Third, a project of 4 years as shown in Example 1a, is decidedly not "temporary", and grizzly bears displaced by such lengthy habitat intrusions can be expected to suffer consequences to feeding, breeding, denning, and mortality – particularly females with cubs (USFWS 2014a). In addition, since the above actual percentages far exceed known grizzly tolerance levels as reported by Mace and Waller (1997), some displaced bears may actually lose their "institutional memory" for key portions of their home ranges, or may fail to pass it on to their cubs.

e) (GBCSA) P. 69, under Standard 04 says:

"Within the NCDE PCA, restricted roads may be temporarily opened for public motorized use for up to 30 consecutive days to allow authorized uses such as firewood gathering, provided the period of use occurs outside of spring and fall bear hunting seasons."

- Once again, this provision is directly tied to a finalized, legal CS, which at the earliest would occur in 2018, and probably well beyond. Until that happens, and grizzlies have been delisted – IGBC direction is that any road open for any of the non-denning season must be counted as Open for the full year and counted against A 19 compliance (IGBC 1998).
- In all likelihood, opening a Restricted area/road for 30 consecutive days, or anything close to it will effectively displace grizzlies from important portions of their home ranges with consequences for feeding, breeding, denning, and survival (USFWS 2014).
- Given that science-based access management like A19 has played a major role in the rebound of the NCDE grizzly population, why would the Flathead turn the clock back to prior times when access decisions routinely ignored the habitat requirements of grizzlies and other wildlife? Why risk a grizzly success story so that someone can get a cord of wood in a restricted area?
- Perhaps most telling is the reference to "spring and fall bear hunting seasons", since it clearly shows that the agencies are already looking beyond the delisting of grizzlies and planning for hunting season – including Spring seasons that could imperil females with cubs.

f) (GBCSA) P. 69 of the PA under Guideline 01 says:

"In each bear management subunit within the NCDE PCA, projects…should be designed so that on-the-ground implementation does not exceed 5 years in a 10-year period, to reduce the potential for grizzly bear disturbance or displacement."

This is immediately followed by a loophole making this guideline even more nebulous: "If an extension to the 5-year time limitation is required (e.g., to meet contractual obligations or to complete on-the-ground treatments), the reasons should be documented in writing prior to authorization of the extension."

- The FNF must know that nothing in this 5 in 10-year language has any foundation in grizzly research or ecology, but rather is an arbitrary provision written in for manager preference/convenience. The inconvenient truth is that no grizzly population will remain secure and thrive if its home range is disrupted for extended time periods during 5 out of 10 years – perhaps repeatedly, since this Guideline contains no limitation on projects or extensions.

g) The "extension" provision to an already excessive 5-year project "limitation" is little more than a blank check to double-down on grizzly habitat destruction, and doesn't even bother to set criteria to determine if an extension is warranted. (GBCSA) PA page 69 under Guideline 02 says:

"Within the NCDE PCA, secure core and motorized route density values (OMRD and TMRD) should be restored to pre-project levels…within 1 year after completion of the project…If an extension to the

1-year time limitation is made…the reasons should be documented in writing prior to authorization of the extension."

Thus the FNF is proposing negatively impacting grizzly bear values for Core, OMRD, and TMRD with 5-year projects, plus unspecified extensions, followed by a 1-year restoration period, with its own unspecified Extension. It's not difficult to see a damaging 5-year project extending its impacts out to 6, 8, or even 10 years – apparently based on little more than manager whim. Such disregard for wildlife habitat impacts is how the grizzly became a Threatened species to begin with, and it's unlikely the results will be different this time around.

h) PA pages 69-70, Guidelines 03 through 11 all seem to us to be very important protective provisions and warrant being reclassified as Standards. In addition, wherever the discretionary word "Should" appears, it needs to be changed to "Shall."

i) PA pp. 157 – 158, The Glossary contains the following questionable definitions and management of Roads:

- Decommissioned: The stabilization and restoration of an unneeded road to a more natural state (36 CFR 212.1). Decommissioned roads do not count towards Total Motorized Route Density as long as they meet the definition of impassable…
- Impassable: A road that has been treated in such a manner that the road is blocked and there is little resource risk if road maintenance is not performed on a regular basis (self-maintaining). These roads are not counted in the total motorized route density as long as the road (generally the first 50 to 300 feet) has been treated to make it inaccessible to wheeled motorized vehicles during the non-denning season…Impassable roads may remain on the inventoried road system if use of the road is anticipated at some point in the future" (emphasis added).

It appears the FNF is trying to claim roads as "Decommissioned and Impassable" so it can remove them from the Total Motorized Route Density (TMRD) list that counts against grizzly security, while simultaneously leaving them on its "inventoried road system" in case they're need for future motorized use. Therefore, we would have a system of "Ghost Roads" that would be "decommissioned – before they weren't decommissioned." Not only is this disingenuous, it would represent a significant retreat from current Amendment 19 standards which require that decommissioned roads be effectively blocked, re-contoured, and have bridges and culverts pulled. It could also present a problem in the event that if the road does fail and treatment is needed to prevent resource damage, funding might not be available to do work on a road that is not on the system.

