

Swan View Coalition Nature and Human Nature on the Same Path



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August 10, 2017

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

Re: Comments on Hungry Lion EA

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 for the Hungry Lion Resource Management Project. They are submitted on behalf of Swan View Coalition and the Montana Ecosystems Defense Council. We incorporate by reference the comments being submitted by Friends of the Wild Swan, WildEarth Guardians and by Jeff Juel on behalf of several groups.

We also incorporate by reference our prior letters of comment on the Hungry Lion Project and their attachments, including our April 20, 2017 letter submitted to you regarding "Inadequate Regulation of Mountain Biking and Use of Stored Roads in the NCDE." While we are pleased to see some of our concerns utilized in the development of alternatives in the EA, we are greatly disappointed in the still-narrow range of alternatives and the low level of analysis afforded. We are similarly disappointed in some of the comments made by your staff during the July 26 field tour, especially concerning the issue of unlawful mountain bikes.

Roads, Logging and Weeds

The EA notes on page 12 that public comments request "the project identify and implement the minimum road system" called for under the Travel Planning regulations. The minimum road system is never mentioned again, not even in the section explaining why the public request for more road decommissioning was not developed into an alternative (EA pages 14-15).

Yet the EA chapter on weeds makes it very clear that roads and logging are the major cause and vector for the spread of noxious weeds. Page 154 finds 94% of the 190 miles of existing road corridors in the project area either contain weeds or are with a quarter-mile of a weed infestation. Figure 8 on page 155 shows a slightly lower likelihood of

weed infestation along roads closed to public travel and shows that leaving roads open to accommodate spraying of weeds does not reduce the miles of roads with weeds.

Pages 153-154 of the EA find that 104 of the units proposed for vegetation management in Alternative 2 contain or are within a quarter-mile of weed infestations, acknowledges that logging equipment will likely spread weeds by disturbing soil and vegetation, and notes that less logging means less risk of weed spread. While page 154 warns that historic road status and putting roads into Intermittent Stored Service renders them impassable “for ongoing treatment of invasives,” page 155 shows that roads open for such treatments nonetheless remain infested with weeds. Moreover, page 154 rightly warns that reusing old road templates as either temporary roads or as logging roads returned to the system runs a high risk of spreading existing weeds further down those road corridors and into currently un-infested areas.

Why on earth, then, would the EA propose to do more logging in this area, to build more temporary roads and to return historic roads to the road system? The emphasis instead should be on utilizing scarce funds to reduce the road system to a size where weeds can be eliminated rather than spread. It is clear from the EA, page 455, that maximizing logging volume at low log prices and low appraised stumpage rates results in larger taxpayer losses and a waste of scarce funds.

The Forest Service is like a kid with its hand stuck in the cookie jar, refusing to let go of the cookie or refrain from stealing cookies in the first place. When will the Forest Service take a break from logging and road building until it has truly repaired the damage it has caused from past logging and road building - as in the case of weed infestations?

That is why Swan View Coalition, Friends of the Wild Swan, Montana Ecosystem Defense Council, WildEarth Guardians, and many others have called on the Forest Service to implement a truly sustainable and resilient “minimum road system” under its Travel Planning regulations. But the EA remains silent about that call, even the call made specifically of the Hungry Lion project.

Roads and Aquatics

The Aquatics section of the EA is unduly redundant and hard to follow. Nonetheless, it makes clear that replacing stream-aligned culverts in roads, rather than carefully removing them and returning the stream to a natural stream profile, fails to eliminate the risk of culvert failure and the delivery of significant sediment to streams (pages 208, 220, 243, and elsewhere). We again urge you to permanently remove the culverts from Road 1614 to protect water quality and to insure you never have to bring heavy equipment into this grizzly bear Security Core again.

It is of no comfort that the EA, on page 206, claims “The action alternative is designed to minimize soil disturbance through utilization of . . . existing road systems.” This is simply not true. Temporary roads would be constructed and historic roads rebuilt to facilitate logging. The only way to read this claim as true is to acknowledge the Flathead has two cumulative road systems because it has improperly left old road

prisms on the landscape by simply abandoning them or minimally decommissioning them from its formal road “system.” Leaving abandoned road prisms on the landscape then throws off the entire environmental baseline, making it look like returning those roads to logging service is of no big hydrologic consequence (EA page 188).

Minimizing soil disturbance is not the same as preventing soil disturbance, just as minimizing the spread of weeds is not the same as preventing the spread of weeds. Until the Flathead identifies and implements a truly sustainable minimum road system and gets serious about full, adequate decommissioning of roads, it will remain in the business of spreading weeds and disinformation.

Abandoned and “stored” roads still negatively influence hydrology (EA at 211). Average annual temperatures in western Montana rose 1.33 degrees centigrade from 1900 to 2006, which is 1.8 times greater than the 0.74 degrees rise in global temperatures (EA at 191). The Forest Service should be looking for every opportunity to restore subsurface hydrology through the re-contouring and full re-vegetation of roads in order to safeguard water quality and temperature. The Forest Service is instead proposing to reconstruct roads, retain their road prisms, ignore the call to re-vegetate such roads, and remove forest cover along those roads via logging.

Roads, Bears and Amendment 19

In our prior letters, we’ve provided reports detailing the rationale and documents supporting A19’s requirement that roads not counted in Total Motorized Access Density must function as neither a road or trail and must be re-vegetated to preclude such use. On page 322, the EA misstates A19 requirements as though a road only needs to no longer serve as a road and be “impassable to motorized traffic” to be omitted from TMRD. Please reread our prior letters and their attached Road to Ruin report and TMRD report until you understand that A19 prohibits both motorized and non-motorized use of roads omitted from TMRD.

The Flathead cannot lawfully reconstruct and scrape the vegetation off of “historic” roads, return them to its road “system,” simply “store” them, allow them to continue being used as trails, and yet not count them in TMRD. Period. We’ve already provided all you need to reach the same inescapable conclusion. The EA is fatally flawed.

Trails, Bears and Amendment 19

One of the reasons A19 requires that a road no longer receive use as either a road or a trail, either motorized or non-motorized, is because human use displaces grizzly bears and displacement subsequently increases the risk of mortality. That’s what the research and science shows and that’s why A19 was written the way it was - and it’s still the law of the land.

The EA, rather than comply with A19, attempts flawed pretzel logic to get around it. On page 308, the EA incorrectly states “Impacts of nonmotorized recreational activity may be small as there is no information documenting increased mortality risk or population

level impacts to grizzly bears from displacement.” Then, on page 310, it correctly states “High human-activity levels could 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,” citing Mace and Waller’s 1997 South Fork Grizzly Bear Study.

We’ve already provided you in our prior letters explanation and documents from both Kendall and Mace and Waller 1997 showing how human intrusions and bear displacement contributes to grizzly bear mortality, as also documented on page 310 of your EA. So what’s with the bogus claim on page 308 and elsewhere that no information exists documenting increased mortality risk from grizzly bear displacement caused by non-motorized human activity?

