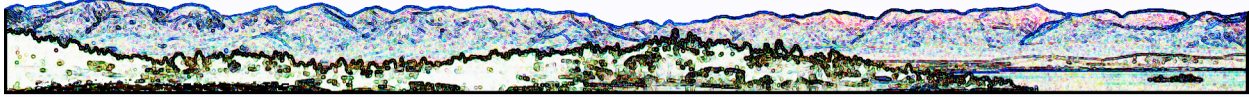


# *Swan View Coalition* Nature and Human Nature on the Same Path



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July 19, 2018

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Sent as pdf to [comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us](mailto:comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us)  
Companion DVD hand-delivered to the Supervisor's Office

Re: Comments on the Betty Baptiste Project EA

Dear Mr. Weber and Ms. Draggoo;

Please accept these comments on the Betty Baptiste Project EA into the public record. We incorporate by reference comments submitted in this matter by Friends of the Wild Swan, Alliance for the Wild Rockies, and WildEarth Guardians - as well as our scoping letter dated 11/5/12. We will hand-deliver a DVD of supporting documents that will be referenced in this letter.

## **Executive Summary**

We appreciate that the EA includes an alternative that would reduce vegetative treatments by not building temporary roads (Alt. 3) and an alternative the EA argues would fully comply with Amendment 19's 19/19/68 standards/objectives (Alt. 4). We will argue in this letter, however, that placing roads into ISS is not the equivalent of A19 road "reclamation" just because the EA says it is.

That said, we appreciate that the EA states "all culverts would be removed" from ISS roads (EA at 9, 113 and elsewhere). This would hopefully ward off problems like we encountered with Raghorn Road #10802. There all culverts were not removed, apparently because some culverts were considered to have lower risk of failing and/or were not considered to be stream-aligned. The Forest has a contractor going back in to remove the remaining culverts. Best to simply remove all culverts in the first place and be done with it so no further mechanized entries are necessary.

We've been wondering why this EA has been so long in coming and we think we found the reason in the Economics section, on pages 218-219:

In this case, base rates [the lowest rates at which timber will be advertised] exceed appraised stumpage rates and predicted high bid estimates for each

alternative, indicating there is a risk of no bids on the project with its current design and under current market conditions.

Indeed, Table 65 shows that predicted high bids are only one-half to three-quarters of the base rates. In other words, the timber sale is not likely to be purchased - which suggests one reason this Project has languished since 2012 with no EA.

Meanwhile, however, the Logan Dry Park grizzly bear subunit has also languished with substandard grizzly bear security otherwise required by A19. When A19 was written in 1995, Fish and Wildlife Service turned its 19/19/68 objectives into standards via nondiscretionary terms and conditions in its 1995 Incidental Take Statements, divorcing from the timber sale program the accomplishment of those standards within ten years (see FWS's 1/6/95 and 2/17/95 Biological Opinions in DVD Folder 01).

It is high time the Flathead meet those 19/19/68 standards and objectives in the Project area and Logan Dry Park subunit. We ask that you forgo the timber sale aspects of this Project and implement Alt. 4 modified to drop the logging/timber sales and to decommission (fully re-vegetate and remove from the system) the roads slated for ISS. You can't fund this work with timber sales, let alone timber sales that are not economically feasible - and that's why A19 intended that the Forest develop and fund its road decommissioning program separate from its timber sale program.

## **Economics**

As mentioned above, the EA's Economics section shows that Betty Baptiste timber sales are not likely to receive bids because base rates are higher than predicted high bids under current market conditions (EA at 218-219). The EA (page 220) shows that Alt. 4 creates the most jobs and labor income due to the increased miles of road storage/reclamation and berming.

This raises the question of why the Forest Service is spending so much time preparing an economically infeasible timber sale, rather than securing the funding necessary to implement the road closures and decommissioning necessary to meet A19's 19/19/68 standards/objectives. If the Forest Service is going to spend taxpayer money on these projects, we think it should be spent on removing roads and restoring watersheds, rather than on timber sales that build roads, disturb soil, harm water quality, and spread noxious weeds - while apparently not generating enough money to pay for the necessary restoration work. The EA needs to include economic analyses of an alternative that would implement the road closure and reclamation work necessary to meet A19 without the logging/timber sale components.

## **Logging is Contrary to Ecosystem Restoration**

By pairing logging/timber sales with road reclamation work, the Forest Service seriously compromises the road reclamation work. If the timber sales receive no bids, will any of the non-timber harvest activities take place?

If the timber sales are sold, their road and logging work adds more wasted expense to the restoration work. For example, Alt. 4's would require one culvert each in Roads #9881 and #1025 to be upgraded, apparently for log hauling, only to later be removed when those roads are put into ISS (EA map on 251, if we are to believe the definition of ISS on EA page 9). Similarly, logging and the building of temporary roads would result in a high risk of infesting Temporary Road B with weeds even though an old road template exists in that location and is not currently infested with weeds (EA at 191). This is a rare find and an absurd way to deal with it.

