

NORTH FORK PRESERVATION ASSOCIATION

77 Moose Creek Rd, Polebridge, MT 59928

Chip Weber
Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

September 30, 2016

Forest Supervisor Weber:

Thank you for the opportunity to comment on the Flathead National Forest Draft Forest Plan & Environmental Impact Statement. The draft Forest Plan and EIS represents a tremendous amount of work and we applaud the Flathead Forest for its diligence in this process.

The North Fork Preservation Association (NFPA) works to protect and preserve the **Watershed, Wilderness, and Wildlife** of the North Fork. As a result, these are the areas of most concern to us in the draft Forest Plan and we support the most strenuous protections of these things. The growth of the human population is creating pressure for more and more recreational uses, but preserving the wild ecosystem is the most important thing to us.

NFPA was a participant in the Whitefish Range Partnership (WRP) and collaborated with many people who do not have the same conservation goals that we do. One of the main reasons for participating in WRP was to get the support of other groups for **recommended wilderness in the northern Whitefish Range**. Although we started those discussions from the position of wanting all roadless areas in the North Fork to be recommended wilderness (Alternative C), after 13 months of talking and listening, we reached consensus with the other represented groups on the areas in the northern Whitefish Range that include **Tuchuck, Hefty, Review, Thompson-Seton, and Nasukoin**. Most of the recommendations in the WRP proposal can be found in Alternative B with the addition of (1) the small piece of 5a on the Northwest corner (bordering Canada and the Kootenai National Forest), (2) The Pacific Northwest Trail (Trail #26) from the Huntsberger area (near Whale Creek) northward to the intersection with Kootenai National Forest Trail #372

A nonprofit corporation dedicated to preserving the integrity of the North Fork of the Flathead Valley on the western edge of Waterton/Glacier International Peace Park.

(south of Mt. Locke), and (3) the areas surrounding Ninko and Tepee creeks. These discrepancies can be seen on the map that accompanies the WRP agreement.

Another important issue regarding wilderness is that we strongly support the **exclusion of nonconforming uses in any recommended wilderness areas** in order to maintain the wilderness character of those areas. There are so many cases in other National Forests where allowing nonconforming uses has degraded wilderness values and made official designation impossible to obtain at a later date. This should not happen in the Flathead National Forest.

NFPA supports **Yakinikak Creek, Trail Creek, Whale Creek, and Nokio Creek** as eligible Wild & Scenic Rivers in the North Fork as proposed in the draft Forest Plan.

Outside of the North Fork, NFPA supports the expansion of the Bob Marshall Wilderness northward along the Swan Range to protect **Bunker Creek and upper Sullivan Creek**. Citizens have wanted this area included in the Bob since the 1950s. This area provides critical habitat for grizzlies, elk, mountain goats and traditional hunting and stock use. In addition, we support recommended wilderness in the **Greater Jewel Basin** and protection for the **Sunset wildlife corridor** adjacent to the Mission Mountain Wilderness. The **western slope of the Swan Range** should be left as backcountry non-motorized (5a) or recommended wilderness where no existing motorized use occurs now.

In terms of wildlife issues, NFPA supports the continuation of management policies to **protect grizzly bear habitat whether or not delisting occurs**. The great bear has had the ability to increase its numbers, maintain population levels, and benefit from habitat security due to the habitat protections that are currently in place. Grizzlies are the heart and soul of the Northern Continental Divide Ecosystem and these protections should continue no matter what happens with delisting.

In addition, NFPA supports management policies that **protect the habitat of all wild species, especially lynx, wolverine, fisher, wolves, and mountain lions**. Our public lands are home to a wide variety of wildlife and their wellbeing is more important to us than the recreation and resource extraction by human beings.

More specifically, **we do not agree with combining grizzly Core and lynx habitat (MA 4.1a) with suitable timber harvest areas (MA 4.1b)**. These MA 4.1a areas should remain distinct to protect wildlife.

Likewise, we have some major issues with the FNF DEIS. We do not believe that the plan supports connectivity between the various sub-populations of grizzly bears. One bear per decade between GYE and NCDE is not connectivity. The DEIS does not include a map that illustrates the relationship between all official recovery zones and where connectivity will be prioritized. We think that all existing roadless areas that connect the Salish Range to the Whitefish Range and the Salish Range to the Cabinet Mountains should be designated as non-motorized to protect these wildlife

corridors. In addition, there should be no increase above baseline in over-snow vehicle use during the den-emergence period anywhere in the forest. Maintaining connected habitats and preventing habitat degradation should be the priority in the DEIS. We also think that the DEIS underestimates the effects of climate change on wildlife populations, including grizzly bears. **We strongly support Alternative 3 for all four national forests.**

Thanks for the work that you do to protect our public lands and the wildlife that lives here.

Sincerely,

Debo Powers, NFPA President