Please reread page 74 of Mace and Waller 1997, which documents grizzly bear displacement from human, non-motorized uses in the Jewel Basin Hiking Area:

Using univariate statistics, we determined that grizzly bears were significantly further than expected from trails, and from lakes with camp-sites during spring, summer, and autumn. In multivariate models however, distance to trails and/or lakes were significant variables only during summer and autumn. During these two seasons the relative probability of grizzly bear selection increased as distance to trails and lakes with camp-sites increased.

The EA unfairly tries to paint the picture that A19 is based solely on preliminary South Fork Grizzly Bear Study progress reports and hence is at odds with the final report and subsequent research findings elsewhere. The preliminary progress reports and the final South Fork report all found bears are displaced from human use and even closed roads. That is why A19 requires that, in order to not be counted in the impacts measured by TMRD, roads must no longer function as either a road or a trail.

We remind you that a skirting of A19 similar to that in the Hungry Lion EA was attempted when the Forest Service and other IGBC member agencies attempted to replace the A19 approach with a new road management “rule set” reliant on gates rather than strict limits on TMRD and truly secure Core. Independent peer review found in favor of A19 and turned thumbs-down on the attempted “rule set.” In this regard, please see the attached peer review by McLellan, Sanjayan and Silvy.

The EA is stripped of scientific integrity due to unprofessional arm-chair quarterbacking; second-guessing A19 and the best available science, trying to make it appear that roads and trails that receive human use do not have significant impacts on bears and that such roads can be omitted from TMRD as though they don’t even exist or have impacts. The EA and wildlife analysis is a lame and wholly inadequate assessment of the known and expected impacts to bears and other wildlife. It is a shameful betrayal of the precautionary principle, trying to poke holes in the best available science rather than respecting it and giving bears the benefit of any doubt.

Mountain Bikes, Trails and the Law

We are dismayed at comments made by your staff during the field tour, to the effect they don't want to be at odds with mountain bikers even though they acknowledge unauthorized clearing and construction of trails and banked corners has occurred. We are further disappointed that the EA essentially reasons that, because the Forest Service doesn't have adequate law enforcement to prevent such trails and use, it should just as well include the trails in its "system."

Saying you can better control mountain biking by formalizing more trails, when you can't afford to enforce and maintain the trails you already have, is very much like saying you can better control weeds through more roads and logging that spreads the weeds! That the agency apparently can't see the bitter irony in this, fess up to it and reorder its priorities to get a grip on these problems - rather than exacerbate them - renders the EA and the proposed action contrary to logic and law.

In short you propose to reward unlawful mountain biking by making lawful the unlawful trails - and the single-purpose ("to promote mountain biking") Flathead Area Mountain Bikers stand ready to assist you (see their attached 8/8/17 web page and comments on the Hungry Lion project). We went into detail during the Hungry Lion field tour and in our 4/20/17 comments why the agency cannot legitimately partner with a group that has repeatedly advocated for the sanctification of unlawfully created or altered biking trails. It is akin to asking the fox to guard the chicken coup.

The Flathead is poised to recreate and redesign trails to accommodate mountain bikers, to the detriment of trail aesthetics and non-mechanized trail users. We whole-heartedly object to it and the fact that the EA tries to cloak this effort in terms of making the trails safer for everyone. More on this later, below.

Your staff is incorrect in saying that mountain biking on the non-system trails is currently managed as dispersed recreation. This is instead code for no management at all. In our April 20, 2017 letter to you, we detailed the 36 CFR 261.10 regulations that prohibit the unauthorized placement of any sort of road, trail or structure on Forest Service land. We urge you to quit repeating the same mistakes in reining in mountain bike use that were made with ATV use off-road. Moreover, the 36 CFR 261.15 prohibitions against the Use of Vehicles Off Roads has been modified over the years to apply to more than just motor vehicles. Under its definitions, the term "vehicle" may include motor vehicles but more broadly "means any device in, upon, or by which any person or property is or may be transported."

The 261 regulations were originally issued in 1977, with amendments in 1978, 1981, and 2001. Mountain bikes weren't an issue in 1977, but were by 2001. While the original intent of the 261 provision at issue here may have been primarily for motor vehicles, its plain language indicates application to non-motor vehicles as well. Note that 261.55(b) allows the agency to issue orders that prohibit "[u]sing any type of vehicle prohibited

by the order" on trails. This section was promulgated in 1990, with amendments in 2004 and 2005.

We urge you once again to not give in to the bully and unlawful tactics of mountain bikers nor to the stick-and-carrot offers of making trails better for everyone. As one attendee on the field tour made very clear, bikes quickly and inevitably displace horseback riders from trails. We hold the same to be true for hikers.

So, if you insist on returning the abandoned trails back to the system, allow only the traditional uses by foot and horse and prohibit the mountain bikes that have demonstrated disregard for other users and the law. But firstly and fully account for the impacts that even these non-motorized human uses have on bears and other wildlife. We also urge you to use the above regulations and active re-vegetation efforts to stem the use of non-system and non-TMRD road prisms by bikes and other human uses.

While MDFWP may have recommended as a courtesy to the Forest Service that bike trails be designed with increased sight distances to reduce surprise wildlife encounters, this is not a blank check for the Forest Service to convert hiker and horse trails to bike trails by increasing sight distances. The responsibility for safe travel speeds ultimately rests with the biker. Moreover, the interagency Board of Review Report and Recommendations we attached to our 4/20/17 letter 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.

Clearing brush back from existing trails to increase sight distances to 50 meters, as apparently proposed on page 314 of the EA, will only encourage bikers to travel faster because they have greater line of sight. The result will be faster bike speeds and increased conflicts with wildlife and other trail users. The EA must fully acknowledge that the trails in question already exist on the landscape and simply don't pass muster with the recommendations of either MDFWP or the Board of Review as safe for mountain bikers and bears.

Here again it is ironic and illogical for the Forest Service, which says it lacks the funds to enforce and maintain these trails, to suggest it can somehow afford to enforce and maintain trails with even greater demands on brushing and maintenance of increased sight distances. You may want to check with Waterton Lakes National Park, which experimented in the late 1980's with the wide clearing of brush from trails to increase sight distance with the goal of reducing surprise wildlife encounters. We hiked one of those trails with the Park Superintendent and the field tour group found the results an aesthetic disaster, an ugly swath that one does not want to encounter during a hike in the woods!

Trying to accommodate mountain bikes with trails of higher maintenance needs/standards will only ruin the desirability of such trails for other users that seek a slower and more intimate trail experience. The Forest Service is once again refusing to do the right thing and instead proposing to ruin trails for hiking and horseback riding in the name of making them more accommodating and safe for mountain bikes. If the Forest Service is indeed proposing to convert hiker and horse trails into bike trails (and

to create scores more miles of bike trails in the Taylor Hellroaring project and others) an in-depth programmatic EIS is firstly required.