Winter Motorized Recreation

Some context for the PA's Need for Change for Amendment 24 as compared to other resource areas is presented here. The Need for Change drops protections for grizzly bears under A19, drops protections under INFISH for bull trout, and drops protections under NRLMD for lynx. In all cases protections are decreased and exceptions increased. Only Amendment 24, is retained without exceptions and the PA expands winter motorized use.

The Desired Condition for Winter Motorized Recreation (FW-DC-WREC – 01), Table 18, Page 61, identifies a Recreation Opportunity Spectrum (ROS) of 33 percent semi-primtive motorized on the FNF. This apparently does not include the 736,000 acres plus of general forest lands MA 6a, 6b and 6c and high use area MA 7, which are suitable for motorized travel on designated roads, trails and areas. Table 29, page 102 shows that the desired condition is to allocate 98,000 acres or 32 percent of the 306,000 acres of Backcountry to MA 5b: Motorized over-snow vehicle use plus another 61,000 acres motorized year-round or summer. Furthermore, examination of Appendix F: Wilderness Evaluation shows that of

the nearly 643,000 acres included in the wilderness evaluation inventory, 340,000 acres or 53 percent are subject to ROS semi-primitive winter motorized. This includes nearly 48 percent of Coal Area, 45 percent of Elk Creek, 68 percent of Essex Area along a critical wildlife connectivity corridor, 41 percent of Hungry Horse East, 78 percent of Hungry Horse West, and an astounding 83 percent of Puzzly/Skywest Areas.

While the numbers vary, in effect, the FNF is proposing to find 33 to 53 percent of the highest quality wild lands on the FNF suitable for motorized over snow use at a time critical to wildlife facing the effects of climate change. The FNF proposes this in habitat that provides ecological conditions necessary to "the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area" (36 CFR 219.9) and even though motorized recreation is not a primary activity on the Forest and according to Assessment Part 2 Figure 119, represents less than 2% of users.

The FNF should be well aware of what happens when snowmobiling is permitted in remote roadless areas. At the April 2014 meeting of the NCDE Grizzly Subcommittee, attendees were shown film footage of a grizzly on a snowy ridge with snowmobilers on either side. The snowmobilers were in an over-snow restricted area and potentially trespassing into designated Wilderness.

The FNF was involved with development of the 2006 Proposed Plan in conjunction with the Lolo and Bitterroot National Forests. The Flathead should recall how motorized use on two ridge trails, TR 313 bordering Bitterroot, Lolo and Beaverhead-DeerLodge national forests and the Stateline trail between the Lolo and Nez Perce-Clearwater national forests generated significant controversy and discussion. The Flathead should consider this in permitting over-snow use along ridge trails that border with other entities. The Bitterroot National Forest just released its Draft Record of Decision – Bitterroot National Forest Travel Management Planning Project (April 2015). Its Draft ROD reduced motorized use in most categories, some significantly including year long single track by 88 percent to 39 miles, seasonal single track by 55 percent, and over-snow areas by 27 percent. We commend their efforts to find a balanced use that protects resources and encourage the FNF to do the same.

Snowmobiling with specialized equipment in primitive and semi-primitive environments used by lynx, wolverine and grizzly denning poses a significant risk to these TEPC and other imperiled species. Allowing motorized use in or adjacent to remote roadless areas sets an unacceptable precedence and enforcement would be a costly logistical nightmare for the FNF and adjacent forests. It increases law enforcement obligations on the part of the Forest Service at a time when budgets are already stretched. We request the DEIS include a full analysis of effects of over snow recreation on threatened and endangered species and their habitat, as well as a cost benefit analysis to include costs of administrative, monitoring, enforcement, and damage to infrastucture, as compared to the publics served.

XIII. Specific Issues & Solutions by Geographic Area

(1) North Fork Geographic Area:

- When the FNF was created in 1906, the Whitefish Range, was a 500,000 acre contiguous block of Wilderness, yet a century of excessive logging and roading has reduced this by more than 60% to a mere 195,000 roadless acres.

  While we applaud the FNF for its recommendation of 80,000 acres as Wilderness, this further 115,000 acre reduction in North Fork Wilderness is unwarranted. It's clear that this area, a critical carnivore linkage as noted by Weaver (2011, 2014) and Squires (2013), has long since paid its dues as a resource colony for the logging industry, and more recently a small but loud motorized/mechanized recreation special interest. It's time for the Flathead to restore the balance and habitat connectivity that's been lost.

