

Swan View Coalition Nature and Human Nature on the Same Path



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Re: Comments on Draft Wilderness Suitability Inventory

Dear Joe;

Please accept these comments into the public record for the draft Wilderness Suitability Inventory (WSI) in particular and the Flathead Forest Plan revision in general. These comments are best viewed in conjunction with our Google Earth "SVC Comments on FNF WSI" and "Roadless Areas Omitted from Flathead NF IRAs" kml files found at: http://www.swanview.org/home/articles/reports-documents/kml_files_for_use_with_google_earth/183

The above kml placemarks (PMs) can then be used to locate the particular features this letter will comment on (double-click on the PM in the Places directory/menu and Google Earth should move to that location), along with the map layers the Flathead has provided on its Geospatial Data page at http://www.fs.usda.gov/detailfull/flathead/landmanagement/gis/?cid=fsm9_042517&width=full.

FNF map layers needed to illustrate the comments made in this letter include: Inventoried Roadless Areas, Regen Harvest Since 1974, Scenic Integrity, Wilderness Inventory Draft May 2014, Fire History, Special Areas, Wilderness, National Forest System Roads, Other Roads, and Historical Roads.

Due to lingering snow pack, our comments at this time will be limited to the use of Google Earth imagery - though we hope to gather field photos and data this summer with which to supplement these comments.

Our comments will focus on transparency of the process, criteria used in the process, and the degree to which the WSI includes areas that should have been included in Inventoried Roadless Areas (IRAs). First, however, we will establish the context for these comments.

The WSI, Wildlands Recovery, Wildlife Linkage, and Management Area Prescription

The WSI and evaluation process is not an academic process devoid of on-the-ground implications. We urge you to dovetail this Chapter 70 process (FSH 1909.12) with other Forest Planning requirements to recognize areas that, while perhaps not currently meeting WSI criteria, will meet them at some point in the future if allowed to. They should receive a special Management Area (MA) prescription that will keep these areas on track and trending toward qualifying for recommendation as Wilderness.

These areas would include “Wildland Restoration Zones” identified by Dr. John Weaver in his “Conservation Value of Roadless Areas for Vulnerable Fish and Wildlife Species in the Crown of the Continent Ecosystem, Montana.” They would also include areas identified as “Wildlands Recovery Areas” in our “Citizen reVision of the Flathead Forest Plan,” some of which qualify for inclusion in the WSI now and some of which may require more recovery time first. Areas needing special protection and recovery of wildlife security would also include areas important to linking fish and wildlife populations together by providing for secure occupancy, travel and migrations.

We urge you to regard the WSI and Chapter 70 process as the Forest’s Suitable Wilderness Base and treat it with the same respect given the Suitable Timber Base. Doing so will help diminish longstanding controversy on the Flathead where logging and road building in the Suitable Timber Base has been given priority over the retention and restoration of fish and wildlife habitat. Again, the WSI is far more than an academic exercise and should be regarded as a primary means to inventory, evaluate and manage lands to maximize their contributions to fish, wildlife, and other wilderness values.

Process Transparency

We find several areas in which the “Process Paper” for the WSI falls short of the desired “transparent process” described at the bottom of its first page.

1. The numbered criteria on page 2 of the Process Paper, under item 4, includes in the WSI areas “proposed for consideration . . . through public involvement during the development of the Assessment of the Flathead National Forest (USDA Forest Service 2014) . . .”. This criteria is vague and opaque, not transparent. The process paper should clearly identify where those areas are and how they were specifically proposed through public involvement.” A similar vague statement is found at the top of page 2 of the Process Paper.

The upper two forks of Bunker Creek, for example, include logging units less than 40 years old but nonetheless included in the WSI. (See PM 01 Bunker Creek Forks). We agree these areas should be included in the WSI, in part because they were included as Wilderness in the 1988 and 1994 Wilderness Bills considered, if not passed, by Congress. The Process Paper needs to describe the criteria and reasons these areas are included in the WSI in order for the WSI to be objective and defensible.

2. Portions of the formal IRA and other roadless and unlogged lands in the vicinity of Horse Ridge (north of Spotted Bear) are omitted from the WSI with no explanation,

even though generally of high scenic integrity. (See PM 02 Horse Ridge IRA and Other Roadless). The Process Paper, in Appendix A, makes it clear that vegetative treatments do not disqualify an area from inclusion in the WSI so we wouldn't expect upland burns scheduled for some of this area under the Spotted Bear River Project would disqualify it. The Process Paper needs to explain the criteria for omitting this and other IRAs/roadless lands from the WSI - though we suspect doing so is improper and/or simply an error. We hope not to see a repeat here of how the 1986 Forest Plan pulled back some IRA boundaries to omit areas included in its Appendix M 10-Year Timber Sale Program (such as Akinkoka and the then already proposed Lost Silver).

