



February 11, 2018

**Objection to the
Flathead Forest Plan
and the
NCDE Grizzly Bear Forest Plan Amendments**

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Submitted electronically via: appeals-northern-regional-office@fs.fed.us

To the Objection Reviewing Officer:

North Fork Preservation Association has participated in the Flathead National Forest plan revision process. We were active participants on the Whitefish Range Partnership and the FNF-led “collaborative” process. In addition, we participated in multiple field trips, submitted multiple comments on the draft plan and the draft EIS. Our comments and objections that follow relate directly to these previously submitted comments.

Objector’s name: Debo Powers on behalf of the North Fork Preservation Association

Address: 11499 North Fork Road, Polebridge, MT 59928

Telephone number and/or email: (406) 407-0787

Our objections are focused on (1) the Flathead Forest Plan and (2) the Final Environmental Impact Statement (FEIS) and NCDE Grizzly Bear Conservation Strategy.

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.

Objection #1 concerning the Flathead Forest Plan: There should be more recommended wilderness in the Swan Range. Specifically, the Bob Marshall Wilderness should be expanded northward to include the north fork of Bunker Creek and upper Sullivan Creek. This added wilderness protection should be contiguous and free of motorized and mechanized corridors.

Reasons for this objection are:

- These areas in the Swan are important for wildlife habitat and connectivity. The Swan Range is an important habitat for grizzly bears, wolverines, mountain goats, and other important species. Recommended Wilderness is good for wildlife.
- The recommended wilderness boundary for the Bunker Creek Area is extremely flawed. The mechanized trail corridors bisecting this area will split it into sections rather than having continuous wilderness. This will degrade the wilderness experience for those hiking on these trails. Recreation interests should not take precedent over recommended wilderness decisions. The north fork of Bunker Creek and upper Sullivan Creek currently has no conflicting interests. This area has wilderness character and values and these should be recognized through appropriate management.
- The west slope adjacent to the Jewel Basin Recommended Wilderness should not be designated MA 5c, motorized over-snow. This area is not currently used by snow machines. It is very steep and not suitable for over-snow vehicles. It would be better to add it to the Jewel Basin Recommended Wilderness and include Trails 187 and 544.

Proposed solutions:

- **Recommend more Wilderness in Bunker Creek, including upper Sullivan Creek, Bruce Creek, Bruce Ridge, and Chipmunk Ridge, running almost all the way to the eastern trailhead near Bunker Hill. This would result in consistent management direction for the entire Bunker drainage, and pull in essential core grizzly habitat from upper Sullivan. Upper Sullivan Creek (including Slide Creek) provides some of the most productive and secure grizzly habitat in the Swan Range north of the Bob.**
- **Remove the mechanized trails which bisect the Bunker Creek Area.**
- **Add the following trails to Recommended Wilderness: The old road of 2820, Trail 101 (North Fork of Bunker), Trail 99 (Bruce Mountain and Chipmunk Ridge), and upper Sullivan Creek including Bruce Ridge.**

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- **Use Road 549 for administrative purposes only or open to non-motorized use to protect core grizzly habitat.**

Our prior formal comments specifically asked for additional recommended wilderness for roadless areas across the Flathead National Forest. Moreover, these comments targeted the Swan Range, including Bunker, upper Sullivan, and the Jewel Basin. Thus, our objections are clearly connected to previous formal comments.

Objection #2: In our DEIS comments, we recommended that the Flathead National Forest adopt proposed Alternative C to ensure proper habitat conditions are maintained, and increased, to adequately protect grizzly bears. We continue to maintain it is the only viable option for this decision. In addition, Amendment 19 to the current Flathead Forest Plan still represents the best available science on grizzlies and motorized access impacts and should be retained.

Reasons for this objection are:

- Federal Judge Friedman has already ruled that habitat quantity, quality, and sufficiency are the determining factors of recovery, not minimum population and distribution numbers. The FEIS should maintain grizzly habitat at or above the level that has allowed the population to increase.
- Grizzly bear population growth estimates of 3% are flawed. Most independent grizzly researchers estimate that true recovery will require a lower-48 grizzly bear population of 2,500-3,000 grizzlies in a linked meta-population, with some estimates as high as 5,000. Yet, the current population in the lower-48 is only approximately 1,800, with many ecosystems largely isolated. Additionally, Dr. Richard Harris, a contributor to the Draft Conservation Strategy, stated that the 3% growth rate the FWS relies on does not meet a “conventional level of statistical certainty.”
- The best available science on grizzly bear habitat security and motorized access route density is Amendment 19 to the Flathead Forest Plan, which was adopted by the Flathead and the other NCDE Forests in 2007. This science should not be discarded and replaced with whatever road densities were present in a 2011 baseline year which has no basis in science.
- Although connectivity is given lip-service in the FEIS, there is no plan for protecting grizzly bear habitat in Zones 1 or 2. In fact, some National Forests (Kootenai, for instance) are systematically denying Recommended Wilderness status to Inventoried Roadless Areas and are designating them as Motorized Backcountry instead. Thus, offering less protection for grizzlies

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and other species. The State of Montana refuses to control attractants on its public lands even though food-conditioned grizzlies have a high mortality rate.

- Grizzlies are one of the slowest reproducing mammals in North America and the mortality of female bears should be monitored.

Proposed Solutions:

Revise the forest plan to adopt Alternative C for the final EIS.

- **Retain Amendment 19 Road Density Standards. Assess all motorized routes and incorporate the best available science on motorized recreation's impacts on grizzly bears.**
- **Revise the FEIS to ensure compliance with the ESA, which necessitates recovery across the species' entire range.**
- **Revise the FEIS to use the 2% growth rate in the latest peer reviewed science, rather than the criticized 3% assumption.**
- **Revise the FEIS to base its decisions on habitat quantity, quality and sufficiency, not purely on population numbers and an assumed growth rate.**
- **Engage in long-term ecosystem-wide habitat research and establish a viable baseline. Ensure the FEIS contemplates the impacts of removal of ESA protections and lack of adherence to Amendment 19 in all assumptions.**
- **Revise the FEIS to encourage the protection of key linkages and corridors with Wilderness designations.**
- **Revise the FEIS to ensure female as well as male grizzly bear dispersal and reproduction. Include clear, enforceable triggers and consequences for female mortality levels based on the best available science. Institute management review if mortality thresholds are exceeded in two consecutive years.**
- **Revise the FEIS to eliminate all "temporary" increases in motorized activity. Recognize and incorporate the impacts of climate change on motorized recreational use, particularly in the denning and rearing seasons.**

Our prior formal comments specifically supported Alternative C. Thus, our

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objections are clearly connected to previous formal comments.

Sincerely,

Debo Powers, President of North Fork Preservation Association

Objections Approved by the NFPA Board of Directors