We appreciate that the gentleman on the field tour from the Coram Experimental Forest confirmed that the old trail up Desert Mountain is already being used as a shuttle-to-the-top downhill mountain bike ride. We also appreciate that the wildlife analysis acknowledges that the trail should be considered a high-use trail that must be buffered from grizzly bear Security Core.

The EA, however, does a minimal job of providing replacement Core to meet A19 objectives, let alone discretionary additions to Core to help offset the heavy press of human developments and recreation from the Highway 2 corridor and surrounding communities. Just because A19 established a “no net loss” objective for the Coram Lake Five subunit, that doesn’t preclude the agency from making net gains for grizzly bear security.

While your staff said it can’t find out why these old trails were abandoned in the first place, page 403 of the EA notes that both used to serve phone lines leading to two fire lookouts, neither of which remain. Given there is also road access into the areas once served by these trails, it does not appear to be much of a mystery as to why they were abandoned.

Keith Hammer worked trails maintenance for HHRD during summers of 1972-1974 and can attest to the inadequate budget available then. Perhaps HHRD was simply trying to reduce the number of trails on its books, especially trails providing access redundant to road access. In proposing to return these trails to the trail “system,” the agency is trying to keep more trails than it can afford, just as it is trying to keep more roads than it (or the environment) can afford.

The EA mentions the Board of Review Report and Recommendations on page 314 but fails to fully report the BOR’s concerns with the results of bike-bear encounters. The BOR Report concludes that, had the grizzly bear that was struck by Brad Treat and his bike been captured, “Release, relocation, or removal of captured bears under such conditions will be complex issues with the public and will involve significant and difficult public relations efforts with minimal benefits to human safety or improved bear management from such captures.” In other words, once a bear kills a human, even if provoked by being slammed into by a mountain biker, it is virtually politically impossible to release the bear - so don’t trap it in the first place.

While the EA concludes “it is unknown if the bear would have been destroyed had it been captured,” the BOR cautions that trapping innocent bears should be avoided because it creates a public relations nightmare and increases the likelihood the bear may be destroyed due to public pressure - just as interagency pressure during the Treat incident resulted in a reversal of the initial decision to not try to trap the bear. The EA makes light of the potential harm bikes can cause bears and instead proposes to increase the risk of bike-bear encounters by authorizing more bike trails that bikers have helped establish illegally.

More On Amendment 19 Compliance

The EA on page 15 states that A19 objectives will be “met shortly” in the Emery Firefighter subunit with implementation of the 2009 Firefighter Project. It does not, however, explain why that implementation has been delayed for so long or the effects of that delay. Nor does it explain that implementation of the A19 road closure and decommissioning work from the 1999 Paint Emery project was delayed so long that the Firefighter project ten years later proposed and made changes to that “scheduled” work. Nor does it make clear in its A19 tables how Firefighter figures into A19 compliance.

Swan View Coalition and Friends of the Wild Swan settled their appeal of the Firefighter Project on the promise that 2009 American Recovery and Reinvestment Act (Stimulus) money would be used to help accomplish the A19 road work. So why is some of that work still pending in 2017? And why, given how the timber industry is reportedly always starving for logs from public land, has the Firefighter Project apparently not yet been completed? Or is this just one more example of the logging getting done in short order but the road closure work languishing for years if not decades, as happened with Paint Emery?

The Flathead has a poor record in its implementation of A19 and other road and culvert management responsibilities, as detailed in the Roads to Ruin report we attached to our earlier comments on Hungry Lion. The EA provides no reason for renewed hope that the Flathead will mend its ways. It is clear the Flathead intends to do the bare minimum to meet the numerical objectives of A19, cheat on its calculations of TMRD in order to increase its road system, and do as little for grizzly bear as possible as it accommodates more logging, more road building, more spreading of weeds, and more human intrusions via recreation.

Simply put, the Hungry Lion project does not make progress toward meeting A19 objectives, as required by the Biological Opinions on the continued implementation of A19. It cannot rely on a renewed promise to do so in a now 8-year-old Firefighter project that has failed to keep its promises.

Need for an Environmental Impact Statement and Additional Alternatives

The proposed project will have, and the environmental baseline is having, a significant impact on the environment, necessitating the preparation of an EIS. The weeds situation alone indicates infestations throughout the project area, especially on or near roads and proposed logging units. The EA, in spite of measure that will be taken to minimize the spread of those weeds, nonetheless concludes there will be a high risk of spreading those weeds through logging and road building. The Forest’s weed control NEPA documents simply do not cover this adequately.

The EA essentially acknowledges that the agency cannot control the rapid increase in recreation in the area, particularly the expansion of mountain bike use. Yet it proposes in some alternatives to facilitate rather than discourage the expansion of mountain biking and other recreation. In combination with Taylor Hellroaring and other projects,

Hungry Lion intends significant creation and modification of trails to better accommodate mountain biking, without the requisite prior programmatic EIS of such a program. The EA also fails to explain why, after 22 years since adopting A19, the Emery Firefighter subunit still does not meet A19 objectives in spite of at least two projects promising to meet those objectives alongside its logging objectives. An EIS is required.

The proposed action also makes it clear that the agency has not learned its lesson about leaving stream-aligned culverts in grizzly bear Security Core. The agency needs a site-specific Forest Plan amendment to remove those culverts but simultaneously proposes to instead replace them with culverts that will retain risk of failure and necessitate future motorized intrusions into Security Core. Such a site-specific amendment and the likely future repeated amendments it sets in motion, requires an EIS.

These circumstances are but a few demonstrating the area is suffering from significant negative impacts to the environment, which will be made worse by numerous actions proposed in the various alternatives. The EA does not include an alternative whose aim is ecosystem restoration via the removal of excess roads, unauthorized trails and noxious weeds. It doesn't even include an alternative responding to public comment and controversy that would reinstate the former system trails as hiker and horse trails while disallowing mountain biking.

The purpose and need of the project is fully at odds with what is needed to reduce baseline-level impacts to the environment and necessitates the preparation of an EIS. The agency's attempt to ignore restoration needs is bad enough. It cannot propose to make matters worse without firstly preparing an adequate EIS.

Adapted Silviculture for Climate Change

In our 8/1/17 letter of comments on the Trout Lake ASCC project, we asked that it also be included as comment on the Hungry Lion project's ASCC proposal. We've attached our 8/1/17 letter for your convenience and ask that it be reviewed as a part of these comments.

Editorial Tidbits

While page 48 of the EA states that the same pack and saddle Trail Class 3 would be applied to both the Desert Mountain and Lion Hill trails, the last paragraph omits mention of the Lion Hill trail, suggesting the design would be applied only the Desert Mountain trail.

Table 50 on page 195 of the EA appears to have reversed the numerator and denominator in attempting to calculate crossings/square mile, displaying instead square miles/crossing.

