January 16, 2020

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 comment on the proposed Frozen Moose Project (Hereafter, The Project). Please enter my comments into the formal record, incorporate my concerns into the environmental analysis, and keep me on the mailing list for all future phases of this project. Also, please include by reference the comments of the Swan View Coalition and Friends of the Wild Swan.

Comments:

(1) Given the sheer size of this Project, the fact that it occurs in the Whitefish Range where it will impact multiple listed carnivore species, and the number of assumptions it is based upon that ignore science and violate law, the Project must be subject to a full Environmental Impact Statement (EIS).

(2) It is clear that this Project in the north end of the Whitefish Range, in combination with the Hell Roaring Basin Improvement Project, Taylor-Hellroaring Project, and Crystal-Cedar Project in the southern end, presents significant problems for imperiled wildlife, in particular the federally listed Grizzly Bear, Lynx, and soon to be listed Wolverine. To adequately address, avoid, mitigate these impacts, the Flathead Forest must conduct a comprehensive Cumulative Effects Analysis for all of these projects as a single unit.

(3) A number of Project elements are based upon a flawed Forest Plan, which in turn is based upon legally and scientifically indefensible conclusions by the U.S. Fish and Wildlife Service in its NCDE Grizzly Conservation Strategy that (a) NCDE grizzly bears were a recovered species as of 2011; (b) that a 2011 Baseline set of standards was a legal way to manage grizzly habitat (USFWS 2018); (c) that the best available science of Flathead Forest's Amendment 19 could now be ignored; (d) and that these invalid assumptions could be folded into the Grizzly Bear Amendments for NCDE Forests. As I have noted in my comments on all of these documents (See Attachments), none of this is true, and cannot be relied upon to conduct any project.

Solutions to the Above:

* In this, and all future and past projects, the Flathead must acknowledge that the grizzly and lynx are still listed under the ESA (1988), and all provisions for their protection and that of their habitat remain in effect.

* Specifically, this means that the Forest Plan and all projects must use the Best Available Science and Objective Measureable Criteria – something that is not currently happening.

* And, as the only recognized Best Available Science relating to grizzlies, roads, and habitat security, Amendment 19 (A19, USDA 1995)) must be immediately reinstated, and all Standards, Objectives, Guidelines, and Desired Conditions in the New Forest Plan must be brought back into compliance.

In particular, this means that the Flathead must begin closing & decommissioning the 518 miles of roads identified under A19 on a 10-year schedule; must resume counting all high-intensity use non-motorized trails as reductions to Security Core; must resume counting all Intermittent Stored Service (ISS) and "impassable" roads under Total Motorized Route Density (TMRD), as well as all "Temporary" roads using an excessive 5-year project timeline.

* The purpose of the NCDE Grizzly Conservation Strategy (CS) is to guide grizzly bear management post-delisting. However, since grizzlies have not been either "recovered" or "delisted", The CS cannot legally be used in this project or any other project under the Forest Plan. This is equally true for the Forest Plan itself (USDA 2017), the Grizzly Bear Amendments for NCDE Forests (USDA 2017), and the 2011 Baseline (USFWS 2018).

(4) The first "Purpose and Need" listed for the Project is: "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."(emphasis added).

* As noted in both my comments on the Crystal Cedar and Taylor Hellroaring Projects, this relies on the scientifically unsupported assumption that the primary cause of high-intensity, high-severity fires is Fuels, when, in reality, the latest fire science indicates the primary drivers are heat, drought, and especially wind (See Attachments). Here are my comments from Crystal Cedar, which are equally valid here:

"A principal "purpose and need" for the project is to lower fire intensity and severity in the Wildland Urban Interface (WUI). This is to be chiefly accomplished by vegetation management, mostly by some form of logging (the cutting of trees), under the assumption that fuels are the primary driver of fires, and the only factor that the Forest Service can affect.

Both of these assumptions are incorrect, and a "hard look" would have revealed that. The rapidly evolving fire science of the last 20 years has shown that, while fuels are important, the primary drivers of large, stand-replacing fires in the west are heat, drought, and especially wind (See Attachments). A local example is the 2018 Howe Ridge Fire in Glacier Park – a stand-replacing fire that burned through the 2003 Robert Fire area – itself a stand-replacing fire from only 15 years before, and one that had significantly reduced fuels. Yet, in the presence of heat, drought, and wind, a second major fire occurred and burned homes in the Lake McDonald WUI.

