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Submitted via email:
<https://cara.fs2c.usda.gov/Public/CommentInput?project=67436>.

District Ranger and Staff:

Please accept the following comments on the proposed West Reservoir Project on behalf of Council on Wildlife and Fish, the Alliance for the Wild Rockies and Native Ecosystems Council. Friends of the Wild Swan.

Background/Introduction

After reviewing the Scoping announcement, we think the environmental analysis, violates federal environmental law, regulation, and policy. The proposal includes Reconstructing 1.6 miles of existing road and 3.1 miles of new road construction, which when added to the existing road system fails maintain the 2011 baseline, in violation of the Flathead National Forest Plan (Plan). In addition, logging 873 acres in Inventoried Roadless Areas violates the Roadless Rule, and logging in riparian zones adds threats to water quality, and bull trout and jeopardizes spawning areas, which fails to contribute to bull trout recovery, in violation of the ESA (Endangered Species Act). Quite the opposite.

Deliberately burning 2,752 acres of grizzly bear secure core is a wicked act of vandalism and a crime against Nature, in violation of the ESA. Where is the Biological Assessment (BA) and Biological Opinion and Incidental Take Permit (ITP) issued by the U.S. Fish and Wildlife Service (USFWS) for bull trout, grizzly

bear, wolverine and white bark pine? These federally listed species may be present in the Project area.

This landscape contains unusually high wildlife values, including secure habitat and important travel corridors for the threatened grizzly bear, wolverine, lynx, big game species, and old growth associated wildlife species and species associated, and/or dependent upon, unlogged (roadless/unroaded) forest. The project area will also impact white bark pine in ways that cannot be predicted but with potential to infect healthy stands due to scientific uncertainty and confounding variables that cannot necessarily be accurately predicted.

There are special procedures for the proposed seed-tree units over 40 acres. What is unclear is why these oversized units are necessary, or even prudent, given the previous cumulative effects of logging and roadbuilding. Past clearcuts have typically regenerated in humungous brush fields that take decades to restore to conifer forest types.

What is the habitat type of each unit in the Project area?

Because “recommended” wilderness (Est. 15,887 acres) and proposed Wild and Scenic rivers (Est. 4,200 acres) will be impacted by the project, these significant issues elevate the analysis level to an Environmental Impact Statement (EIS). This the only way to fully analyze the direct, indirect and cumulative (past, present and foreseeable future) impacts.

Please admit that climate change is likely to have significant impacts your assumptions/presumptions about the effectiveness of this Project’s proposed actions. Please estimate the current risk of being wrong about ever meeting the presumed, underlying “desired future condition.” Please cite sources for these presumptions/assumptions based on the best available climate science.

Old Growth and Old-growth Habitat

The EIS must also analyze impacts to old-growth dependent wildlife, region 1 sensitive species in addition to threatened and endangered species.

Old-growth forests provide irretrievable and irreplaceable habitat for many animal and plant species. Already below biological minimums, old growth is never maintained or improved by logging and logging road construction. Attributes such

as large old trees, downed woody material, snags and dead trees are key characteristics of old growth forest habitat. Canopy closure provides snow intercept to facilitate movement of wildlife and thermal regulation for big game in summer and winter.

How much old-growth forest habitat is there in the project area? Where is it? What is next to it? How connected is it? Where are mature stands that can be recruited as replacement old growth? What old-growth dependent wildlife are using it? Will this project log in old-growth forest habitat? If so, why? It does not improve habitat for wildlife, plants and other organisms. Old-growth associated species have nowhere else to go. Logging creates local extinctions.

The EIS must map and estimate the amount, location of functioning stands, and the relative connectivity of those stands, and analyze and disclose the adverse effects on old-growth dependent wildlife.

Where are snags and dead-down trees located in the project area? How much do you have? Please analyze and disclose the adverse impacts of logging in these irreplaceable stands. If you are currently operating below biological minimums, what kind of thinking are you using to rationalize destroying more?

Will the Project result in more, or less, sequestered carbon.

Ecosystem processes and functions.

The project is located within the Northern Continental Divide Ecosystem (NCDE), Grizzly Bear Recovery Zone. The Zone is divided into Bear Management Units (BMUs) for habitat evaluation and population monitoring.