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

Sincerely,

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

Keith J. Hammer
Chair - Swan View Coalition

And on behalf of:

Steve Kelly
Montana Ecosystems Defense Council
PO Box 4641
Bozeman, MT 59772
406-586-4421

Attachments:

Peer Review of the Motorized Access Management Strategies for Grizzly Bear Habitat in the Northern Continental Divide Ecosystem. September 19, 2000. Dr. Bruce McLellan, Dr. M.A. Sanjayan and Dr. Nova Silvy.

8/8/17 Flathead Area Mountain Bikers web page including its comments on Hungry Lion.

8/1/17 letter of comments on the Trout Lake ASCC project.

**Peer Review of the Motorized Access Management Strategies for Grizzly Bear Habitat in
the Northern Continental Divide Ecosystem**

19 September 2000

By

**Dr. Bruce McLellan
President, International Association for Bear Research and Management**

**Dr. M. A. Sanjayan
Member of the Board of Governors, Society for Conservation Biology**

**Dr. Nova Silvy
President, The Wildlife Society**

INTRODUCTION

In October 1999, Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator for the United States Fish and Wildlife Service (USFWS), asked The Wildlife Society, the Society for Conservation Biology, and the International Association for Bear Research and Management to work together and organize a peer review of motorized access management strategies on public lands in grizzly bear habitat, developed by USFWS for the Northern Continental Divide Ecosystem (NCDE). In response, each organization nominated the following individuals to participate in the workshop:

Dr. Nova Silvy, President
The Wildlife Society
210 Nagle Hall
Department of Wildlife and Fisheries Sciences
Texas A & M University
College Station, TX 77842, USA

Dr. M. A. Sanjayan, Member of the Board of Governors
Society for Conservation Biology
C/o The Nature Conservancy
201 Mission Street, 4th Floor
San Francisco, CA 94105, USA

Dr. Bruce McLellan, President
International Association for Bear Research and Management
C/o British Columbia Ministry of Forests
RPO #3, Box 9158
Revelstoke, B.C.
V0E 3K0, Canada

We, the peer review group, was specifically asked to:

1. Study the two approaches to motorized access management in western Montana – the current approach hereafter referred to as A19 (Amendment 19) and the newly proposed approach.
2. Comment on the adequacy of the correct use of the available scientific information on the impacts of motorized access on grizzly bears used to develop these approaches.
3. Comment on the rationale and acceptability of the assumptions made to develop these access approaches given the available scientific information.

We were instructed, however, not to critique the adequacy or scientific basis for the existing information on grizzly bears nor were we to create a new design for motorized access management.

The NCDE Data Base Manager provided us with a set of documents. Broadly, these documents described the current A19 approach, the proposed approach, background South Fork grizzly bear studies, in-depth analysis of methods, and a set of maps delineating access under A19 and under the proposed guidelines. A full list of the documents is attached. In addition, we were given a copy of a report produced by Lee H. Metzgar (1998) for The Alliance for the Wild Rockies, that critiqued the rationale and choices made during the development of the proposed access guidelines. We met for two days in Kalispell, Montana to review the material, discuss the proposals, and most importantly, meet with agency scientists who developed the access management approaches. We also were given the opportunity to talk to interested non-agency parties, including those publicly critical of the access guidelines. However, we have not exercised this option thus far and have only engaged agency staff made available to us during the workshop for substantial dialogue.

ASSUMPTIONS COMMON TO BOTH AMENDMENT 19 AND THE PROPOSED APPROACH.

Both A19 and the Proposed Approach are based mainly on research conducted by the South Fork Study Team (SFST) between 1987 and 1996, with additional information from the East Front Study Area (EFSA). Using primarily data from the South Fork of the Flathead (SFSA) involves some assumptions common to both A19 and the Proposed Approach and these include:

1. Do Bear Management Unit (BMU) sub-units represent grizzly bear biological units?

We assume BMU sub-units were delineated to ensure guidelines were distributed more or less evenly across the landscape. The sub-units, however, were not explicitly based on grizzly bear ecology, and thus may or may not be suitable units for bear use. The assumption being made is that each unit contains all the necessary requisites to support at least one grizzly bear. It appears that it is assumed that bears will be free to move among sub-units and features lacking in one sub-unit are assumed to be available in adjacent BMUs.

2. Is the South Fork Study Area representative of the NCDE west of the Rocky Mountains and in the Proposed Approach, is the East Fork Study Area representative of the NCDE east of the Rocky Mountains?

Comparisons of topographic (elevation, ruggedness), ecological (average temperature, forest cover, habitat type), or human created features and activities (road densities, human settlement densities, hunter-days) were not made even though GIS basemaps of some of these factors are likely available. Thus, it is difficult to

determine if study areas are indeed representative. Features of the SFSA such as the Hungry Horse Reservoir and a lack of small tract public holdings and associated access routes suggest that there may be important differences. In addition, grizzly bear telemetry data are available in other parts of the NCDE (USA) such as in the North Fork of the Flathead and Blackfeet Reservation that could eventually be used to test the models.

3. Are data from the radio-tagged female bears in the South Fork study representative of all bears in the South Fork area?

Because only a small sample of adult female bears was used to develop A19 and the Proposed Approach, the conclusions are unlikely representative of all bears. Although adult females are the most critical segment of the population for population growth, they can't meet conservation requirements alone. Subadult females are needed to replace adults and adult males are also needed. Recent publications suggest that the death of a resident adult male may have significant consequences to the population as young, immigrant males may have a higher propensity to kill cubs that cannot be their own (Wielgus and Bunnell 1994, 1995). Based on these proposed methods, it may be difficult to develop a rational strategy for the conservation of male bears.

4. Can bears used in the study form the basis of a conservation strategy?

Both management strategies were developed primarily from data collected on adult female bears in the SFSA, and after, the EFSA. Although the females used were those that survived and reproduced successfully (as these were the only ones that provided enough telemetry data for the analyses), the best estimate of the population trend from all bears monitored in the SFSA was negative. If the "successful" females had home range and areas of use different from "unsuccessful" females, then the characteristics of the successful females' ranges may be considered sufficient as the basis for conservation planning. However, if the home ranges and habitat use patterns of successful and unsuccessful females were similar, but some were just luckier or more skilled at avoiding people within their range, then the "lucky to be successful" females may not be suitable as the basis for conservation planning. If the successful females lived in more secure areas than unsuccessful females, then it would be assumed they needed that level of security to be successful; perhaps they could have done fine with less security. Without comparing the range locations and habitat use of bears with varying levels of success (probability of being killed appears to be the currency of success) then this question remains unanswered. There were too few locations of females that were unsuccessful to make this analysis, however, the logic and potential errors of using only one study area to identify needed habitat features for conservation, should be thought through.

