

Swan View Coalition

Nature and Human Nature on the Same Path



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Chip Weber
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Rob Davies
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Re: Request for withdrawal of two Special Use Permits/ Authorizations issued without adequate Scoping or requests for public comment.

Dear Mr. Weber and Mr. Davies;

Swan View Coalition appreciates Supervisor Weber's 1/17/18 response to our 12/18/17 complaint in the above matter, which we filed along with nine other groups and individuals. Swan View Coalition also appreciates that you find Ranger Davies was incorrect to assert he could issue the permits "without NEPA, scoping or analysis."

We are disappointed, however, that you would consider Ranger Davies' crisis management and damage control to constitute public scoping. It still stands that Ranger Davies conducted no public scoping prior to announcing to his staff and the press that he "is issuing a temporary special use permit to Glacier Adventure Guides." Nor did he include in that announcement his intention to extend Isaak Walton Inn's permit to include a skier shuttle service.

Public scoping must occur well in advance of actions being taken and decisions being made. Half-hearted attempts to notify the public and paste together environmental analyses for decisions that have essentially already been made violate the spirit and letter of NEPA. We discussed these shortcomings in detail in the prior group letter and won't repeat them here.

You have denied us the relief we seek. Moreover, you follow Ranger Davies' simultaneous compounding and discounting of cumulative effects by stating the newly permitted activities will occur in an area and on a road already open to motorized use. This is no excuse or justification to add more human impacts to those already occurring.

Ranger Davies' 12/8/17 letter "To Whom It May Concern" notes that Izaak Walton Inn "currently provides improved access to backcountry skiers by grooming the Dickey Creek Road to the end of the road for both nonmotorized and motorized over snow uses." That improved access alone increases the number of people accessing the upper

reaches of Dickey Creek and it is no surprise that fur trappers are taking advantage of the easy access as well.

Members of Swan View Coalition, including me, have skied up the Dickey Creek Road to the end of the grooming twice in the last five years and have seen fresh wolverine tracks near the end of the road both times. We did not get photos of the tracks on 1/6/13 but we encountered very fresh tracks in the same area on 1/4/18. I did take photos on 1/4/18 of the wolverine sign and marten trap sets along the road.

We include a few of those photos at the end of this letter and conclude that a wolverine is marking its territory near the end of the Dickey Creek Road, where traps are also set apparently for pine marten. This is not a good mix to begin with and near the end of Dickey Creek Road is the last place a ski shuttle should be dropping of skiers to begin their day of skiing. Give wildlife a break!

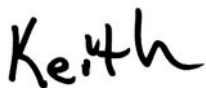
Members of Swan View Coalition have skied Dickey Creek Road and beyond prior to it being groomed by Izaak Walton Inn and since. There is no need to groom this road for skiers to enjoy it and the uplands; doing so only increases the human penetration of remote wildlife habitats. The easier access provided by allowing snowmobiling and grooming is resulting in the setting of traps in the habitats of threatened and non-target species like lynx and wolverine with the potential for non-target injury and death.

From the standpoint of cumulative effects in the face of increasing human populations and outdoor recreationists, you should be looking at closing the Dickey Creek Road to snowmobiles and no longer grooming it in order to allow inconvenience to once again naturally limit the magnitude and depth of human impacts. Instead, you are following a sure recipe for disaster for both people and wildlife in the area.

Your monitoring during the life of the temporary permits will not capture the levels of use and conflicts likely to occur should more permanent permits be issued and years of promotion of the service offered under the permits ensue. Please nonetheless include this letter in your project file and monitoring program.

This letter is written on behalf of Swan View Coalition only, but is cc'd to the other parties to the 12/18/17 complaint. When submitting this letter to you via email, we will also attach your 1/17/18 letter so all parties have been informed of your response.

Sincerely,



Keith J. Hammer
Chair

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Keith Hammer's January 4, 2018 Photos Taken up Dickey Creek Road



Wolverine tracks on ski track just beyond the end of the groomed road.



Wolverine marking of tree alongside the last stretch of groomed road.



Wolverine tracks leaving groomed road, crossing creek and heading away from road.



Trap set visible from groomed road (one of a half-dozen or more).