- As recommended by Weaver (2014), Recommended Wilderness must be extended south from the Canadian border at least to the SW corner of the Coal Creek State Forest. In addition, fingers of 6a & 6b General Forest that fragment this block of lands must be reclassified as 1b Recommended Wilderness, or 5a Backcountry Non-Motorized to consolidate secure habitat linkages, as follows:
  - Whale Creek (FR 318) would be reclassified west of the Hornet Lookout junction as 1b Recommended Wilderness or 5a Backcountry. General Forest 6b bracketing an Eligible Wild & Scenic creek is completely inappropriate;
  - Red Meadow Creek west of Section 10, and beyond a 500m buffer on either side would be 5a Backcountry Non-motorized;
  - Hay Creek west of Section 26 would be 1b Recommended Wilderness beyond a 500m road buffer;
  - Coal and South Coal areas west of the Coal Creek State Forest would have roads closed, habitat restored, and be reclassified to 1b Recommended Wilderness and 5a Backcountry Non-Motorized;
  - Immediately south of the Coal Creek State Forest, the area around Dead Horse Creek would be changed from 6a & b General Forest, to 5a Backcountry Non-motorized, and linked to similar 5a areas surrounding it;
  - North of Big Creek, and west of FR 5233 (Elelehum Lake RD) all lands would become 5a Backcountry Non-motorized, with the exception of FR 315, 316, 5207 and their 500m buffers.
  - South of Big Creek, the area currently shown as 5a would remain so, but all contiguous 6a General Forest areas would become 5a Backcountry, as would the current 6b General Forest immediately to the NW.
- Given the FNF's eagerness to abandon Amendment 19, although it's based on the best available grizzly bear science, it's imperative that it also revisit and completely revise Amendment 24 relating to snowmobiles, and currently based on the recreational "wants" of a comparatively small number of forest users.

  Specifically, given the N/S lynx corridor identified by Squires (2013), and the impending listing of the wolverine, which relies on higher elevation snow bowls and areas of late spring snow as maternal habitat, we recommend the following:
  - The large snowmobile play area (5c) off the NW corner of Red Meadow Rd. in the Chain Lake-Nasukoin region (PA map C-20) should be immediately reclassified to 1b Recommended Wilderness – which already surrounds it on 3 sides.
  - The large snowmobile play areas (5c) and the routes that feed them SW of the Coal Creek State Forest and N-NW of Moose Lake are textbook examples of how to fragment wolverine maternal habitat and lynx Critical Habitat. They must be reclassified as 5a Backcountry to complement the surrounding habitat, and provide the connectivity the Forest claims to value.

  The FNF's Wilderness Evaluation rates this area "low" for lynx connectivity, but this situation is entirely of the agency's creation due to excessive roads and snowmobile sacrifice areas, both of which must be closed and restored – particularly since this is all critical habitat.

  The high elevation snowmobile areas shown along the western margins of this GA are inappropriate in light of potential impacts on lynx, wolverine, and grizzly denning habitat, In addition, the unintended consequences of snowmobiles packing routes for wolves and coyotes into big game winter range must be acknowledged and analyzed (Gese et al. 2013, Pletcher 1998, pers. comm.).

- P. 121 of the PA under Desired Condition 10 says, "The Cedar Creek/Crystal Creek/ Teakettle Mountain areas provide habitat connectivity for wide-ranging wildlife species (e.g., grizzly bear, Canada lynx, wolverine) moving between the Swan Valley, Hungry Horse, Middle Fork, and North Fork watersheds."

  While we agree with the FNF that this is a "desired", even vital condition, there is nothing in the Management Area designations that has a prayer of bringing this about. In fact, the designation of the lower 15 miles of the North Fork GA as primarily 6b Moderate logging and 7 Focused Recreation, when combined with private property attractants, the BNSF railroad, and Highway 2 with thousands of vehicles per day May – October (Waller 2005), makes this area a minefield for carnivores.

  We recommend that the FNF reclassify a significant band of the 6a & 6b General Forest NW of Hungry Horse as 5a Backcountry, and connect it to the 5a Backcountry south of Big Creek.

- Desired Condition 11 on the same page says, "The Transboundary Flathead River Basin provides habitat connectivity for wide-ranging wildlife species (e.g., grizzly bear Canada Lynx, wolverine) moving between Glacier National Park and the Whitefish Range."

  However, as we've detailed above, the FNF's intention to repeatedly fracture otherwise secure roadless areas with the intrusions of General Forest 6b logging and snowmobile routes and "play areas", places this connectivity in jeopardy. We recommend that the FNF adopt all of our security-building changes to make this connectivity a reality.

(2) Hungry Horse Geographic Area:

- PA pages 114 – 115 say the following:
  - Desired Condition 03 – "The north end of Hungry Horse Reservoir has recreational development that accommodates high use levels at concentrated developed sites;
  - Desired Condition 08 – "The Hungry Horse Race Track and other motorized trails systems (including Alpine 7, Columbia Mountain, and interconnecting trails along the Swan Divide) provide summer motorized opportunities close to local communities."
  - After these Desired Condition statements, accurately portraying an area of intense motorized, mechanized recreation, Desired Condition 12 repeats the impossible hope that, "The area from Badrock Canyon to Hungry Horse provides habitat connectivity for wide-ranging species (e.g., grizzly bear, Canada lynx, wolverine) moving between the South Fork, North Fork, and the Middle Fork Flathead River Watersheds."

