

November 9, 2018

Crystal Cedar Project Scoping Comments

Robert Davies, District Ranger
Hungry Horse-Glacier View Ranger District
P.O. Box 190340
Hungry Horse, Mt. 59919

Dear Ranger Davies,

Thank you for the opportunity to provide scoping comments on the proposed Crystal Cedar Project. Please enter my comments into the official record and advise me as updates and additional steps occur.

From reading the proposed action and examining the maps showing the scope of the project, it's clear that the Flathead Forest has developed this plan in an alternate universe where grizzlies and lynx have been delisted and their security and habitat needs can be ignored. In the real world, that's obviously not the case.

In the real world, grizzlies remain a Threatened species and are likely to remain so for the foreseeable future for the same reason that Greater Yellowstone bears were just relisted. In the real world, the NCDE Conservation Strategy (CS) has not been approved, and due to a number of arbitrary and capricious provisions, won't withstand legal scrutiny (See my attached comments on the CS, Flathead Forest Plan, and Grizzly Amendments). In the real world, Amendment 19 to the Flathead Forest Plan is still in full force, and rather than creating another 7.4 miles of road, the Forest must get back to closing the remaining 518 miles of roads required by A19 (USDA 2017).

Problems With Purpose Statements:

Purpose #1 - "Provide sustainable trail-based recreation opportunities close to local communities that are compatible with other resources."

* Does this refer to ecologically sustainable, or sustainable from a maintenance standpoint?

* Rapidly injecting high levels of foot, horse, bike, and motorized user recreation into a linkage zone pinch point between the North Fork and Hungry Horse Geographic Areas is not compatible with the habitat security needs of grizzlies, lynx, elk, or wolverines.

* Of the 24.5 miles of trails, 24.4 miles (99.6%) will allow mountain bikes, suggesting that the Forest has learned nothing from the death of Brad Treat. If Treat, traveling at high speed on an NFS road can have a sudden, fatal encounter with a grizzly, imagine what will happen on narrower trails with far shorter sight lines. The Flathead is knowingly creating an "accident waiting to happen" situation. We remind the Flathead of

the statement of Fish, Wildlife and Parks Tim Manley that high-speed mountain bike travel in carnivore country was inherently dangerous and not to be encouraged (See Attachment).

* This trail system, due to its proximity to Columbia Falls, will almost immediately be in the “high intensity non-motorized use” category, and despite U.S. Fish and Wildlife Service (FWS) “spin control” to the contrary, and based upon actual science, will displace grizzlies from otherwise preferred habitats (Mace and Waller 1997, Kasworm and Manley 1990, USFWS 2014).

* This Purpose says that “Community members in Columbia Falls asked the Forest service to consider a nonmotorized trail system in the project area that could be constructed and maintained in partnership with community organizations.” I’m from Columbia Falls and I made no such request. The Flathead would do well to remember that this is not a Columbia Falls City Park or local playground, but a National Forest belonging to all Americans.

Purpose #2 – “Reduce tree densities and fuel loadings within the wildland-urban interface to result in less intense fire behavior near communities and facilitate safe wildland fire operations.”

* While this statement fits nicely with the Forest Service’s well established goal of logging early and often, certainly the Flathead must be aware of the research over the last decade showing that fuel loading is not the prime driver of fire frequency, intensity, and severity (See Attachment). Rather, the primary culprits are temperature, drought, and especially wind – all likely to increase under global warming.

Therefore, the Flathead needs to focus on a full discussion of management options based upon these latter causes instead of building this project’s foundation primarily on various logging scenarios to reduce fuel density.

* Since the stated purpose is to reduce problems in the Wildland-Urban Interface (WUI), the Forest must certainly be aware that most current research indicates that the most important fuel treatments to create “defensible space” around homes and other buildings are those that occurs within about 150 feet of those structures – not hundreds of yards or miles away on National Forests where they’re just another transparent reason to log rather than provide tangible protection for private property.

In addition, since most 150-foot defensible space buffers will fall on private property, it should be obvious that work in such buffers is the responsibility of the private homeowners themselves – not the Forest service at taxpayer expense. Certainly, if the Flathead wanted to create an additional 150-foot buffer along the WUI that might be justified from the standpoint of lowering fire intensity/severity, but that claim should not be used across the 3881 acres of harvest shown in Table 1 of the proposal. Nor is it clear why the “project area” covers 27,249 acres when only a small portion is part of the Proposed Action.

Purpose #3 – “Improve the diversity and resiliency of forest vegetative communities and associated wildlife habitat.”

