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Organization: Friends Of The Wild Swan

Title: Program Director

Comments: Attached are Friends of the Wild Swan's comments on the Flathead National Forest Plan Suitability Changes: Winter Travel Management Recommended Wilderness Environmental Assessment. Please acknowledge that you received them.

Friends of the Wild Swan

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May 6, 2024

Flathead National Forest

Attn: Anthony Botello

650 Wolfpack Way

Kalispell, MT 59901

Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=61460>

Mr. Botello,

Please accept the following comments on the Flathead National Forest Plan Suitability Changes: Winter Travel Management Recommended Wilderness Environmental Assessment on behalf of Friends of the Wild Swan. We incorporate by reference the comments submitted by Swan View Coalition.

[bull] We support that public mechanized and motorized vehicles will not be allowed in Recommended Wilderness Areas or trails leading to them. However, we disagree with allowing mechanized use, helicopters and other motorized vehicles by Forest Service personnel. This can have detrimental impacts to proposed wilderness values. The Flathead has conducted trail clearing and other non-impactive activities in recommended wilderness and wilderness for many years without the use of mechanized or motorized equipment and should continue to do so.

Whitebark pine restoration should be conducted outside of recommended wilderness since these are experimental treatments.

[bull] Damage to whitebark pine from snowmobiles running over them is not adequately addressed or analyzed in the EA. Why is it necessary to allow 2,122 acres of whitebark pine predicted range as open to snowmobiling?

These are trees and a threatened species, they cannot move out of the way. This is an impact to their survival and recovery yet it is given scant attention in the EA.

[bull] The EA is ambiguous regarding monitoring of whitebark pine.

Page 19: "In accordance with 36 CFR 212.57, we would monitor the effects of over-snow vehicle use in designated areas to ensure compliance with design features. We would consider monitoring options to assess potential over-snow vehicle damage to whitebark pine in the acres proposed for designation of over-snow vehicle use in the Upper North Fork, Canyon and Big Creeks, and Skyland Challenge areas." (emphasis added)

Page 87: "Flathead National Forest would consider monitoring options to assess potential over-snow vehicle damage to whitebark pine within the project area. Specifically, monitoring would try to assess potential over-snow vehicle impacts to whitebark pine populations and high-value, cone-bearing individuals in targeted areas within the project area. (emphasis added)

Rather than trying to assess damage already done the Flathead should just outright keep snowmobiles out of whitebark pine predicted range.

[bull] The EA does not evaluate the cumulative impacts to wildlife from increasing the Canyon creek and Big creek snowmobile areas in addition to the Whitefish Mountain ski area and other non-motorized users. Especially since the 12% and 51% increases in the Canyon/Big creek areas are in maternal wolverine habitat.

[bull] There is no conservation strategy or recovery plan for wolverine so increasing snowmobile activity in wolverine habitat is not appropriate until the appropriate standards for recovery are in place.

Please keep us informed.

/s/Arlene Montgomery

Program Director