  We remind the FNF of the report by grizzly researcher Kate Kendall at the Spring 2013 NCDE Grizzly Subcommittee meeting, and in the Draft CS itself (USFWS 2013, p. 13-14) that this very same highway corridor was well on its way to being a fracture zone for grizzlies.

- Unfortunately, when we look at the Hungry Horse GA map (C-18), we see that the above conflicts with wildlife connectivity are just the tip of the iceberg. From Hungry Horse SE to the Bob Marshall Wilderness Complex, the FNF proposes to create a linear fracture zone encircling the Hungry Horse Reservoir and 35 miles long by 5-12 miles wide – created by MA designations of 6a/6b General Forest, 5b Motorized year-round, and 5c Motorized winter – with the vast majority of it inappropriately compromising one of the largest IRA blocks and wildlife connectivity areas on the FNF.
- The only 1b Recommended Wilderness is Jewel Basin as a token 22,170 acres and even here we note the area is completely cut off on all sides by motorized use and logging, creating an island wilderness in a sea of severed connectivity.

If the FNF is to repair these important landscapes, and its credibility as an agency that supports habitat/wildlife connectivity, it must move clearly and forcefully in the following ways:

- At a minimum, adopt the Wilderness recommendations of Weaver (2014) page 101, running east from the Swan Crest and including all areas currently designated as 5b Motorized year-round, 5c snowmobile, and 6a General Forest.
- Include Doris, Lost Johnny, Graves, Wheeler, and Quintonkin Creeks as restoration areas and Sullivan Creek as Eligible Wild & Scenic.
- Adopt Weaver's (2014) Backcountry Non-motorized 5a recommendations west of the reservoir, and where they're in conflict, reclassify 6a General Forest, 5b & 5c motorized MA's to 5a non-motorized. In particular, with 79% of the Hungry Horse West Wilderness Inventory Area an IRA, it's unacceptable to have 77% open to snowmobiles – especially with nearly 100 miles of snowmobile routes adjacent to the reservoir itself, where they're far less damaging.

East of the reservoir, all areas classified as Inventoried Roadless Area should be 1b Recommended Wilderness and added to the Great Bear Wilderness. Adjacent 6a General Forest and 5c Snowmobile should be reclassified as 5a Backcountry Non-motorized Year-round. Given the area's proximity to the Great Bear Wilderness, and the fact that 80% is grizzly Core and 97% lynx critical habitat (PA Appendix F), these more intrusive uses are unacceptable.

- If connectivity truly is a priority with the FNF, all portions of the Swan Crest, any trails crossing it, and Alpine Trail 7 itself, must be classified as Non-motorized. Specifically, a section of Alpine 7 between Thunderbolt and Sixmile is excluded from the surrounding grizzly Core by its inappropriate designation for motorized use. It, and all similar Alpine 7 motorized routes must be closed.

(3) Middle Fork Flathead Geographic Area:

- Given the vital role that this narrow band of non-wilderness plays in connecting the Great Bear Wilderness with Glacier National Park, we're frankly amazed that the Flathead would risk that connectivity with a patchwork of postage-stamp Mas seemingly tossed together, with most damaging to wildlife connectivity.

  Besides the potential impacts of 6b General Forest at four locations, we're especially concerned with the substantial 5c Snowmobile areas, especially those south of Marias Pass Summit where the Flathead's ill-advised late snowmobile season has allowed riders to illegally enter Wilderness in the Skyland region and disturb grizzlies emerging from their dens. Before additional grizzly bear females with cubs are displaced by late season snowmobile routes and "play areas" the FNF must close all such late-season areas forest-wide.
- We strongly recommend that the FNF classify all non-wilderness lands in this critical corridor as either 1b Recommended Wilderness, or 5a Backcountry Non-Motorized as shown by Weaver (2014), P: 97.

(4) South Fork Geographic Area:

- We commend the FNF for it extensive additions of 2b Eligible Wild and Scenic River, both inside and outside the Bob Marshall Wilderness. Creeks and rivers this wild and pristine are increasingly rare, even in the Northern Rockies, and this classification is a wise and timely choice.
- The non-wilderness northern end of this GA serves as both a gateway into the Bob Marshall, and an important transition from the recreational sacrifice zone around Hungry Horse Reservoir to the important wildlands upstream. Because of this, and the existing Wild and Scenic South Fork Flathead

River bisecting it, we find the logging and motorized MAs shown on map C-22 to be ill advised at best. We recommend the Flathead make the following changes:

- Areas shown as 1b Recommended Wilderness would remain as such.
- Given the presence of Wilderness on three sides of this GA, all IRAs should be designated 1b Recommended Wilderness and conflicting MA's reclassified as such.
- Non-IRA areas bracketing the South Fork Flathead River and Spotted Bear River, and currently designated as 6a & 6b General Forest make no ecological sense. These classifications are incompatible with these streams Wild & Scenic, and Eligible Wild & Scenic status and should be changed to 5a Backcountry Non-Motorized.
- There should be protective buffers along FR 895 to Meadow Creek Trailhead, FR 549 to Gorge Creek Trailhead, and FR 568 to Silvertip Trailhead with the roads closed beyond those points to restore habitat connectivity.