The motorized level and density of access is the standard for measuring and tracking the motorized access impacts and indicators in the ecosystem.

Whitebark Pine and Wolverine have relationships to the NCDE. Please consult with the USFWS before making a Decision or issuing a FONSI.

Focal species (multiple) research, monitoring and reporting is the preferred (best available science) means to assess and disclose the ecological conditions required under 219.9 of the 2012 Planning Rule. The Rule calls for "a small subset of species" (219.19) that are **selected based on their functional role in the ecosystem**. Emphasis added.

The Flathead NF has failed to adopt an appropriate monitoring program to measure the effectiveness of the plan in maintaining or restoring ecological conditions at an ecosystem scale, or a forest-wide scale for that matter. Within the NCDE it makes sense to employ proper scientific methodology to use of the same focal species throughout the ecosystem in which they occur (across planning units). Among the multiple forests that comprise the NCDE, no consistency has yet been coordinated or implemented in the various monitoring programs. This means no commitment to ecosystem management under the 2012 Revised Forest Planning Rule, and an opportunity lost to maintain, enhance and protect biological diversity, as required by NFMA § 6(G)(3)(B).

Clearcutting/NFMA§ 6(g)(3)(F) ...insure that clearcutting, seed tree cutting, shelterwood cutting, and other cuts designed to regenerate an even-aged stand of timber will be used as a cutting method on National Forest System lands only where—

(i)

for clearcutting, it is determined to be the optimum method, and for other such cuts it is determined to be appropriate, to meet the objectives and requirements of the relevant land management plan;

(ii)

the interdisciplinary review as determined by the Secretary has been completed and the potential environmental, biological, esthetic, engineering, and economic impacts on each advertised sale area have been assessed, as well as the consistency of the sale with the multiple use of the general area;

(iii)

cut blocks, patches, or strips are shaped and blended to the extent practicable with the natural terrain;

(iv)

there are established according to geographic areas, forest types, or other suitable classifications the maximum size limits for areas to be cut in one harvest operation, including provision to exceed the established limits after appropriate public notice and review by the responsible Forest Service officer one level above the Forest Service officer who normally would approve the harvest proposal: Provided, That such limits shall not apply to the size of areas harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm; and

(v)

such cuts are carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource.

And:

(h) SCIENTIFIC COMMITTEE TO AID IN PROMULGATION OF REGULATIONS; TERMINATION; REVISION COMMITTEES; CLERICAL AND TECHNICAL ASSISTANCE; COMPENSATION OF COMMITTEE MEMBERS

(1)

In carrying out the purposes of subsection (g) of this section, the Secretary shall appoint a committee of scientists who are not officers or employees of the Forest Service. The committee shall provide scientific and technical advice and counsel on proposed guidelines and procedures to assure that an effective interdisciplinary approach is proposed and adopted. The committee shall terminate upon promulgation of the regulations, but the Secretary may, from time to time, appoint similar committees when considering revisions of the regulations. The views of the committees shall be included in the public information supplied when the regulations are proposed for adoption.

The Forest Service has failed “provide for diversity” and to assess and disclose the cumulative impacts of stochastic events, cumulatively with their man-made impacts from industrial-machine logging and roadbuilding with the equally destructive impacts of industrial-machine recreation and residential and commercial development on adjoining state, private and corporate lands. Neither the programmatic Revised Forest Plan, nor the proposed Project consider the

significant combined impacts of private and public plunder on water, wildlife, native fisheries, or quality of life in the NCDE.

The cumulative effects on wide-roaming four-legged creatures and birds are indisputable. Cumulative impacts are self-evident, although the Forest Service eschews any ecosystem-wide environmental analysis and/or disclosure.

It as if the Flathead NC is in total denial of the existence of the ecosystem and its connecting ecological corridors. This ecosystem perspective is foundational and the best available science addressing the reality of existence for all lifeforms in the NCDE. This is a critical failure, ecologically, biologically, morally, and legally. This blindness to ecosystem science and management is systemic.

The 2012 Revised Forest Planning Rule is the direct cause of this myopic perception of the reality of ecosystems and their validity as the best available science when trying to understand the functions and processes that sustain aquatic and terrestrial lifeforms. The Revised Flathead NF Plan and 2012 rule are in violation of NEPA, MFMA, the ESA and APA.

