MONTANA WILDLIFE FEDERATION

Protecting Montana's wildlife, land, waters and hunting & fishing heritage for future generations.

October 13, 2020

United States Forest Service
Flathead National Forest
Supervisor's Office
650 Wolfpack Way
Kalispell, MT 59901

Re: Mid-Swan Landscape Renewal and Wildland Urban Interface Project

Ⅰ. Introductory Statement

I write to you on behalf of the Montana Wildlife Federation (MWF). We are Montana's oldest statewide conservation organization, founded in 1936 by passionate and dedicated conservationists. Today we represent a diverse group of public land users and advocates who regularly and actively use the lands encompassed by the Flathead National Forest. We thank you for this opportunity to comment and provide feedback on the Mid-Swan Landscape Renewal and Wildland Urban Interface Project (Mid-Swan Project).

We recognize the importance of properly managing the landscape encompassed by this project and the key role that public involvement plays in this process. The amount of work that goes into these massive landscape projects does not go unnoticed and we are extremely thankful that the staff of the Flathead National Forest is taking a proactive step in managing our public lands. Due to the sheer scope, spatially, and temporally, we ask that you carefully consider our comments, suggestions, and objections and assess the benefits that would come from implementing our feedback.

MWF's key priorities are the protection of wildlife, wildlife habitat, and public access to public lands. Our comments are aimed at finding a balanced approach that encompasses: scientifically-based land and wildlife management, access to quality recreation, and adherence to the 2018 Flathead National Forest Land Management Plan.

Ⅱ. Background

The Mid-Swan Restoration and Wildland-Urban Interface Project (Mid-Swan Project) encompasses some of the most rugged and wild country in the lower-48. This region of Montana attracts visitors from across the world for the vast amount of backcountry outdoor recreation opportunities found within this valley. Wildlife watchers, anglers, hunters, hikers, mountain bikers, horseback riders, snowmobilers, motorized users, and many other forms of recreation are common throughout the year here.

Additionally, this valley is home to habitat for a wide variety of wildlife including black bears, elk, mule deer, whitetail deer, upland game birds, several different species of fish, and many species of songbirds. Threatened and endangered species, or those proposed for listing under the Endangered Species Act (ESA), such as grizzly bears, Canada lynx, and wolverine are also found within this valley.

Wildfire is a constant and ever-growing threat in Montana. As climate change drives warmer, drier weather in the western half of the state, dense fuel beds and forest stands are producing wildfires that threaten the many small communities within the Swan Valley. There is no doubt that something must be done to address this situation, however, we must find a balanced approach that mitigates wildfire risk while also maintaining and enhancing the many recreation and wildlife values found there.

Ⅲ. Comments

1. Wildlife
    a. Species of Conservation Concern

Clark's Nutcracker

The current 2018 Land Management Plan for the Flathead National Forest contains the following desired condition that addresses Clark's nutcracker:

> *FW-DC-WL-DIV-01*
> "Summer habitat: forests in the cold vegetation type contain live, seed-producing whitebark pine trees to provide food and nest sites for Clark's nutcrackers during the breeding season.
> Winter habitat: forests in the warm-dry and warm-moist types contain live, seed-producing ponderosa pine trees to provide food in winter."

Through the restoration of whitebark pine, as described in alternative B and alternative C in this proposal, this species habitat stands to greatly improve throughout the project. While Alternative B does improve the quality of whitebark pine stands, there is some concern with seeding for whitebark within the Mission Mountain Wilderness Areas (see designated areas section). Additionally, increases in ponderosa pine forest composition between the alternatives proposed are negligible. Alternative B would increase ponderosa forest composition by 1.6% and alternative C would increase it by 1.1%. In this light, we recommend Alternative C as the best course of action.

