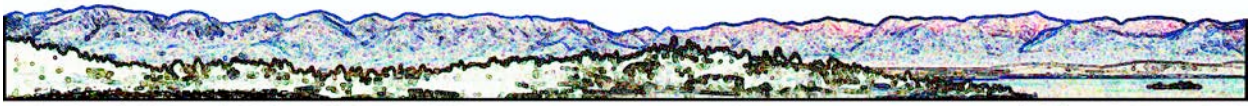
Swan View Coalition *Nature and Human Nature on the Same Path*



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

April 26, 2020

To: comments-northern-flathead-tally-lake@usda.gov
comments-northern-flathead-hungry-horse-glacier-view@usda.gov
comments-northern-flathead-swan-lake@usda.gov

Re: Comments on 12 Special Use Permits (SUPs) for Recreation Events and Guiding

Dear Flathead National Forest Folks;

These comments are in response to your April 17 request for public comments in the above matter. They are the best we can muster after days of trying to obtain adequate maps and descriptions of the proposals from your offices - with limited success.

FTBT and WLP Trail Marathons

As last year, we oppose the SUPs for the Foys to Blacktail and Whitefish Legacy Partners' trail marathon permits because it sends absolutely the wrong message to the public about safe travel in the habitats of bears and mountain lions. We've included in this PDF our comments from last year, made with independent wildlife biologist Brian Peck (Attachment 1), and last year's comments by grizzly bear expert Dr. Chris Servheen (Attachment 2).

As though the documented increased risks to both humans and wildlife from trail running is not enough, we are shocked to see that you this year propose expanding the number of WLP participants from 200 to 400, along with an allowance for an additional 300 spectators and volunteers! Where have you provided monitoring information to the public from last year's events and shown where it justifies such an exorbitant increase to 700 participants, spectators and volunteers? Please send us that monitoring information ASAP.

Journey to Wellness and Powdered Soul

On the other end of the spectrum, we support the Journey to Wellness and Powdered Soul proposals - provided they remain non-competitive, are conducted at a slow pace, and teach safe human recreation in the habitats of bears and mountain lions. We are concerned, however, that 200 participants in the Powdered Soul bike ride is perhaps an unwieldy number for youth in a backcountry setting - and we'd hope that the 20-50 spectators would largely be confined to the gravel pit staging area.

Whitefish Shuttle Livery and Guided Tours and Whitefish Bike Retreat Livery

As last year, we support WSLGT's proposal to shuttle and/or guide hikers and bicycle riders - provided the permittee is required to practice and distribute information about safe (slow) biking and hiking in the habitats of bears and mountain lions and warn about the dangers of fast travel in these habitats. (See Attachments 1 and 2 from last year). Ditto for WBRL.

However, commercial group hikes or bike rides should not be allowed on roads closed to motor vehicles, which likely already receive plenty of non-commercial use. Most road closures are intended to provide wildlife security. Commercial group activities will most certainly reduce the intended security and displace wildlife.

We also don't think the Forest Service should be encouraging the burning of fossil fuels as a form of recreation, due to their impact on the public environment and climate change. It is one thing to use motorized vehicles to get to and from trailheads in order to engage in healthy, human-powered recreation. It is quite another to propose van tours of huge loops and remote destinations (Upper Whitefish-Red Meadow-Polebridge, Coal-Cyclone, Moose Lake) and we oppose those aspects of Whitefish Shuttle's proposal both in terms of climate change and in terms of promoting commercial motorized recreation in critical bear habitats of the North Fork and Whitefish Range.

NW Adventures and Action Rentals ATV Tours

Again, we don't think the Forest Service should be encouraging the burning of fossil fuels as a form of recreation, due to their impact on the public environment and climate change. Moreover, we oppose NW Adventures' promotion of commercial motorized recreation in critical bear habitats in the North Fork and Whitefish Range, including Red Meadow Lake, Red Meadow Creek, Big Creek, and Werner Peak.

Kiwanis ATV and Motorbike Fun Run

While we appreciate Kiwanis' desire to conduct a public fundraiser, we wish they would do it in a manner that does not promote the use of motorized vehicles on public lands. We don't think the Forest Service should be encouraging the burning of fossil fuels as a form of recreation, due to their impact on the public environment and climate change.