Lynx

The Flathead NF recently promised the Court it did not intend to ‘move forward’ with three ongoing projects until the Court’s Order (Biological Opinion) has been completed. Apparently, the Flathead NF knew about the Westside Reservoir Project, withheld that information from Plaintiffs and the Court, and is implementing this project under the Revised Plan without complying with the Court’s Order, and without a new forest-wide (programmatic) Biological Opinion and ITP issued by the USFWS. That would be ‘contempt of Court’ in my opinion. Comply with the Court’s Order, simple.

What will be the adverse effects (adverse modification) to lynx critical habitat?

How does the Flathead NF ignore the fact that lynx avoid clearcuts. These huge seed-tree units annihilate cover and winter foraging habitat. Please map these valuable habitat areas for lynx.

Please analyze and disclose cumulative effects on the foraging habitat in the Project area. And please map all the previous logging units and haul roads.

Roads/Habitat Effectiveness

How is the current total and open motorized route density adversely affecting grizzly bear core habitat? Please calculate these densities in each grizzly bear subunit and indicate if the subunit is growing bears, or is maintained as a 'sink.' Is this Project contributing to grizzly bear recovery? Where is the Court-ordered new BO?

Please analyze and disclose how these excessive road impact R-1 sensitive species.

Wolverines avoid human disturbance(s). Please do consult with the US Fish and Wildlife Service on impacts to wolverine. More road access increased wolverine deaths from poaching, trapping and displacement from preferred areas due burning, and mechanized recreational thrill seeking. Wolverines avoid roads and thrive in habitats with secure vertical habitat (low 3,350' to high 7,550'). Roads traverse landscapes, fragmenting these vertical habitat preferences. Fragmentation is always bad for wildlife. Habitat fragmentation is a primary factor in the present extinction epidemic.

Fragmentation destroys ecosystem function. switch from being predominantly internally driven to being predominantly externally driven. Fragmentation is deadly for migrant songbirds.

This project must analyze a NEPA alternative that reduces fragmentation. Many bird and wildlife species will die if the Flathead insists on continuing clearcut logging and logging road construction and reconstruction. There are already too many roads. Enough already.

Monitoring, what monitoring?

The Revised Flathead Plan is described as an "adaptive" programmatic management strategy and system. Without monitoring, no adaptive management system can perform adequately. NO exceptions.

The following is what is required as per the 2012 Planning Rule:

§ 219.12 Monitoring. (a) Plan monitoring program. (1) The responsible official shall develop a monitoring program for the plan area and include it in the plan. Monitoring information should enable the responsible official to determine if a

change in plan components or other plan content that guide management of resources on the plan area may be needed. The development of the plan monitoring program must be coordinated with the regional forester and Forest Service State and Private Forestry and Research and Development. Responsible officials for two or more administrative units may jointly develop their plan monitoring programs. (2) The plan monitoring program sets out the plan monitoring questions and associated indicators. Monitoring questions and associated indicators must be designed to inform the management of resources on the plan area, including by testing relevant assumptions, tracking relevant changes, and measuring management effectiveness and progress toward achieving or maintaining the plan's desired conditions or objectives. Questions and indicators should be based on one or more desired conditions, objectives, or other plan components in the plan, but not every plan component needs to have a corresponding monitoring question. (3) The plan monitoring program should be coordinated and integrated with relevant broader-scale monitoring strategies (paragraph (b) of this section) to ensure that monitoring is complementary and efficient, and that information is gathered at scales appropriate to the monitoring questions. (4) Subject to the requirements of paragraph (a)(5) of this section, the responsible official has the discretion to set the scope and scale of the plan monitoring program, after considering: (i) Information needs identified through the planning process as most critical for informed management of resources on the plan area; and (ii) The financial and technical capabilities of the Agency. (5) Each plan monitoring program must contain one or more monitoring questions and associated indicators addressing each of the following: (i) The status of select watershed conditions. (ii) The status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems. (iii) The status of focal species to assess the ecological conditions required under § 219.9. (iv) The status of a select set of the ecological conditions required under § 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern. (v) The status of visitor use, visitor satisfaction, and progress toward meeting recreation objectives. (vi) Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area. (vii) Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities. (viii) The effects of each management system to determine that they do not substantially and permanently impair the productivity of the land (16 U.S.C. 1604(g)(3)(C)). (6) A range of monitoring techniques may be used to carry out the monitoring requirements in paragraph (a)(5) of this section. (7) This section does not apply to projects or activities. Project and activity monitoring may be used to gather information for the plan monitoring program, and information gathered