Unfortunately, it's not until EA P: 92 that we see mention of the fact that vegetation management itself, by opening up a stand, can increase "rate of spread" by increasing heat and wind. The Howe Ridge Fire made it clear that it can also result in high intensity, high severity, stand-replacing fires."

* Similarly, the Project's definition of what constitutes a Wildland-Urban Interface (WUI) and reducing fire intensity near communities, is simply out of touch with on-the-ground reality. The only thing vaguely resembling a "community" in the entire North Fork is Polebridge, and this is 4 miles from the Project boundary. As the Project description admits on P: 1, private land only makes up 6 percent of the entire project area, and cannot justify the expansive Project Area and its logging and road proposals. Here again, my comments from Crystal Cedar are equally valid here:

"**The EA's claimed Wildland Urban Interface has no basis in actual fire science, but rather has been delegated to a political body in Flathead County.**

* P: 90 of the EA notes that "The wildland-urban interface is based upon locally produced community wildfire protection plans, as stipulated and defined in the Healthy Forests Restoration Act of 2003 (HFRA). For the Crystal Cedar Project, wildland-urban interface is mapped through the Flathead County Community Wildfire Protection Plan (Suenram 2011) (project file exhibit J-1)."

* In the 25 years that I've lived in Flathead County, it's been obvious that Flathead County government was an ardent supporter of "active management" (logging) on National Forest lands, and served as a willing mouthpiece for the timber industry. And while HFRA allows Flathead County to propose what it sees as the Wildland Urban Interface as part of its Community Wildfire Protection Plan, it doesn't authorize the Forest Service to simply turn over the management of National Forest lands relative to fire and logging to a County logging booster club, as the Flathead Forest has done here.

*The Healthy Forests Restoration Act (HFRA 2003) definition of WUI that pertains to Crystal Cedar is, "An area within or adjacent to an at-risk community that is identified in recommendations to the Secretary in a community wildfire protection plan…" (emphasis added).

The Flathead CWPP, P: 31 says, "As detailed in HFRA, a commonly accepted definition of the Wildland-Urban Interface is the zone where structures and other human developments meet and intermingle with undeveloped wildland and vegetative fuel." (emphasis added). Similarly, P: 34 of the FCWPP, quoting the SILVIS Lab at the University of Wisconsin-Madison repeats the meet and intermingle language. Clearly, the original intent of WUI was to include lands touching or immediately adjacent to forested USFS property.

Yet on FCWPP, P: 34 we see where Flathead County, with the Flathead Forest following suit, went astray: "The California Fire Alliance (2001) defined 'vicinity' as all areas

within 1.5 miles (2.4km) of wildland vegetation, roughly the distance that firebrands can be carried from a wildland fire to the roof of a house." The problem with adopting this 1.5-mile California buffer is that virtually nothing about fire regimes in that state, are comparable to NW Montana. The topography, soils, weather, plant-communities (oak, Manzanita, evergreen for example) all produce fire conditions that are dramatically more volatile than those in Montana."

As the Flathead Forest is certainly aware, most recent research on creating "defensible space" around homes and communities has found that a buffer of approximately 150 feet is the most important area to concentrate efforts. And in the North Fork, it's highly likely that most, or all, of that 150-foot buffer falls entirely on private property where it is not the responsibility of the Forest Service to expend public tax dollars. Yet the Project maps show that the Flathead Forest has drawn its WUI lines encompassing areas from 1-6 miles from any actual private land, and including areas 2-3 miles inside Glacier National Park where there are virtually Zero private residences. It's clear that the primary reason for this expansive view of the Wildland Urban Interface is to allow the forest to "increase the cut", not mitigate fire danger.

(5) The Project area of 151,200 acres includes 139,869 acres of NFS lands (92%). Of those NFS acres, the Project improperly includes 86,792 acres of Inventoried Roadless Areas (62%). P: 3 of the Project states the following:

"The 2001 Roadless Conservation Rule states that timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, unless the Responsible Official determines that the removal of generally small diameter timber is needed for one of the purposes specified in 294.13(b)(1), such as reducing the risk of uncharacteristic wildfire effects. Additionally, any removal of small diameter timber must also maintain or improve one or more of the roadless area characteristics, including but not limited to: diversity of plant and animal communities; habitat for threatened or endangered species; and natural appearing landscapes with high scenic quality."