3. The Process Paper fails to describe how the Scenic Integrity inventory/map layer play into WSI determinations. As in the above example, Horse Ridge is omitted from the WSI even though it is an area generally of high scenic integrity.

Similarly, a portion of the Sullivan Creek watershed is omitted from the WSI even though it has no apparent signs of past logging or roads, is in an IRA and has moderate to high scenic integrity. (See PM 03 Sullivan Cr SE Omission). The Process Paper needs to either better describe how the Scenic Integrity inventory affects the WSI or omit the Scenic Integrity inventory from the process - and it needs to either explain these odd WSI omissions or correct them.

We will speak more to the omission of portions of IRAs and other roadless lands later.

Problems With Using the <40-Year-Old Logging Unit Criteria

Though the Process Paper provides Appendix A to explain use of the <40 year age criteria for omitting logging units from the WSI, this criteria nonetheless remains somewhat arbitrary for several reasons:

1. There is great variation in whether such logging units are "substantially noticeable" in areas that have not subsequently burned by wildfire. An example of this can be seen by looking at cutting units in the Cedar Creek area south of Spotted Bear. (See PM 04 Cedar Creek Unit Comparison). The two logging units nearest the PM are not "substantially noticeable" from this view, especially when compared to the several units to the left/west - though all were logged since 1974.

2. Subsequent wildfire in most, if not all, cases renders past logging units no longer "substantially noticeable" by erasing the delineation between the logging unit and the surrounding forest - at least at the background and mid-ground views, if not at foreground views as well.

See for example PM 05 Bunker Creek Burn: This 1984 logging unit is no longer "substantially noticeable" from this view, having burned in the 2000 Chipmunk Fire.

See also PM 06 Sullivan Creek Burn: This 1984 logging unit is no longer "substantially noticeable" from this view, having burned in the 2003 Ball Creek Fire.

Similarly, see PM 07 Sullivan Creek Burn: This 1976 logging unit is no longer "substantially noticeable" from this view, having burned in the 2003 Ball Creek Fire.

3. Roads are often more noticeable than the boundaries of the logging units, no matter their age. Chapter 70 includes in the WSI ML (Maintenance Level) -1, some ML-2 roads and decommissioned roads, regardless of their visible impacts. The Process Paper, however, notes the "term substantially noticeable was defined in terms of what a viewer will likely see when viewing harvest areas and associated roads from the background, mid-ground and foreground . . ."

See for example PM 08 Sullivan Cr Roads v Logging: The 2005 salvage logging unit immediately east of the PM is omitted from the WSI, though it is not "substantially noticeable" from this view. In contrast, the >40 year old logging unit immediately west of the PM is largely included in the WSI in spite of "jammer roads" visible due to more substantial vegetation growing on the old road templates.

The above example again raises the question of how scenic integrity plays into WSI determinations. It also raises a new question of whether some <40 year old salvage logging is necessarily "substantially noticeable" when the prior wildfire eliminated surrounding forest alongside which the logging unit would otherwise contrast.

We urge caution here as we don't want to imply that salvage logging can be practiced in roadless lands without considerable and unacceptable impacts to wilderness values that include critical wildlife habitats, of which burned forests are especially key. But we also do not want past mistakes, like this salvage logging and/or old jammer roads, to eliminate an area's inclusion in a defensible WSI and/or other MA prescriptions that intentionally keep such areas on a track to full wildland recovery. More on this later.

In this context we reference our earlier, preliminary comments on the effects of wildfire on diminishing the visibility of past and perhaps subsequent logging units, found at: http://www.swanview.org/reports/Sullivan_Log_v_Wild_Study.pdf

Roads and Maintenance Levels

Chapter 70 allows ML-2 roads to be included in the WSI, but the Process Paper excludes all of them. This is a serious flaw and fails to dovetail the WSI with the Roads Analysis process, other aspects of the Forest Planning process, and fiscal reality - as required by Chapter 70.

