Aug. 20, 2020
To: Superintendent Jeff Mow
Re: Inside North Fork Road Status

For the past 10 years, Glacier National Park's Inside North Fork Road has been closed to motorized access from Logging Creek to Camas Creek due to road maintenance concerns. We understand park managers are considering plans to reopen this section to vehicles, perhaps as soon as fall 2020, and we write to you in strong opposition to those plans.

Given the rapid rate of change in the area, and the dramatically increasing visitation numbers, we believe an updated NEPA review is required to analyze a full range of alternatives for appropriate management of the entire Inside North Fork Road and the Bowman and Kintla access roads.

We are longtime researchers, scientists and land managers – several of whom have chosen to live in the North Fork -- and have decades of experience working in the North Fork Flathead River Valley. The area has long been a critical focus for conservation, with Glacier Park managers defending the North Fork against dams, development and upstream mines. In fact, the park's General Management Plan demands the area "be preserved to contribute to the integrity and primitive character of the transboundary watershed," and that "management actions would preserve that primitive character." That same NPS management plan warns that the wilderness qualities defining the North Fork have become "increasingly rare."

And while that plan makes concession for the Inside Road, it is important to note that this management plan was adopted in 1999, when visitation to Glacier National Park was ~1.7 million as opposed to today's ~3 million. Since that management plan was drafted, Polebridge vehicle entrance counts for the month of July have increased 240%, from 3,900 vehicles to more than 13,000. Even during this pandemic summer, when overall park visitation is down by more than half, Polebridge gate counts continue to climb with July vehicle entrances up 45% over last year.

And, of course, many of those additional visitors have access to a new generation of street-legal ATV machines whose potential effect on the North Fork's unique characteristics has not been evaluated. In fact, there has been no updated NEPA evaluation whatsoever of the effect increased visitation is having on North Fork wildlife and natural and cultural resources, nor on any other affected park areas. Opening this route as a "scenic loop" is likely to have significant impacts requiring an updated EA or EIS review.

We understand the need for human safety protocols in the case of wildfire or other emergencies, but contend that residents and visitors already have many options for egress including Trail Creek Road, Red Meadow Creek Road, Camas Creek Road and the outside North Fork Road to Columbia Falls. Should these many options prove insufficient, the gates on the Inside North Fork Road could be opened to vehicles in the case of emergency evacuation. It is worth noting that allowing vehicle access, particularly in the absence of adequate staffing, may actually increase the risk of fire in the region. The recent arson fires in the North Fork, one of

which claimed the historic Ford Creek Cabin, suggest that any motorized "loop" would at minimum require a full-time presence at the Logging Ranger Station.

There are many reasons to maintain the current closure of the Inside North Fork Road to vehicle access, and to not establish a "scenic loop" at this time. These include, but are not limited to: the North Fork area's *Recommended Wilderness* and *Wild and Scenic River* land-use designations, which are indicative of the protection level historically deemed appropriate for the area; the long history of National Park Service actions to protect the North Fork from development; the deep and longstanding international commitment to protect the transboundary corridor; the many actions already taken to protect the watershed (Canadian ban on mining/drilling, U.S. ban on mining/drilling leases, MT no-surface-occupancy rule, Whitefish Range Partnership emphasis on protection, etc.); the opportunity to establish new visitor experiences for cyclists, hikers and equestrians; the frequent forced closures of already over-burdened North Fork destinations such as Bowman and Kintla Lakes; the spread of noxious weeds attendant to vehicle access; the impacts to the already overburdened "outside" road of establishing a scenic loop; the added pressure on Polebridge community infrastructure, including supplies, potable water, power, septic and waste disposal; the increasing development of North Fork properties; the added pressures on limited fire and emergency response infrastructure and personnel; and the added pressure on limited NPS staff who already cannot fulfill existing duties (issuing permits, conducting inspections, staffing gates, etc.). In short, demand already outpaces supply and there exists no formal plan for limiting use.

