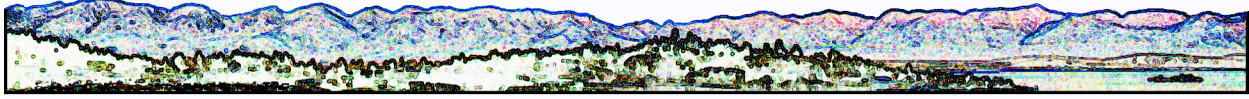


Swan View Coalition

Nature and Human Nature on the Same Path



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January 16, 2020

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

Re: Comments on Frozen Moose Proposed Action

Sent via email to comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us

Dear Mr. Davies;

Please accept these comments into the public record in the above matter. We incorporate by reference all comments and documents submitted by Friends of the Wild Swan and Brian Peck in this matter.

For the reasons set forth below, we find your Proposed Action inconsistent with the Forest Plan and its pledge to maintain the grizzly bear habitat conditions that existed in 2011 in order to be consistent with that same pledge made in the NCDE Grizzly Bear Conservation Strategy. We also find the PA will result in significant effects on the environment and require the preparation of an EIS and formal consultation with FWS regarding impacts to listed species.

We've included with the hard copy of this letter a companion DVD of supporting documents. References to those documents will generally follow the format of "DVD Folder XX, filename."

Let us say at the outset that this PA appears skewed by you having consulted with a select segment of the American public about this portion of their public land prior to scoping (the 2019 North Fork Interlocal meeting and additional, unspecified public contacts - see your 12/18/19 Frozen Moose cover letter). We received no notification that you were conducting pre-scoping discussions about Frozen Moose or that you were at that time soliciting comments from the public, even though we have repeatedly asked to be notified and invited to be involved in all Flathead National Forest projects.

It is of no comfort that the new Forest Supervisor, Kurt Steele, demonstrates a similar bias in stating "I look forward to engaging with our partners, local businesses, and surrounding communities as we write the forest's next chapter together" (1/10/20 Flathead NF press release). The broader public should always have equal say in the

management of their lands. It should not be limited to local partners, businesses and surrounding communities.

A. The Forest Plan and Its Implementation Will Not Maintain 2011 Grizzly Security

The revised Forest Plan's Biological Assessment and the NCDE Grizzly Bear Conservation Strategy both pledge to maintain the on-the-ground grizzly bear habitat conditions that existed in 2011, conditions believed to have resulted in a larger NCDE bear population and found necessary to conserve the NCDE population. As the revised Plan has been implemented and we have filed Objections on various projects, however, it has become clear through the Flathead's claims and various documents that implementation of the Plan will not maintain those 2011 conditions.

We incorporate here, by reference, our recent Objections to the Hellroaring Basin Improvement Project - which we have included, along with pertinent project file exhibits, in DVD Folder 39. Our HBIP Objection, on pages 2-3, cites to the appropriate DVD folders containing our Objections to the revised Forest Plan, our Roads to Ruin report and its supplements, comments on FWS's Habitat-Based Recovery Criteria for the NCDE, and our comments on the NCDE Grizzly Bear Conservation Strategy - all of which further describe how the Forest Plan and Conservation Strategy will fail to maintain the on-the-ground 2011 habitat conditions. (See DVD Folder 00, SVC Forest Plan Objection.pdf; Folder 04, Roads to Ruin.pdf and its 3 supplements; Folder 21 HBRC Comments; and Folder 22 SVC on NCDE CS 130720.pdf; and the remainder of our HBIP Objection).