* While the above statement of purpose seems to be pretty reasonable, the following discussion under “Proposed Vegetation Treatments” is a bit of a jumble, leaving confusion about how the various “treatment” all fit together on the landscape. For example, commercial thinning is proposed on approximately 2022 acres with the largest, healthiest trees left, while the 420 acres of regeneration harvest (all ecologically functional Clearcuts) would remove all/most large/medium trees. And overstory removal (46 acres) where step one removes the older trees while step two thins the smaller ones doesn’t sound all that different from a regeneration harvest. Finally, the live birch cutting for 150 feet on either side of three forest roads doesn’t seem to have any sound natural resource purpose at all, but rather serves merely as a PR firewood gathering opportunity to please the locals like me. Unfortunately, it also expands the grizzly bear displacement zone along these roads from 500m per side to 550m.

Table 4 gives a breakdown of these proposed treatments by “Unit” but without a map showing all of the units, or color-coded by treatment type, the reader has no way to grasp the overall landscape impacts of what’s being proposed.

* Purpose #3 says that, “Vegetation management would be designed to maintain wildlife habitat connectivity...” Yet it seems to me that the combination of logging, new roads, and a spike in recreational users will do the exact opposite. The lynx movement corridors shown by Squires et al. (2013) come right through this area between the North Fork and Hungry Horse Geographic Areas; grizzlies must similarly use this area to get between the Haskill Basin and Coram Connectivity Areas; and Kate Kendall at the Spring 2013 NCDE Grizzly Subcommittee Meeting reported that this area along the west end of the Middle Fork Corridor was already in danger of becoming a bottleneck for bears. The Crystal Cedar Project would seem to be jamming the cork a good deal tighter in that bottle.

Purpose #4 – “Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local economies.”

* This would appear to be the only purpose statement that is factual, and like most Forest Service projects is the actual “prime directive.” Yet there are a couple of problems with the statement and its land management perspective.

First, while this purpose falls under “multiple use and sustained yield”, it suggests that it’s the Forest Services job to serve as a Chamber of Commerce with physical, commercial products as the chief objective rather than the proper, science-based management of natural resources. This results in the National Forests being viewed as “timber”, “lumber”, “board feet”, grazing AUM’s, and permitted mined, while clear air, clean water, wildlife and habitat, or wilderness are undervalued, or not valued at all because they have no clear dollar sign.

Second, it says that the “Chamber of Commerce” function is to provide jobs and income to Local economies although these lands belong to all Americans. The result is a project built primarily around local wants and needs, and the land as essentially a Columbia Falls Municipal Playground and Woodlot. The scope needs to be broadened to include the best interests of the American people, the National Forest generally, and the ecological integrity, stability, and connectivity of the broader landscape specifically. How are, for example, Crystal Cedar’s negative wildlife and habitat connectivity impacts related to the habitat fracturing impacts of the “Mid-Swan Landscape Restoration and Wildland Urban Interface Project?”

Public process & Constitutional problems:

* The Crystal Cedar cover sheet says: “Because of the large amount of research regarding forestry practices and methods, if you cite literature in your comments, please provide us with a complete bibliography and a copy of referenced materials.”

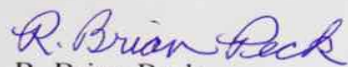
Since the Forest Service has easy access to nearly every forestry article available and the staff, funding, and time to quickly locate them – while the average citizen may not – the apparent requirement of “a copy of referenced materials” is a transparent attempt to thwart public comment and an effort to set up arbitrary hurdles to the public process.

The U.S. Constitution, Amendment I says, “Congress shall make no law respecting the establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.”

Note that nowhere does it condition any of these rights on providing a well-staffed Forest Service with “a copy of referenced materials” and as such, this arbitrary requirement must be removed from the current proposal, and all USFS documents in the future.

Thank you again for the opportunity to comment. I look forward to seeing my issues and concerns addressed and incorporated into future Crystal Cedar documents.

Sincerely,



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References Cited

- Kasworm, W.F. and T. Manley. 1990. Road and Trail Influences on Grizzly Bears and Black Bears in Northwest Montana. International Conference on Bear Research and Management 8: 79-84.
- Mace, R. D. and J.S. Waller. 1996. Grizzly Bear Distribution and Human Conflicts in the Jewel Basin Hiking Area, Swan Mountains. Wildlife Society Bulletin 24: 461-467.
- Squires, John R., et al. 2013. Combining Resource Selection and Movement Behavior to Predict Corridors for Canada Lynx at Their Southern Range Periphery. Biological Conservation 157 (2013) 187-195.
- USDA Forest Service. 2017. Volume 1 – Wildlife Section 3.7 of the Final Environmental Impact Statement for the Forest Plan, Flathead National Forest. December, 2017.
- USFWS. 2014. Final Biological Opinion on the Effects to Grizzly Bears From the Implementation of Proposed Actions Associated With Plan of Operations for the Montanore Minerals Corporation Copper/Silver Mine. March 31, 2014. 161 pp.

NOTE: All of the above references, along with copies, have been provided to the Flathead in my comments on the 2017 Final Flathead Forest Plan and Grizzly Bear Amendments.