through plan monitoring may be used to inform development of projects or activities. But, the monitoring requirements of this section are not a prerequisite for making a decision to carry out a project or activity. (b) Broader-scale monitoring strategies. (1) The regional forester shall develop a broader-scale monitoring strategy for plan monitoring questions that can best be answered at a geographic scale broader than one plan area. (2) When developing a monitoring strategy, the regional forester shall coordinate with the relevant responsible officials, Forest Service State and Private Forestry and Research and Development, partners, and the public. Two or more regional foresters may jointly develop broader-scale monitoring strategies. (3) Each regional forester shall ensure that the broader-scale monitoring strategy is within the financial and technical capabilities of the region and complements other ongoing monitoring efforts. (4) Projects and activities may be carried out under plans developed, amended, or revised under this part before the regional forester has developed a broader-scale monitoring strategy. (c) Timing and process for developing the plan monitoring program and broader-scale strategies. (1) The responsible official shall develop the plan monitoring program as part of the planning process for a new plan development or plan revision. Where a plan's monitoring program has been developed under the provisions of a prior planning regulation and the unit has not initiated plan revision under this part, the responsible official shall modify the plan monitoring program within 4 years of the effective date of this part, or as soon as practicable, to meet the requirements of this section. (2) The regional forester shall develop a broader-scale monitoring strategy as soon as practicable. (3) To the extent practicable, appropriate, and relevant to the monitoring questions in the plan monitoring program, plan monitoring programs and broader-scale strategies must be designed to take into account: (i) Existing national and regional inventory, monitoring, and research programs of the Agency, including from the NFS, State and Private Forestry, and Research and Development, and of other VerDate Mar2010 15:15 Apr 06, 2012 Jkt 226001 PO 00000 Frm 00107 Fmt 4701 Sfmt 4700 E:\FR\FM\09APR2.SGM 09APR2 pmangrum on DSK3VPTVN1PROD with RULES_2 21268 Federal Register / Vol. 77, No. 68 / Monday, April 9, 2012 / Rules and Regulations governmental and non-governmental entities; (ii) Opportunities to design and carry out multi-party monitoring with other Forest Service units, Federal, State or local government agencies, scientists, partners, and members of the public; and (iii) Opportunities to design and carry out monitoring with federally recognized Indian Tribes and Alaska Native Corporations. (d) Biennial evaluation of the monitoring information. (1) The responsible official shall conduct a biennial evaluation of new information gathered through the plan monitoring program and relevant information from the broader-scale strategy, and shall issue a written report of the evaluation and make it available to the public. (i) The first monitoring evaluation

for a plan or plan revision developed in accordance with this subpart must be completed no later than 2 years from the effective date of plan decision. (ii) Where the monitoring program developed under the provisions of a prior planning regulation has been modified to meet the requirements of paragraph (c)(1) of this section, the first monitoring evaluation must be completed no later than 2 years from the date the change takes effect. (iii) The monitoring evaluation report may be postponed for 1 year in case of exigencies, but notice of the postponement must be provided to the public prior to the date the report is due for that year (§ 219.16(c)(6)). (2) The monitoring evaluation report must indicate whether or not a change to the plan, management activities, or the monitoring program, or a new assessment, may be warranted based on the new information. The monitoring evaluation report must be used to inform adaptive management of the plan area. (3) The monitoring evaluation report may be incorporated into other planning documents if the responsible official has initiated a plan revision or relevant amendment. (4) The monitoring evaluation report is not a decision document representing final Agency action, and is not subject to the objection provisions of subpart B.

Please present in the EIS a comparison between minimum monitoring requirements, which are mandated by 1) the 2012 Forest Planning Rule, and 2) The Revised Flathead Forest Plan, and 3) actual monitoring accomplishments (a plan monitoring program; a broader-scale, R-1 monitoring strategy; or a Biennial evaluation of the monitoring information, or a “first monitoring evaluation...?”) since adoption of the new Forest Plan.