Guided Bike Tours

Commercial group hikes or bike rides should not be allowed on roads closed to motor vehicles, which likely already receive plenty of non-commercial use. Most road closures are intended to provide wildlife security. Commercial group activities will most certainly reduce the intended security and displace wildlife.

Ranger Davies' 4/24/20 email response (Attachment 3) is wrong in saying the only closed road used for bike tours is Adventure Cycling's use of "an approximately 2.5 mile stretch on a closed road 9814" to cross the Seeley-Swan divide near Holland Lake (where a short ride down Hwy 83 would accomplish the same purpose). Both Spotted Dog Tours and Cycling House propose to use some 5 miles of closed road 1685 to connect Polebridge/Hay Creek to Red Meadow Road. (See CycleHouse_map2.pdf and Spotted Dog Itinerary.pdf that were attached to Ranger Davies' 4/24/20 email response, and the District's Motor Vehicle Use Map at https://www.fs.usda.gov/main/flathead/maps-pubs). Road 1685 is closed to motor vehicles to provide wildlife security away from the main North Fork Road. It should not be used for commercial group rides and tours because that will compromise wildlife security and displace wildlife. Please restrict this route to the North Fork Road as per Adventure Cycling's route.

Your scoping document makes no mention of the commercial camping in FNF campgrounds that is part of some of the commercial bike tours, some in remote locations like Red Meadow Lake and Tuchuck Campground. Can these campgrounds accommodate large groups that are part of commercial bike tours? Might the general public arrive to find no room left for their camping?

While Ranger Davies' 4/24/20 email provided us with itineraries for the three bike tour companies, you have not indicated whether a special use permit has been requested for each of the listed bike tours. Indeed, Ranger Davies' 4/24/20 email promises to send us the permit applications after personal identity information is redacted, but notes that "application forms were not submitted for KRMC Journey to Wellness, Adventure Cycling, and Whitefish Bike Retreat." Then why are you asking the public to comment on permits for which you've received no application and why haven't you provided on your web site each permit application and its relevant maps and supplemental information?

Summary and Conclusion

We've now spent a week trying to secure all the necessary information to make informed comments. This letter can't wait for the Flathead to someday email us the partially redacted permit applications. We must get this letter posted on our web site so our members have some sort of summary of our concerns should they wish to submit their own comments by May 1.

The Flathead NF gets a big red "F" in its handling of these permits and its reluctance to accurately summarize the necessary information and maps and provide them on their web site prior to asking the public to comment in two short weeks. So much for the Forest Service motto "Caring for the land and serving people."

We asked the Flathead via email on April 20 to back up and restart this process, especially in light of its lack of web-based information about these large-group permits and the nation's discussion on how and when to begin relaxing COVID-19 restrictions. We were promptly refused by the new Forest Supervisor and have been engaged in an information search that one Flathead Forest employee described as "clear as mud" as he

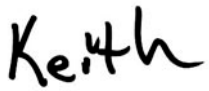
forwarded the wrong map to Ranger Davies so he could forward it to us (see the email string in Attachment 4), only to later have to send us the correct map (Attachment 3).

So we submit this letter in protest and again ask that the Flathead recognize it is engaged in a Special Use Permit program that needs to be better organized and have its cumulative impacts assessed in either an Environmental Assessment or Environmental Impact Statement. Some permits are being reissued year after year and cannot simply be dismissed as "minor, short-term special uses" Categorically Excluded from the need to prepare an EA or EIS. The Flathead's practice of truncating mapped routes at Forest and District boundaries is likewise a failure to display and assess cumulative effects.

President Trump's national health advisor Dr. Anthony Fauci is currently making it clear that COVID-19 will still be with us this Fall. Yet the Flathead NF wants the public to consider a special use permit, among other group permits, to allow the Whitefish Legacy Partners to bring in up to 400 participants and 300 spectators for its Whitefish to Big Mountain trail run in October? We've already made our case for why such trail runs present a heightened risk to the health of people and wildlife (Attachments 1 and 2). Now we ask that the Flathead also consider the increased risks of holding a 700 person event in one of the states currently among the least-infected with COVID-19.