(5) Swan Valley Geographic Area:

- Low elevation valley bottoms and their associated riparian networks provide some of the highest quality wildlife habitat in the Rocky Mountains, and that's certainly true for the Swan Valley GA. In addition, its position between the Mission Mountain Wilderness on the west and the Swan Range and Bob Marshall Wilderness on the east, makes the Swan Valley a Priority area for the restoration of ecological connectivity – north-south as well as east-west.

  The Swan Valley's habitat integrity has been impaired by more than 50 years of excessive logging and road building by: Plum Creek Timber, Montana Dept. of Natural Resources and Conservation, and the Flathead National Forest. These impacts have been made worse by the patchwork quilt of federal, state, and private timberlands spanning the valley.

  However, the sale and transfer of 310,000 acres of Plum Creek land through The Nature Conservancy, and on to state and federal agencies under the Montana Legacy Project has consolidated public land ownership and provided the Flathead Forest with a unique opportunity to create Management Area designations that will reweave the area's ecological web, while providing for more sustainable logging operations.

  Unfortunately, when we examine the MA designations for the Swan Valley GA (map C-23), it's clear that the FNF has largely failed to grasp the opportunity in front of it. Virtually the entire central core of the valley, both south and north of the Swan River State Forest has been given over to 6b General Forest – Moderate (Logging), with much of the Swan Face and Crest sacrificed to 5b, 5c, and 5d – Backcountry Motorized Year-round, Motorized Over-snow, and Motorized Summer.

  In addition, we note the designation of Krause Basin as an MA 7 Focused Recreation area – directly contradicting previous commitments by the Flathead in the 1988 Noisy Face Recreation Plan to reduce motorized routes by half, restore the damaged habitat, and to not mark area trails. Those commitments must be kept.

  Welcome exceptions to this sanctioned habitat fragmentation include the designation of the southern Swan Face from Inspiration Pass south to the Forest boundary as 1b Recommended Wilderness, and similar small 1b additions to Jewel Basin, and along the Valley's western margin. Additional sound decisions include the classification of portions of Lion, Piper, Elk, and Glacier Creeks, and the Swan River at Lindbergh Lake and south of Swan Lake as 2b – Eligible Wild and Scenic Rivers.

  To build on these habitat/connectivity success stories, and make a clear commitment to Ecological as well as Economic Sustainability in this important Geographic Area, we recommend the following changes to Management Area designations:

- Thanks to the purchase and transfer of former Plum Creek lands to the Forest Service under the Montana Legacy Project, nearly 90% of the sections south of the Swan River State Forest are now under FNF management. This means that many Bear Management Subunits that formerly did not fall under the motorized route standards of Amendment 19 because they were less than 75% Forest Service, now meet or exceed that standard. The Flathead must move immediately to adopt the A19 standards in these Subunits and incorporate them in the new Forest Plan. We note as well that these changes are required by the court decision in the Glacier/Loon case (Swan View Coalition et al v. Chip Weber 2014).

- Since 1995, the FNF has been part of the Swan Valley Grizzly Bear Conservation Agreement (SVGBCA) along with Plum Creek Timber, Montana DNRC, and the U.S. Fish and Wildlife Service to manage the patchwork of land jurisdictions and provide some level of connectivity for grizzlies by way of four Linkage Zones between the Swan and Mission Mountains (USFWS 1995).

  We recommend that the FNF immediately bring the Valley generally, and its portions of the Linkage Zones specifically, under the protection of A19; designate the roads to be closed and the habitat to be restored; provide a timetable and budget to achieve this; and formally consult with FWS on this new plan. We further recommend that the top quality riparian habitat from Elk Creek to Cold Creek be included in the Linkage Zone W-NW of Condon.

- Given the heavy logging and roading the former Plum Creek sections have undergone over many decades, it's hard to justify the Flathead's classification of nearly the entire central core of the valley as 6b Moderate (logging), thereby continuing the habitat decline rather than beginning the restoration process.