The Invasive Plants section of the EA clearly indicates that logging and road building have the highest risk of spreading weeds. It also concludes that reclaiming and re-vegetating roads helps reduce the spread of weeds, favoring Alts. 3 and 4 for less road construction and more road reclamation, respectively (EA at 191 and 198). You can't control weeds by continually building and rebuilding roads.

### **ISS is Not Equivalent to A19 Reclamation and Decommissioning**

A19 requires that a road must be reclaimed, fully re-vegetated so it no longer functions as a road or trail, and decommissioned/removed from the road system before it can be omitted from calculations of Total Motorized Route Density. DVD Folder 04 includes our Roads to Ruin report and its three Supplements, which in turn provide the rational and Flathead NF documents supporting this conclusion.

The EA's definition of ISS roads, on pages 9, 113 and elsewhere, falls short of the A19 definition of reclaimed by making the road impassable only to motorized traffic instead of impassable to all human use, including foot traffic. It also falls short by not requiring that the road be re-vegetated and removed from the system, which is how the Flathead has interpreted and implemented A19 from 1995 until recently.

Importantly, the EA notes only temporary benefits to soil productivity from road reclamation because the roads would remain on the system and be used again (page 61). Full road decommissioning and a commitment to reduce the road system has long-lasting benefits to soil productivity, subsurface water flow and carbon sequestration, among other things (see for example Lloyd et al's "Influence of road reclamation techniques on forest ecosystem recovery in DVD Folder 15).

### **Culverts**

We do, however, encourage you to remove all culverts from stored, bermed and decommissioned roads. The EA confirms one culvert has already "washed out" where Deadhorse Creek crosses Road #11089 (page 69; should Table 32 list #11009 instead?). What about the culverts located beyond the washed-out one? The EA is problematic in proposing to remove only a few culverts in key roads, which would appear to leave abandoned culverts beyond those locations, where they would be difficult to monitor and maintain.

For example, the EA proposes to remove one culvert from Road #11009 at Deadhorse Creek (already washed out if this is #11089 in Table 32). This would appear to abandon culverts beyond this point on a gated, bermed or ISS road, depending on alternative. This is how we end up with roads like Raghorn #10802 with abandoned culverts stranded beyond the reach of machinery needed for maintenance and easy monitoring. Similarly, Alt. 4 would appear to remove only one culvert from Road 1636, which is currently bermed and would be bermed further south under Alt. 4. What about the other culverts on this road?

Is there a culvert monitoring plan for the area? The EA maps fail to show how Security Core will change as additional roads are bermed or reclaimed. Where is the culvert monitoring plan required by A19 for any bermed roads in Security Core that have culverts remaining? (See our Roads to Ruin report in DVD Folder 04 for a clear description of this A19 requirement and the Flathead's failure to comply with it).

The EA fails to adequately describe where culverts are located, which ones are stream-aligned, and which are or are not accessible for easy monitoring. Table 34 on page 75 fails to account for "potential sediment that may result from failure of undersize culverts." Moreover, Table 34's footnote and Exhibit J-2 either greatly underestimate the potential sediment from culvert failures or anticipate a sloppy job of culvert replacement in concluding: "It is estimated that culvert failure would produce at least twice the amount of sediment as replacement." Culvert removals and replacements should contribute far, far less than half the sediment of a culvert failure. Failures should be estimated to produce many times more sediment than removals. The words "at least twice" fail to adequately estimate the risks to aquatics from culvert failures.

Similarly, the EA fails to provide estimated cumulative sediment production by alternative even though that is the title of Table 36 on page 78. Only one alternative is shown and it is not named.

## **Grizzly Bear**

The EA fails to cite local research that formed the basis of A19 and instead relies on far-flung research and anecdotes to suggest that bears are not displaced by restricted roads. Nowhere does the EA cite Mace and Manley 1993 (DVD Folder 24). They found that even roads closed to motorized vehicles displace grizzly bears, concluding:

Apparently, grizzly bears adjust their habitat use patterns in part to both precise open road densities and precise total road densities. Unless a road has completely revegetated, managers should assume that some level of human use is occurring along closed roads, and grizzly bears will respond to that use . . .

Mace and Manley (1993) is research the Flathead helped fund to answer questions about the impacts of roads on bears (see the Third Supplement to our Roads to Ruin report in DVD Folder 04). Perhaps the Flathead no longer respects the answers provided?

If the Flathead thinks research no longer supports these answers, it needs to issue a Forest Plan amendment that redefines TMAD and "reclamation" to no longer require

that a road be re-vegetated and rendered impassable to humans before it can be omitted from TMAD. This the EA does not do. It instead ignores the research upon which A19 is based and relies on anecdotal statements like “the district biologist has frequently observed grizzly bears using restricted (gated or bermed) roads for travel further suggesting no displacement is occurring due to the presence of restricted roads.”