At $100-per-runner entrance fee, WLP stands to bring in up to $40,000 via its proposed permit. Meanwhile, Germany has cancelled Munich's 2020 Oktoberfest celebration that was worth $1.3 billion to the city in 2019. Perhaps now is the time for the Flathead to consider fewer and less harmful commercial activities that lower impacts and risks to people, wildlife and our climate - instead of proposing more and more harmful activities. Management of public lands shouldn't be about the money.

Sincerely,



Keith J. Hammer
Chair

Attachments:

1. SVC and Brian Peck's 2019 comments on Flathead NF SUPs.

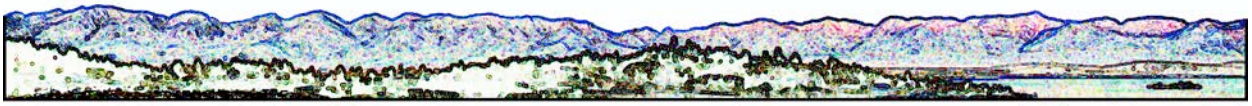
2. Dr. Chris Servheen's 2019 comments on Flathead NF SUPs.

3. Email string concluding with Ranger Davies' 4/24/20 response.

4. Email string concluding with Ranger Davies' 4/23/20 response.

ATTACHMENT 1

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

June 13, 2019

To: comments-northern-flathead-tally-lake@fs.fed.us and comments-northern-flathead-swan-lake@fs.fed.us
Re: June 12 Request for Public Comment on Four Special Use Permits (SUP)

The Board of Review (BOR) reports on the death of Brad Treat when he slammed into a grizzly bear while mountain biking at high speed must be regarded as the best available science and expert advice for reducing surprise encounters between people and bears:

> Don't Run - jogging in bear country increases the odds of surprise encounters at close distances and surprised bears are more likely to be aggressive. [1]
>
> Slow Down [when mountain biking]- Encounters with bears are much more likely to occur when riding at high speed. Surprised bears are more likely to be defensive and to cause injury to bike riders. [2]

- Do not issue the Whitefish Trails and Foys to Blacktail ultra-marathon SUPs. To do so amounts to a Forest Service endorsement of the commercial promotion of irresponsible behavior in bear habitat and runs contrary to the BOR recommendations that the Forest Service is party to. The public education intended by the BOR will essentially be nullified by the commercialization and expansiveness of the irresponsible behavior endorsed in such SUPs! (See our attached letter of 6/11/19 for more details).

- Issue the Whitefish Shuttle and Guiding SUP only if the business is willing and required to abide by and distribute the BOR recommendations to its passengers and clients. These materials should be developed by the Forest Service and approved by the BOR, insuring that permittees are positive ambassadors for human-bear safety.

- We see no red flags for the more modest Journey to Wellness Program SUP, provided the permitted activities are indeed hikes and not trail running. This SUP offers another opportunity for the permittee to abide by and distribute the BOR recommendations.

While we appreciate this opportunity, one week for public comment is too short for most people and agencies to become informed and submit comments.

Sincerely,

Keith

Keith J. Hammer - Chair (see attached letter for endnotes/sources)

ATTACHMENT 1

Swan View Coalition & Independent Wildlife Consultant Brian Peck

June 11, 2019

Chris Dowling - Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911
chris.dowling@usda.gov

Bill Mulholland - Ranger
Tally Lake Ranger District
650 Wolfpack Way
Kalispell, MT 59901
bill.mulholland@usda.gov

Re: Comments on Foys to Blacktail and Whitefish Legacy Partners Ultra-Marathon Special Use Permits (submitted as pdf to the email addresses above)

Dear Rangers Dowling and Mulholland;

We're glad you both have promised to open up public scoping on the above ultra-marathon Special Use Permits. Below are our initial thoughts that we ask be included in the scoping record, which we may supplement once we see your scoping announcement(s).

Swan View Coalition and Independent Wildlife Consultant Brian Peck oppose Forest Service issuance of Special Use Permits for fast-paced recreation, such as ultra-marathons and mountain bike races, in the habitats of bears and mountain lions. Issuing such Permits constitutes an agency endorsement and commercialized promotion of high-risk recreation the agency otherwise recommends against!