Virtually none of the exceptions to the "no logging" rule apply here, as follows:

* As noted on Project P: 3, "Fire is the primary disturbance factor influencing vegetation in the North Fork of the Flathead River. Records show that fire burned approximately 45 percent of the project area between 1910-1929. The fires between 1910 and 1929 were largely stand replacement fires, killing nearly all trees." Clearly, large high-intensity, high severity fires do not qualify as "uncharacteristic wildfire effects" justifying logging or roads.

* Obviously, the single most important characteristic of Inventoried Roadless Areas is that they are – Roadless and Unlogged – something that this Project will directly destroy – not "maintain or improve."

* It should be obvious that prior to the arrival of USFS management more than a century ago, Nature itself had been doing a fine job itself of maintaining and improving "diversity

of plant and animal communities; habitat for threatened and endangered species; and natural appearing landscapes with high scenic quality" for thousands of years. It is a century of logging, roading, and fire suppression by the Forest Service itself that has scrambled these ecosystems and resulted in the Project Area's unbalanced state. Clearly, there is no reason to believe that the Forest Service – rather than Nature – needs to "fix" this problem with more logging and roading (523 acres), and certainly not in IRA's, which must be removed in their entirety from the Project Area.

In addition, P: 9 of the Proposed Action notes the intention to conduct 542 acres of prescribed burning in the Tuchuck-Whale recommended wilderness area (RWA). As the Flathead must know, management in RWA's must not compromise the area's qualities as Designated Wilderness, and since the use of motorized/mechanized equipment runs counter to Wilderness, it cannot be used here.

(6) P: 1 of the Project says, "The forest plan was developed following the process and requirements set forth in the 2012 NFS land management planning rule (36 CFR 219). The rule requires that the forest plans provide for ecological sustainability…" As the Flathead knows, that same 2012 Planning Rule requires that forest plans place a high priority on creating and protecting wildlife habitat connectivity – particularly as it relates to Threatened and Endangered species.

Yet the Flathead Forest Plan generally, and this Project specifically, utterly fail in that regard, as landscapes critical to the recovery of grizzlies and lynx, and soon to include wolverine, are "sliced and diced" by numerous individual projects. In the case of Frozen Moose – when combined with Crystal Cedar, Taylor Hellroaring, and the Hellroaring Basin "Improvement" Project - the Flathead is systematically fracturing the Whitefish Range's Linkage Zones north-south and east west for listed carnivores, including a lynx corridor identified by Squires et al. (2013). My objections to the Flathead Forest Plan and Grizzly Amendments are equally valid here, and are reproduced below and Attached:

"The Flathead National Forest holds a unique place in the NCDE, and is critically important for wildlife connectivity throughout the ecosystem. In his pivotal report, "Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana" Dr. John Weaver (2014) found that "The community of carnivores (17 species) on the Flathead National Forest appears unmatched in North America for its variety, intactness, and density of species that are rare elsewhere (P: 114)…" and "Consequently, many scientists advocate the need for conservation corridors or linkages between habitats (existing and future) to support necessary movements and greater viability (P: 5)…"

These findings echo the earlier conclusions of Weaver (2001, P: 5) that, "Due to these unique characteristics and its strategic position as a linkage between National Parks in both countries, the transboundary Flathead may be the single most important basin for carnivores in the Rocky Mountains.The challenge is to develop and implement a transboundary conservation plan that honors these outstanding values. Key principles for carnivore conservation include to: (1) maintain food resources with management of

habitat and prey populations, (2) provide security from excessive mortality with networks of core reserves and other precautionary measures, and (3) maintain regional connectivity with landscape linkages." (emphasis added).

In his pivotal research on connectivity and fragmentation in the transboundary region of SE British Columbia and the northern NCDE, Michael Protor recommended the following:

"We recommend that the entire regional metapopulation be considered, that multiple jurisdictions work together on a larger strategy to manage the system for inter-area connectivity, particularly of females, and that larger core subpopulations be managed as potential sources of bears for adjacent smaller threatened subpopulations." (Proctor, et al 2012, p. 39).