5. Are areas of $>10.12 \text{ km}^2$ (2,500 acres) preferred by adult females?

This value appears to be a personal communication from Tim Manley well before the study was completed. There may not be any better scientific information on this topic as it does not appear to have been based on any analyses, however, a 3.9 square mile area may not be adequate for animals that move a great deal like grizzly bears.

6. Are the mean values of open and total road densities for female SFSA grizzly bears sufficient for conservation?

The average proportion of each adult females home range that included $< 1 \text{ km/km}^2$ of open roads and of total road densities of $< 2 \text{ km/km}^2$ were 11 and 14%, respectively. One bear, No. 94, lived in an area with high road density and her extreme values may have forced the mean value to higher levels than most bears. The median values of 10.145 and 13.875, however, were not very different.

THE CURRENT APPROACH: AMENDMENT 19

On 22 January 1986, the United States Forest Service adopted the Land and Resources Management Plan for the Flathead National Forest. The Forest Plan provided management direction for multiple uses of the Flathead National Forest. The Biological Opinion for the Flathead Forest Plan (15 May 1985 and amended 18 July 1989) concluded that implementation of the Plan was not likely to jeopardize the continued existence of threatened and endangered species. No incidental take was authorized. Eighteen previous amendments have been proposed to the Forest Plan dealing with a variety of resource management issues. Amendment 19 (approved 31 July 1989) added the Interagency Grizzly Bear Guideline (IGBG) to the Forest Plan. The Forest Service consulted with the USFWS on this and other amendments to the Forest Plan. The USFWS consistently found that the Forest Plan and proposed amendments did not jeopardize the continued existence of threatened and endangered species.

On 22 February 1989, conservation groups filed a lawsuit challenging the Flathead Forest Plan and accompanying Environmental Impact Statement (EIS). Although the U.S. District Court ruled in favor of the Forest Service, plaintiffs appealed to the Ninth Circuit Court of Appeals. On 3 November 1993, the Circuit Court issued an opinion and an order amending the opinion and denying rehearing on 5 July 1994. This opinion affirmed the District Court's ruling on 11 of the 12 claims but reversed the District Court ruling on one claim. The 5 July 1994 order held that "...the Forest Service acted arbitrarily and capriciously in concluding, on the record as a whole, that the Plan would not jeopardize listed species even at timber harvest levels of 100 mmbf/year." The Court noted the Forest Service could reinitiate formal consultation with the USFWS and after the USFWS issued an amended opinion based on its assessment of all the relevant information, the Forest Service must reevaluate its determination the Plan would not be likely to jeopardize listed species. To comply with this order, the Forest Service proposed Amendment 19 and formally consulted with the USFWS. Early in this consultation, the USFWS recommended the proposed amendment include objectives for open and total

road densities and security core areas. Amendment 19 (Decision Notice March 1995) is the culmination of the Forest Service's efforts to comply with the Court order. The principal changes to the Plan were:

A. Forest-wide Standards for Grizzly Bear

In all BMU sub-units, there would be no net increase in total motorized access density greater than 2 miles per square mile, no net increase in open motorized access density greater than 1 mile per square mile, and no net decrease in the amount or size of security core area.

B. Forest-wide Objectives for Grizzly Bear

On all BMU sub-units that were greater than 75% in the National Forest System land the Forest Service would:

1. limit high-density (> 1 mile/square mile) open motorized access to no more than 19% of a BMU Sub-unit within 5 years.
2. limit high-density (> 2 miles/square mile) total motorized access to no more the 24% of a BMU Sub-unit in 5 years and no more than 19% in 10 years
3. provide security core areas that equal or exceed 60% of each BMU sub-unit in 5 years, and 68% in 10 years

On all BMU sub-units that were less than 75% National Forest System land the Forest Service would:

1. assure that Forest Service activities would not result in an increase in motorized access density or reduction in security core areas on the National Forest System lands
2. improve habitat effectiveness through cooperative management with other landowners, land adjustments, or other means.

A. Forest-wide Objectives for Timber Management

The Forest's allowable sale quantity was amended to 270 million board feet (mmbf) for the period 1995-99, or an annual average of 54 mmbf.

B. Forest Plan monitoring

The Forest Plan monitoring decisions were amended to increase efforts to monitor the use of open and restricted roads and trails. In addition, this Decision required an annual report on implementation of grizzly bear habitat objectives.

The Flathead National Forest currently operates under the Forest Plan that includes Amendment 19. Grizzly bear/road use information incorporated into Amendment 19 was obtained primarily from research ongoing in the South Fork Flathead River grizzly bears (Mace and Manley 1993). Preliminary results indicated adult grizzly bears used habitat with open road densities greater than one mile/square mile less than expected. All sex and age classes used habitat with total road densities greater than 2 miles/square mile less than expected, and adult female bears maintained home ranges with substantial amounts of habitat greater than 0.5 miles from roads. In addition, areas larger than approximately 2,260 acres (3.53 square miles) were used more than expected by adult females (Manley, unpublished data). Along with the South Fork study, other supportive studies concerning the effects of motorized access on grizzly bear habitat use were Mace and Jonkel (1980), Mattson et al. (1987), McLellan and Shackleton (1988), and Kasworm and Manley (1990).

Assumptions of Amendment 19: Weaknesses and Strength

Assumptions used in the development of A 19 include include:

1. Will all areas with low road densities be of value to bears or are other factors, such as habitat quality, also important in delineating the road-free core areas?

This assumption is a major weakness of A19 as habitat quality was not considered. It may be possible that the potentially the best bear habitat may be in heavily roaded areas while poor habitat is included in core areas. It is also possible that roads may be closed at great expense in areas of poor habitat that will only have marginal value to bears. By not incorporating habitat value, it is not possible to make optimal trade-offs between costs of road closures to people and value to bears.

2. Is the use of a composite home range for all female bears appropriate for defining a core area?

It may be misleading to describe a core area by defining a composite home range using all telemetry locations for all female bears. If some female bears have more locations than others then the composite home range will be biased towards those females and could, in turn, affect the results of core size and the amount of roads a "average" bear will tolerate. A median core size and median amount of roads tolerant to bears may be a better metric.

1. Is the shape or juxtaposition of the 68% of road-free core areas considered?

The only requirement is that areas to be included be at least 2,500 acres in size. However, the shape and number of separate included areas, and juxtaposition of pieces comprising the core area could have considerable bearing on use on non-use by grizzly bears. Also, known non-bear areas are not excluded from the 68% core area.

Amendment 19 also has several strengths including:

1. The major advantage of A19 is that it is a relatively simple method and thus easier to implement and more easily understood by the public,
2. A19 has demonstrably secure areas for the grizzly bears, year round.
3. A third strength of A19 is there is no net loss of habitat to new roads and roads can be closed to meet the 68% rule.