Multiple agencies, including the Flathead National Forest, recommend people not run in bear habitat: "Don't Run - jogging in bear country increases the odds of surprise encounters at close distances and surprised bears are more likely to be aggressive." [1]

Following the 2016 death of Flathead National Forest employee Brad Treat, when he slammed into a grizzly bear while mountain biking at high speed, these same agencies extended these precautions to include mountain biking: "Slow Down - Encounters with bears are much more likely to occur when riding at high speed. Surprised bears are more likely to be defensive and to cause injury to bike riders." [2]

Issuing Special Use Permits for the commercialization and expansion of these risky activities effectively nullifies interagency efforts to educate the public to instead recreate responsibly. Special Use Permits are specifically intended to permit larger group events (more than 75 total participants, spectators and support crews). They are also intended to allow the promoters to charge entrance fees and commercialize the events. [3] No amount of agency public education can match the commercialization of irresponsible behavior!

This will inevitably result in harm to both people and wildlife, with the "offending" wildlife often killed for having defended itself or its young. Such was the case when a

woman was tackled by a black bear while running an ultra-marathon in New Mexico in 2016. The woman was not killed but authorities later killed the black bear. This prompted Montana grizzly bear expert Tim Manley to state:

> There are more and more foot and bike races in mountainous areas and this is something I have been worried about happening in NW Montana . . . it appears the female black bear was acting in defense of her cubs. They ended up killing her according to policy. In my view, they should run these races in places where people live ... not where bears and lions live. [4]

Dr. Chris Servheen, as Grizzly Bear Recovery Coordinator for U.S. Fish and Wildlife Service, told the Hungry Horse News in 2010:

> It's contrary to what we tell everyone [don't run in bear habitat] . . . It's likely to lead to injury to the runner and the bear . . . It's human arrogance about human behavior in natural systems. [4]

Servheen and others, including two Flathead National Forest representatives, concluded from the Brad Treat incident and others:

> Bears involved in surprise encounters have no record of repeated attacks on humans, nor is there any information that they are more dangerous because of their involvement in such an incident. This highlights the complications arising when setting traps for bears involved in such surprise encounters . . . Release, relocation, or removal of captured bears under such conditions will be complex issues with the public and will involve significant and difficult public relations efforts with minimal benefits to human safety or improved bear management from such captures. [1]

In other words, even if there is a public expectation that bears involved in surprise encounters will be trapped, the agencies should not do so. The emphasis must instead be on minimizing the likelihood of surprise encounters.

Issuing Special Use Permits for activities that knowingly increase the risk to humans and bears sends a message that such risks are acceptable and endorsed by the Forest Service. It runs contrary to agency advice that people not run and bike fast on trails in bear habitat.

The public is free to run or bike fast on trails in bear habitat, however ill-advised it may be. The public does not have a right to expect the Forest Service to issue a Special Use Permit so the permit-holder can gather larger groups to participate in such risky behavior on public lands and in order to charge entrance fees so it can make money in the process. The result is a money making campaign to promote irresponsible recreation on public lands that is contrary to interagency advice intended to instead promote the welfare of the public and its wildlife.

The public does not need the endorsement of the Forest Service via a Special Use Permit in order to engage in irresponsible group behavior, provided no entrance fees are charged and the total group size is no larger than 75 (including participants, spectators

and support crews). [3] It is clear that Foys to Blacktail wants a Special Use Permit for this year's ultra-marathon so it can charge entrance fees to help promote its trail interests and so it can raise its number of run participants from 50 to 100. [5] It is clear that Whitefish Legacy Partners already secured a Special Use Permit (with no public review process) so it can promote its trail interests, charge entrance fees, and have up to 200 participants in its ultra-marathon from Whitefish to the top of Big Mountain. [6 - 10]

Special Use Permits are a luxury to better enable the irresponsible and commercial promotion of trail running and mountain biking on public lands. They are not a necessity for such ill-advised behavior. The Forest Service should not grant such Permits because they come at the expense of interagency programs to educate the public to instead behave responsibly in the habitats of bears and mountain lions.