Unfortunately, when we look at the Forest Plan's Geographic Area maps B-19 through B-24, it's clear that the Flathead has made a conscious decision to ignore all of this advice, decades of research on connectivity, and set course in the exact opposite direction, as follows:

North Fork Geographic Area

* Although there are several small bright spots where Management Areas (MA's) have been changed from 6a to 5a (South Fork Coal Creek, Hallowat Creek, and SE of DNRC lands) the overall tide continues in the direction of creating a fractured landscape in one of the most critical areas of the Forest for carnivores.

* Stringers of 6b moderate-intensity logging extend most of the way from the North Fork Road west toward the Whitefish Divide along Whale, Red Meadow, Hay, Coal and South Coal, and Big Creeks. In the process they sever otherwise large blocks of 5a Backcountry Non-motorized (all of which north of Big Creek should be unified as 1b Recommended Wilderness) into smaller, narrower, less functional bands of 5a habitat impeding north/south connectivity.

* The Flathead has literally choked the entire southern end of the North Fork GA with large blocks of 6b logging, a significantly enlarged MA 7 Focused Recreation sacrifice zone, with some snowmobile areas thrown in the middle of it for good measure. This effectively creates a habitat minefield for any carnivores trying to move north/south, or west toward the Salish DCA. Both of these designations must be dramatically reduced and changed to the 5a and 1b designations of last years Alternative C, or better still, the Citizen reVision alternative submitted by Hammer and Montgomery (2014), and arbitrarily discarded by the Flathead.

* Finally, in the extreme northwest corner of the GA the Flathead's portion of the Ten Lakes WSA has been improperly designated 5a, and must be reassigned to 1b – Recommended Wilderness."

(7) Purpose and Need #3 is to "maintain and improve aquatic ecosystems." In that regard, the Project, page 5 says, "Aquatic restoration activities such as road maintenance, culvert replacements, and road rehabilitation, would reduce the risk of road and culvert failures and associated sediment production from entering those streams, benefiting bull trout, westslope cutthroat trout, and other aquatic species (FW-OBJ-CWN-01 and 02)."
The above statement makes it sound as though roads and culverts are inherently good things in bull trout and cutthroat trout habitat – as long as they're maintained, when in reality, that's not true. As the Flathead is well aware, roads are guaranteed to interfere with normal drainage patterns, erode, and produce sediment, and all culverts will ultimately fail, dumping that sediment into streams. The Forest has admitted as much in numerous public meetings.

What's missing in this Project, and the larger Forest Plan, is a concrete plan to "Right Size" the Flathead's road system to match actual maintenance budgets; commit to restoring the scientifically and legally sound Amendment 19; and aggressively resume Decommissioning unneeded or damaging roads, not just engaging in "cosmetic maintenance" of Intermittent Stored Service (ISS) roads that continue to damage both aquatics and grizzly bear security while being dishonestly left out of Total Motorized Route Density (TMRD) calculations.

(8) Purpose and Need #2 is: "Improve the diversity and resilience of vegetative communities and associated wildlife habitat." While it's absolutely true that combined high-intensity logging and the Wedge Fire have generated dense "doghair" stands of lodgepole pine, it's not clear at all that the 6 Desired Condition categories on P: 4-5 are on the right track.

For example, (DC #1) "Increase presence of western larch, western white pine, whitebark pine, and quaking aspen" and (DC #2) Maintain and increase the presence of large and very large classes of trees" while desirable, are conditions that Nature is perfectly capable of creating without saws and roads. In fact, if you visit the portions of the Wedge, Robert, and Moose fires in Glacier National Park where no logging is permitted, you'll find these conversions well underway. In addition, (DC #3) "Reduce moderate and high density forest conditions with focus in the wildland-urban interface" is completely undermined by the Project's tying it to a non-existent wildland-urban interface miles from any actual homes, structures, or Polebridge, making it clear that the Flathead is merely looking for an excuse to log in more areas.

Similarly, (DC #4) seems to be a solution in search of a problem when the Project admits that Riparian Management Zones "reflect a natural composition of native flora and fauna and conditions appropriate to natural disturbance regimes", but then recommends "vegetation management activities" anyway. As I noted in my Comments and Objections to the Forest Plan, unless the Forest Service can demonstrate a clear ecological and science-based need to log in RMZ's, it must stay the hell out! It's particularly troubling to see from Project maps that the majority of Seed Tree cuts would occur immediately adjacent to RMZ's.