We will repeat here the 5 key ways in which the Plan and its implementation fail to maintain the promised 2011 habitat conditions:

1. By allowing unlimited miles of non-motorized trails to be constructed with no trail density standard - or 2011 Baseline parameter - to limit them.
2. By allowing unlimited miles of non-motorized "high-use" trails to exist in the Secure Core Baseline parameter by redefining the previous Plan's Amendment 19 "Security Core" in order to allow them to go undetected in the revised Plan's "Secure Core." "Security Core" did not allow such high-use trails.
3. By allowing an unlimited mileage of roads - by not including roads with the entrance simply rendered "impassable" to motor vehicles in Total Road Density, even though the road will be retained as a road and continue to contribute human impacts to grizzly bear habitat. This was not allowed under Amendment 19, which required that roads had to be reclaimed and no longer function as roads or trails, motorized or non-motorized, in order to be omitted from TRD.
4. By not including Special Use Permit roads that are on Forest Service land, and often simply closed by gates, in calculations of TRD.
5. By allowing road construction and the relaxing of road closure types to diminish the amount of "security habitat" greater than 500 meters from roads simply because that

habitat does not already remain in blocks of at least 2,500 acres. This is essentially a license to further fragment already fragmented habitats and further relegate security habitat to higher elevations rather than allow it to persist in critical lower elevations such as Hellroaring Basin.

Please read our Hellroaring Basin Objections in their entirety in order to grasp the entire context of our comments here. We will discuss Failure #3 further, below.

B. Roads Stored on the System Must be Counted in TMRD

We wholeheartedly disagree with your proposition to rebuild a number of previously decommissioned roads, then simply store them but not count them in TMRD. The administrative record for Amendment 19, including its Amended EA, document that a road must be decommissioned, not just reclaimed, and no longer function as a road or trail, either motorized or non-motorized, to be omitted from calculations of TMRD. Your PA simply states these reconstructed historical / previously decommissioned roads will be stored as roads “impassable” to wheeled motor vehicles during the non-denning season. This will lessen existing grizzly bear security by not decommissioning the roads and insuring they no longer functions as either a road or a trail. Nor will storing them as impassable require that all stream-aligned culverts be removed in order to prevent the failure of culverts in these admittedly “critical habitat” bull trout watersheds.

The PA is self-contradictory in proposing to remove stream-aligned culverts from three historical / previously decommissioned roads (PA at 11) while simultaneously proposing to reconstruct 13 miles of historical / previously decommissioned roads, then not removing their stream-aligned culverts and instead simply storing those roads as “impassable” system roads (PA at 7). Stored impassable roads will not receive adequate monitoring to insure that culverts do not fail and send sediment downstream toward bull trout critical habitat.

In DVD Folder 04, we included our 2016 Roads to Ruin report and its three supplements. These provide the details of our concerns here, most of which are provided in Roads to Ruin’s Appendix A TMRD paper. The upshot here is that the A19 Amended EA confirmed, in response to public comments, that roads must be decommissioned to reduce TMRD, in part by indicating on page 97 that the estimated miles of road to be reclaimed would also be decommissioned / removed from the road system. Moreover, the required annual reports from the Flathead to FWS on the implementation of A19 have, since 1995 to present, included a running tally of the miles of road decommissioned and removed from the system as a prime indicator of (reducing) adverse effects to grizzly bear.

The Flathead since 2013 and via the revised Forest Plan, however, has tried to redefine A19 to allow roads to be stored in the system and yet not counted in TMRD to assess accurate impacts to bears and other wildlife species. It’s lame defense has centered on the fact that the A19 Amended EA also mentioned that some reclaimed roads may need to be rebuilt to access timber in the future - which is aside from the fact that the EA finds those roads in the meantime would be removed from the system and have their culverts removed. Moreover, the NFMA requires that roads removed from the system

be re-vegetated within ten years, which goes hand-in-hand with A19's emphasis on re-vegetating roads to insure they no longer function as a road OR a trail.

In this regard, we include the Flathead's 4/28/93 Draft Implementation Note #12 in DVD Folder 04, Supplement to Roads to Ruin 171205.pdf. This Note lays out the need to include in road density calculations and maps all roads "except those sufficiently revegetated with shrubs and/or trees to deter travel by foot or ATV" in order to be consistent with the South Fork Grizzly Bear Study Project, which remains some of the best available science for A19 and Flathead NF management. Draft Note #12 was never finalized because it was instead incorporated into A19 as described in part in our attached Roads to Ruin/TMRD paper.