Flammulated Owl

The current 2018 Land Management Plan for the Flathead National Forest contains the following desired condition that addresses the Flammulated Owl:

> *FW-DC-WL-DIV-01*
> "These forests provide the following habitat conditions for flammulated owls:

• old-growth forest (see glossary) and mature forest with the presence of large and very large snags to provide for nesting,
• a mosaic of forest conditions that includes (1) areas with an open mid-story, (2) areas with dense Douglas-fir and ponderosa pine seedlings/saplings in the understory to provide roosting habitat, and (3) small openings to provide foraging habitat; at a scale that provides a cluster of potential home ranges for flammulated owls."

To maintain this desired condition, this project must find an adequate method of balancing different types of vegetation/timber treatments. We recommend that some mix of alternatives B and C be established that will limit the loss of habitat while also planning for future habitat conditions. The current flammulated owl habitat is under the threat of wildfire due to current dense stand conditions. Managers must therefore plan to take certain steps to restore this habitat while leaving a majority of current owl habitat intact.

Black Swift

The 2018 Land Management Plan for the Flathead National Forest contains the following desired condition that addresses the Black Swift:

FW-DC-WL-DIV-01
"Waterfalls with known nest sites for black swifts have water flow throughout the nesting season to provide nest site shading, or if this is not present, shading in front of potential nest sites provided by vegetation. Human disturbance levels do not disrupt nesting."

Black swifts are an incredibly unique species that nest behind waterfalls and, as such, require specific protections. Due to their unique nesting habits, this species is notoriously difficult to survey and establish accurate population estimates for. While forest stand structure has no known impact on these birds, we recommend that known, and potential, nesting sites be given a buffer zone with no mechanized treatment. Alternative C best fits this measure.

b. Grizzly Bears

Grizzly bears are currently listed as threatened under the ESA. Recently populations within the Northern Continental Divide Ecosystem (NCDE) have been increasing (Mace et al, 2011). These bears are increasingly being found throughout western Montana and, in particular, this project area. Habitat connectivity and quality are necessary to maintain the persistence of this species and allow for dispersal as its population rebounds (Proctor et al, 2015).

At a fine-scale, the survival of this species is tied directly to the level of human development on the landscape with road density contributing to individual bear survival

(Schwartz, Haroldson, & White, 2010). However, these roads are most damaging if they are infrequently used. In some cases, grizzly bears have been documented utilizing the edge habitats formed by roads (Stewart et al, 2013). With this in mind, roads should be managed to allow no net increase in open roads either during, or after, the project timeline. Open roads should be managed to allow some measure of vegetation growth along roads to provide security.

Additionally, the following desired condition is listed with the 2018 Land Management Plan for the Flathead National Forest:

> *FW-DC-WL-DC-02*
> "Within the NCDE primary conservation area and zone 1 (including the Salish demographic connectivity area), grizzly bear habitat on NFS lands contributes to sustaining recovery of the grizzly bear population in the NCDE and contributes to connectivity with neighboring grizzly bear recovery zones."

To meet this desired condition, the Mid-Swan project must take an active and balanced approach to ensure this species can thrive, and disperse, from within and through this landscape. Both alternatives B and C result in no increase in road density and no increase in motorized access, however, alternative B does significantly reduce hiding cover, by 13%, within the project area. We recommend a mix of both alternatives B and C to assess the efficacy of utilizing other forms of vegetation/treatment methods to reduce the impact to cover for this bear. Additionally, management activities should not occur within denning habitat during the denning season and roads should be made impassable rather than just gated or bermed.

c. Canada Lynx

Canada lynx are another species listed as threatened under the ESA and, as such, require special consideration in regards to proposed management actions. The following desired condition and standard are found within the 2018 Land Management Plan for the Flathead National Forest:

> *FW-DC-WL-05*
> "Within Canada lynx critical habitat mapped by the USFWS, boreal forest landscapes support a mosaic of differing forest successional stages, providing the physical or biological features essential to the conservation and recovery of the Canada lynx population."
>
> *FW-STD-WL-04*
> "The Northern Rockies Lynx Management Direction in appendix A, as modified by the Flathead National Forest's forest plan record of decision, shall be applied."