Indeed, the Flathead's 2006 "Analysis of the Management Situation" found that the Forest needs \$6.2 million annually to maintain its road system, but was receiving less than \$1 million annually. The 2014 "Assessment of the Flathead National Forest" now finds that \$1.3 million is need annually for road maintenance but only some \$564,000 is being received. And, while the Assessment finds this is "approximately 43 percent of the funds needed to maintain the road system to standard," it also finds as little as 4% of the non-passenger car system is receiving the maintenance necessary to avoid or minimize environmental damage. (2014 Assessment Part 2, pages 198-201).

The upshot of this is that the Flathead still has far too many roads in ML-2 and above. Chapter 20 requires the Flathead to anticipate the disinvestment of roads into ML-2 and the disinvestment of roads from ML-2 to ML-1 or decommissioning - and to plan accordingly, including in its WSI process.

Minor and Major Exclusions

The Process Paper should include a process for identifying areas that, if excluded from the WSI will not get the later evaluation of fish, wildlife and other wilderness values they deserve. PM 09 Battery Mountain, for example, shows how the Battery Mountain area is omitted from the WSI even though it is contiguous via a narrow “isthmus” between 1975 and 1976 logging units accessed by now decommissioned roads from opposite sides of the mountain. Moreover, it shows how including the no longer “substantially noticeable” 1975 and 1976 logging units in the WSI will help acknowledge the degree to which prior road decommissioning in this area has improved wildlife security, water quality and bull trout habitat in both Quintonkin and Wheeler Creeks. In other words, this is an example of firstly omitting an area that does meet the criteria to be included in the WSI, then making the matter worse by not taking a harder look at whether a strict <40 year old criteria should be applied to the logging units in this critical area.

A more minor exclusion is exemplified at PM 10 Lakalaho Unit, where a single small logging unit appears to disqualify a substantial preexisting roadless area between the decommissioned Lakalaho and Kinnimiki roads. This appears to firstly be an error in failing to identify this area as part of the adjacent IRA, then perhaps an error in using one small cutting unit to disqualify the entire area from the WSI (see also mention of this in the following section).

Roadless Land Omitted from IRAs and the WSI

In February 2014, we used Google Earth to identify roadless lands that should have been included in the Flathead’s IRAs because they are indeed roadless and contiguous to existing IRAs. Our “Roadless Areas Omitted from Flathead NF IRAs” kml file is at: http://www.swanview.org/home/articles/reports-documents/kml_files_for_use_with_google_earth/183

The WSI indeed includes most of these omitted areas, as it should. Following, however, is a list of areas (by Placemark name in the above kml file) where either parts of the IRA or other adjacent roadless lands were omitted from the WSI with no apparent reason provided in the Process Paper criteria (this list is not all-inclusive, but includes the most egregious):

A. Whitefish Range - north to south:

PM Coal Ridge East: Substantial roadless lands are omitted near the PM and substantial IRA is omitted to the south.

PM Deadhorse Ridge Hallowat: Omits substantial roadless lands west of the Kletomus Creek Loop Road and substantial IRA to its east.

PM Standard Peak Mid West: Omits substantial roadless lands between the decommissioned Lakalaho Road to the west and the decommissioned Kinnimiki Creek Road to the east (as mentioned in the previous section, above).

B. The Lebeau WSI omits the easternmost portions of the IRA (no PM for this).

C. Middle Fork - west to east:

PM Pyramid Deerlick: Omits roadless land the "Ownership Title" map layer indicates is Forest Service.

PM Geifer Creek: Omits roadless land, some of which is IRA, which links the Essex WSI to the SkyWest WSI.

Both the SkyWest and Puzzle WSIs omit substantial IRA lands, only a very small portion of which contain logging units <40 years old (no PM for this).

D. Hungry Horse Reservoir East and Spotted Bear Area - north to south.

PM Desert Mountain: Omits substantial unroaded and unlogged lands in the Coram Experimental Forest. It seems this area should be included in the WSI via the process criteria and then evaluated to see whether or not it should not be considered for Wilderness recommendation.

PM Emery Creek: Omits a sizeable and contiguous roadless area between Desert Mountain and Emery Creek roads.

PM Baptiste Creek: Rightfully includes most, but not all, of the roadless lands contiguous with the IRA.

PM Brush Creek: Rightfully includes much of the roadless lands contiguous with the IRA, but does not about the 1974 logging units nor include them even though they are not "substantially noticeable" from this view.

PM Horse Ridge: As noted in the above section, the WSI omits substantial portions of the IRA and a substantial contiguous roadless area.

PM Bent Trail: Rightfully includes most, but not all, of the roadless lands contiguous with the IRA.