Frozen Moose and the Flathead in general cannot now simply rebuild previously decommissioned roads, which removes the vegetation that has become reestablished, then store them as system roads with no regard to whether they adequately re-vegetate or are used as trails - while nonetheless omitting them from TMRD, other numerical assessments of the impacts to bears, and apparently the NFMA's intent that long-unused roads be re-vegetated. This does not maintain the on-the-ground habitat conditions that existed in 2011, as required by the Forest Plan and Conservation Strategy, and allows the degradation to remain unaccounted for in the Baseline parameters.

Moreover, the Flathead's forest-wide 2014 Travel Analysis Report makes no mention of the Flathead increasing its road system by rebuilding and retaining previously decommissioned roads. Yet Frozen Moose follows Hungry Lion, Trail Creek Salvage, Crystal Cedar, Bug Creek, Mid-Swan, and Taylor Hellroaring projects as projects that did or propose to do just that. All totaled, these projects have reconstructed or propose to reconstruct 37 miles of previously decommissioned roads and return them to the road system. Plus, another 69 miles of new system roads have been proposed, which would increase the road system by 106 miles in just these eight projects! (See DVD Folder 15, Flathead NF Road and Trail Construction 200114.pdf). All this and it magically does not increase Total Road Density!

Nor did the Flathead's Revised Forest Plan DEIS discuss increasing the size of the road system in this manner. The Frozen Moose PA makes no mention of the cumulative number and miles of historical/previously decommissioned roads being reconstructed on the Flathead and then retained in the system as impassable to motor vehicles, nor does it indicate whether a project-specific or area-specific Travel Analysis Report is being prepared. This the Flathead and DEIS must do.

C. Road Decommissioning Preferred Over Berm Closures in Security Core

While the proposal to relocate the closure berm on Road 1681 to increase Secure Core may sound noble, it is not the preferred method prescribed under A19. A19 sought to prevent the failure of culverts behind berms (or the constant monitoring and maintenance needed to prevent failure) by emphasizing roads be decommissioned in grizzly bear security core rather than bermed shut. The goal was to make Core more resistant to human access and to make it unnecessary to ever have to bring heavy

equipment into Security Core to maintain culverts and bridges. Bermed roads were supposed to be the exception to the decommissioning rule in Security Core, yet the Flathead has essentially reversed that rule via implementation of both its former and revised Forest Plans. (See DVD Folder 04; Roads to Ruin.pdf).

It is of no comfort that the PA has identified three roads it says are historical/ previously decommissioned, yet contain stream-aligned culverts that need to be removed via Aquatic Restoration. Stream-aligned culverts are not supposed to be left in abandoned roads, historical roads, or roads decommissioned under A19! So why should the public trust the Flathead to leave such culverts in “impassable” roads and bermed roads, even if some of them are upsized to reduce the chances of failure?

If you upsize culverts or otherwise leave them in closed roads, are you prepared to monitor them on a regular basis as required by the 4/15/15 FWS Biological Opinion on the Effects of Road-Related Activities to Bull Trout (DVD Folder 15, 150415 Roads BiOp.pdf)? Simply put, the public has little reason to trust that upsized culverts will be monitored and maintained in Security Core any better than the existing ones, or that further future mechanical entries into Security Core will not be needed to maintain them.

We ask that your DEIS include an extensive photo inventory of all culverts in the project area, the problems with them, and a full environmental and economic analysis of upsizing these culverts versus removing all of them through thorough road reclamation and decommissioning.

D. Specific Road Issues

We compared the PA maps with the KML files downloaded 1/13/20 from the Flathead’s Geospatial Data page, which was last updated 12/18/17 shortly after the Flathead issued its Biological Assessment on the revised Forest Plan and FWS responded with its Biological Opinion. We viewed those KML files using Google Earth and have the following questions and comments:

1. While placing a berm on Road 1681 to increase Secure Core is appreciated, this road runs deep into existing Core and crosses many steeply incised streams. This road should instead be decommissioned and have all stream-aligned culverts removed to prevent erosion and culvert failures - as preferred in Core. This is especially important as the streams this road crosses flow into bull trout critical habitat in Red Meadow Creek.

