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

3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

April 4, 2018

Objection Reviewing Officer
USDA Forest Service - Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Re: Krause Basin Management Plan Submitted for Krause Basin Objector Meeting
Submitted as PDF to appeals-northern-regional-office@fs.fed.us , lmarten@fs.fed.us cweber@fs.fed.us , bsweatland@fs.fed.us , and raysmith@fs.fed.us

Dear Objection Reviewing Officer, Regional Forester Marten, Forest Supervisor Weber;

Previous obligations prevent me from attending the April 13 Objector Meeting for Krause Basin. I submit this letter and Krause Basin Management Plan Outline for the record and as our proposed resolution to the Krause Basin portion of our Objection.

Brian Peck will be attending on behalf of Swan View Coalition and will have the authority to ask questions on our behalf. He will not have authority to agree to a resolution on our behalf. As requested in our March 5(a) letter, we again ask that you notify us in writing of any "potential to resolve specific issues" so that we may respond in a thoughtful and timely manner. We have yet to hear from you in this regard.

Krause Basin Management Plan Outline

A. The Flathead National Forest in 1970 proposed to retain the Krause Basin Hemlock Stand along the Strawberry Lake Road because "This stand is representative of the old-growth hemlock stands that were prevalent in the Krause Basin area prior to our [logging] activities . . . Stands of old-growth hemlock of this type are relatively rare on the Flathead Forest since we are on the eastern edge of the western hemlock type." The 1970 Plan called for an interpretive signing program that was never developed. [1]

Responding to this call, we developed and continue to maintain the Krause Basin Interpretive Trail near the Strawberry Lake Road under a volunteer agreement with SLRD. We use an interpretive brochure written with and approved by Flathead NF staff. [2] We propose that the Flathead Forest Plan protect all of the remaining hemlock stands in the Krause/Echo Basin from logging and thinning because they are indeed rare, provide a unique recreation setting, and are crucial habitat for grizzly bear, wolverine, lynx, pine marten, and other wildlife.

Moreover, moist hemlock forests like those found in Krause Basin and other old-growth forests tend to burn infrequently and can help arrest the spread of fire. [3] The biggest threat of fire to Krause Basin and nearby communities is human use of motorized vehicles and their contribution to reckless campfires, bonfires, beer parties, and shooting of guns - which we have documented in Krause Basin, including during seasons of high fire danger when some of these activities are legally prohibited. [4]

B. In 1987, the Flathead NF engaged a broad representation of interested people in the Noisy Face Recreation Task Force, of which we were a part. After some 13 meetings spanning over a year, the 1988 Noisy Face Recreation Plan was approved with stipulations that the few ATV trails to be retained NOT be marked on the ground. [5]

C. The intention of the wildlife biologists that crafted the Noisy Face Plan was to phase out the remaining ATV trails. They made passage on even the retained ATV trails physically difficult to discourage their use and designated the area a Wildlife Management Area to protect grizzly bear, elk, and other wildlife. [6] Some of these trails have indeed become brushed-in and no longer function as ATV trails. [7]

D. In 1995 the Flathead NF issued Flathead Forest Plan Amendment 19 in order to better protect grizzly bears from human and motorized disturbance. The majority of public comments submitted on the Amendment 19 EA, in some cases 4 out of 5, supported tighter restrictions on motorized vehicles and stronger protections for grizzly bear habitat. [8] A19 would close all the remaining ATV trails in Krause Basin to motorized use, along with the Peters Ridge and Strawberry Lake Trails. [5]

E. Somewhere around 2005, the Flathead for the first time printed the remaining ATV trails in Krause Basin on its District Map. Pursuant to new Travel Planning rules, the Flathead also printed the ATV trails on its Motor Vehicle Use Maps. Contrary to those rules, however, the District conducted no public process to firstly determine whether those ATV trails still exist and, if they do, whether they minimize adverse effects to soils, vegetation, wildlife, other recreational uses, and nearby homes - as required by 36 CFR 212.55. [9] Nor has the Flathead applied similar minimization criteria to snowmobiling as required by the new Travel Planning rules. In 2015, we photo-inventoried the ATV trails shown on the District map and found nearly half of them either do not exist or have become brushed-in and no longer function/are no longer used as ATV trails. [7]

