



SIERRA CLUB

May 6, 2024

Anthony Botello, Supervisor
Attn: Gary Blazejewski
Flathead National Forest Supervisor's Office
650 Wolfpack Way
Kalispell, MT 59901

RE: Flathead Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness #61460

Dear Supervisor Botello,

Sierra Club is appreciative of the opportunity to comment on the winter travel management and recommended wilderness suitability changes on the Flathead National Forest (FNF). Our members recreate extensively on the Flathead National Forest, including in winter, through a variety of activities including cross country and backcountry skiing, hiking, snowshoeing, wildlife watching and snowmobiling, among other activities. We care deeply about the forest, the wildlife it supports and the opportunity to enjoy these natural treasures in both quiet recreation and, where appropriate, through motorized recreation.

Formed in 1892, Sierra Club is the nation's oldest and largest environmental advocacy organization. Our mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment and to use all lawful means to carry out these objectives.

We have a long history of working to conserve and protect the wildlands of the Northern Rockies, including on the Flathead National Forest. Our work aims to conserve key

wildlife habitat, help conserve and recover native wildlife species including grizzly bears, wolves and wolverine, among others; and to balance those goals with the public's desire to enjoy these wildlands through many activities including quiet recreation, fair chase hunting and fishing, and wildlife watching.

Those goals have caused Sierra Club to take a hard look at the proposal for winter travel management on the Flathead National Forest. We commend the FNF for taking some good steps to protect wildlands, and in particular lands that are eligible for protection under the Wilderness Act. However, there is room for improvement in this proposal.

Proposals Sierra Club supports

Sierra Club supports the FNF's proposal to close Recommended Wilderness Areas to motorized and mechanized use. These areas offer secure habitat for wildlife, including big game like elk, deer and moose, as well as other species including wolves, wolverine and lynx. These areas also offer quiet recreation for people, including through winter hiking, cross country skiing, snowshoeing and wildlife watching. Maintaining the wild character of these areas benefits wildlife and people.

The FNF should also be commended for using geographical features including trailheads and other easily distinguishable points as boundaries for motorized and other uses. These points are far easier for the Forest Service to enforce and easier for the public to understand. It makes a lot more sense and is more practical than using the boundaries of wilderness areas and recommended wilderness that can be harder for the public to discern. We are encouraged that the Forest Service is taking this into consideration, and this is a model that should be used throughout Region One of the Forest Service, as well as nationwide.

Sierra Club is particularly supportive of the winter closure in the Skyland Challenge snowmobile area of the route that goes up Puzzle Creek. This area is used for illegal incursions by snowmobiles into the Badger-Two Medicine area. The area has deep cultural significance to the Blackfeet Nation. It is also excellent wildlife habitat that provides security for numerous species, including mountain goats, elk, deer, black bears and grizzly bears. Taking this step to prevent illegal incursions into the areas is an excellent action that will protect the wild values of this incredible area.

Moving the boundary for the Skyland Challenge snowmobile area to the Morrison Creek bridge, where a warming hut and restroom is located, is the better option. It will be easier to enforce for Forest Service personnel, and provide clarity for snowmobile riders while protecting the character of the Badger-Two Medicine.

Proposed improvements in the winter travel plan

Sierra Club offers the following proposed improvements to the winter travel management plan on the FNF. These suggestions would provide more protection for the Badger-Two Medicine area and the cultural and wildlife values it holds, and provide greater clarity for FNF officials, snowmobile riders and quiet recreation advocates that the proper balance between wildlands and wildlife protections and motorized recreation is reached.

The FNF should not open the Marias Pass section of the Skyland Challenge snowmobile area without a better defined plan for how it will prevent illegal incursions into the Badger-Two Medicine area. This has been a problem, and working to get a clear plan to prevent this will help protect the Badger-Two Medicine, which again has deep cultural values to the Blackfoot Nation as well as the incredible wildlife values discussed earlier.

Forestwide, the FNF should implement some mechanisms to close areas in the later part of the snowmobile season when minimum snow depths are reached as a result of melting. We know that motorized use in areas with too little snow can cause damage to waters, vegetation and soils. At the same time, these areas have the potential for grizzly bear occupancy from bears that are leaving the den early, which is more likely in milder winters that correspond with lower snow depths. This is of particular conservation value for female grizzly bears with cubs. The FNF needs to develop an adaptive closure policy to account for grizzly bears as needed.

Sierra Club also supports a clarification of FNF policy that it will not use motorized and mechanized equipment to conduct restoration work in recommended wilderness areas. While hand-held equipment including chainsaws are acceptable, the use of motorized vehicles and other, larger mechanized equipment degrades the wilderness qualities of those areas.

Finally, it's imperative that the FNF take on a more thorough analysis in specific areas of the impact of winter motorized recreation on lynx and wolverine, two species that are protected under the federation Endangered Species Act. These species are sensitive to

human disturbance and need secure habitat for denning and foraging. This will help as we work to recover these valuable native wildlife species and foster connectivity through the FNF, which is an essential landscape for both species.

Again, thank you for the opportunity to comment on this proposal to improve winter travel management on the FNF. We are encouraged by many steps the Forest Service is proposing, and confident that with some further changes we can continue to protect wildlands and wildlife in this national treasure.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Gevock". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nick Gevock
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