The PA makes no mention of the condition of this already bermed road in Core or its culverts. We do know that the Flathead failed to develop a single culvert monitoring plan, as required under A19, for any of its bermed roads in Core (see DVD Folder 04, Roads to Ruin report and its three supplements). The DEIS must make this right and fully disclose the condition of this road and its culverts.

2. While we appreciate the PA calls for Aquatic Restoration on “Historical Road” HIR 1662B near Red Meadow Creek, the District map and the Flathead’s KML files indicate

this is system road 1662 Red Meadow Ridge. The PA fails to describe the specific Aquatic Restoration measures other than stream-aligned culvert removals that would be applied to this closed system road, let alone whether this road is being decommissioned and removed from the system. The DEIS must do this.

3. Roads 10828 and 1682 appear correctly identified as historical/previously decommissioned, yet still having stream-aligned culverts. While we appreciate the PA calls for Aquatic Restoration of these roads, it fails to detail what this will entail aside from removing stream-aligned culverts. The DEIS must do this. We urge that existing vegetation and other debris, which helps prohibit human entry of these roads and helps control erosion, be disrupted as little as possible during Aquatic Restoration. Please use a spider-type backhoe or locate an excavator operator of the caliber that removed the culverts from Raghorn Road in order to minimize this disturbance. Ditto for Road 1662, above.

4. We object in the strongest of terms to the reconstruction of HIR 1672. The Flathead's KML files indicate this road is "not needed." The thinning and logging units it would access are distant from private property and structures and will be ineffective in protecting such property from fire. Moreover, the proposed reconstruction extends outside the WUI and leads to no proposed units whatsoever. Worse yet, about 95% of this reconstruction would occur in Secure Core, rendering it less secure. This does not maintain the on-the-ground habitat conditions that existed in 2011, as required by the Forest Plan and Conservation Strategy, and allows the degradation to remain unaccounted for in the Baseline parameters.

5. Ditto objection to the reconstruction of HIR 10887 as a temporary road. Even though it would be "temporary," reconstruction of this road in Core will remove or set back the reestablishment of vegetation needed to prohibit human use of this road template. This does not maintain the on-the-ground habitat conditions that existed in 2011, as required by the Forest Plan and Conservation Strategy, and allows the degradation to remain unaccounted for in the Baseline parameters.

6. Ditto objection to the reconstruction of the two short HIR roads stemming from Roads 10888 and 10889. Ditto objection to the reconstruction of HIR 5332, 5322A, 1675, and 1675. The Flathead's KML files indicate these roads are "not needed" and almost the entire length of them is in Secure Core. Ditto objection to the reconstruction of HIR 10914 and the plethora of other permanent and temporary roads that are both inside and outside Core and often in areas that have already been heavily logged. Ditto for the extension of FSR 9899 onto the HIR portion - is road access really needed for mostly hand-thinning and are people no longer able to carry a chainsaw on their back or a sled for a couple of miles? This road reconstruction does not maintain the on-the-ground habitat conditions that existed in 2011, as required by the Forest Plan and Conservation Strategy, and allows the degradation to remain unaccounted for in the Baseline parameters.

The Flathead has allowed an overzealously drawn WUI boundary to interfere with its duties to protect and conserve the habitats of threatened and endangered species including grizzly bear. The vast majority of the proposed permanent and temporary road construction in Frozen Moose is in Secure Core and distant from private property

and structures. Would the road construction, vegetation treatments and Aquatic Restoration work occur during the grizzly bear non-denning season when in Core? As will be discussed below, vegetation and fuels reduction treatments are largely ineffective at protecting property and structures when more than 100 feet away. We will also discuss below how thinning and other treatments actually increase the likelihood that fire will move quickly through the landscape.

E. Vegetation, Fire, Resilience

The vast majority of the PA talks about vegetation and essentially asks the public to trust that the agency and industry that chopped up the forest via logging and road building can somehow stitch it back together again via logging and road building.