Additionally, the following standards taken from the Northern Rockies Lynx Management Decision must be taken into consideration:

> "Standard VEG S1. In order to provide a distribution of age classes, the LCAS recommended that an lynx analysis unit (LAU) (an area the size of a female lynx home range) not have more than 30 percent of the lynx habitat in an unsuitable condition, and Record of Decision – Northern Rockies Lynx Management Direction 9 if an LAU was at 30 percent then vegetation management projects should not create more. Lynx habitat in an unsuitable condition includes those forests in a stand initiation structural stage that are too short to provide winter snowshoe hare habitat. These conditions are created by stand-replacing wildfires, prescribed burns that remove all of the vegetation, or regeneration timber harvest." (Northern Rockies Lynx Management Decision 2007, p.8)
>
> "Standard VEG S2. The LCAS also recommended that timber harvest not change more than 15 percent of lynx habitat to an unsuitable condition (stand initiation structural stage that is too short to provide for winter snowshoe hare habitat) over a decade." (Northern Rockies Lynx Management Decision 2007, p.9)
>
> "Standard VEG S5. The LCAS recommended no precommercial thinning that reduces winter snowshoe hare habitat in the stand initiation structural stage." (Northern Rockies Lynx Management Decision 2007, p.11)
>
> "Standard VEG S6. The LCAS recommended no precommercial thinning that reduces winter snowshoe hare habitat in multistory forests." (Northern Rockies Lynx Management Decision 2007, p.13)

Several studies have shown that lynx habitat must be managed as a mosaic of different habitat types. While summer habitat is typically associated with broader resource use that includes younger forests, forests with larger diameter trees and high horizontal cover are highly preferred in the winter. Because the winter habitat is most limiting for this species, we recommend that special attention be paid to the management of lynx winter habitat (Squires, Decesare, Kolbe, & Ruggiero, 2008; Squires, Decesare, Kolbe, & Ruggiero, 2010). Additionally, forest canopy closure and sparsely stocked spruce-fir stands create highly unfavorable conditions for denning (Squires, Decesare, Kolbe, & Ruggiero, 2008).

To effectively manage lynx habitat, managers must effectively manage snowshoe hare habitat. Research has shown that precommercial thinning has negative impacts on snowshoe hare abundance and, therefore, lynx abundance. Precommercial thinning with reserves (PCT-R) treatments should be utilized to thin younger stands while still retaining habitat patches (Griffin & Mills, 2007).

Alternative B, as it stands, presents too high of a risk to lynx and snowshoe hare populations. We recommend balancing treatments from both alternatives B and C to achieve some habitat management objectives that increase future lynx habitat while not degrading current lynx habitat too significantly.

d. Wolverine

Under alternative B, wolverine habitat stands could be significantly affected (roughly 40% higher than alternative C). Additionally, helicopter flight in wolverine habitat stands to add disturbance to this species for an activity that we believe should not be conducted in designated or recommended wilderness areas (see designated areas section below). Additionally, the following guideline from the 2018 Land Management Plan for the Flathead National Forest should be adopted anywhere that helicopter flight is necessary for treatment:

> *FW-GDL-WL-04*
> "New projects or activity authorizations involving low-altitude helicopter flights or landings in areas of modeled wolverine maternal denning habitat (identified in cooperation with USFWS and the USFS Rocky Mountain Research Station) should not occur from February 15 to May 15 unless they include strategies or design features to mitigate disturbance to wolverines. Exceptions to this guideline may occur for public health and safety, emergency activities, or other approved administrative activities, such as site maintenance."

Given the magnitude of difference to disturbed wolverine habitat between alternatives B and C, we recommend alternative C be adopted.

e. Biodiversity

The following desired condition from the 2018 Land Management Plan for the Flathead National Forest states that:

> *FW-DC-WL-DIV-01*
> "Ecological conditions provide for wildlife diversity (including species of conservation concern) and wildlife habitat connectivity (including seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long-distance range shifts of species). For desired conditions for select wildlife species, see table 14."