There are at least two things wrong with this anecdote: 1) it wrongly assumes that some use of the road equates to “no displacement” and 2) it has not been subjected to the rigors of statistical analysis that would show whether bears use the area on or near the road less than would otherwise be expected (as was the research concluding bears are indeed displaced from such roads - that’s how scientific research works).

The EA is biased, wholly inadequate, and incorrectly applies A19. The grizzly bear has not been de-listed in the NCDE, the Conservation Strategy does not yet apply, and the Forest Plan is not yet been revised in order to apply to this Project. A19 is the law of the land for this Project.

The Logan Dry Park subunit currently has A19 parameters of 30/36/51 instead of the required  $\leq 19/\leq 19/\geq 68$  for OMAD/TMAD/Security Core, respectively (EA at 115, Table 50). A19 requires “there will be no net increase in density of open motorized access routes or total motorized access routes [or security core]. Forest Service activities will result in a net gain towards meeting objectives for open motorized access routes **and** total motorized access routes **and** security core areas on National Forest Lands (A19 Decision Notice; DVD Folder 01; emphasis added).

EA Alts. 1, 2 and 3 fail to result in a net gain towards OMAD, TMAD **and** Security Core. This violates A19. Only Alt. 4, if its ISS roads were truly reclaimed and decommissioned, results in net gains in all three A19 parameters, as required. These parameters were not met in the Logan Dry Park within the required ten years of A19 being authored, nor has it met the time extensions issued by FWS since, nor has the Forest Plan been amended to change those initial 10-year requirements. It is high time these parameters get met once and for all!

The EA alternatives fail to favor the needs of the grizzly bear in its MS-1 habitats, in violation of the Forest Plan and IGBC Guidelines. Indeed Alts. 2 and 3 are issued a finding of “May Affect, are likely to Adversely Affect the grizzly bear” on EA page 123. Alt. 4 is issued a “Not Likely to Adversely Affect grizzly bear” finding on page 123, due to meeting all three of A19’s 19/19/68 parameters. We find, however, that the displacement cause by timber sale activities would still adversely affect grizzly bear, as will the reduction in Security Core caused by Temporary Roads A, B and F (EA at 112).

Moreover, temporary roads, even if “reclaimed” after logging, will increase TMRD and continue to adversely affect grizzly bears until the roads have re-vegetated to the degree their reclamation becomes effective and renders them inaccessible to human use. Only then are they qualified for omission from TMAD calculations (see the First Supplement to our Roads to Ruin report in DVD Folder 04).

It takes many years for reclaimed roads to reach reclaimed / re-vegetated status - it does not occur immediately at the close of the timber sale or road reclamation contract. The EA's treatment of these factors violates the MS-1 standards and A19 standards.

Last but not least, page 110 of the EA provides a confusing statement about activities that can occur on gated roads during the Spring grizzly bear security period. Page 110 simultaneously says these activities will only occur on open roads, as does page 114.

### **Transportation, Travel Planning and the Minimum Road System**

The EA and Project fail to identify and implement the minimum road system (MRS) called for under the Travel Planning regulations. The EA makes no mention of a Travel Analysis having been prepared for the Project area, let alone used to guide transportation and travel planning decisions proposed in the EA.

We would argue that full compliance with A19 dictates perhaps the most important aspect of the MRS for the Project area. This is what we argued in our comments on the Flathead's draft Forest-wide Travel Analysis Report (see DVD Folder 29). The Final TAP in turn recognized "Eight grizzly bear subunits do not meet Forest Plan direction related to road density standards. Additional opportunities [for road decommissioning] may be identified in these subunits." (DVD Folder 29). Such is the case for the Project Area and Logan Dry Park subunit.

EA Alt. 4 most closely identifies the legally required MRS and should be implemented as described at the outset of this letter, in our Executive Summary. Finally, page 191 of the EA instructs the reader to "refer to the Transportation Section for more information." The EA contains no Transportation Section.

### **Old Growth**

We disagree with the EA's conclusions (e.g. pages 38 and 166) that "regeneration treatments" will create better old growth forest than allowing existing older stands to evolve untreated. Such a finding is arrogant and contrary to the best available science. Even if it were true, who wants old growth that is infested with invasive weeds and bordered by the roads needed for the logging "treatments?" Give native forests and nature some credit for managing old growth successfully for millennia!

### **EA Tidbits and Typos**


Table 6 on page 12 appears to have reversed the mileages for ISS and bermed roads from what is presented in Table 2 on page 7. This appears to be corrected in Table 11 on page 15 (Alt. Comparisons).

Table 11 on page 15, however, incorrectly numbers the action alternative headers as 1-3 instead of 2-4.

Page 113 refers to ISS as “road obliteration,” which is nonsense.

Thank you for this opportunity to comment and please keep us informed of how you intend to proceed with this Project.

Sincerely,

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

Keith J. Hammer  
Chair