While (DC #5), "Maintain landscape pattern and connectivity so that wildlife can continue to move through the project area" is laudable, it's not clear how logging and roading – including "temporary" 5-year long projects achieves either of these Desired Conditions. In addition, it's clear that the Flathead misunderstands the purpose of Linkage Zones and Habitat Connectivity. They're not simply for wildlife to "move through" the project area, but to serve as Residential Habitat that provides security and home range occupancy.

Desired Condition (#6), "Maintain and improve sagebrush communities where they exist" also seems worthwhile, but it's not clear why this is confined to an existing stand, rather than looking at the historical range of the sagebrush type in the area.

(9) Purpose and Need #4 is to "Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local communities." Yet the Proposed Action presents a somewhat muddled picture of how this will be accomplished. On the one hand, Table 2, P: 7 shows 529 acres of Seed Tree cuts (Functional Clearcuts) "that would alter the forest from a mature tree class to a seedling stage." On the other hand, FW-DC-TE&V-11 and 12 on page 4 says the goal is to "Maintain and <u>increase</u> the presence of large and very large size classes of trees." (emphasis added). Which is it? And with one of the Projects prime directives being to lower stand densities in dog hair stands, especially in a contrived Wildland-Urban Interface, it's difficult to see how "clearcutting" mature forest advances that goal. Rather, it seems that the sole purpose of logging 529 acres of Mature Forest in the Whitefish Range, which has already seen more than its share of high-intensity logging, is to throw a bone to the "Get Out The Cut" boosters in surrounding communities. That's not a good example of sound forest management or "economic sustainability."

* Vegetation treatments in the Wild and Scenic river corridor: P: 9 of the PA says that USFS intends to employ 371 acres of "vegetation treatments" – chiefly logging – in the Wild and Scenic river corridor, including 14 acres of seed tree (Clearcut) logging. These Wild & Scenic designations are intended to provide <u>more</u> protection to these critical habitat types, but the Flathead is proposing less protection, and the Flathead must provide a clear, science-based, ecological justification for conducting <u>any</u> vegetation treatments (logging) in this corridor.

* <u>Treatment Methods:</u>

(a) Commercial Harvest – The PA proposes to log approximately 3552 acres, and to use mechanized equipment including tracked or rubber-tired equipment. While this may be the most efficient way to maximize private profit from public lands, it's also the most damaging technique to use on those lands – increasing damage to soils, erosion potential, and the spread of invasive species. In addition, all this heavy equipment will necessitate the new, re-opened, and "temporary" roads called for in the PA which will damage wildlife habitat security and run counter to Purpose and Need #3 – "Maintain and improve aquatic ecosystems."

In addition, those roads, and the Forest's intention to retain them as part of its System Roads while not counting them in Total Motorized Route density (TMRD), violates the Flathead's commitment in both the Forest Plan, Grizzly Amendments, and NCDE Conservation Strategy to abide by the 2011 Baseline for habitat security. If the Flathead can't be trusted to keep its promises, it renders those documents, and the Forest's word, useless. Since 3023 acres of the commercial total (85%) are thinning, the PA should consider hand cutting with chainsaws as it does on 1413 acres of precommercial thinning. The fact that mechanized logging is easier, cannot be used to compromise forest, soil, or wildlife habitat integrity.

(b) Precommercial thinning – If the Project can log 1413 acres using chainsaws, then it should cut the other 2032 acres using the same technique. Minimizing mechanized equipment and the damaging roads that goes with it, should be the prime directive.

(c) Understory Removal – While I understand the desire to remove "ladder fuels", doing so on just 78 acres will have minimal impact on fire behavior. In addition, the Flathead must look at potential impacts to snowshoe hares and lynx from understory removal.

(d) Underburning within the WUI – If this technique is used in the real WUI of 150 feet as recommended by fire-science, then this might be justified. However, employing it in the wildly unrealistic WUI shown in the PA, often miles from any private land or residences, is without basis.