  We recommend that the FNF reconsider this wholesale designation of many sensitive or impaired landscapes for further logging - in particular those bracketing Lion, Piper, Cold, Elk, and Glacier Creeks, and Swan River at the mouth of Lindbergh Lake - most with sections of 2b Eligible Wild and Scenic River and/or in Linkage Zones. It defies ecological common sense to bracket such areas with 6b Moderate logging. It makes far more sense to designate many of these sections as 6a General Forest (Low) and remove them from the Suitable Timber Base, while developing a comprehensive plan for the restoration of surrounding habitat. Riparian zones and critical bull/cutthroat trout streams of this quality are no doubt important habitat and linkage zones across the valley for grizzlies and other carnivores. As such, they should be buffered on each side by 500m with logging and roads excluded. We recommend an additional buffer around this of 6a General Forest Low to further protect these important streams from the intensive logging that has impaired much of the valley.

- Along the eastern boundary of the GA (Swan Face/Crest) virtually the entire area is IRA and we recommend extending the MA 1b Recommended Wilderness north from Inspiration Pass to a 500m buffer along Highway 2. Any portions that the FNF could ecologically demonstrate did not meet 1b standards would become 5a Backcountry Non-motorized – including Alpine Trail 7 along the Swan Crest. This would simultaneously provide critical wildlife connectivity, and break the isolation of the Jewel Basin Recommended Wilderness.

  The PA's current designation of most of the Swan Face/Crest as MA 5b, 5c, and 5d Motorized is frankly incomprehensible, as these motorized uses would enter and fracture designated grizzly bear Core (68-82%) and lynx critical habitat (98-100%, USDA 2014) – ignoring science, law, and common sense. Now is the time to address and fix those errors.

(6) Salish Mountains Geographic Area:

- (GBCSA) The Management Area designations for this GA highlight a fundamental problem for the Draft CS (USFWS 2013) and any PA based upon it. Both documents claim that the Salish Mountains are a Demographic Connectivity Area (DCA) for grizzly bears seeking to move between the NCDE and the Cabinet-Yaak Ecosystem (CYE).

  Unfortunately, decades of mismanagement by the FNF have relegated this area to the role of a motorized, industrial logging moonscape, with road densities well beyond the documented capability of grizzlies to survive long-term (Mace and Waller 1997). And neither the Draft CS nor the PA do anything to reverse this trend, restore its habitat, or provide any grizzly security.

  The Draft CS mentions that Montana Fish, Wildlife & Parks (FWP) bear managers have documented several grizzlies using the area – confusing that with evidence of either occupancy or survival. Apparently calling a landscape a Demographic Connectivity Area is the same as it actually being one in agency minds.

- The real-world MA designations, however, lay out a far different reality, as more than 90% of the Salish Mountains are 6b General Forest Moderate (logging) and 6c General Forest High (logging). Even two small sections of 2b Eligible Wild and Scenic River are completely compromised as follows:

  - Logan Creek west of Tally Lake is bracketed by MA 7 Focused Recreation on the east, MA 6c high logging on the west, and another Focused Recreation area after it leaves the lake to the north.
  - Le Beau Creek in the northern corner of the GA has MA 6c High logging on the east, and the even more heavily logged and roaded Kootenai National Forest to the west. The FNF has essentially created two Eligible Wild & Scenic Rivers to Nowhere.

  The Island Unit of this GA west of Lakeside fares even worse, with 100% dedicated to 6b Moderate logging, 6c High logging, and a large swath of Focused Recreation at its heart – essentially a habitat sacrifice zone. If any of the Salish Mountains GA is to function as a true DCA between the NCDE and CYE, the FNF and the U.S. Fish and Wildlife Service must immediately step up to the habitat plate with significant MA designations based on the best available science regarding grizzly habitat security. We recommend that the FNF make that connectivity a long-overdue reality by adopting Amendment 19 standards for Open Motorized Route Density, Total Motorized Route Density, and Security Core throughout the Salish and Island Subunits.

IXV. <u>Conclusion and Recommendations:</u>

To ensure that the FNF and other forests of the NCDE have Forest Plans that are firmly grounded in science and law, we urge your adoption of the following recommendations:

- (GBCSA) As currently written, the Draft CS is biologically and legally inadequate to conserve NCDE grizzlies or their habitat, and does not provide the "adequate regulatory mechanisms" or Habitat Based Recovery Criteria required prior to delisting. Between now and the release of the Final CS, we recommend that all NCDE Forests work closely with the U.S. Fish and Wildlife Service to address and correct the shortcomings that we have identified in our current comments, and our previous comments on the Draft CS (See Attachment).

- (GBCSA) Amendment 19 to the Flathead Forest Plan – and adopted by the other Forests of the NCDE – provides the only Motorized Access Management standards based upon the "best available science" as required by law and sound wildlife management, and must be retained and fully implemented ecosystem-wide.

- The Flathead Forest Plan must actively promote landscape connectivity – particularly for wide-ranging carnivores - by employing management strategies based upon the best available science and our Management Area designations for all Geographic Areas.

- The FNF must immediately reverse its PA's policy of artificially inflating its Suitable Timber Base by entering grizzly bear Core and lynx critical habitat. We believe that neither action is legal under the Endangered Species Act (1988), and basing a Forest Plan on the assumption that either species will be prematurely delisted is extremely poor forest management. Until the FNF can conclusively show that it has superior, scientifically sound numbers, the Suitable Timber Base from the Draft 2006 Plan – 328,328 acres – must stand.