THE PROPOSED APPROACH

Once A19 began to be developed, land managers and biologists discovered several serious shortcomings that failed to optimize trade-offs between the needs of bears and the desire of people to access bear habitat. In particular, the quality of habitat for grizzly bears was not incorporated into A19 rules for establishing "core areas" and a substantial amount of expensive road reclamation was planned that may have little value to bears. Because the NCDE did not have an ecological or forest cover base map, the South Fork Study Team (SFST) was unable to extrapolate habitat quality data from their study area until near the end of their research project. At that time, the SFST developed mathematical models to predict the probability that a location would be used by adult female grizzly bears. This was done by simultaneously incorporating information on 3 classes of roads, human activity point sources, 3 elevational categories, and a "pseudo-habitat" variable based on categories of the "greenness" spectral bands of LANDSAT satellite images (Mace et al. 1998). The effect of human features such as roads could be excluded from this model to estimate "habitat potential" or the predicted habitat value in the absence of humans.

Once the SFST developed the ability to predict the multivariate nature of habitat quality, they had to determine how much high quality habitat secure from human disturbance that bears needed and the optimal location for these Seasonally Secure Areas (SSA). Based on the relationship between the size of each female's entire home range (95% adaptive kernel) compared to the size of a series of 9 utilization density contours designed to contain 10, 20, ... to 90% of all radio-locations, core areas of 8 females were determined. Core areas averaged 58 km² for 8 females in spring and 74 km² for 11 females during summer/fall (Mace and Waller 1997). Because grizzly bears use lower elevations that are more often roaded during spring, SSAs were to be 58 km² to accommodate the spring habitat and space requirements of adult females. The 58 km² was simplified to 45% of each sub-unit.

To locate SSAs within each sub-unit in a consistent and repeatable way, a computer algorithm was developed that would begin with the pixel (actually, 100 pixels were aggregated into 300 x 300 m cells) with the highest habitat potential. To it, from all adjacent cells, was added the one with the highest habitat potential, provided the growing

SSA did not violate a shape constraint that limited the perimeter to area ratio to ensure some degree of amalgamation. This process of adding the highest ranking cell from the adjacent to the growing SSA continued until it reached 11.6 km^2 or $1/5$ of the 58 km^2 needed for a SSA. To ensure other portions of a sub-unit did not contain an area of overall better habitat, this process was continued 5 times, each time beginning with the pixel with the highest habitat potential that was not already in previously located potential SSA. All portions of a SSA had to $>10.12 \text{ km}^2$ (2,500 acres) because SFSA females appeared to prefer habitat blocks of this size. The growing of SSAs was continued until 45% of the sub-unit was included in the SSAs. Cells of lower quality habitat that were engulfed within the SSAs were automatically included, and an equal number of cells on the perimeter were excluded from the final SSA with lower quality cells being deleted first.

Once the method of delineating SSAs was developed, it was extrapolated over the multiple use land of the NCDE. By studying the output of the model, it was clear that modifications were needed, particularly for spring SSAs. This was because the best potential spring habitat was at low elevations where most of the roads were and closing roads at low elevations (source of roads) often resulted in closing the entire road network. In addition, due to non-closable roads on private and public lands, public demand for access after July 4, and other exceptional circumstances, several additional modifications of SSA delineation and rules governing access within them were made.

The delineation of SSAs in the proposed method is relatively complex, however, SSAs only cover 45% of each sub-unit; other road density guidelines still needed to be developed for the majority of the land base. Based on the average open and total road densities in the home ranges of 10 adult females in the SFSA, it was determined that 11% of each sub-unit could contain areas with open road densities of $0.0\text{--}1.0 \text{ km/km}^2$. This was increased by 1 Standard Deviation or 7% during summer because few bears were killed during summer. Similar calculations on the eastside resulted in recommendations that 7% of each sub-unit could contain areas with open road densities of $0.0\text{--}1.0 \text{ km/km}^2$ (increased to 10% during summer). Total road densities of $< 2 \text{ km/km}^2$ were acceptable on 14 and 2% of the West and East Side, respectively.

Assumptions of the Proposed Approach: Weaknesses and Strength

The proposed method is much more complex than the A19 and involves many analyses and assumptions. Here we review some of assumptions that may be worthy of consideration.

1. How adequate is the pseudo-habitat "greenness" index?

Without a habitat base map, the SFST transformed a LANDSAT satellite spectral image into greenness bands. Grizzly bears appeared to show selection for habitats with different categories of greenness as this variable was significant in multivariate models.

Greenness is generally limited to static conditions and it is difficult to forecast because of changes in greenness over time due to ecological events such as fire or timber harvest. It also is a difficult concept to communicate with forest managers or to make prescriptions to increase greenness. However, grizzly bears use has been found to be associated with this pseudo-habitat as far away as Banff National Park (Gibeau, pers. comm.).

2. How accurately does seasonal dates established by the proposed approach reflect bear habitat use?

Based on diet studies in the SFSA and further south (Craighead et al. 1982, Mace and Jonkel 1986), 15 July was identified as the division between spring and summer (Mace and Waller 1996, Waller and Mace 1997). This break was moved to 30 June because the public believes that summer begins on 4 July. The diet studies of Mace and Jonkel (1986) however, were based on only 140 samples and these were not analyzed weekly or bi-weekly. The division between spring and summer was also not clear from the elevational movement data in the SFSA (Waller and Mace 1997). In the North Fork of the Flathead, shifts in diet, elevation, and habitat use suggested that the spring/summer division was at the end of July (McLellan and Hovey, 1995, in press). If roads closed to protect bears during spring are opened on June 30, then bears in portions of the NCDE will not have security in their spring SSA for 1 month.

3. Is the size of early period (spring) core sufficient for SSAs?

The core range of the sample of adult female grizzly bears was determined to be 58 km² during the early period (spring) and 74 km² for the late period (summer and fall). Because most conflicts between grizzly bears and roads are in the spring, a SSA of 58 km² was considered sufficient. However, 2.8 times as many (14 versus 5) SFSA bears were killed in the fall as in the spring (none were killed in summer). If a major goal of access management is to decrease the mixing of bears and people to reduce the mortality rates of bears, then perhaps the fall core area may be more appropriate for the fall season.

4. Should lower quality pixels engulfed with SSAs be included at the expense of better quality perimeter habitat?

This trade-off was accepted in order to ensure that SSAs remained 45% of each sub-unit. Given the nature of mountainous terrain, rock outcrops with little or no value to grizzly bears may be included in the SSAs at the expense of higher quality, lower elevation habitats. In mapping grizzly bear security areas near Banff, Alberta, Gibeau et al. (in press) excluded non-habitat that included rock and ice. If there is a little rock and ice in the multiple-use areas of the NCDE, this may not be a significant issue. Perhaps it may be preferable to trade "relative values" of the engulfed cells with relative values of perimeter cells. For example, if the engulfed cells had, on average, half the value as the perimeter cells, then half as many perimeter cells should be

removed. This will result in slightly >45% of the sub-unit to be in a SSA, but should not jeopardize the bears as much.

