



Anthony Botello, Forest Supervisor  
Flathead National Forest  
650 Wolfpack Way  
Kalispell, MT 59901

Re: Flathead National Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness Project, Draft Environmental Assessment

*Submitted electronically:* <https://cara.fs2c.usda.gov/Public/Comment?Project+61460>

May 6, 2024

Dear Supervisor Botello:

This document serves as comments on the Flathead National Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness Project, Draft Environmental Assessment.

Since 1935, The Wilderness Society has led the effort to permanently protect nearly 112 million acres of wilderness in 44 states. We have been at the forefront of nearly every major public lands victory, and we appreciate the opportunity to comment on this phase of the Environmental Assessment.

The Wilderness Society has a deep connection to The Flathead National Forest, including our founder Bob Marshall whose name looms large across a huge part of the Forest. We have been a part of several collaboratives and campaigns that have touched down on the Flathead National Forest including our role as a member of the Whitefish Range Partnership (WRP) and we represent our million plus members and supporters in submitting these comments.

We welcome the fact that this process finally puts elements of the WRP into place and clarifies that non-conforming uses are not appropriate within the recommended wilderness. The amended Travel Plan addresses other opportunities agreed to with the WRP for Over-Snow Vehicle use. These significant steps may require further analysis on the part of the agency since the listing of the wolverine under the Endangered Species Act in November of 2023.

Once the Forest Service has completed a planning process (FNF 2018) that produces a recommendation of wilderness to the Congress of the United States, it is policy that the agency preserve the ecological and social conditions that make an area suitable for that recommendation. This step of aligning the OSV Travel Management with the wilderness recommendation in the Forest Management Plan largely meets that policy and captures the intent behind the years of collaboration that went into the WRP. We support the comments from the Glacier Two Medicine Alliance (GTMA) and the National Parks Conservation Association (NPCA) that highlights some of the challenges with trails that may tempt users to violate the intent of not allowing those non-conforming uses and that the scoping maps make it unclear where there may be possible incursions.

It is important that the agency place guidelines on all the ways that an area's wilderness characteristics may be impacted, including actions proposed for administration of the area. The suitability language does not go far enough in placing guardrails that will prevent degradation of the wilderness characteristics. By addressing the administrative uses in this process in a way that does not provide clear intent, the agency is opening itself up to possible impacts that should be avoided. While temporal invasions of the character of an area may

meet policy, it is possible that some administrative actions could leave permanent impacts. The Forest Service should add detailed language to the final action that outlines a 'minimum-tool analysis framework process' for allowing any non-conforming uses for the administration of the area recommended for wilderness.

The other major changes to the OSV Travel Management outside of the Whitefish Range (largely in the Skyland/Marias Pass area) reflect a real commitment from the Forest Service to finding a balance in the opportunity spectrum for recreationists (travel), but it is difficult to ignore that the balance may create certain management challenges as it relates to incursions into the protected and culturally significant Badger-Two Medicine area on the Helena - Lewis & Clark National Forest. We acknowledge that the plan does seem to try and address this issue by closing the Puzzle Creek area, but at the same time the plan may set up incursions from another point (new areas close to Marias Pass).

The Flathead National Forest should further analyze how to meet the need for OSV recreation while reducing management challenges regarding access to restricted areas like Badger-Two Medicine. The agency should also consider the rapidly changing climate when it sets seasonal access and restriction parameters for any new or existing areas for OSV availability. All data shows that the protected Northern Continental Divide Ecosystem Grizzly Bear population is emerging earlier from their dens each spring, and the agency should use current and relevant data to reduce impacts to these bears in the spring window.

This action is a welcome step that aligns OSV Travel Management with the 2018 Flathead National Forest Plan, and we look forward to providing any assistance to improve the product in the final decision. Please feel free to reach out with any clarifying questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Hodge', with a stylized, cursive script.

Bill Hodge  
Montana State Director, The Wilderness Society