PM Lower Big Bill: Omits a substantial portion of the IRA and a lesser but contiguous roadless area.

PM Lower Trail: Omits a substantial roadless area north of the Spotted Bear River that is contiguous with the IRA south of the River.

PM S Fk Flathead Meadow Creek: A substantial roadless area contiguous with the IRA is omitted, rather than just omitting the airstrip that has not road access.

E. Swan Range - east side south to north, then west side north to south.

PM Cedar Bunker: Omits parts of the IRA along the easternmost part of this lobe.

PM Larch Cedar and PM Addition Jungle: Rightfully includes most but omits some roadless lands contiguous with the IRA and not affected by <40 year logging units.

PM Tin Bruce: Omits substantial roadless lands contiguous with the IRA.

PM Tin Creek: Rightfully includes some of the area with decommissioned roads, but excludes nearly an equal and contiguous amount to the northeast.

PM Quintonkin Ball: Rightfully includes some, but not all, of the area with decommissioned or ML-1 roads.

PM Battery Mountain: Omits substantial roadless lands contiguous with the IRA and as discussed in the previous section, above.

PM Aeneas Creek: Omits substantial portions of IRA lands around Graves Bay, along Graves Creek, and in the Baker Creek and Jones Creek areas.

PM Clayton House Log Ridge: Omits some IRA and some contiguous roadless lands.

PM Lid Clayton: Rightfully includes most, but not all, roadless lands adjacent to the IRA. Omissions are to the east.

PM Wounded Buck: Rightfully includes most roadless lands adjacent to the IRA, but this is another area where the logging units are not “substantially noticeable” from this view and should be considered for inclusion in the WSI along with the area’s ML-1 and decommissioned roads.

PM Alora Endor Doris: Rightfully includes some of the roadless lands contiguous to the IRA and some lands with decommissioned or ML-1 roads - but this is another area where wildfire and other factors have rendered the logging units not “substantially noticeable” from this view. The logging units aside, a much larger and contiguous area qualifies for inclusion in the WSI.

PM Goat Creek: With the exception of omitting significant roadless lands on the south slope of Napa Ridge nearest the Napa Lookout Road, the WSI does a decent job of including roadless lands contiguous with the IRA along the west slope of the Swan Range north of here.

F. Swan Valley - east side; then west side, south to north

PM Smith Cooney: Omits a bit of the IRA and more substantial contiguous roadless lands to the west.

We are pleased to see the Beaver Lake WSI includes some lands critical to wildlife connectivity and containing ML-1 roads, some of which are being considered for decommissioning in the Beaver Creek Project.

We are also pleased to see other critical lands contiguous with the Mission Mountain Wilderness included in the WSI, as they should be. These include the Lindbergh Lake, Meadow Lake, Glacier Creek, Elk Creek, Cold Creek, North Fork Cold Creek, Jim Creek, Piper Creek, Fatty Creek, and Woodward Creek WSIs.

We are puzzled, however, why Mission Mountain Wilderness Addition IRA 01504 is omitted from the WSI? Only the northern half of the IRA contains substantial roads and logging, but those roads are all ML-1 and the single 1983 logging unit is no more “substantially noticeable” from a Google Earth view than the older neighboring units.

The WSIs contiguous to the Mission Mountain Wilderness should be given very serious consideration for their wilderness, fish and wildlife values - along with the road-removing restoration of lands in the area of the Seeley-Swan Divide - to help restore fish and wildlife connectivity in a heavily impacted Swan Valley. Closure of these Wilderness-contiguous areas to snowmobiles would also reduce snowmobile trespass into the Mission Mountain Wilderness proper.

Summary

The WSI and Forest Planning process affords a new opportunity to identify and protect lands that are either currently suitable for recommendation as Wilderness or are on a recovery track to become suitable. We urge the Flathead to give top priority to its new Suitable Wilderness Base and to develop MA prescriptions that place top priority on restoring other lands to wilderness suitability. This will go far to minimize longstanding conflicts in trying to conserve fish and wildlife habitat and connectivity in the face of MA-15 and other logging-emphasis MAs in the Suitable Timber Base.

We have written frankly in these comments about the need to develop a process by which previously logged areas are included in the WSI or kept on track to be included later, but without inferring that roadless lands can be logged without substantial harm to its fish, wildlife and other wilderness values/ characteristics - whether the logging is sooner or later “substantially noticeable” to the human eye or not.

Thank you for this opportunity to comment and please keep us in the loop on this.

Sincerely,



Keith J. Hammer
Chair