So, where is the Revised Flathead Forest Plan monitoring report 2019 - 2020 which, apparently, has not been finalized since 2022.

Does the Revised Forest Plan need to be amended? Revised again? How is this integral relationship between the adaptive management and non-discretionary monitoring requirements working, or not working? I cannot stress enough that monitoring is integral to all “adaptive management” program/strategy. The Flathead is no exception.

How can the Flathead proceed with this Project with no monitoring reports or evaluations providing the essential feedback loop to guide future management decisions. What monitoring will be done for wildlife and fish? What will be monitored to evaluate old growth, old-growth habitat and old-growth associated species?

Without monitoring how can the Flathead determine whether the proposed management actions will ever achieve the projected (assumed) desired results?

The “First” Flathead Forest Plan monitoring report must be issued before NEPA compliance on this proposed Project can be realized? This Project cannot be tiered to an “adaptive” Forest Plan with no monitoring evaluation report. **NO adaptive management plan can survive without an effective monitoring program, diligent implementation, and reporting/evaluations.** Emphasis added.

Water Quality/Native Fish

The Clean Water Act requires that federal agencies protect water quality and comply with state water quality standards on National Forest system lands. *Marble Mountain Audubon Soc. v. Rice*, 914 F.2d 179, 182 (9th Cir. 1990); *Oregon Natural Resources Council v. U.S. Forest Service*, 834 F.2d 842, 848 (9th Cir. 1987); *Northwest Indian Cemetery Protective Ass’n v. Peterson*, 794 F.2d 688, 697 (9th Cir. 1987); 33 U.S.C. 1323(a) (“Each department, agency, or instrumentality of the executive [branch] . . . shall be subject to, and comply with, all Federal, State, interstate, and local requirements, administrative authority, and process and sanctions respecting the control and abatement of water pollution”); 16 U.S.C. 1604(g)(3)(E)(iii) (timber may be harvested only where “protection is provided for streams, streambanks shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment”); 36 C.F.R. 219.23(d) (“Forest Planning shall provide for -- Compliance with requirements of the Clean Water Act, the Safe Drinking Water Act, and all substantive and procedural requirements of Federal, State and local governmental bodies”) and 36 C.F.R. 219.27(a)(4) (“All management prescriptions shall . . . Protect streams, streambanks, shorelines, lakes, wetlands and other bodies of water”).

Despite all these promises, native fish populations are in steady decline, including threatened bull trout. Each state where bull trout are present maintain inventories of thousands of “impaired” waterbodies on a (§ 303(d)) list.

33 USC §1313(d). Please list all listed waterbodies in the Project area, the cause of impairment, and the date they were first listed.

Literally thousands of listed segments in the bull trout recovery area are not meeting state water quality standards or failing to meet designated uses due to identified, and preventable, man-made causes.

States are required to develop Total Maximum Daily Loads (TMDL) for these waters (33 USC Sec 1313 (d)(1)(c)). TMDLs are designed to address all sources of pollution limiting the water quality of the public waters and should include point and non-point

sources of pollution, such as sediment generated from logging, and agricultural activities, just to name a couple of major contributors. In the absence of a TMDL federal agencies have a duty to avoid further degradation of impaired stream segments.

TMDLs have not been completed for hundreds, if not thousands, of impaired waterbodies on state 303(d) lists. Many others have TMDLs completed but languish on the list for failure to implement TMDL recommendations. There is no regulatory enforcement mechanism to force polluters to stop polluting. There is no time mandated to accomplish TMDL goals or meet state water quality standards. Of course, the longer cleanup is delayed, the longer bull trout suffer in decline toward extinction.

If a TMDL exists, please comply with all proposed remedies in the ‘cleanup plan’ without delay.

State and federal agencies rely on Best Management Practices (BMPs) to mitigate impacts of erosion, sediment overloads, and increase nutrients to comply with the Clean Water Act and state of Montana regulations. BMPs have proven to be an ineffectiveness means of mitigating the effects of logging. BMPs have failed to protect water quality. BMPs are a significant threat to bull trout. This constitutes an unauthorized “taking” of bull trout that was not quantified or authorized in an ITP (Incidental Take Permit) issued by the USFWS. Where is your BA and BO?