- Although we are in the very earliest stages of Forest Plan Revision, the FNF has already eliminated more than 60 % of all IRAs from Recommended Wilderness status, while providing none of the justification required by the Forest Service Handbook, Chapter 70 on Wilderness.

  We recommend that all IRAs be designated as Recommended Wilderness. If the FNF can provide compelling evidence based on the Wilderness Act and the ecological needs of the landscape that this is not appropriate in certain cases, then those IRA's would be Backcountry Non-motorized, Year-round. Decisions against Recommended Wilderness cannot be made based on manager or management preferences, or the recreational "wants" of users elevated over the ecological "needs" of the land.

- We recommend that the FNF grant Wild and Scenic River eligibility determinations to the 36 streams noted above.
- Finally, we recommend that the FNF consider and adopt the specific Management Area Designations that we have presented for each Geographic Area.

Implementing these recommendations will result in much-needed protection for listed and candidate wildlife species and water quality, as well as a functionally-connected forest landscape, while providing a manageable road system that is both ecologically and fiscally responsible and a truly 'suitable' timber base.

Thank you for your consideration of our comments.

Sincerely,

Claudia Narcisco
Conservation Committee Chair
Montana Chapter Sierra Club

Bonnie Rice
Northern Rockies Senior Representative
Sierra Club - Our Wild America Campaign

Brett Hartl
Endangered Species Policy Director
Center *for* Biological Diversity

Josh Osher
Montana Coordinator
Public Policy Consultant
Western Watersheds Project

Brian Peck
Independent Wildlife Consultant

Literature Cited

Chadwick, Douglas H. 2010. The Wolverine Way. Patagonia Books, Ventura, Calif. 93001-2717.

Claar JJ, Bertram T, Naney R, Warren N and Ruediger W. 2004. Wildlife linkage areas: an integrated approach for Canada lynx. IN: Proceedings of the 2003 International Conference on Ecology and Transportation, Eds. Irwin CL, Garrett P, McDermott KP. Center for Transportation and the Environment, North Carolina State University, Raleigh, NC: pp. 234-239. (http://repositories.cdlib.org/jmie/roadeco/Claar2003a/) (map available through http://databasin.org/datasets/0659dded-ba41-4f0f-a38c-fa930ab1eb85)

Dombeck, Michael, Chief of the U.S. Forest Service. 2001. "Unite and Conserve." Washington Post, April 28, 2001, P. A21.

Flathead Beacon. 2015. Flathead National Forest Unveils Vision for Future Management. March 9, 2015

Fund for Animals v. Babbitt, 903 F Supp. 96, 113,118(D.D.C. 1995)

Fund for Animals v. Babbit, Civil Act. No. 94-1021 (PLF) and National Audubon Society v. Babbitt, Civil Act. No. 94-1106 (PLF) (Consolidated).

Gese, Eric M., Dowd, Jennifer L.B., and Aubry, Lise M. 2013. The Influence of Snowmobile Trails on Coyote Movements During Winter in High Elevation Landscapes. PLoS ONE.

Inman, Robert M., Brent L. Brock, Kristine H. Inman, Shawn S. Sartorius, Bryan C. Aber, Brian Giddings, Steven L. Cain, Mark L. Orme, Jay A. Fredrick, Bob J. Oakleaf, Kurt L. Alt, Eric Odell, Guillaume Chapron 2013. Developing priorities for metapopulation conservation at the landscape. Wildlife Conservation Society Greater Yellowstone Wolverine Program, Ennis, Montana. 2013, 10, Elsevier. https://www.sciencebase.gov/catalog/folder/54b94a96e4b043905e00fc42 (map available at http://databasin.org/datasets/7ce6300b5312463eab6af35ff3bbfd18

Interagency Grizzly Bear Committee Taskforce Report. 1998. Grizzly Bear Motorized Access Management. July 29, 1998. 6 pp.

Kalispell Daily Interlake. 2015. Logging Needed for Forest Restoration, March 21, 2015, Dillon Tabish.

Mace, R.D. and J.S. Waller. 1997. Final Report: Grizzly Bear Ecology in the Swan Mountains. Montana Fish, Wildlife and Parks, 1920 6th Ave. East. P.O. Box 200701, Helena, Mt. 59620-0701.

Mace, R.D., and J.S. Waller. 1996. Grizzly Bear Distribution and Human Conflicts in Jewel Basin Hiking Area, Swan Mountains, Montana. Wildlife Society Bulletin 24:461-467.

McLellan, B.N., and D.M. Shackleton. 1989. Grizzly Bears and Resource-extraction Industries: Habitat Displacement in Response to Seismic Exploration, timber harvesting and road maintenance. Journal of Applied Ecology 26:371-380.

