

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

November 15, 2018

Robert Davies - District Ranger
Hungry Horse - Glacier View RD
PO Box 190340
Hungry Horse, MT 59919

Re: Crystal Cedar Project Comments sent as PDF to:
comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us

Dear Mr. Davies;

Please accept these comments on the Crystal Cedar Project Proposed Action (PA) into the public record. They are submitted on behalf of Swan View Coalition.

While we do not agree with the logging and other vegetative treatments proposed in the Project, we will focus here primarily on road and mountain bike issues, and how both impact wildlife and other resources.

Purpose and Need

Page 1 of the PA includes the following as a Purpose and Need: "Provide sustainable trail-based recreation opportunities close to local communities that are compatible with other resources." The PA, however, does not disclose whether the Project will be assessed under the current Forest Plan or the still-pending revised Forest Plan.

Under either Plan, however, the continued use of temporary roads as foot, bike and horse trails is not allowed due to limits on Total Motorized Route Density and the NFMA requirement that temporary roads be fully re-vegetated and returned to resource production. Amendment 19 to the current Forest Plan requires that roads be reclaimed, fully re-vegetated, and no longer function as a road or a trail, motorized or

non-motorized, in order to not be counted in TMRD calculations. A19 does not allow the increase in TMRD that this Project would cause.

The revised Forest Plan requires that the 2011 baseline conditions for A19's 19/19/68 parameters be maintained. Hence, reconstructing or constructing temporary roads and then using some of them as trails will increase TMRD, result in a net increase in TMRD, degrade the 2011 baseline, and hence violate the revised Forest Plan, NCDE Grizzly Bear Conservation Strategy, and FWS's Biological Opinion on the revised Plan. For a full discussion of how A19 was developed, the science it is based on, and how neither is being complied with during implementation of the current Forest Plan, in the revised Plan, or in the Conservation Strategy, please visit the following links:

http://www.swanview.org/articles/whats-new/supplement_issued_to_roads_to_ruin_report/248

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

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

http://www.swanview.org/articles/reports-documents/swan_view_testifies_at_grizzly_bear_habitat_workshop/228

The Regulatory Environment and Issues That Must be Addressed

Your analysis of this Project must include the following and clearly answer the following questions:

1. What are the laws and regulations setting forth the requirements for how temporary roads can and cannot be managed, used, and reclaimed? Please include the cited passages in your analysis, not just citations that the public must then look up.
2. What are the Forest Service Manual, Handbook, and Forest Plan requirements for how temporary roads can and cannot be managed, used, and reclaimed? Please include the cited passages in your analysis, not just citations that the public must then look up.
3. Where, specifically, is it written that temporary roads can continue to be used as either motorized or non-motorized trails and how is this consistent or inconsistent with items 1 and 2, above? Please include the cited passages in your analysis, not just citations that the public must then look up.
4. The science upon which A19 is based made it clear that roads must essentially be made impassable to both motorized and non-motorized human use in order to not be included in Total Road Density/TMRD. What science does the Flathead rely upon to allow motorized or non-motorized human use of old road templates, temporary roads,

roads rendered impassable to motorized vehicles, and non-motorized trails without including those roads/trails in calculations of TMRD or buffering them out of Security Core or Secure Core? Please provide links to the cited research that do not require purchase by members of the public.

Project Specific Comments and Questions

5. Please see the attached 11/9/18 Advocacy Alert posted by Flathead Area Mountain Bikers. Among other things, it encourages mountain bikers to request a “bike specific trail in the [Crystal Cedar] project.” We object to such a bikes-only trail, primarily on the basis that it will promote faster biking speeds in grizzly bear habitat, where bikers need not worry about running into hikers and horses. For a detailed accounting of our concerns about mountain biking in grizzly bear habitat, lessons learned from the death of Brad Treat and the death and injury to others, and our recommendations for minimizing these conflicts, please see our 4/20/17 letter to the Flathead at: http://www.swanview.org/reports/Bikes-Trails-Roads_NCDE.pdf

6. In reference to the above and attached FAMB Advocacy Alert and our 4/20/17, we object to the notion that the Forest Service should be in the business of making unauthorized trails legal and part of the System. We similarly object to the notion that the Forest Service should be in the business of essentially privatizing public resources by bringing on private partners to build and maintain trails that otherwise cannot be afforded or sustained either financially or in terms of impacts to wildlife.

7. Crystal Cedar is but one current proposal on the Flathead to build or bring into the trail System user created mountain bike trails. Four current proposals on the Flathead would add 79 miles of bike trails to the System: Hungry Lion - 12 miles, Taylor Hellroaring - 28 miles, Bug Creek 15 miles, and Crystal Cedar 24 miles. Where is the analysis of the cumulative effects of these trails, all in grizzly bear habitat? Please include this analysis in your Crystal Cedar NEPA documents.

Conclusion

It appears that this bike trail proposal is “sustainable” only by turning substantial management over to private partners. Based on what we see in this PA and the other trail proposals mentioned above, the PA is not “compatible with other resources,” especially wildlife security and, conversely, public safety. The Flathead is engaged in the unlawful process of presenting the public with a wish list of mountain bike trail

opportunities that are not adequately constrained by a prudent application of science, regulations and concerns for the safety of both trail users and wildlife.

Sincerely,

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

Keith J. Hammer
Chair

Attachment: 11/9/18 Advocacy Alert posted by Flathead Area Mountain Bikers.