F. We submitted a petition to the Flathead NF in 2015 with 98 people objecting to the revised Forest Plan's proposed action to designate Krause Basin a motorized Focused Recreation Area with the ATV trails marked on the ground. Signors want the ATV trails closed to motorized use in order to protect wildlife habitat, quiet recreation and to "help maintain peace and quiet in the adjacent Foothills Road neighborhood." Noisy ATVs in the heart of Krause Basin can be heard at residences along Foothill Road, Krause Lane, Larch Lane, and other nearby residential roads (all ATV trails are within 1.5 miles of private land). [7] The 98 signors of the petition include local residents, major area landowners, snowmobilers, ATV riders, skiers, hikers, mountain bikers, horseback riders, and neighbors that simply want peace and quiet or love to walk their dogs in the quiet beauty that Krause Basin offers. [5]

G. Of the nearly 34,000 comments submitted on the Forest Plan DEIS, 98% of them asked for the continued implementation of Amendment 19, which requires the closure of the ATV trails in Krause Basin (among others) to motorized vehicles. [5]

H. Not a single snowmobile has used Forest Service lands in Krause Basin other than on the Peters Ridge Road and Strawberry Lake Road in the past five years or more. There are no snowmobile play areas in the heart of Krause Basin. This is a positive evolution from motorized to non-motorized recreation. The two main roads bracketing Krause Basin, however, still provide for snowmobiling and initial snowmobile access to backcountry skiing and snowboarding destinations like Peters Ridge and Spider Bowl.

Summary of Our Plan

The Forest Service took the initiative in 1970 to protect the hemlock forests of Krause Basin and took the initiative in 1988 and 1995 to protect the wildlife that depend on Krause Basin. The neighborhood has been working together to foster respectful recreational use of Krause Basin, has assisted both Forest Service and DNRC law enforcement, and is making progress.

All we are asking is that the Forest Service keep its promise to close the Krause Basin trails to motorized use and, while at it, extend that closure to prohibit snowmobiles (other than on the Peters Ridge and Strawberry Lake roads) to protect the quiet ski trails that have replaced them. We ask the Forest Service to extend its intended no-logging protection of rare hemlock forests along Strawberry Lake Road to include the entire Krause/Echo Basin. We ask the Forest Service to better protect those forests and nearby neighborhoods from human-caused fire by making them less accessible to motorized vehicles and the many problems that come along with them.

This is a very special place and we recognize that Krause Basin and the Strawberry Lake Trail are becoming more popular. That growth in popularity, however, has fortunately been in non-motorized recreation. We are already working with the District on how best to develop a better parking area for the Strawberry Lake Trailhead.

Why is it that the Flathead appears so dead set on turning Krause Basin into a Focused Recreation Area that is motorized during two of the highest fire danger months (July and August), when it has previously committed to making it non-motorized and the evolution of use in the area is toward non-motorized recreation?

The question seems to be this: Does the Flathead NF want to work with us and the neighborhood to better manage non-motorized recreation in a wildlife management area that includes rare hemlock forest, or does it want to continue fighting the community tooth and nail over motorized access where it simply doesn't belong?

Please notify us in writing of any "potential to resolve specific issues" so that we may respond in a thoughtful and timely manner. We'd also love to visit Krause Basin with any of you anytime so you can become more familiar with the area and issues.

