

Flathead National Forest ([flatheadplanrevision@fs.fed.us](mailto:flatheadplanrevision@fs.fed.us))  
650 Wolf Pack Way  
Kalispell, MT 59901

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Date

Dear Flathead National Forest;

Thank you for inviting public comments on the proposed revised Flathead Forest Plan and on proposed amendments to Forest Plans for the four other Forests in the NCDE.

1. Grizzly bear management standards and guidelines for all five forests are largely discretionary and do not constitute the “adequate regulatory mechanisms” necessary to replace federal Endangered Species Act protections. These Forest Plans must continue with Flathead Forest Plan Amendment 19 and similar mandatory habitat standards.
2. Do not abandon the Inland Native Fish Strategy and its mandatory standards for streamside area management. Keep the Strategy and establish clear road density standards that protect the clear, cold waters needed by bull trout and other fish.
3. Reduce the “suitable timber base” by at least half, as was done in the 2006 draft Flathead Forest Plan to better protect water quality, fish, wildlife, and visual quality. The proposal weakens protection for all these resources, retaining the bloated 3,500-mile road system needed to log the inflated timber base rather than removing roads to protect resources and ease the burden on taxpayers. Conduct an economic analysis of the subsidies needed to retain the bloated road system and money-losing timber sales.
4. Areas where snowmobiling and summer motorized recreation are allowed are excessive and fragment lynx travel corridors, key wolverine habitats and grizzly bear security habitats. These include areas recommended by Wildlife Conservation Society’s John Weaver in 2014 and the Citizen reVision of the Flathead Forest Plan as wilderness, wildland restoration zones, and backcountry non-motorized conservation areas.
5. Develop, analyze and compare as management alternatives the 2006 draft proposed Flathead Forest Plan, John Weaver’s 2014 recommendations, and the 2014 Citizen reVision that would recommend wilderness designation for all wilderness-suitable lands and is currently endorsed by 100 folks including wildlife biologists and economists. Recommend and manage all wilderness-suitable lands as Wilderness!
6. Remove the western slopes of the northern Swan Range from the “suitable timber base,” as was done in the 2006 draft Plan, and assign the area the highest Scenic Integrity Objectives along with enforceable standards to maintain those objectives.
7. Close the outdated ATV trails in the Krause Basin area to motorized uses to finally provide adequate security for grizzly bear and calving elk. Do not designate the area a “Focused Recreation Area” as proposed, instead letting foot, bike and ski use blend in.

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Name

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Address