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Organization: Wilderness Watch

Title: Conservation Director

Comments: Dear Supervisor Botello,

Please accept these comments from Wilderness Watch on Flathead Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness EA. Wilderness Watch is a national wilderness conservation organization headquartered in Missoula. Our mission is the protection and proper stewardship of all units of the National Wilderness Preservation System, including Recommended and Potential Wildernesses such as those on the Flathead.

#### Uses Not Allowed in Recommended Wilderness Areas (RWAs)

We appreciate that public use of mechanized vehicles will not be allowed in RWAs, nor on a number of trails leading into RWAs. We still do not agree with allowing administrative use of mechanized and motorized vehicles and equipment in RWAs. Moreover, the newly proposed language to allow for these administrative exemptions is overbroad and allows any kind of motorized use. There are plenty of places outside RWAs for the Forest Service to conduct whitebark pine restoration and trails can be maintained without motorized vehicles or tools. Ditto for igniting prescribed fires.

If the protection and restoration of whitebark pine is such a big issue in the EA, why does it not propose more areas closed to OSVs to prevent damage to whitebark pine? Why does the EA, at 19, say only that "We would consider monitoring options to assess potential over-snow vehicle damage to whitebark pine the acres proposed for designation of over-snow vehicle use in the Upper North Fork, Canyon and Big Creeks, and Skyland Challenge areas?" "Consider" is a wholly non-committal word and aren't there also whitebark pine in areas open to OSVs in the Swan Range, for example?

Nor does the EA revisit the selection of RWAs (EA at 1) in the face of numerous changed circumstances, among them the listing of wolverine and whitebark pine as threatened species and the documented shortening of the grizzly bear denning season, all in the face of climate change. Where is the practice of "adaptive management" in these matters, as the Forest Service so often claims as its policy? The EA and this planning process instead demonstrate stubborn inertia and unwarranted faithfulness to outdated circumstances and political tradeoffs.

The Forest Service must manage RWAs as if they were designated Wilderness. To allow any administrative motorized uses in RWAs embeds a constituency for those motorized uses and will make it difficult for the Forest Service to terminate such uses if and when Congress designates the RWAs as Wilderness. Don't create a massive headache for a future Forest Supervisor.

Wilderness Watch fully supports the comments submitted on this EA by the Swan View Coalition and incorporates them by reference.

Sincerely,

Kevin Proescholdt

Conservation Director

Wilderness Watch