A number of scientists and researchers are skeptical of the approach being taken in this Project. Whether conducted in the WUI or in the backcountry, logging and thinning has been found to be largely ineffective at changing fire behavior because it can't accurately predict where fire will occur, can dry out the treated areas and make them more flammable, and pales in the face of extreme weather and fire events. Please see DVD Folder 33 for Dr. Dominick DellaSala's 9/27/17 testimony in these matters for a good overview of the relevant research.

We also include in DVD Folder 33 Six et al (2018), which finds that logging and thinning likely screws up the natural selection process by removing trees that are the most genetically adapted to pine beetles - a choice that only nature can make - and hence adds the thinning mortality to the natural mortality. Similarly, we include in DVD Folder 33 Tague and Moritz (2019), which finds that increased tree growth following thinning can be "too much of a good thing" by producing larger trees that may experience greater water stress. In other words, nature would once again favor drought-resistant trees by killing the least resistant - whereas human thinning can unwittingly kill the most drought-resistant trees while simultaneously making the remaining trees less drought-resistant.

The PA's focus to "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" is misdirected. More simply put, it is directed at suppressing fires in fire-adapted ecosystems in order to supposedly protect private property and structures. The focus instead should be on helping private landowners to lower their home and structure ignition potentials in the "home ignition zone" within 100-200' of homes and structures.

Former Forest Service fire researcher Jack Cohen has spoken and written extensively about this misdirected focus:

Preventing WUI fire disasters requires that the problem be framed in terms of home ignition potential. Because this principally involves the home ignition zone, and the home ignition zone primarily falls within private ownership, the responsibility for preventing home ignitions largely falls within the authority of the property owner. Preventing wildfire disasters thus means fire agencies

helping property owners mitigate the vulnerability of their structures. The continued fire management focus on fire suppression suggests the WUI fire problem persists largely as a consequence of framing the WUI fire problem primarily in terms of the fire exclusion paradigm.

(DVD Folder 33, COHEN wui fire problem final.pdf). Rather than put the money and human effort where it matters, in the home ignition zone, Frozen Moose instead invests them in building roads, rebuilding roads, re-storing roads, thinning, and logging in a greatly exaggerated WUI and beyond. As made clear in these comments, fish, wildlife and the native ecosystem will pay the price. The results of this hugely misdirected make-work project will not help protect private homes and structures and it should not be regarded as some sort of noble venture.

F. Summary

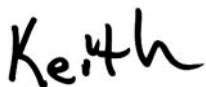
In summary, the Forest Service displays hubris in this Project proposal. It gives short shrift to the idea that nature can heal itself if the impediments to that healing are removed. It instead proposes to correct the problems created by human intervention through what research is already showing may be equally misguided human intervention. This project will not “improve the diversity and resilience of vegetative communities and associated wildlife habitat,” as described above in these comments.

The Project proposes to fix problems created by logging and road building with more logging and road building. This flies in the face of the Interior Columbia River Basin Ecosystem Management Project, which to the contrary and along with numerous other studies, found that roaded and managed ecosystems were the least resilient while those that were unroaded and unmanaged were the most resilient. High road densities have been correlated with nearly every malady that compromises ecosystem integrity. (See the Annotated Bibliography attached to Friends of the Wild Swan’s comments and the 3/28/16 version of that bibliography included in DVD Folder 34).

The largest impediment to ecosystem resilience in the Frozen Moose area is the road system, which greatly increases the likelihood of human-caused fires, the spread of noxious weeds, the sedimentation of bull trout habitat, and the displacement of wildlife. In order to restore the Frozen Moose landscape and help protect the WUI, this Project must focus its active management on reducing the road network instead of reducing vegetation far outside the immediate vicinity of homes and structures.

Thank you for this opportunity to comment and please keep us posted.

Sincerely,

A handwritten signature in black ink that reads "Keith".

Keith J. Hammer
Chair

Enclosure: DVD of supporting documents.