The alternatives within this proposal do not adequately address effects to wildlife diversity within the project boundary. We would like to see a more thorough analysis given to the effects of proposed treatments on different species in a way that fully fulfills this desired condition.

f. Games Species

Elk habitat must be managed to provide a balance of security and forage. Security habitat must account for the distance from roads, forest stand conditions, lesser hunting pressure, and nearby forage quality/quantity. Both elk and mule deer occupy a variety of habitat throughout the year and their requirements change seasonally.

In the fall, distance from roads, canopy density, and hunting pressure all directly affect elk occupancy in any given area. However, with higher hunting pressure comes a need

for further distances from roads (Lowrey, Devoe, Proffitt, & Garrott; Ranglack et al, 2017). Additionally, areas that receive high hunting pressure should retain a higher number of security areas (Ranglack et al, 2017). While roads can negatively affect the degree at which elk will occupy an area, they have been shown to provide parturition sites as long as road closures are in place and there is some form of vegetation buffer (Lehman et al, 2015; Montgomery, Roloff, & Millspaugh, 2012).

Both alternatives B and C propose significant impacts on winter range for elk and mule deer. Roughly 86% of the winter range within the project area would be treated under alternative B while 47% would be treated under alternative C. Alternative B could reduce snow-intercept cover by 55% and allow commercial treatments on up to 46% of winter range while alternative C would reduce snow-intercept cover by 28% and allow commercial treatments on up to 25% of winter range. Additionally, alternative C would reduce hiding cover by a significant margin over alternative B. We recommend the forest service utilize different treatments to still achieve results with fuel management while mitigating some damage to elk and deer habitat.

g. Connectivity

The following desired conditions and standards from the 2018 Land Management Plan for the Flathead National Forest directly address connectivity on this forest:

> *FW-DC-WL-DIV-01*
> "Ecological conditions provide for wildlife diversity (including species of conservation concern15) and wildlife habitat connectivity (including seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long-distance range shifts of species). For desired conditions for select wildlife species, see table 14. "
>
> *FW-GDL-WL-DIV-06*
> "If site-specific analysis determines that cover for one or more wildlife species is lacking in a project area, vegetation management activities should be designed and/or scheduled to retain cover between areas of forest where cover is lacking (e.g., recent large stand-replacement fire areas until succession creates new cover), if present. The intent is to avoid severing connectivity of cover."

These conditions described above should be met at every stage of the project duration and after the project is completed. Wildlife needs the ability to adapt to human disturbance and these conditions directly address this issue.

2. Designated Areas

The following desired conditions, standards, and guidelines are taken from the 2018 Land Management Plan for the Flathead National Forest.

MA1a-DC-01
"Designated wilderness areas are managed to preserve and protect their wilderness character as required by the Wilderness Act and each wilderness area's enabling legislation. Wilderness character includes the qualities of untrammeled, undeveloped, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other features of value (ecological, geological, scientific, scenic, or historic value unique to each specific wilderness area)."

MA1a-DC-02
"Natural ecological processes and disturbances (e.g., succession, wildfire, avalanches, insects, and disease) are the primary forces affecting the composition, structure, and pattern of vegetation. Wilderness areas provide opportunities for visitors to experience natural ecological processes and disturbances with a limited amount of human influence."

MA1a-STD-04
"Prehistoric resources shall not be maintained, rehabilitated, restored, or interpreted within the Mission Mountains Wilderness."

MA1a-GDL-03
"To protect wilderness character, motorized use and mechanized transport should not be allowed within designated wilderness areas except as allowed by the Wilderness Act and the wilderness area's enabling legislation."

Any management actions taken within designated wilderness areas should comply with the above statements. However, that does not mean that management actions cannot be completed in the Wilderness. Utilizing mechanical or motorized equipment is not suitable for wilderness and should be excluded from any proposed actions. While this can limit the ability to manage some areas, it does maintain wilderness characteristics.

