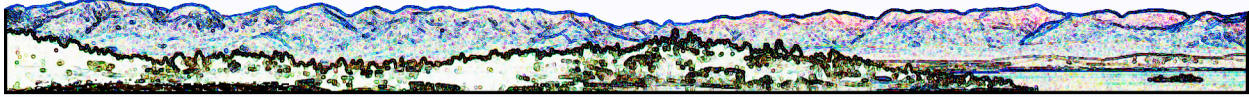


Swan View Coalition

Nature and Human Nature on the Same Path



3165 Foothill Road, Kalispell, MT 59901

swanview.org & swanrange.org

ph/fax 406-755-1379

January 22, 2018

Deb Bond - Project Leader
Tally Lake Ranger District
650 Wolfpack Way
Kalispell, MT 59901

Re: Comments on the Taylor Hellroaring Project EA
Submitted as PDF via comments-northern-flathead-tally-lake@fs.fed.us

Dear Ms. Bond;

Please accept these comments on the Taylor Hellroaring EA, per Ranger Timchak's 1/10/18 letter inviting us to do so. These comments are submitted on behalf of Swan View Coalition, Friends of the Wild Swan, WildEarth Guardians, and Brian Peck.

These same groups submitted a letter to Ranger Timchack on 4/20/17 for inclusion in the Taylor Hellroaring Project File. That letter contended primarily with "inadequate regulation of mountain biking and use of 'stored' roads in the NCDE" Grizzly Bear Ecosystem. Our comments herein focus primarily on how well the EA has or has not addressed our concerns.

The Alt. 2 Proposed Action still proposes the construction or authorization of 40 more miles of bike trails in an area already riddled with logging roads and often-unauthorized bike trails. Alt. 3 "was designed to address issues concerning proposed trail development. Commenters were concerned about trails located close to private property, the density of trails and potential impacts of some trails to wildlife-human encounters, wildlife and aquatic habitat." (1/10/18 Timchack letter). Alt. 3 nonetheless still proposes 26 miles of bike trails.

Neither the Timchack letter nor the EA adequately capture and respond to our concern about mountain bike use of abandoned or "stored" roads without prior authorization. Nor do they adequately capture and respond to our concerns about the agency authorizing mountain bike use and trails where it has been established illegally.

Developing Alt. 3, which would build and/or authorize nearly two-thirds the miles of bike trails as Alt. 2, does not present an adequate range of NEPA alternatives. Nor does it provide an adequate response to and relief of our concerns.

We've reviewed Tables 2-3 through 2-8 and nowhere do they make it clear which bike trails already exist and/or are already located on abandoned or stored roads. Nor do

they make it clear which trails would intentionally be placed on abandoned or stored road templates.

While the EA, on page 2-18, attempts to respond to our concerns about biking in bear habitat, it misconstrues the recommendations provided by the Board of Review into the death of Brad Treat. The BOR does not recommend constructing trails to have greater sight distances but instead recommends that sight distances be one factor in deciding whether or not a trail is suitable for mountain biking.

The EA turns this on its head and proposes trail construction that “may include increased vegetation clearing to increase sight distance.” In addition to allowing trail tread “widths of up to four feet,” wider clearing of vegetation invites higher speeds of mountain biking. This works against trying to minimize bike speeds and runs up against this stated objective on page 2-18: “Forest clearing in the proposed trail corridors would be reduced to the extent practical through careful trail design and layout.”

In terms of reconstructing formerly decommissioned or overgrown roads for logging, then simply storing those roads in ISS, both action alternatives would do so on “nearly 4 miles of historic road template.” This fails to respond to our concerns and fails to develop an adequately wide range of NEPA alternatives.

We are pleased to see that the EA, on page 3-169, acknowledges that the displacement of bears by human activity can result in reduced fitness and mortality and includes a citation to the Forest’s own “Evaluation and Compliance” document (USDA Forest Service, 2017a):

Grizzly bears have been shown to have a negative relationship with human development and activity. High human activity levels may negatively affect grizzly bears by causing displacement from preferred habitats. Grizzly bears are highly dependent upon learned habitat; displacement into unknown territory may lead to sub-marginal nutrition, reduced reproduction, or greater exposure to adult predatory bears or human food sources, which can lead to human-caused mortality (R. D. Mace & J. S. Waller, 1997; USDA Forest Service, 2017a). Roads and their associated traffic are known to lessen the effectiveness and use of adjacent habitat, and expose bears that do travel on or near them to elevated risks from human-caused mortality (Kasworm & Manley, 1990; R. D. Mace & J. S. Waller, 1997; B. N. McLellan & Shackleton, 1989).

