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April 29, 2014 9:55 AM

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Snowmobiles in Griz Denning Habitat

4 Attachments, 1.1 MB

Chip Weber, Jodi Bush and Mike Munoz;

Attached is FWS's Biological Opinion on Flathead Forest Plan Amendment 24, which allows snowmobiling until May 15 in the Skyland/Challenge area, among others.

On pages 57- 59 are the non-discretionary Terms and Conditions I read from at the NCDE meeting last Wednesday, which are legally necessary to limit harm and "taking" of grizzly bears by snowmobiling and to "ensure adequate protection to known and discovered grizzly bear den sites and post-emergent females with cubs."

In particular, T&C #8 requires that you confer "In the event that one female with young is detected in any of the four 'extended use areas' during the 'extended use seasons'" in order to "develop and implement, if necessary, any protective measures related to snowmobile use in the area."

Rick Mace provide this photo of a female emerging from her den in the Skyland area which he suspects had young due to tracks near the den.





Moreover, Mike Madel presented photos showing unlawful snowmobiles in the Badger Two-Medicine area that enter from the FNF Skyland "extended season" area - and their some hundred-yard proximity to his "Two Med" female's den site of last year and the location of her now-dropped telemetry collar. Here are two of Mike Madel's photos and, as we recall, Two Med's den site was nearby to the left and below the pictured snowmobile, with her now-dropped collar to the right (you'll need to confirm this with Mike Madel).





Because the unlawful snowmobiles are entering the Badger Two-Medicine area near den site(s) via the FNF, Amendment 24 Terms and Conditions apply here as well as to the Skyland area itself.

Moreover, Amendment 24's T&C #5 requires that "In the event that an occupied grizzly bear den site is located:

- a) The Forest shall notify the Service within 48 hours, and shall confer with the Service to evaluate the site-specific information . . .
- b) If the den site appears exposed to impacts from snowmobiles, the Forest shall take appropriate measures to protect the site . . ."

Rick Mace's report alone requires you confer about what to do to protect grizzly bears NOW in the Skyland area, and Mike Madel's report indicates immediate protections are also necessary in the Badger Two-Medicine to protect known den site(s) there threatened by snowmobiles entering illegally from the Skyland area.

We ask that you firstly confirm that you indeed initiated consultation within 48 hours of being notified of these den sites and concerns.

We ask that you immediately close the Skyland/Challenge "extended use" area and the Skyland road to snowmobiles at U.S. Highway 2 for the remainder of the "season" to protect these known den sites in the Skyland and Badger Two-Medicine areas - and enforce the closure via law enforcement presence at Highway 2 and along Skyland Road.

We ask further that you remove all late-season snowmobile areas during Flathead Forest Plan revision and return to the pre-Amendment 24 Forest-wide snowmobile closing date of March 15 to protect grizzly bears emerging from winter dens.

The attached Amendment 24 BiOp makes it clear how unlikely it is that snowmobiles near den sites will be detected due to the vast area that needs to be monitored and other factors. We are presented this opportunity to set things right only because of some astute monitoring on the part of MDFWP and their willingness to step forward at the NCDE meeting and via reports to the Forest Service. We ask that you consider how much of this activity is going undetected across the Flathead National Forest, both in "extended use areas" as well as unlawfully in other areas (like the unlawful snowmobiling I documented in the Camp Misery area on April 19, 2014 and reported to you at the NCDE meeting) and rescind the reckless "extended use" provisions of Amendment 24.

Please let us know ASAP what you are doing about this.

Thank you,

Keith



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