

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



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October 21, 2020

Sadie Wehunt and Amy Jacobs

Flathead National Forest

Via email to comments-northern-flathead@usda.gov

Re: Comments on Winter 2020/2021 Recreation Special Use Permits

Dear Sadie, Amy and others reviewing Winter SUPs;

Please see that this letter gets to all the appropriate specialists and decision-makers involved in the Winter 2020/2021 Recreation Special Use Permits (SUPs) ASAP. We also ask that you immediately clarify on your web site that “snowbike” refers to a motorcycle retrofitted with a ski in front and a snowmobile track on the rear, not a fat tire mountain bicycle. It is disingenuous for SnowBike Nation to include a bicycle in the logo used on its Tally Lake map when their business is the promotion of motorcycle snowbikes with similar speeds but far greater maneuverability than snowmobiles. See https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd828405.pdf).

Across the board, commercial recreational activities must be limited to the grizzly bear denning period of December 1 - March 31. Most of the proposed SUPs would continue after April 1 and well into the crucial “den emergence” and “spring habitat” periods, when bears are most limited in their ability to find food and move about freely. This makes them most vulnerable to human disturbances, be they motorized or non-motorized, causing their likely displacement from preferred habitats following months without eating. (See Forest Plan pages 176 and C-67).

We are particularly concerned with Glacier Adventure Guide’s proposal for skiing and snowshoeing on portions of the previously reclaimed and decommissioned Paola Creek Road #1638 through April 30th, a full month into the grizzly bear den-emergence/spring habitat period. As with Wheeler Creek road and others, the upper portion of Paola Creek road was decommissioned (under the 1997 Middle Fork Ecosystem Management Project and Forest Plan Amendment 19) to be re-vegetated and to no longer function as either a road or trail, motorized or non-motorized, in order to better secure key streamside and avalanche chute habitats for grizzly bears.

We’ve attached a Google Earth image of the decommissioned portion of the Paola Creek Road and a copy of the relevant SUP Project Map so they can be compared. It is clear that Glacier Adventure Guides wants to lead commercial group trips into the streamside and avalanche chute habitats of grizzly bear, wolverine and lynx - including during

Spring when bears and wolverine will be looking for winter-killed carrion in those avalanche chutes and streamside areas.

This is a really bad idea for wolverine all winter (they don't hibernate) and for bears, especially as they emerge hungry from their winter dens and are seeking out limited food sources. Moreover, commercial trips on this decommissioned road will tempt the clearing of the vegetation that is intended to keep the road from being used as either a road or a trail, motorized or non-motorized - which is bad for all wildlife.

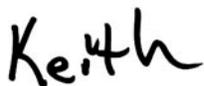
Fish and wildlife biologists had good reason for the particular roads they chose for decommissioning, like Wheeler Creek and Paola Creek, including protecting especially key bear habitats from human intrusions. You'll notice on the attached Google Earth image that the Paola Creek Road closure and decommissioning started well before where the Paola Creek culverts were removed - in order to better protect the streamside areas from human intrusion. This SUP proposal runs counter to that and should be abandoned.

We again ask that you provide this letter ASAP to the resource specialists and decision-makers that will be making determinations about whether these SUP proposals should move forward or not. We hope that the wildlife biologists currently working for the Flathead National Forest will keep intact the wildlife protections envisioned and implemented by those that came before them.

We ask that the Flathead recognize it is engaged in a summertime and wintertime Special Use Permit program that needs to have its cumulative impacts assessed in either an Environmental Assessment or Environmental Impact Statement. Some permits are being issued year after year and some permits overlap in time and/or place. All are being issued in habitats occupied by numerous threatened species. These SUPs cannot legally be individually Categorically Excluded from the need to prepare an EA or EIS.

Thank you for this opportunity to comment and please keep us informed about the fate of these SUPs.

