

NORTH FORK PRESERVATION ASSOCIATION

77 Moose Creek Rd, Polebridge, MT 59928

February 29, 2022

Kurt Steele, Forest Supervisor Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901
comments-northern-flathead@usda.gov

Dear Kurt Steele and Rob Davies,

Thank you for the opportunity to comment on this site-specific travel management process. North Fork Preservation Association (NFPA) participated in both the forest plan revision process and the Whitefish Range Partnership (WRP), and we appreciate the timely follow through of this site specific analysis as outlined in the Final Forest Plan three years ago. Nearly forty years ago, NFPA was born from landowners who care about protecting the land and watershed of the North Fork of the Flathead River. As a grassroots, landowner driven organization, we have strong investment and knowledge of the areas being evaluated.

Recommended Wilderness management

We support managing recommended Wilderness areas to maintain the social and ecological values to preserve their potential for congressional designation. Therefore, we agree with the action to close recommended wilderness areas to motorized and mechanized travel and align with the decisions made in the 2018 Forest Plan.

We specifically support the closure of 82.3 miles of trails to mechanized travel and 2 acres of snowmobile areas in the Tuchuck-Whale recommended Wilderness areas. These areas and trails are remote, provide excellent grizzly bear and wildlife habitat, and should be maintained for foot and stock use only. For decades, managers have recognized the incredible wildlife habitat that exists in the Whitefish Range and the need to protect it. They have supported recommended wilderness designation and some have publicly agreed that mechanized transport is not appropriate in this special area (**see Tim Manley letter attached**).

The Whitefish Range Partnership developed solutions for all interests and we agreed that the northern Whitefish Range should be recommended for Wilderness. This also means the area should be managed to preserve wilderness character and the potential for future designation by prohibiting motorized and mechanized use.

Motorized over-snow vehicle expansion

As a member of the Whitefish Range Partnership, we support a site specific evaluation to assess the potential expansion of snowmobiling in the southern Whitefish Range. We understand that snowmobiling may occur here

depending on the results of a site specific analysis. In order to understand impacts from a possible expansion, we would like to see alternatives that reflect different ways that over-snow use could be designated within the newly-suitable areas. This includes wildlife analysis for lynx, grizzly bears, wolverine, and applying the minimization criteria for routes and areas.

Programmatic amendment language

We have concerns that the proposed suitability language amendment is far too vague and dilutes the intention of MA1b-SUIT-06. We recognize that the forest would like to retain restoration flexibility into the future. However, we see restoration as separate, not contradictory, to motorized and mechanized *transport* in recommended Wilderness areas.

The forest plan is clear in the FEIS and MA1b-SUIT-03 that certain restoration activities are suitable and appropriate, and we do not see the necessity for a qualifier to the existing MA1b-SUIT-06 and it's focus on *transport*.

In January 2022, The Custer-Gallatin National Forest released their forest plan with the following suitability language that we would like to propose be adopted by the Flathead NF as well:

- *FW-SUIT-RWA-02 Recommended wilderness areas are not suitable for motorized or mechanized transport.*
- *FW-SUIT-RWA-03 Recommended wilderness areas are suitable for low impact restoration activities that move toward desired conditions (such as prescribed fires, active weed management, planting) and that protect and enhance the wilderness characteristics of these areas.*

Thank you again for initiating this travel planning process. We would be pleased to connect and answer any questions you may have.

Sincerely,

Flannery Coats, NFPA President

nfpapresident@gravel.org

(406) 407-3863

335 River Drive

Polebridge, MT 59928