(e) Whitebark Pine Restoration – While this is a project that would have major benefits for grizzly and black bears as well as Clark's nutcrackers, both the proposals in the Forest Plan and in this project are so minimal as to undermine their positive impact. If the Forest Service is serious – and it should be – it needs to plan, staff, and fully fund a WBP recovery program involving thousands of acres and hundreds of thousands of seedlings per year. Prescribed burns in support of this effort are probably a good idea.

(f) Underburn – The Forest needs to more comprehensively explain the pros and cons of underburning on these 90 acres. PA P: 8 says that "Treatment would modify fire behavior and improve opportunities to proactively manage the size and cost of future fires." First, it's difficult to see how underburning just 90 acres would have much impact in this regard. Second, the wording suggests that this is mostly being done for "manager convenience" rather than a sound ecological purpose. Remember that PA page 3 says that from 1910-1929 45 percent of the Project Area burned in mostly stand-replacing fires – suggesting that these may have been natural, historic events.

(g) Sagebrush Restoration – Given the sagebrush/prairie restoration that Glacier Park has done in Big Prairie and Round Prairie, and the wildlife benefits in this unique habitat type for NW Montana, this seems like a worthwhile component. The Flathead should contact GNP to discuss lessons learned during their burns across the river and perhaps coordinate restoration efforts.

(h) Proposed activities in grizzly bear secure core – The PA says that it intends to implement "…both commercial and noncommercial vegetation treatments and road maintenance to access these vegetation treatments. Aquatic restoration activities on historical roads are also proposed in secure core. Project activities that require the use of roads will be incompliance with forest plan standards…"

As the Flathead must surely be aware, none of these activities are compatible with, or allowed in secure core as clearly spelled out in the 1998 IGBC Access Management Guidelines, the NCDE Conservation Strategy, Amendment 19, and the NCDE Grizzly Bear Amendments. These activities also violate the Flathead Forest's commitment as a signatory to the Conservation Strategy to abide by the 2011 Baseline security levels, suggesting that its signature and promises are worthless. And finally, these proposed activities attempt to ignore that grizzlies are still a Threatened species, the Forest Service is still required to use the "best available science" regarding them, and Amendment 19 is that best available science. According to law, science, and common sense, all of the above activities must be removed from Core.

(i) Road Management and Aquatic Restoration – When the PA on P: 10 says that "The Frozen Moose Project does not propose any changes to public motorized access in the project area", the Forest Service is playing semantic word games by falsely claiming that its 24.1 miles of project roads will do no damage to wildlife security. Nothing could be further from the truth, as follows:

* As the Flathead is well aware, research by Mace and Waller (1997) as well as Amendment 19 (USDA 1995), makes it clear that grizzlies are displaced by human use of roads and trails whether it is motorized or not, and it's equally clear that the Flathead has no intention of decommissioning any of these roads so that they no longer function as a trail or road – as required by Amendment 19 before routes can be removed from Total Motorized Route Density (TMRD). This clearly breaches the Forest's commitment to maintain the 2011 Baseline required by the NCDE Conservation Strategy.

* In fact, the PA admits that 17 miles of these roads (70%) will be closed or historical roads that were previously decommissioned and now will be improperly and illegally re-opened, with most going into Intermittent Stored Service where they'll be illegally "returned to the NFS road system", yet not counted against TMRD - Another clear breach of the 2011 Baseline and grizzly bear science.

* The PA improperly implies that because these 24.1 miles of roads aren't open to "public motorized use" that there are no consequences for grizzly bear security, which of course nonsense. Grizzlies are displaced by motorized use (Mace & Waller 1997) regardless of who is driving the vehicles.

* The Flathead Forest Plan admits that the agency still has 518 miles of roads that were supposed to be closed under A19 but won't be under the new Forest Plan. This project's attempt to raise that number by another 24 miles, and intentionally fail to count those miles against TMRD ignores grizzly bear science and violates the 2011 Baseline again.

* The PA indicates that 7.1 miles of road would be "temporary." However, under the Forest Plan, "projects" and the temporary roads that go with them can take 5 years, with extensions possible. As I noted in my forest plan comments, even the U.S. Fish and Wildlife Service (2014) acknowledges that such long-term displacement can negatively impact grizzly bear feeding, breeding, and survival. The Flathead needs to get back to using Best Available Science; reinitiating its A19 road-decommissioning program; and finally "right-sizing" its road system to the needs of the land.

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