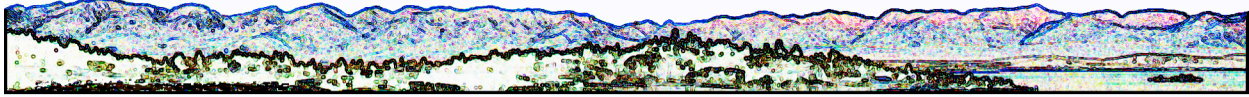


Swan View Coalition Nature and Human Nature on the Same Path



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ph/fax 406-755-1379

October 3, 2016

Flathead National Forest
Attention: Forest Plan Revision
650 Wolfpack Way
Kalispell, MT 59901

Re: Tidbits and Overall Complexity

Submitted via <https://cara.ecosystem-management.org/Public//CommentInput?Project=46286>

Dear Folks;

This is our last letter of comment before the deadline closes. We wish to make a few comments on the overall complexity and timing of the DEISs and draft Proposed Plan, then follow up on a few details.

The DEISs and Proposed Plan are unnecessarily complex and your releasing them for public review during summertime is inexcusable. As we indicated in our email exchanges in August and our comments that followed, the DEISs and Plan are riddled with errors - some of which are major and we are left without answers at the close of the comment period. Following are but a few examples:

1. We still don't know what the overall Forest budget is so we can compare it to the Timber budget.
2. We still don't know whether Alt. C requires \$2.2 million less in timber budget than the other alternatives or \$1.3 million less. The DEIS says the former, but its tables indicate the latter.
3. Similarly, it depends where in the documents you read whether Alt. C indeed closes the old ATV routes in Krause Basin to motorized use during the summer and whether this is indeed in addition to the existing Spring and Fall area closure. Moreover, one of our members asked this question at your last Open House in Kalispell and was told there would still be motorized use of the old trail system during summer. When she emailed Joe Krueger to get a clarification, she got no response.
4. The various maps of where snowmobiling is currently suitable and where it is proposed as suitable are confusing. Part of this confusion stems from not clearly

indicating on the map keys what represents the current state of travel planning. Instead it appears this is keyed as “currently suitable” under that particular alternative. Well, wouldn’t the currently suitable areas be the same under all alternatives?

5. The maps and descriptions of what will and won’t be allowed in MA7 Focused Recreation areas is confusing for many areas, not just for Krause Basin. We simply can’t support MA7 for any area other than Whitefish Mountain Resort. Everywhere else it simply expands past mistakes with further mistakes that expand harmful motorized and mechanized uses. Limit MA7 to one sacrifice area only, WMResort.

Even given the above uncertainties, we urge you to carry Amendment 19 forward into Alt. C and select it as your revised Forest Plan - as described in our earlier comment letters

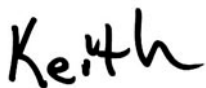
Given the complexity of your documents, the timing, the number of errors, and the number of unanswered questions, this draft process has essentially been wasted as an opportunity for the public to come to understand what you propose. In failing to identify a preferred alternative, you made the public attempt to read a Proposed Plan in a manner that simultaneously interprets three different action alternatives and often requires simultaneous referencing to another section or appendix of the Proposed Plan and /or DEIS.

Unless you change course, the public is now left with nothing but the formal Objection process to make their lingering concerns known to the Forest Service. And that process you currently propose to kick off by releasing the FEIS and draft Record of Decision in April of next year - just in time to dump another 2,000 pages of documents on the public as the weather warms up outside and summer approaches!

Please learn something from what has just occurred, take some extra time to correct the problems in your draft documents, and release them for public comment during the winter when most folks have more time to review them. Do not shoot yourself in the foot by releasing the next set of documents during summer or the holiday season.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and somewhat stylized.

Keith J. Hammer
Chair