We recommend that management actions adhere to the "minimum tool principle" to have the lightest footprint on the land as possible. Additionally, we would like to see the Forest take steps to determine the minimum management actions needed to achieve positive results on the landscape.

3. Eligible Wild & Scenic Rivers

We recommend alternative C apply to eligible wild and scenic rivers (WSR). Commercial and mechanized harvest do not belong along WSR corridors and often produce results that are not characteristic of these rivers.

4. Recommended Wilderness

The following desired conditions, standards, and guidelines are taken from the 2018 Land Management Plan for the Flathead National Forest.

MA1b-DC-01

"Recommended wilderness areas preserve opportunities for inclusion in the National WildernessPreservation System. The Forest maintains and protects the ecological and social characteristics that provide the basis for wilderness recommendation."

MA1b-DC-02
Recommended wilderness areas are characterized by a natural environment where ecological processes such as natural succession, wildfire, avalanches, insects, and disease function with a limited amount of human influence.

MA1b-SUIT-03
Recommended wilderness areas are suitable for restoration activities where the outcomes will protect the wilderness characteristics of the areas, as long as the ecological and social characteristics that provide the basis for wilderness recommendations are maintained and protected.

Our comments regarding recommended wilderness areas are very much in line with our comments regarding the management of designated wilderness. Recommended wilderness should be managed exactly in the same way as designated wilderness so that these areas may be included in the Wilderness system at a later date.

5. Vegetation Management

a. Whitebark Pine

The following desired conditions and objective from the 2018 Land Management Plan for the Flathead National Forest address whitebark pine management on the forest:

FW-DC-PLANT-03
"Habitat conditions support the long-term persistence of whitebark pine (Pinus albicaulis), which is currently a candidate species under the Endangered Species Act. Ecological conditions and processes that sustain the habitats currently or potentially occupied by this species are retained or restored."

FW-DC-PLANT-04
"Whitebark pine trees or stands identified for collection of scion, pollen, or seed; areas identified as important for cone production; and whitebark pine plantations are protected from potential loss due to fire, insect, disease, or other threats to support the recovery or long-term persistence of this species."

FW-OBJ-PLANT-01
"Treat 8,000 to 19,000 acres for the purpose of sustaining or restoring whitebark pine in the ecosystem and contributing to achieving desired conditions for the presence of this species across the landscape."

While both alternatives from the proposal address the conditions described above, there is some concern with utilizing helicopters to seed within the wilderness and recommended

wilderness areas. These trees are essential to maintaining a healthy overall ecosystem and efforts should be made to restore them to their former range. However, we would like to see the proposal address the possibility of utilizing non-mechanized forms of transportation to achieve project goals, even if on a small scale.

b. Old Growth

Old-growth forests have declined substantially throughout the west and are in dire need of solid conservation measures. However, alternative B causes undue harm to these stands by proposing temporary road construction within old growth. New roads through old-growth should not be considered even if they are the only option left.

We do believe that these stands should be managed to reduce wildfire threats but in a way that does the most to minimize threats of the treatments themselves. Hand thinning and small-scale prescribed burns could potentially help protect these stands while also mitigating potential harm caused by treatments.

Ⅳ. Closing Statement

The Swan Valley is well-known for its diverse array of ecosystems and the sheer amount of biodiversity and recreation opportunities found there. Many of Montana's characteristic megafauna are found here as well as critical nongame species and world-renowned big game populations. With proper planning and input, the Flathead National Forest staff can continue to adequately care for the land held in our trust.

Crafting a comprehensive land management proposal to guide forest management is no easy feat and we commend the Flathead National Forest staff for undertaking this effort and including the public and every step of the way. MWF is grateful for the opportunity to comment on this proposal and lend our voice to the conservation of this critical region of Montana.

Sincerely,

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V. References

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