Sincerely,

Keith J. Hammer
Chair

Endnotes

1. See Attachment 1 in this PDF: 1970 Swan Lake Ranger District Plans.

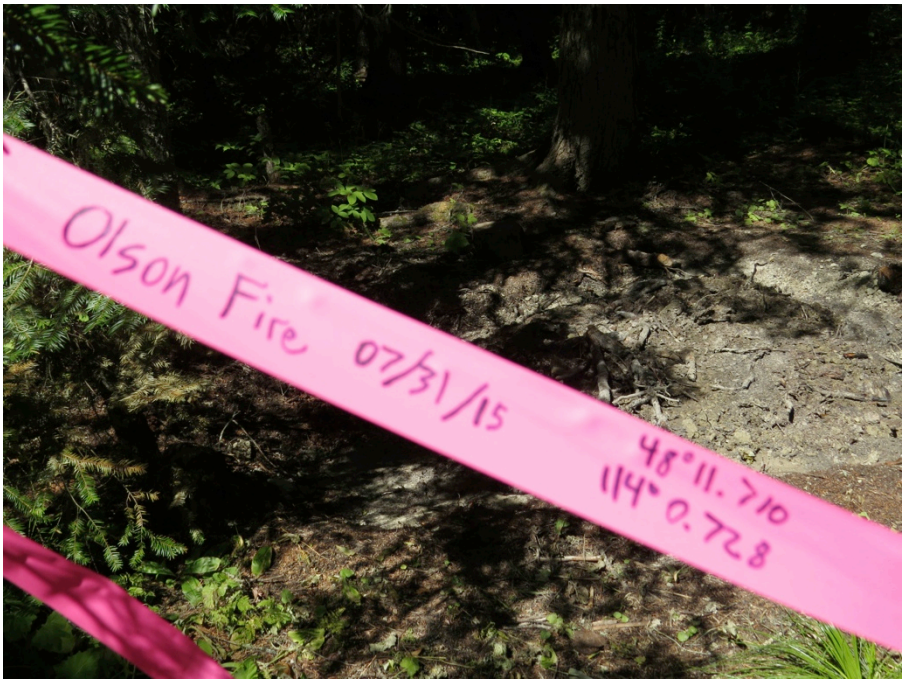
2. See http://www.swanview.org/info/krause-basin-interpretive-trail.

3. See http://www.oregonlive.com/wildfires/index.ssf/2017/09/eagle_creek_fire_evacuation_or.html and http://mtpr.org/post/glacier-park-fire-threatens-cedars-rare-inland-rainforest for examples of how fire spread slowed when encountering old-growth and cedar-hemlock forests.

4. Below is a photo of illegal ATV use inside the Krause Basin Area Closure during the closed season (on 5/27/14) and on an unauthorized route. This involved underage drinking (while driving no less) near a bonfire area used for mud-bogging, drinking and shooting and on Strawberry Lake Road:

Below are two in a series of photos showing increased amounts of ammunition and shooting waste (along with invasive spotted knapweed and hawkweed) at the above bonfire area during high fire danger (taken 7/31/15 and 8/16/15, respectively):

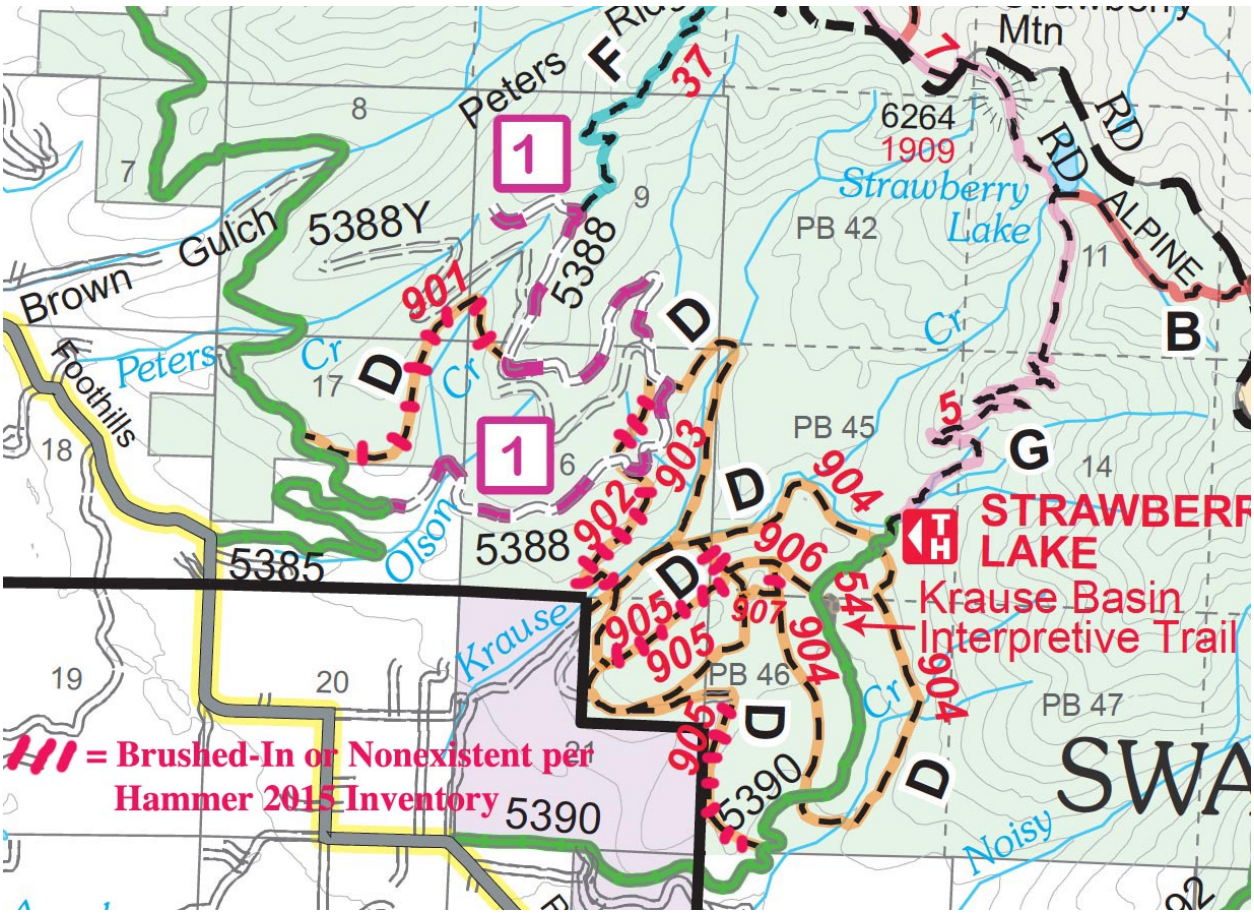
Below is a photo of a campfire left unattended that authorities had to extinguish along Peters Ridge Road in Krause Basin during the high fire danger season of 2015:



