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Comments: Anthony Botello, Forest Supervisor

Flathead National Forest

650 Wolfpack Way

Kalispell, MT 59901

Re: Flathead National Forest Plan Suitability Changes: Winter Travel Management and Recommended Wilderness Project, Draft Environmental Assessment

Submitted electronically: https://cara.fs2c.usda.gov/Public/CommentInput?Project=61460

May 6, 2024

Dear Supervisor Botello:

Thank you for the opportunity to comment on the Flathead National Forest (FNF) Plan Suitability Changes: Winter Travel Management and Recommended Wilderness Project, Draft Environmental Assessment (EA/Plan). On behalf of the National Parks Conservation Association (NPCA) and our 1.6 million members and supporters nationwide, I submit the following comments.

Formed in 1919, NPCA's mission is to protect and enhance America's National Park system now and for future generations; nationwide we continue to fulfill this mission by working to connect our National Parks with their surrounding landscapes and maintaining connectivity important for wide ranging wildlife species.

As a founding member of the Whitefish Range Partnership (WRP) we want to acknowledge and thank the FNF for taking our WRP recommendations seriously. Our collaborative group spent many hundreds of hours working toward unanimity and consensus, and each of our original recommendations was crafted as a balanced part of the entire WRP forest planning package. We appreciate that the final pieces of our agreement on snowmobiling and recommended wilderness management are finally being enacted. We would highlight that the WRP agreement was finalized long before the wolverine was listed under the Endangered Species Act (in November of 2023), so while we continue to be supportive of the analysis of suitable Over Snow Vehicle (OSV) additions in the Whitefish Range, we believe that the FNF needs to do a more thorough analysis of the impacts of OSV use to wolverines and at the forest level not just in these areas proposed for changes in this project. We suspect that many of the currently open areas under Amendment 24 (which the FNF just carried forward without site-specific review) contain important wolverine maternal denning habitat and should actually be closed to OSV use.

We also appreciate that the FNF for taking these steps to implement the suitability changes in the 2018 forest plan and that the FNF was responsive to the comments we, and many others made, during scoping for this project.

We continue have some concerns around what is being proposed and some ideas for changes to be made to the amendment language.

Recommended Wilderness

We are fully supportive of prohibiting motorized use and mechanized transport through the issuance of a long-term closure order for the recommended wilderness areas (RWA's) across the forest. This closure order is necessary to meet the management directive's set forth in the 2018 forest plan. This decision to "to prohibit public use of mechanized transport and motorized use in recommended wilderness areas" (RWAs), (Footnote 1) will align travel management with suitability determinations in the 2018 forest plan, which is necessary to protect the social and ecological characteristics of these areas that make them worthy of future wilderness designation by Congress. It is also consistent with Forest Service directives (Footnote 2) and federal policy for management of recommended wilderness (Footnote 3).

We appreciate the FNF's responsiveness to our comments during the scoping phase of this project, in deciding to close "short segments of trails that occur just outside of recommended wilderness," (Footnote 4) as initiating a closure order at a trailhead, junction or other clear geographic reference point will "make for more intuitive trail closures to users" (Footnote 5) and increase compliance.

We support and second the additional recommended trail closures cited by the Glacier-Two Medicine Alliance (GTMA) in their comments. In addition, we would include a couple of sections of trails in the Whitefish Range that, following this logic, should be added to the list of trail segments in Table 7 on page 18 of the EA that are proposed to be closed to mechanized transport (we would also note, due to the scale/light coloring of the maps and lack of contour lines, it's difficult to see where the RWA boundary intersects with trails, so there may be natural boundaries that exist. In the future those should be included on maps that the FNF releases as part of projects). These segments include:

1. Trail #13 from Trail Creek Road to the RWA boundary. On the current map on page 85, this section remains open to mechanized use, but a clearer closure would be at the trailhead, instead of at the RWA boundary.
2. Trail #375 from the Link Lake/Lake Mountain/Nasukoin Trailhead to the RWA Boundary. As with the other proposed segments for closure this is a more intuitive and enforceable closure than the RWA boundary.
3. Trail #374 from the Whitefish Divide trail to the RWA boundary. As with other trail sections, it would be a more intuitive closure at the junction rather than partway down the trail.

We also believe that trail #91 in the Alcove-Bunker RWA should be closed to motorized and mechanized use, as having a trail corridor through an RWA is an invitation for trespass into the surrounding RWA.