Our primary concern as scientists and managers, however, is the potential for significant disruption of the region's world-class wildlife and their aquatic and terrestrial habitats. Every year since 1987 wolves have denned in the area between Logging Creek and Dutch Creek in April. They also locate their rendezvous sites (safe havens for their pups) in this area until September, when the pups become more mobile and begin traveling more widely with the adult pack members. The wolves choose this location to raise their pups because: 1) it has abundant deer and elk populations to feed growing pups; 2) it has diverse habitat and scattered water sources that support many wildlife species; and most importantly, 3) it is free from human intrusion including motorized vehicles, human food sources, dogs, hunting and trapping.

Wildlife biologist Dr. Diane Boyd (among those signed below) has monitored the movements and dynamics of wolf packs in this area via radio-collar telemetry and trail cameras for nearly 35 years. The cameras reveal the story of how critical this area is not only to wolves, but also to grizzly bears, black bears, mountain lions, and wolverines. During spring and summer, the road between Logging and Dutch creeks is rich with wolf and bear scats that mark the route as an important predator corridor. Dr. Kate Kendall (among those signed below) determined through hair-capture DNA research that the Camas and Dutch Creek area has the highest density of grizzly bears in Glacier Park, and that it was especially important fall-season range for the bears.

Additionally, there is a natural mineral lick on the Inside Road near Anaconda Creek that is heavily frequented by ungulates (and thus their predators). This mineral lick is also where a large bull elk was shot (poached) from the road when the road was open to through motorized

traffic, circa 1990. That elk was found decapitated and abandoned. We believe increased human road traffic may disrupt wildlife patterns associated with this important mineral lick.

Wolves, deer and elk also congregate in this Logging-to-Dutch region seasonally due to the heterogenous habitat that provides critical browse and thermal cover for the ungulates, which in turn benefits the wolves and other predators. The section of road between Logging Creek and Dutch Creek is not your typical doghair lodgepole -- which is found throughout much of the North Fork and is fairly useless for wildlife. Instead this area maintains a diverse matrix of mature Ponderosa pine, larch and Douglas fir, mixed with patches of regenerating lodgepole and spruce, with many interspersed wetlands. This complex mosaic makes it a critical habitat for associated toads, salamanders and other sensitive species. The Inside Road corridor also contains known nesting habitat for the solitary sandpiper, and is among the only such known sites in Montana (far south of the species' predominant breeding range).

We strongly encourage you to conduct a full environmental analysis (EA or EIS) of all potential impacts and opportunities prior to taking action with regard to the road's future use, and to review a complete array of management options in the light of best possible outcomes for all users groups, wildlife, and public safety. The decisions made today will have tremendous effect on the future character of the North Fork and its wildlife heritage, especially given the unprecedented growth in visitation over the past decade, the pressures of climate change, the continuing advance of human technology, and the habitat fragmentation that is severing ties between Glacier National Park and surrounding forest land. None of these dynamics have been adequately considered in existing environmental analyses.

Until an updated NEPA review is completed, we support maintaining the status quo – continued vehicle access to the portions of the Inside Road currently open to motorized use, and continued closure of the ~7 miles currently off-limits to vehicles. We look forward to working closely with you on a new, thoroughly reviewed management plan that preserves the unique characteristics of the North Fork for future generations of residents, visitors and wildlife.

Sincerely,

Dr. Diane Boyd, FWP biologist, ret.
Mr. Chas Cartwright, GNP superintendent, ret.
Mr. Doug Chadwick, biologist/author
Dr. Cristina Eisenberg, OSU biologist
Mr. Steve Gniadek, GNP chief biologist, ret.
Dr. Kate Kendall, USGS biologist, ret.
Dr. Rick Mace, FWP biologist, ret.
Dr. Riley McClelland, GNP/UM biologist, ret.
Dr. Sterling Miller, NWF biologist, ret.
Mr. Tom Parker, naturalist/guide
Mr. Jack Potter, GNP chief of science, ret.
Dr. Chris Servheen, FWS biologist
Ms. Erin Sexton, UM biologist
Mr. Tim Their, FWP biologist, ret.
Dr. John Weaver, WCS biologist
Mr. Rick Yates, biologist