The Forest Service routinely fails to monitor the effectiveness of BMPs. Failed monitoring implementation leads directly to agency ignorance of effects of management-induced sediment on bull trout. Without proper monitoring is impossible to evaluate the cumulative effects of repeatedly relying on the untested and unmonitored effectiveness of the BMPs.

BMPs fail to protect and improve water quality because of the allowance for “naturally-occurring degradation.” In Montana, “naturally-occurring degradation” is defined in ARM 16.20.603(11) as that which occurs after application of “all reasonable land, soil and water conservation practices have been applied.” In other words, damage caused directly by sediment (and other pollution) is acceptable as long as BMPs are applied. The result is a never-ending, downward spiral for water quality and native fish.

Here’s how it works:

- Timber sale #1 generates sediment damage to a bull trout stream, which is “acceptable” as long as BMPs are applied to project activities.

- “Natural” is then redefined as the stream condition after sediment damage caused by TS #1.
- Timber sale #2 – in the same watershed – sediment damage would be acceptable if BMPs are applied again – same as was done before.
- “Natural” is again redefined as the stream condition after sediment damage caused by TS#2.

The downward spiral continues with disastrous cumulative effects on bull trout and most aquatic life. This is precisely how, and why, hundreds, if not thousands of bull trout watersheds languish on 303(d) lists, not meeting state water quality standards – not supporting beneficial uses, native bull trout populations.

BMPs are not “reasonable.” Clearly, beneficial uses are not being protected. In Montana, state water quality policy is not being followed. § 75-5-101 et seq. and ARM 16.20.701 et seq. Reliance on BMPs does not represent a reasonable “road map to recovery.” 50 CFR 402.02.

BMPs cannot be trusted as an “objective measureable criteria” by which to monitor recovery ((16 U.S.C. § 1533(f)), or for a gateway to achieving bull trout recovery plan “goals for the conservation and survival of the species.” 16 U.S.C. § 1533(f)(1)(B)(i).

USFWS cannot rely on state water quality policy, as currently practiced, to recover bull trout. Policy and practice represent “inadequate regulatory mechanisms,” which makes continued future deterioration of bull trout habitat highly likely. 16 U.S.C. § 1533(a), (b), (c).

How will logging in RMZs contribute to recovery of bull trout and other native fish species?

Please analyze and disclose how this project will adversely impact fish habitat and water quality? Please stay out of riparian areas. NO machines, no logging, no burning, just leave them alone.

The EIS must use the best available science to analyze and disclose to the public the adverse effects logging riparian habitat harms native fish, native fish habitat and water quality. Stream crossings adversely impact fish habitat and water quality. Roads not be constructed and upgraded, and should instead should be decommissioned and all culverts removed, returning the original slope and grade.

Quintonkin creek is a bull trout spawning stream and bull trout critical habitat. This should remain a no-action zone.

Because this is bull trout critical habitat and westslope cutthroat trout habitat there should be no increase in (suspended, or bedload) sediment. Fine-sediment deposition is a known killer of spawning/emerging and juvenile salmonids.

The Revised Flathead Forest Plan removed (arbitrarily) forestwide standards for sediment, temperature, pool frequency and bank stability. How will adaptive management measure pollution levels against a baseline with no management standards?

The project relies on decades of failed BMPs to protect water quality and fish habitat. There is no correlation between BMPs and water quality and native fish outcomes.

Please admit that the Project area contains recommended wilderness (15,887 acres) and proposed Wild and Scenic rivers (4,200 acres) and that the Project fails to conform to the Flathead Forest Plan.

See: Suitability MA 1B Suit contains limitations on activities in recommended wilderness:

02 Recommended wilderness areas are not suitable for timber production; timber harvest is not allowed.

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 recommendation are maintained and protected.

04 Recommended wilderness areas are not suitable for road construction or reconstruction.

06 Mechanized transport and motorized use are not suitable in recommended wilderness areas.

07 The Jewel Basin hiking area is not suitable for motorized use, mechanized transport, and stock use.

The Project also violates the Roadless Rule and the Wilderness Act by failing maintain and improve existing high-quality wilderness characteristics. This is shameful and illegal neo-colonialism (dominance, commodification and domestication).

We thank you for this opportunity to comment and express our concerns.

Sincerely,

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