Motorized Over Snow Vehicle Use

Overall, we are supportive of the over snow vehicle (OSV) closures included in this amendment. In particular, we are happy to see the closure of Puzzle Creek in the Skyland area. This route has long been a source for trespass into the adjoining Badger Two-Medicine area of the Helena-Lewis and Clark National Forest (HLC), which is closed to motorized use. Since the Badger Two-Medicine area is a designated Traditional Cultural District and

the Blackfeet have long supported the non-motorized management of that area, and the HLC has committed to that type of management, we are glad to see that with this proposal the cross-jurisdictional management is the same. We would suggest that the FNF should go further and close the 1.5 miles of groomed route from Morrison down puzzle creek. Since this is a very short dead-end route, it's closure would create a more intuitive and clean boundary line for OSV use in this area.

We continue to have concerns around opening the polygon labeled "Marias Pass" all the way to the Continental Divide. Trespass into the non-motorized Badger-Two Medicine area of the HLC through this terrain is already a problem. The Continental Divide is also geographically indistinct in this area. While we agree with the FNF that a shorter boundary will be easier to patrol and enforce, the same outcome can be had by moving the boundary downslope and away from the Continental Divide. This should include moving the existing open area on Flattop Mountain downslope closer to the East Skyland Rd. # 1653. A downslope adjustment would better protect wildlife and cultural resources in the Badger-Two Medicine from inadvertent trespass, as well as non-motorized winter recreational use on all sides of Flattop Mountain. The adjustment would also create a contiguous, non-motorized corridor for wildlife west of the divide from Highway 2 to the Bob Marshall Wilderness Complex.

While we support the designation of the polygons labeled "Elk Calf Mountain" and "Skyland Challenge" as open to OSVs, we disagree with the proposal that they be open Dec 1-May 14. The FNF should rethink all of it's late-season snowmobile areas, since we are seeing earlier emergence of grizzly bears as snowpack lessens and the climate warms. At the very least the FNF should commit to immediate closure of any late season OSV use if grizzlies are detected in the area.

Additionally, the FNF must do a better job of considering impacts to existing non-motorized recreational uses in the area around Marias Pass. Backcountry skiers currently ski runs on the both the west and east side of Flattop Mountain. This area provides an easily accessible unique backcountry experience, particularly on days when avalanche danger is high, that is available to all levels of fitness and experience. Rather than just assume that non-motorized users will adjust to the new motorized uses in the area, the FNF should consider the potential for user conflicts, and that non-motorized users will not just move away.

Wolverine

The US Fish and Wildlife Service listed wolverines in late 2023 as a threatened species under the Endangered Species Act (ESA). One of the key factors that warranted the listing is the loss of reliable denning habitat due to declines in snowpack, a phenomenon largely driven by climate change. The listing decision also identified winter recreation as a threat to their continued persistence (Footnote 6). Female wolverines in particular tend to avoid areas of dispersed motorized winter recreation (Footnote 7). Frequent disturbance can lead to den abandonment (Footnote 8). The impact of winter recreation, the decision asserts, is likely to grow over time as climate change reduces the areas of deep persistent snow, concentrating recreationists and wolverine mothers closer together. As well, it's been noted that as winter recreation increases in frequency so too does the level of disturbance. This is of particular importance when the FNF is stating that the closing of OSV use in the Sullivan Creek area is equivalent to the opening of lands in the Canyon/Big Creek area. The Sullivan Creek area is currently minimally used, due to the remote nature of the area, (Footnote 9) whereas the Canyon/Big Creek area is likely to be heavily used, given its proximity to currently open OSV areas and because it's easily accessible from the Flathead Valley. This "trade" is not to the benefit of wolverine's on the FNF.

Under the ESA, the Flathead has an obligation not just to minimize impacts to the current population, but to actively maximize wolverine recovery. The densest, most significant wolverine population in the lower 48 states is in Glacier National Park. The FNF contains outstanding wolverine habitat, including dispersal and reproductive habitat, most of which is assumed to be lightly or unoccupied at present. Protecting this habitat is likely critical to

the initial recovery of wolverines. In determining which suitable acres to designate as open, and which currently open acres to close, the Flathead should prioritize wolverine recovery over accommodating motorized recreation enthusiasts' access. The best available science suggests that minimizing motorized winter recreation in areas of suitable wolverine denning habitat would benefit wolverine survival and reproductive success. At the very least, the Flathead should not expand the motorized winter recreation footprint until better data on wolverines on the forest, including population and habitat data, exists and the USFWS has established a recovery plan.

