



77 Moose Creek Rd, Polebridge, MT 59928

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Anthony Botello, Forest Supervisor Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901
comments-northern-flathead@usda.gov.

Dear Supervisor Botello;

Thank you for the opportunity to comment on the Flathead Suitability Changes Draft Environmental Assessment. The North Fork Preservation Association (NFPA) participated in both the forest plan revision process and the Whitefish Range Partnership (WRP), and we appreciate the follow through of this site specific analysis as outlined in the Final 2018 Forest Plan five years ago. NFPA participated in the scoping process in January of 2022. The NFPA mission is to to champion the exceptional biodiversity and wildness of the North Fork of the Flathead River watershed in Northwest Montana. As a grassroots, landowner driven organization, we have strong investment and knowledge of the areas being evaluated.

Trail closure to mechanized travel in Proposed Wilderness

We support managing recommended Wilderness areas to maintain the social and ecological values to preserve their potential for congressional designation. Therefore, **we applaud the recommended closure of 82.3 miles of trails to mechanized travel in the Tuchuck-Whale recommended Wilderness areas as well as other recommended Wilderness areas in the Flathead Suitability Changes Draft Environmental Assessment.** These areas and trails are remote, provide excellent grizzly bear, wolverine, lynx and other wildlife habitat, and should be maintained for foot and stock use only.

Motorized over-snow vehicle expansion

As a member of the Whitefish Range Partnership, we supported a site specific evaluation to assess the potential expansion of snowmobiling in the southern Whitefish Range. We understand that management to allow for recreational snowmobiling is consistent with the conclusions of the Whitefish Range Partnership. As proposed in the EA we support the closure of snowmobiling in the Puzzle Creek and Marias Pass areas that currently threaten illegal use in the Badger Two Medicine. We also support the proposed closures that protect lynx habitat. The proposed expanded territory for snowmobile use in the North Fork is continuous with existing areas open to snowmobiles and is consistent with the conclusion of the Whitefish Range Partnership.

Programmatic amendment language

We object to the proposed language for MA1b-SUIT-06 (USDA Forest Service 2018a, p. 90) “Mechanized transport and motorized use are not suitable for use in recommended wilderness except for accomplishing administrative purposes such as restoration activities (for example, management of ignited fires or using chainsaws to reduce stand densities around whitebark pine trees) and trail maintenance.” We do not believe that amendment language allowing for routine chainsaw use for trail maintenance in recommended wilderness is consistent with the Wilderness act of 1964. Chainsaw use in wilderness is and should be permitted on a case by case basis by the Forest Superintendent generally for emergency purposes only. We recognize that there is on going debate on this subject but feel strongly that to make an allowance via amendment to the Forest Plan is a grave deviation from the philosophy of management for wilderness and recommended wilderness as set forth in the Wilderness Act. As stated by Wilderness Watch “The concept of wilderness as codified in the Wilderness Act is to restrain the impulse to use our industrial might, to allow wilderness to be left untrammelled by humans and dominated by natural processes.”

The whitebark Pine has been recently listed as threatened under the Endangered Species act. Restoration of whitebark pine stands therefor could conceivable constitute an emergency under administrative rules. However, low impact restoration methods such as hand girdling and weeding would seem to be the minimum tools required to achieve this, rather than chain saws. Volunteers could help implement this restoration work. Prescribed fire has also been proposed as a restoration tool.

Thank you again for accepting our comments on this travel planning process. We would be pleased to connect and answer any questions you may have and look forward to further dialog regarding the Flathead Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness.

Sincerely,

Flannery Coats
NFPA President

Suzanne Hildner,
Secretary NFPA