Sincerely,



Keith J. Hammer
Chair

Cc: sadie.wehunt@usda.gov and ajacobs@fs.fed.us

Attachments:

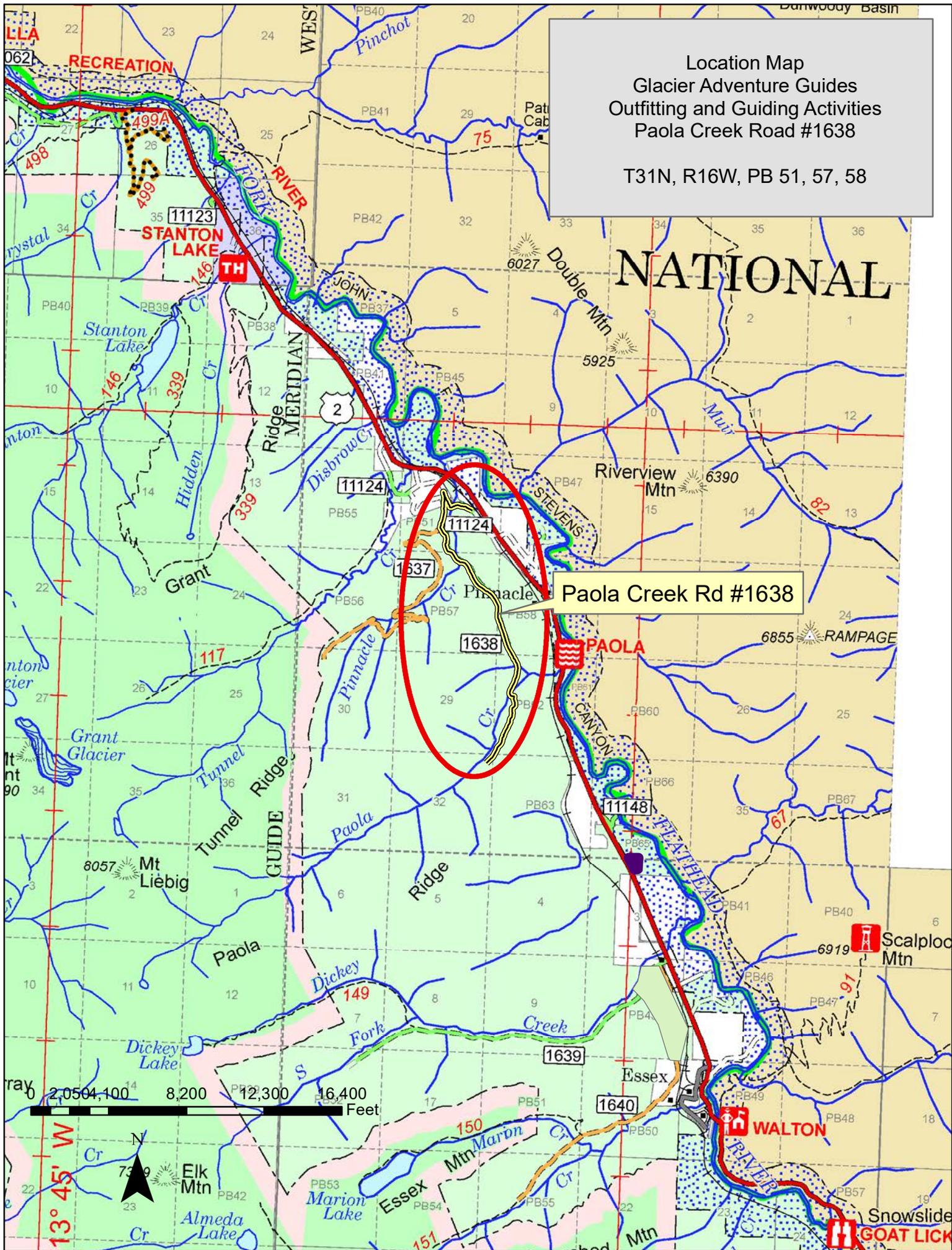
1. Google Earth photo of the reclaimed / decommissioned Paola Creek Road.
2. Map of GAG's Outfitting and Guiding Activities on Paola Creek Road #1638.

Paola Creek Road 1638 >>>>>>>>

This portion of Paola Creek Road 1638 was reclaimed and decommissioned under the 1997 Middle Fork Ecosystem Management Project, running from the bare turn-around closure area to the right of the above pointers southwest and up Paola Creek past snow avalanche chutes and rich streamside wildlife habitats. The 1995 Flathead Forest Plan Amendment 19 requires that reclaimed roads be re-vegetated and no longer function as roads or trails, motorized or non-motorized, in order to protect grizzly bear.



Location Map
Glacier Adventure Guides
Outfitting and Guiding Activities
Paola Creek Road #1638
T31N, R16W, PB 51, 57, 58



NATIONAL

Paola Creek Rd #1638

0 2,050 4,100 8,200 12,300 16,400 Feet

13° 45' W

GOAT LICK