To that end, we recommend closing the approximately 1.5 miles of groomed route beyond the warming hut in the Skyland / Challenge snowmobile area (i.e. the final stretch of Road 569.1) as this lies within modeled wolverine maternal denning habitat (Footnote 10). Given this area's high elevation and close proximity to wolverines in Glacier National Park, it is likely to remain good denning habitat much longer than some other areas of the forest. We also recommend against designating any additional acreage in the Whitefish Range that is classified as suitable yet falls within modeled wolverine maternal denning habitat per the 2018 forest plan (Footnote 11). This underscores the need for comprehensive winter recreation travel planning as discussed below.

We also are unclear why the Flathead chose to analyze impacts to wolverine at the forest-wide scale, rather than at a more granular scale, such as the home range of a female wolverine (Footnote 12). The forest-wide scale seems rather arbitrary; given the lack of data on wolverine occupancy on the forest we believe that the FNF should operate under presumed occupancy of maternal denning habitat and conduct its analysis as such. The forest-wide scale may miss localized, yet biologically significant, effects on individual or small concentrations of wolverines. The scientific basis for the analytical scale needs to be justified in the record of decision.

Programmatic Amendment

In regard to the proposed amendment to MA1b-SUIT-06, we continue to have concerns around the broad-brush language that the FNF is proposing. As proposed, the language could potentially allow administrative use of wheeled or tracked transport in RWA's, along with the FNF's stated desires of using chainsaws to clear the trails, particularly to Thoma Lookout; for whitebark pine restoration; and for using helicopters to light prescribed burns.

The revised suitability language suggested in the draft EA is overly broad and permissive; it needs to be tightened to prevent the use of ground disturbing transportation or equipment, and to ensure consistent application as Forest Service staff turns over. To that end, we and others, suggested during scoping the FNF adopt language similar to the language adopted by the Custer-Gallatin National Forest in their revised forest plan. The FNF instead opted to propose language similar to that of the HLC National Forest's revised forest plan. However, there is a key difference between the suitability provisions in the HLC Forest plan and the proposed language in the draft EA. The HLC's suitability components limit motorized use in RWAs to motorized equipment, like a chainsaw. The proposed language in the draft EA would allow the Forest to use wheeled or tracked vehicles to transport people and equipment, or perform work such as falling conifers encroaching on whitebark pine stands or establish fire breaks for prescribed fire. The use of ground disturbing vehicles and equipment, even if used solely to restore whitebark pine will degrade wilderness character and invite the public to unlawfully use off-highway or over-snow vehicles in the RWA.

Conversations with FNF staff and review of the Final Environmental Impact Statement for the revised forest plan indicate the Flathead's objective with the proposed amendment is primarily to clarify its authority to use helicopters and chainsaws to conduct whitebark pine restoration, a federally-protected species whose recovery and restoration we fully support. If the FNF determines it cannot conduct the necessary work without amending the forest plan, we suggest the FNF adopt the following language for MA1b-Suit-06:

Mechanized transport and motorized use are not suitable in recommended wilderness areas. Exception may be

made for the administrative use of handheld motorized or mechanized equipment, or for the use of helicopters, to accomplish low impact restoration activities (for example, management of ignited fires or using chainsaws to reduce stand densities around whitebark pine trees) that protect or enhance the wilderness characteristics of these areas.

This language would maintain the clear existing suitability determination in the first sentence. It then combines language from the Helena-Lewis and Clark, Custer Gallatin, and draft EA to achieve the FNF's objective of greater agency flexibility for whitebark pine restoration, while also providing greater certainty to the public and consistency in application.

We appreciate that the forest has taken steps to fulfill planning commitments made through the 2018 forest planning process. We are looking forward to continuing to engage on this process as it moves forward. Please feel free to reach out for clarification or questions.

Sincerely,

Sarah Lundstrum

Glacier Senior Program Manager, National Parks Conservation Association

Whitefish, MT

Footnotes:

1 Draft EA, p. 14

2 Forest Service Manual 1923.03

3 36 CFR [sect] 219.15(e); 36 CFR [sect] 219.10(b)(1)

4 Draft EA, p. 17

5 Draft EA, p. 18

6 Endangered and Threatened Wildlife and Plants; Threatened Species Status With Section 4(d) Rule for North American Wolverine. Available at https://www.federalregister.gov/documents/2023/11/30/2023-26206/endangered-and-threatened-wildlife-and-plants-threatened-species-status-with-section-4d-rule-for

7 Heinemeyer 2019. Available at https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.2611

8 Ibid

9 Draft EA, p. 55

10 See Forest Plan FEIS Volume 4, Figure 1-19

11 Ibid

12 Draft EA, p. 22