McRae et al 2015. Pacific Northwest Terrestrial Local Landscape Permeability. Map available at http://databasin.org/datasets/b41a83f4348f41cfa33d2a0996dd3fa0

Pierce, J. 2013. Western Governors' Association Connectivity Zones and Large Intact Blocks, Map available at: http://databasin.org/datasets/00902177710a4abcbb1682c6804310d3

Schwartz, C.C., M.A. Haroldson, and G.C. White. 2010. Hazards Affecting Grizzly Bear Survival in the Greater Yellowstone Ecosystem. Journal of Wildlife Management 74:654-667.

Squires, John R., et al. 2013. Combining Resource Selection and Movement Behavior to Predict Corridors for Canada Lynx at Their Southern Range Periphery. Biological Conservation 157 (2013) 187-195.

Squires, John R., Decesare, Nicholas J., Kolbe, Jay A., Ruggiero, Leonard F., 2010. Seasonal Resource Selection of Canada Lynx in Managed Forests of the Northern Rocky Mountains. Journal of Wildlife Management.

Stouder, Scott. 2002. Roads, Elk, and Hunting. Bugle Magazine, Rocky Mountain Elk Foundation, March/April 2002, pp. 56-63.

Swan View Coalition v. Chip Weber, Flathead National Forest Supervisor et al. CV 13-129-M-DWM, Document 51, Filed 9/25/14.

USDA Forest Service. 2015. FSH 1909.12 – Land Management Planning Handbook, Chapter 70 – Wilderness. 15 pp.

USDA Forest Service. Land Management Plan, 2015a Revision, Kootenai National Forest.

USDA Forest Service. 2015b. National Forest System Statistics, FY 2014. FS-905 (13), January 2015.

USDA Forest Service. 2014. Assessment of the Flathead National Forest, Part 1 (234 pp.) and Part 2 (451 pp.), April 2014.

USDA Forest Service. 2014a. Travel Analysis Report for Flathead National Forest. 12/30/14.

USDA Forest Service. 2012 National Forest System Land Management Planning Rule, 36 CFR Part 219, April 9, 2012. 115 pp.

USDA Forest Service. 2006. Draft Revised Land Management Plan, Flathead National Forest.

USDA Forest Service. 1995. Flathead National Forest, Forest Plan Amendment 19, Allowable Sale Quantity and Objectives and Standards for Grizzly Bear Habitat Management. March 1995. 271 pp.

USFWS.2014. Biological Opinion on the Effects of the Flathead National Forest Amendment 19 Revised Implementation Schedule on Grizzly Bears. Montana Field Office, Helena, Montana. 157 pp.

USFWS. 2014a. Final Biological Opinion on the Effects to Grizzly Bears From the Implementation of Proposed Actions Associated with Plan of Operations for the Montanore Minerals Corporation Copper/Silver Mine. March 31, 2014. 161 pp.

USFWS. 2013. Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy. April 2013. 148 pp.

USFWS. 2011. Grizzly Bear 5-Year Status Review: Summary and Evaluation. U.S. Fish and Wildlife

Service, Grizzly Bear Recovery Office, Missoula, Mt. 108pp.

USFWS. 2007. Biological Opinion on the Effects of the Ansbro Petroleum Project on Grizzly Bears, Blackfeet Indian Reservation. Montana Field Office, Helena, Montana. July 31, 2007. 86 pp.

USFWS. 1995. Biological Opinion on Flathead National Forest Amendment 19. Issued January 6, 1995, Amended February 17, 1995.

USFWS. 1995. Biological Opinion on the Swan Valley Grizzly Bear Conservation Agreement Between: Montana Department of Natural Resource Conservation, Flathead National Forest, Plum Creek Timber Company, LTD, and the U.S. Fish and Wildlife Service. December 4, 1995

USFWS. 1993. Grizzly Bear Recovery Plan. Missoula, Mt. 181pp.

USFWS. 1988. Endangered Species Act of 1973. U.S. Dept. of Interior, Washington, D.C.

Waller, John S. 2005. Movements and Habitat Use of Grizzly Bears Along U.S. Highway 2 in Northwestern Montana 1998-2001. Doctor of Philosophy Dissertation Univ. of Montana, Missoula, Mt.

Weaver, J.L. 2014. Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana, Wildlife Conservation Society Working Paper No. 43. Bronx, New York, USA. 155 pp.

Weaver, J 2013. Safe Havens, Safe Passages for Vulnerable Fish and Wildlife: Critical Landscapes in the Southern Canadian Rockies, British Columbia and Montana. Wildlife Conservation Society, Canada Conservation Report, No. 6, March 2013.

Weaver, J.L. 2001. The Transboundary Flathead: A Critical Landscape for Carnivores in the Rocky Mountains. Wildlife Conservation Society Working Paper No. 18, July 2001.

Wilderness Act of 1964. PL 88-577 (16 U.S.C. 1131-1136) September 1964.