5. Will seasonally gated roads provide sufficient security for grizzly bears?

The SSAs, particularly those for spring, will require seasonal road closure using gates. It is assumed that gated roads will function as closed roads at best or at least as low use roads (< 1 vehicle/day). SFSA female grizzly bear use of areas near low use roads is not clear. When all other measured variables are equal, adult female bears appear to avoid areas with high densities of low-use roads in spring a summer (but not fall) (Mace et al. 1998). But, from within their seasonal ranges, most bears do not avoid low use roads by 500 m (Mace and Waller 1996). It appears that these bears avoid areas with high densities of low use roads but don't avoid these individual roads when they are encountered in their seasonal range. If densities of gated roads are excessive, SSAs may not be as secure as hoped. In addition, it not clear that areas with networks of roads that are only closed seasonally will be regarded by bears the same as permanently closed roads. Once a bear is within a network of closed roads, the roads may have little effect on the bears use, however, bears may not use areas with seasonally closed roads because of previous experience during seasons when the roads are open. There appears to be no data on the effectiveness of seasonally closed roads.

6. Are the multiple standards used for sub-units with private land sufficient for conservation?

Several add-hoc exception rules were made to road standards for sub-units with private ownership and associated access routes. Private roads were excluded from road density calculations and, if federal land was <75% of the sub-unit, "no net loss" rather than the numerical guideline value was used. These, and other rules that relaxed road density guidelines were established in sub-units with private lands even when it was shown that a bear's level of risk was 30.27 times as great in rural areas as in backcountry areas. It would appear that in sub-units with private holdings that stricter, not reduced, access controls would be necessary to offset higher levels of mortality.

CONCLUSION

A motorized access management strategy for grizzly bear habitat, Amendment 19, is currently in place for NCDE. Several assumptions were made in developing A19. Chief amongst these were that habitat quality was not needed in identifying optimal locations for core areas, the extrapolation of data from the South Fork Study Area to other areas, the use of a composite home range, and the relaxation of shape or juxtaposition requirements for the core areas.

Nevertheless, the simplicity of A19 and its ability to permanently secure areas for grizzly bears makes it a powerful tool in the conservation of the grizzly bear in the NCDE.

However, as A19 began to be implemented, biologists and land managers discovered a potentially serious flaw. A19 failed to optimize the trade-off between bears and human access to bear habitat because grizzly bear habitat quality was not incorporated into the rules for establishing "core areas". In response, to make A19 more biologically realistic, the USFWS has developed a new proposed access management approach that incorporates some topographical and "pseudo-habitat" variables. The proposed approach's added complexity unfortunately necessitated several additional assumptions, some of which are tenuous.

The authors of the proposed approach should be commended for their exhaustive search of the literature and their attempt to incorporate all the scientific information available to them. Apart from a few relatively minor exceptions, available scientific information was correctly used in the development of both A19 and the proposed approach. However, when examining, in totality, the assumptions we have highlighted in the previous section, we must conclude the assumptions made were too bold at this time to fully justify the added risk and uncertainties created for grizzly bears under the proposed approach. While we applaud and encourage the authors to continue their work on incorporate habitat quality indicators into access management guidelines – a clearly necessary step – we caution against any relaxation of establishing permanently secure areas unless the assumptions made meet a higher standard than demonstrated in this proposed approach.

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Hungry Lion Comment Period (<http://www.flatheadamb.org/news/hungry-lion-comment-period>)

8/8/2017 0 Comments (<http://www.flatheadamb.org/news/hungry-lion-comment-period#comments>)



Make your voice heard! Submit your comments by August 13

The Forest Service is proposing to adopt and improve the Desert Mountain and Lion Lake trails near Coram as part of a larger timber management project. You might remember a call for comments on this earlier in the year - now the Forest Service has completed their environmental analysis, so it's up for comment again.

Show your support for the trails and submit comments indicating that you want the trails included in the forest trail system! Comments can be addressed to District Ranger Rob Davies, and can be emailed, with subject line "Hungry Lion Information" to: comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us (<mailto:comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us>)

If you want to read more on the topic, or look at maps of the project, there's more info [here](https://www.fs.usda.gov/project/?project=50134) (<https://www.fs.usda.gov/project/?project=50134>).

FAMB submitted the following comment:

Dear District Ranger Davies,

Please accept these comments regarding the Environmental Assessment for the Hungry Lion Resource Management Project. Flathead Area Mountain Bikers (FAMB) supports the inclusion of the Lion Lake and Desert Mountain trails into the forest trail system. As such, FAMB supports alternatives 2 and 4 with respect to recreation. FAMB does not take any position on the road building, fuels treatment, or vegetation management aspects of alternatives 2 and 4.

As previously discussed, FAMB continues to be interested in assisting in the maintenance and upkeep of the Lion Lake and Desert Mountain trails, and we look forward to working with you and your excellent staff to ensure those trails provide a quality recreational experience for mountain bikers as well as other trail users.



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Great Fish Challenge is raising money for FAMB's Armory Park Pump Track! (<http://www.flatheadamb.org/news/great-fish-challenge-is-raising-money-for-fambs-armory-park-pump-track>)

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(<http://www.greatfishchallenge.org/>)

FAMB is excited to announce the commencement of the 2017 Great Fish Community Challenge. From now until September 15, 2017, donors can make tax-deductible contributions to FAMB to support its

About Us

Flathead Area Mountain Bikers, a 501(c)(3) nonprofit, is working to promote mountain biking and improve trail access in the Flathead Valley.

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[August 2017 \(/news/archives/08-2017\)](#)
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Armory Park Pump Track project. Site prep is complete, the City has approved our project proposal, and we will be bringing in fill dirt, leveling the site, and installing irrigation during the latter half of Summer 2017. Pump track construction will be completed during the Fall of 2017. But first, we need your support! Donate to FAMB during this year's Great Fish Challenge and we have the opportunity to be awarded matching funds! Which means your donation dollar goes the extra mile. Help us make this fun and exciting community resource a reality!

DONATE TODAY<https://whitefishcommunityfoundation.thankyou4caring.org/greatfish/donation-page---flathead-area-mtn-bike-gf> Like 0[Tweet](#)

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Taylor Hellroaring Project Comments - Short Form (<http://www.flatheadamb.org/news/taylor-hellroaring-project-comments-short-form>)

4/28/2017 0 Comments (<http://www.flatheadamb.org/news/taylor-hellroaring-project-comments-short-form#comments>)

Public comments for the Taylor Hellroaring Project are due on Friday April 28, 2017. This is a proposal to build a new network of trails on the Whitefish Face, to the north and west of Whitefish Mountain Resort. These trails would connect to the existing trails on Whitefish Mountain Resort and to the Whitefish Trail as well as to the network of trails to the north of the resort. FAMB has been instrumental in crafting this proposal and strongly supports this project.