5. See our Flathead Forest Plan Objection for more details and supporting documents: http://www.swanview.org/reports/SVC_Forest_Plan_Objection.pdf

6. Below is a 2013 photo of the Wildlife Management Area sign on Peters Ridge Road:

7. Below is the Krause Basin portion of the Swan Lake Ranger District Map. It shows in brown with black dotted lines the ATV trails added to the map and numbered 901 - 907. Magenta hash marks have been added by Keith Hammer to indicate trails that either do not exist in those locations or have become brushed in and no longer function/are no longer used as ATV trails:



8. See the Flathead's 2/16/95 Amendment 19 Content Analysis Summary; A19 Project File Document #I-12.

9. See Attachment 2: Our 3/27/15 Freedom of Information Act request and the Flathead NF's 4/24/15 response. Neither of the two documents provided by the Flathead indicated the Flathead had informed the public about any travel planning for the Krause Basin area or the printing of Krause Basin ATV trails on public maps. One document was the Flathead's 2005 A19 report to FWS indicating the Flathead was for the first time fully including the Krause Basin ATV trails in calculations of Open Motorized Route Density. The second document is included in Attachment 2 and is a public invitation to be involved in Travel Planning on the Hungry Horse and Glacier View Ranger Districts. This is something the Swan Lake Ranger District never did, as confirmed by the lack of such a document for the SLRD.

Keith

Attachment 1

UNITED STATES DEPARTMENT OF AGRICULTURE

FOREST SERVICE

2130 MULTIPLE USE

SWAN LAKE DISTRICT

RANGER DISTRICT PLANS
REVISED 12/70

U.S. GOVERNMENT PRINTING OFFICE : 1969 O—298-007

6200-7 (4/68)

Attachment 1

*GF-1 GENERAL FOREST ZONE - MANAGEMENT UNIT 8

KRAUSE BASIN HEMLOCK STAND

I. Management Situation. This unit is a stand of decadent oldgrowth hemlock adjacent to the Strawberry Lake Road. This stand is representative of the oldgrowth hemlock stands that were prevalent in the Krause Basin area prior to our management activities, which disposed of these decadent stands through pulp sales and stand improvement projects. Stands of oldgrowth hemlock of this type are relatively rare on the Flathead Forest since we are on the eastern edge of the western hemlock type.

II. Management Decision

1. The oldgrowth hemlock stand will be retained as a representative example of the stands that used to occupy the area.

2. Prepare an interpretive signing plan for the area explaining our management activities.*

*Revised 1/71

Attachment 2

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

3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

March 27, 2015

Rich Kehr
Swan Lake District Ranger
200 Ranger Station Road
Bigfork, MT 59911

Sharon LeBrecque
Acting Flathead Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Re: Information request and FOIA REQUEST via email to rkehr@fs.fed.us and slabrecque@fs.fed.us

Dear Mr. Kehr and Ms. LaBrecque;

Please provide us the following information pursuant to the provisions of the Freedom of Information Act.