We are also pleased to see that the EA, on page 3-175, acknowledges the difference between temporary displacement of bears by logging activity and the long-term increasing displacement of bears by increasing recreational use of trails:

It is a different situation when considering the increased human activity in the project area that will be the result of proposed trail construction included in the project (Table 3-74, below). This displacement would be long-term and increasing over time. The access points for these proposed trails are located close to the town of Whitefish and would tie into a larger system of trails in the

Whitefish area. The potential for human encounters with bears along newly constructed trails is discussed below.

Alternative 2 has the greatest potential for displacing grizzly bears both during implementation of proposed activities and into the future resulting from increased human activity in the project area due to the additional miles of trail proposed for construction, especially the trail immediately adjacent to the ski and summer resort (Trail 2) and the two connector trails (C3 and C4) that would facilitate access to the Smoky Range National Recreation Trail (NRT), which passes directly through the center of a large area of Security Core. This trail could become a high-use trail in the future, particularly if access is facilitated through the construction of either or both of these two connector trails.

Under Amendment 19, a trail that becomes high-use would then have to be buffered out of Security Core - which would reduce the amount of Security Core. This would violate A19. Were the revised Forest Plan not changing the definition of Security Core into "Secure Core" where high-use trails are allowed with no reduction in Core, this increase in trails and trail use would also violate the revised Forest Plan.

We can't find where the EA discusses the probability that Taylor Hellroaring could be decided under the existing Forest Plan and not reduce Core until trail use actually increases, claiming that the decision meets A19. Then, once the trail use does increase as expected, the Forest can excuse those impacts as still being in compliance with the revised Forest Plan because the Forest Plan no longer accounts for the displacement of bears from trails. This the revised Plan does with its new definition of Secure Core, which would show no decrease in Core over the amount that existed in 2011 so that it supposedly complies with the NCDE Conservation Strategy.

Yes, that is how downright deceitful the revised Forest Plan is. But the EA does not adequately disclose and discuss these circumstances. Nor does dropping Trails 1, C3 and C4 from Alt. 3 provide the wide range of NEPA alternatives needed to address these issues across the project area. Nor does doing so address the issues of increased bear displacement from trails not in Core, whether they reach "high-use" levels or not. A19 developed "high use" non-motorized criteria in order to approximate displacement similar in degree to displacement from a motorized road or trail, not to imply that lesser used trails do not displace bears.

Moreover, many of these trails pass through habitats providing key bear foods, inviting disaster for both bears and bikers. EA page 3-179:

Given that many of the trails are proposed in areas known to receive seasonal use by bears due to high quality forage, the likelihood of a human-bear conflict is moderate, particularly along trails that pass through huckleberry patches or riparian habitats or that cross loud streams (Table 3-74 above), in addition to trails that receive a high number of users.

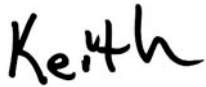
We know of these dangers and likelihood of human-bear encounters not only from the research and BOR reports, but through the personal experience of Keith Hammer. Though he has hiked in bear habitat his entire ambulatory life, the only times (twice)

that he has been charged by bears was while riding a mountain bike at modest speed. The Taylor Hellroaring project is doing neither mountain bikers nor bears any favors and we ask that the trail proposals be stricken from the alternatives.

We appreciate that you have dropped the proposal for a new rental cabin from consideration in this proposal. However, we don't think the EA does an adequate job of assessing how the bike trail proposals are likely to increase bike-to-cabin use and demand, given DNRC's existing lookout cabin on Werner Peak. We find the short mention on page 3-5 confusing and inconclusive about what will or will not occur with or without the Taylor Hellroaring actions.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and slightly slanted to the right.

Keith J. Hammer
Chair

Also signing for:

Arlene Montgomery
Program Director
Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911

Marla Fox
Rewilding Attorney
WildEarth Guardians
80 SE Madison Street, Suite 210
Portland, OR 97214

Brian Peck
Independent Wildlife Consultant
96 Trap Line Road
Columbia Falls, MT 59840