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FAMB Comments Regarding the Taylor Hellroaring Project (a.k.a. Whitefish Face) (<http://www.flatheadamb.org/news/taylorhellroaringproject>)

4/20/2017 2 Comments (<http://www.flatheadamb.org/news/taylorhellroaringproject#comments>)

Below are the full comments to be submitted by FAMB concerning the Taylor Hellroaring Project on the Flathead National Forest. The project includes a proposal for building a new trail network to the north and west of Whitefish Mountain Resort, as well as various logging operations and fuels reductions in the same area. FAMB supports this project, and feels that the proposed trails would be a tremendous asset to the community. Please submit your comments in support of the project today!

[Read More \(http://www.flatheadamb.org/news/taylorhellroaringproject\)](http://www.flatheadamb.org/news/taylorhellroaringproject)

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FAMB Comments Regarding the Ten Lakes Wilderness Study Area (<http://www.flatheadamb.org/news/famb-comments-regarding-the-ten-lakes->

wilderness-study-area)

2/7/2017 0 Comments (<http://www.flatheadamb.org/news/famb-comments-regarding-the-ten-lakes-wilderness-study-area#comments>)

The Ten Lakes Wilderness Study Area area near Eureka represents some of the best backcountry mountain biking opportunities in the region. Access to high alpine trails and lakes with fantastic mountains and scenery make the area unique, but the Kootenay National Forest has released a draft environmental impact statement that proposes drastic restrictions on mountain bike access.



Read More (<http://www.flatheadamb.org/news/famb-comments-regarding-the-ten-lakes-wilderness-study-area>)

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Ten Lakes Wilderness Study Area Comments
(Long Form) (<http://www.flatheadamb.org/news/ten-lakes-wilderness-study-area-comments-long-form>)

2/7/2017 0 Comments (<http://www.flatheadamb.org/news/ten-lakes-wilderness-study-area-comments-long-form#comments>)

When the Montana Wilderness Study Act was passed in 1977 none of the authors would have imagined that these areas would remain in limbo 40 years later. The House of Representatives Report from the 95th congress states,

To avoid tying up this large acreage in wilderness study status for longer than is necessary, the committee suggests that the Secretary of Agriculture give a high priority to the completion of all nine studies within a period of 24 to 30 months (or less)...



Photo: Marc O'Brien

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Bonsai Pump Track Fundraising Party (<http://www.flatheadamb.org/news/bonsai-pump-track-fundraiser>)

10/5/2016 0 Comments (<http://www.flatheadamb.org/news/bonsai-pump-track-fundraiser#comments>)

Come Get RAD!

Come join us at Bonsai on Friday, October 7 to raise money for FFT's Armory Park Pump Track project! FFT hopes to break ground on a new pump track on the current site of the dirt jumps in Armory Park in Whitefish in the Spring of 2017. This project would be great for the town of Whitefish and will especially benefit our kids.

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Armory Park Pump Track Fundraiser (<http://www.flatheadamb.org/news/october-05th-2016>)

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Flathead Fat Tires is working to bring a pump track to Whitefish!



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Flathead National Forest Plan Comments – What You Need to know (<http://www.flatheadamb.org/news/september-27th-2016>)

9/27/2016 0 Comments (<http://www.flatheadamb.org/news/september-27th-2016#comments>)

Mountain bike access to some of the best trails in the area are at risk! Your help is needed!

The Flathead National Forest is working on revising the Forest Plan – the document that guides all use within the local forests. Trails like Alpine No. 7 are at risk of being closed to bikes, but we’re fighting to not only preserve access, but also improve it.

We’re asking anyone who likes riding bikes in the forest to submit comments regarding the plan to make sure we have support for bikes on trails into the future. We strongly urge you to [submit your comments here](https://cara.ecosystem-management.org/Public//CommentInput?Project=46286) (<https://cara.ecosystem-management.org/Public//CommentInput?Project=46286>) and support the continued (and improved!) access for bikes in our national forests!

The deadline is October 3rd, so send in your comments today!

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August 1, 2017

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

Re: Comments on Trout Lake ASCC

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

Dear Mr. Davies;

Thank you for the field-tour the other day regarding Hungry Lion project and that portion of the ASCC. Please accept these comments into the public record for both the Hungry Lion and Trout Lake portions of the proposed ASCC units. We incorporate by reference the letter being submitted by Friends of the Wild Swan in this matter and are pleased to see it includes discussion of research conducted by Dr. Diana Six and others.

We question why the ASCC proposal would include the planting of "improved" white pine and larch, if the intent is to study what types of vegetation management results in what types of genetic adaptations over time. As Dr. Six and others point out, human choices in management often are at odds with the natural choices made through genetic adaptation.

We are also disappointed to learn this is largely a "how to log" study, which limits the scope of the type of work proposed to conventional forms of commercial logging using heavy equipment - which will inevitably result in the spread of noxious weeds. The proposed treatments will also result in the removal of wood from the sites. Why not experiment with leaving hand-felled trees on the ground to increase the amount of down, woody material that will offer micro-site shade and help retain moisture in a warming climate?

Our experience with logging of private and public lands reveals significant changes in forest use by squirrels and songbirds, even with fairly light thinning, along with changes in populations of mice and voles and the birds and other wildlife that feed on them. The ASCC should be investigating these effects also, not just the effects on certain tree species.

We are generally concerned that, for research purposes, the ASCC proposal appears to be largely logging-as-usual rather than innovative. As disclosed in the Hungry Lion EA,

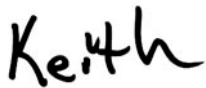
logging and road building has resulted in extensive infestations of weeds. So, using the principles of adaptive management, how about experimenting with something that doesn't involve logging and road building/rebuilding in order to truly minimize the spread of weeds? Otherwise, this ASCC experiment is likely to simply confirm the fact that logging and road building spread weeds, resulting in the need to use herbicides, the use of which would incredibly skew how these test units would otherwise evolve over time.

While we are generally supportive of looking at how to help forest ecosystems remain resilient in the face of climate change, we do not support the notion that doing so requires more logging, more roads and more focus on individual tree species to do so. It is roads and logging that has done the most damage to forest ecosystem resilience, as recognized broadly in the Interior Columbia Basin Ecosystem Management Project (USFS 1996a and USFS 1996b).

So lets not think those are the tools that can also repair the damage. We'd much rather be in the position to get behind efforts to restore ecosystem resilience through the removal of the largest impediments to that resilience; roads and the operation of heavy equipment on forest soils.

Thank you for this opportunity to comment.

Sincerely,

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

Keith J. Hammer
Chair

Literature Cited

U. S. Forest Service. 1996a. Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin and Portions of the Klamath and Great Basins. General technical report PNW-GTR-382. September 1996.

U. S. Forest Service. 1996b. Status of the Interior Columbia Basin: Summary of Scientific Findings. General technical report PNW-GTR-385. November 1996.