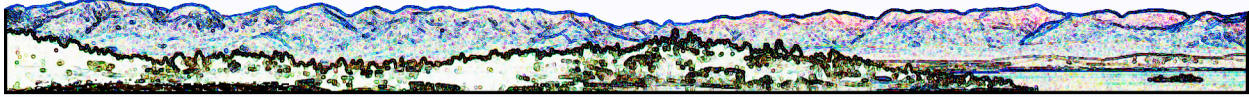


Swan View Coalition

Nature and Human Nature on the Same Path



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January 21, 2018

Kendall Cikanek - Acting District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Comments on Bug Creek Project Scoping Notice
Submitted as PDF to comments-northern-flathead-swan-lake@fs.fed.us

Dear Mr. Cikanek;

Please accept these initial scoping comments on the Bug Creek Forest Health and Fuels Reduction Project Proposal dated 1/12/18. They are submitted on behalf of Swan View Coalition, Friends of the Wild Swan, WildEarth Guardians, and Brian Peck.

We appreciate this opportunity to see how the Flathead National Forest intends to conduct projects and analyses under the revised Forest Plan once it has a final Record of Decision. At least that's what we assume is going on here because the initial analyses and Proposal you present fail to comply with the current Forest Plan, as per Table 1.

Table 1: Crane Mountain Grizzly Bear Subunit Motorized Route Density and Security Parameters

	OMRD	TMRD	Security Core
Amendment 19 Objectives	≤19%	≤19%	≥68%
Current A19 Conditions	28%	53%	25%
Bug Creek Proposal, p. 4	"Secure habitat for grizzly bears . . . is abundant."		

Apparently, the new way of doing analyses has abandoned scientific integrity altogether. As brief as it is, your Scoping Proposal reveals how the new analyses is designed to wholly discount the impacts of road and trails, both motorized and non-motorized, on grizzly bears, as follows.

On page 4, the Proposal states: "Secure habitat for grizzly bears and elk during hunting season is abundant." How can this be, when Fish and Wildlife Service's 11/22/17 Biological Opinion on the revised Forest Plan lists the current Amendment 19 habitat security parameters for the Crane Mountain Subunit as 28/53/25 for OMRD/TMRD/Secure Core, respectively (page III-62)?

FWS's BO, on page III-87, continues to use the 19/19/68 parameters as OMRD and TMRD maximums and Core minimum above and below which Incidental Take of female grizzly bears is anticipated, based on these "research benchmarks." In other words your scoping analyses somehow conclude that abhorrently substandard OMRD, TMRD and Core deserve to be called "abundant" grizzly bear security!

Apparently, what you are trying to do is simply declare that whatever the 2011 or current habitat security happens to be, it is now hereby declared "abundant" because the revised Forest Plan has changed up how it defines and calculates OMRD, TMRD and Core. Your findings are arbitrary, capricious, an abuse of agency discretion, an ignorance of the best available science, and not in accordance with law.

Nor do your analyses comply with the best available science and promises made in the draft NCDE Grizzly Bear Conservation Strategy to retain the grizzly bear habitat security conditions that existed in 2011 - both of which are promised in the revised Forest Plan. The Proposal gets it wrong right from the get-go, in describing the existing habitat security for grizzly bears and elk.

With this blasphemy at the outset, you then proceed to renege on prior road decommissioning decisions and instead propose to build/authorize up to 15 miles of mountain bike trails (some already illegally built) and build 17 miles of permanent road in this already over-roaded area (with some of that road construction apparently on previously decommissioned road templates that you would bring back into the road "system"). The bike trails would appear to reside in the revised Plan's Crane Mountain MA-7 Focused Recreation Area. (See the Proposed Action Transportation Map).

We object in the strongest of terms to the notion that mountain bike trails and stored "ISS" roads that may still function as trails (yet be omitted from calculations of TMRD) can exist in unlimited numbers without displacing and having a negative impact on grizzly bears. This is the type of non-analyses laid out in the Forest Plan and FEIS that we are currently objecting to for reasons largely described in our comments on the draft Conservation Strategy and draft Habitat Based Recovery Criteria, as well as in our Roads to Ruin/TMRD report and our Supplement to that report. Please find those documents at the following links and consider them a full part of this comment letter:

http://www.swanview.org/reports/SVC_on_NCDE_CS_130730.pdf

http://www.swanview.org/reports/SVC_HBRC_Oral_160707.pdf

http://www.swanview.org/reports/SVC_et_al_HBRC_Comments_180103.pdf

http://www.swanview.org/reports/Roads_to_Ruin.pdf

http://www.swanview.org/reports/Supplement_to_Roads_to_Ruin_171205.pdf

We do appreciate your mention that the 1996 Crane Mountain Salvage decision called for the decommissioning of 84 miles of road, and that 60 miles of that work remains left undone. The Flathead's 3/23/15 Road Decommissioning spreadsheet, however, lists 107 miles of decommissioning under that decision, with 72 miles left undone. See:

http://www.swanview.org/reports/150323_FNF_Decommm_Spreadsheet.pdf

More importantly, however, we appreciate that you rightly refer to these road treatments as "decommissioning" even though the 6/18/96 Crane Mountain Salvage Decision Notice and the 1996 Crane Mountain Supplement Appendix E refer to it as

“reclamation.” As you’ll find in the A19 administrative record and our Roads to Ruin/TMRD and Supplemental reports linked above, the A19 Amended EA and the Road Decommissioning Spreadsheets treated the two terms as synonymous from the very beginning of A19. We’re glad that you do also.

What we don’t appreciate, however, is “This project proposes to add the roads back on to the road system from decommissioning in the Crane Mountain salvage decision” (Proposal page 5). Your Proposal not only abandons the decommissioning already decided in 1996, it replaces it with the construction of new roads, the reconstruction of previously decommissioned roads and with the trading in of permanent road barriers for gates to facilitate logging, forest management and potential firefighting. Page 5, for example, states: “Two barriers will be replaced with gates on NFSR’s 9713 and 9714 to maintain drive through access for wildland fire suppression and forest management access within the project area.”

Replacing permanent barriers with gates and building roads to be put into storage (ISS), where they can continue to be used as trails and easily violated by motor vehicles, does not maintain the grizzly bear habitat security conditions of 2011, let alone accomplish the level of habitat security promised in 1996 (even though the 1996 decision itself would fall short of 19/19/68 standards/research benchmarks).

Storing a road as ISS, when it is not needed “within the next 10 to 20 years” (Proposal page 5), does not provide the wildlife security intended by reclaiming and decommissioning roads under A19. ISS allows the road to be blocked to motor vehicles for a mere 50 feet and to remain barren of vegetation where it continues to get human use by becoming one more favorite bike path, foot path or ATV trespass. A19 requires that the road be revegetated and no longer function as a road or trail, motorized or non-motorized.

Moreover, “ISS roads would not be returned to the productive land base” (Proposal page 6) which, if they did, would include the growing of trees and brush that limit human use and secures wildlife habitat from such intrusions. Decommissioning does return roads to the productive land base, per NFMA requirements. The 2011 grizzly bear habitat security conditions will not be retained under this Project.

Lastly, we do appreciate the Proposal’s finding, on page 4: “For numerous wildlife species, reducing closed road densities can decrease displacement and mortality risk.” This statement is consistent with A19 and the best available science (provided it is not done by opening closed roads). Storing closed roads as ISS, however, does not reduce closed road densities. That requires that roads be decommissioned and removed from the road “system.”

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:

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