1. Any and all records indicating how the 13 miles of ORV trails in the Krause Basin-Peters Ridge area retained in the 1988 Noisy Face Recreation Plan decision came to appear on Swan Lake Ranger District (SLRD) maps and Motor Vehicle Use Maps - generally as routes 901 - 907 as best we can tell.

These records should include, but may not necessarily be limited to: a) notices to the public that SLRD was undertaking Travel Planning pursuant to 36 CFR Part 212 or other federal regulations, b) notices to the public that SLRD was considering identifying the 13 miles of "non-system" routes as "system" routes, c) notices to the public that SLRD was considering adding the 13 miles of routes to its Motor Vehicle Use Map, d) notices to Fish and Wildlife Services that SLRD was considering adding the 13 miles of routes to its Motor Vehicle Use Map, and e) any notice to Swan View Coalition in particular that any of the above actions were being considered (we can find none in our files). These records may of course also include intra-agency records.

Please feel free to contact us regarding the scope of this request or with any questions you may have. We prefer to receive the requested information in common electronic formats such as Word, PDF or Excel.

In closing, we request that any fees in connection with your furnishing this information be waived on the ground that disclosure of the documents requested primarily benefits the general public (Section 4(b)(1) of 7 CFR Subtitle A, Subpart A, Appendix A) and that, in requesting these documents, our non-profit corporation is engaged in a non-profit activity designed for the public safety, health and welfare (Section 4(a)(3) of same).

The information provided will be summarized and made available to other conservation organizations and to the general public. Public understanding will be increased significantly because the requested information will allow the public to see how the Forest Service came to publish maps of the Krause Basin - Peters Ridge area showing the ORV routes, apparently as routes 901 - 907.

We provide on our web site (at http://www.swanview.org/home/info/foia) supplemental information relative to the six factors the Forest Service considers when assessing fee waiver requests pursuant to its FOIA guidelines, a copy of our Certificate of Incorporation as a non-profit, a copy of our IRS letter of determination that we are a non-profit, tax-exempt corporation, and a description of past instances where we have used information provided pursuant to the FOIA to promote the public interest. This FOIA request and the supplemental information demonstrate the information we request herein "is in the public interest because it is likely to contribute significantly to public understanding of the operations and activities of the Government and is not primarily in the commercial interest of the requester." Accordingly, we ask that our request for a waiver of fees be granted.

Your help in fulfilling this request is greatly appreciated.

Sincerely,

Keith

Keith J. Hammer
Chair

Cc by email Michele Dragoo

Attachment 2

United States Department of Agriculture
Forest Service
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901
(406) 758-5200
Fax (406) 758-5367

File Code: 6270
2015-FS-R1-02838-F
Date: April 24, 2015

Keith Hammer
Swan View Coalition
3165 Foothill Road
Kalispell, MT 59901

Dear Mr. Hammer,

This letter is in response to your FOIA request received via email on March 27, 2015. In this email, you requested "any and all records indicating how the 13 miles of ORV trails in the Krause Basin-Peters Ridge area retained in the 1988 Noisy Face Recreation Plan decision came to appear on Swan Lake Ranger District (SLRD) maps and Motor Vehicle Use Maps - generally as routes 901 - 907 as best we can tell."

In response to the above, I have provided two documents responsive to your request.

If you have any questions, please contact Michele Draggoo at 406-758-5269.

Sincerely,

Sharon L. Labrecque
SHARON LABRECQUE
Acting Forest Supervisor

Enclosure

Attachment 2

United States Department of Agriculture | Forest Service | Hungry Horse and Glacier View Ranger Districts 406-387-3800 | 10 Hungry Horse Drive P.O. Box 190340 Hungry Horse, MT 59919

File Code: 1950

Date: January 10, 2008

Dear Forest User:

The Hungry Horse and Glacier View Ranger Districts are beginning the process of evaluating roads, trails, and areas available for motor vehicle use as directed in the 2005 National Forest Service Travel Management Rule. You are invited to an open house that will be held on Thursday, January 24, from 4:00 to 8:00 pm at the Hungry Horse Ranger Station in Hungry Horse. Please feel free to stop by any time during this time period. This open house will focus on an overview of this national rule, provide a display of the existing wheeled motorized travel system on the two ranger districts, and ask for input on this system. Winter motorized use will not be addressed in this evaluation process since this has already been done through the recent Winter Motorized Recreation Plan (Amendment 24).

When the wheeled motorized evaluation process is completed this year it will result in clear, standardized designations of where motorized recreation is appropriate, sustainable and desirable on the two ranger districts. It will protect natural resource values through effective management of motor vehicle use, enhance motorized recreation experiences, and allow for areas of non-motorized travel and experiences.

BACKGROUND

Most National Forest visitors use motor vehicles to access the National Forests, whether for recreational sightseeing; camping and hiking; hunting and fishing; commercial purposes such as logging, mining, and grazing; administration of utilities and other land uses; outfitting and guiding; or the many other multiple uses of National Forest System lands. For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, off-highway vehicles (OHV), motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management.

Recent management direction of OHVs occurred in 2001 with a Regional Forester decision to amend nine national forest plans, including the Flathead National Forest, that restricted yearlong-wheeled motorized cross-country travel. One notable exception was that wheeled motorized cross-country travel to a campsite would be permissible within 300 feet of roads and motorized trails as long as no resource damage was incurred. Subsequently, the Flathead National Forest issued a special order that prohibited motorized vehicles off National Forest System roads when no visible, clearly evident, two track or single track routes are present. Additionally, the motorized travel must fit to the same width of the track. The 300 feet wheeled motorized use to a dispersed campsite was also permissible within this special order.

In 2005, the Forest Service adopted a national Travel Management Rule (hereafter known as the Rule) which requires each National Forest to formally designate those roads, trails, and areas where motorized travel is permitted and show them on a Motor Vehicle Use Map (MVUM). Once the rule is implemented, motorized travel would be designated only on the roads, trails, and areas shown on the MVUM.

Specific schedules were assigned across Montana to allow for the Rule to be fully implemented in the Region by 2009. As a result, the Hungry Horse and Glacier View Ranger Districts will publish a MVUM by September 2008, followed by Tally Lake Ranger District and Swan Lake Ranger District in September 2009. Spotted Bear Ranger District printed a MVUM in October 2007. Information about this Rule can be found at the following websites:

http://www.fs.fed.us/recreation/programs/ohv/.
http://www.fs.fed.us/r1/flathead/nepa/trav_mngmt.shtml

DESIGNATION CONSTRAINTS

In designating a system of roads, trails and areas for wheeled motorized vehicles and meet the timelines to produce a MVUM by September 2008, the following constraints will be used to guide the planning process:

- Providing for grizzly bear security habitat is a major management factor on the Flathead National Forest. The current Forest Plan grizzly bear standards limit the areas of consideration for designating new wheeled motorized use.
- Travel management planning has been occurring on the two ranger districts through past planning projects. Some of these planning efforts have solely been related to access management whereas others have included access management as one of the components of the decision. These decisions form the basis for the existing wheeled motorized situation during our current travel planning process. We do not plan on re-visiting these decisions at this time.

Once we produce a MVUM, it will be updated annually to account for any changes to the designated system from future planning efforts.

OPEN HOUSE AND NEXT STEPS

We welcome your participation at the open house to review the current motorized road, trail, and area access on Hungry Horse and Glacier View Ranger Districts. If you wish, you may send or phone in comments within the constraints regarding motorized travel management planning. Written comments may be sent to me at the Hungry Horse and Glacier View Ranger Districts, P.O. Box 190340, Hungry Horse, MT 59919 (or drop them off at our office – 10 Hungry Horse Drive, Hungry Horse, MT). To submit comments electronically, please send to: comments-northern-flathead-hungry-horse-glacier-view@fs.fed.us. If you have no comments at this time but wish to remain on the mailing list for this project, please let us know or your name will be removed. Please feel free to share this letter with neighbors or other interested parties in the event we have missed somebody.

We anticipate there may be some changes needed to the existing wheeled motorized travel system on the two ranger districts. Changes to the existing system will require more specific planning actions with further public involvement. These further planning actions would likely take place in the near future in a separate analysis.

Please visit the previously mentioned Flathead National Forest website for additional information regarding travel planning. We will post the existing condition maps, sideboards and other pertinent travel information as it becomes available.

If you have questions about the open house and travel planning in general please contact either Paula Peterson at 387-3818 or Michele Draggoo at 387-3827.

Sincerely,

JIMMY DEHERRERA
District Ranger