We urge you in the near term to rescind the Special Use Permit granted to Whitefish Legacy Partners [10] and to not grant the Permit sought by Foys to Blacktail Trails. We urge you in the bigger picture to establish a policy on the Flathead National Forest that does not allow for Permits to be issued to foot and bike races on trails in the habitats of bears and mountain lions. Such permits are a harmful and unnecessary luxury.

The Forest Service has erred in concluding from its internal scoping that no extraordinary circumstances exist relative to species listed under the ESA and other public resources. The sources we cite in this letter are indication enough that there are extraordinary risks to humans and wildlife when recreation is conducted at a fast pace - and there are plenty more indications in the sources and circumstances those sources cite in turn. Use of a Categorical Exclusion is inappropriate here and, at a minimum, an Environmental Assessment must be prepared.

The Forest Service has also erred in not conducting full public scoping on the Foys to Blacktail and Whitefish Legacy Partner's ultra-marathons prior to apparent promises of and actual issuance of the Permit, respectively. Public scoping is required to help the agency determine the scope of the project and issues related to it. It is not a trivial speed bump to be given lip service after the agency has already determined its course of action. So please pay attention, we argue here that extraordinary circumstances do exist.

Firstly, there is the actual likely harm to people and wildlife that will result from issuance of these and future Permits for foot and bike races on Forest Service trails, given the Forest Service's propensity to hand them out to its trail building partners. The Forest Service has already demonstrated its willingness to hand out these Permits to commercialize the promotion of risky recreational behaviors the agency itself recommends against. The Flathead has also demonstrated it will do this with no public review unless it is firstly forced to conduct the public scoping required by law. [7, 9]

Secondly, and an equally important extraordinary circumstance, is the fact that the agency appears wholly blind to, or in denial of, the damage such Permits will do to interagency efforts to educate the public to behave responsibly in the habitat of bears and mountain lions. The agency can't be telling the public to "do as I say and not as I do" when it comes to the proven high risks of running and biking fast on trails in these sensitive wildlife habitats.

We urge you to deny these requests for ultra-marathon Permits and instead double down on your efforts recommending that people not run and bike fast on trails in the habitats of bears and mountain lions. People may want to take these risks on their own accord, but they should not be allowed to do it with the Forest Service endorsement and commercialized promotion that come along with a Special Use Permit.

Sincerely,

Keith Hammer - Chair
Swan View Coalition
3165 Foothill Road
Kalispell, MT 59901
406-755-1379
keith@swanview.org

cc: Forest Supervisor Chip Weber via chip.weber@usda.gov

Sources
(Links with cited content as of June 11, 2019)

1. http://igbconline.org/wp-content/uploads/2016/03/160629_BOR_Report_Treat_NCDE.pdf

2. http://igbconline.org/wp-content/uploads/2016/03/160629_BOR_Recomm_Treat_NCDE.pdf

3. 36 CFR 251.51 - https://www.law.cornell.edu/cfr/text/36/part-251/subpart-B

4. http://www.swanview.org/reports/Servheen_and_Manley_Quotes.pdf

5. https://www.ftbtraces.com/marathon

6. https://flatheadbeacon.com/2019/04/18/whitefish-legacy-partners-adds-ultramarathon-race-roster/

7. https://whitefishpilot.com/local_news/20190604/forest_takes_comments_on__race_permit_after_objection

8. https://www.whitefishlegacy.org/event/whitefish-trail-run/

9. http://www.swanview.org/reports/SVC_to_Mulholland_190506.pdf

10. http://www.swanview.org/reports/WLP_Ultra-Marathon_SUP_190408.pdf

ATTACHMENT 2

From: Servheen, Chris
Sent: Thursday, June 13, 2019 12:49 PM
To: comments-northern-flathead-tally-lake@fs.fed.us
Subject: Comments on issuing permits for Whitefish Trails Ultra-marathon and Foy's to Blacktail Trail Marathon and Whitefish Shuttle Guiding Service

Thank you for the opportunity to comment on these permit requests.

I oppose the USFS issuing special use permits for trail running events in grizzly and black bear bear habitat because by doing so the USFS is permitting activities that are known to increase the danger of human-bear conflict, human injury, and even human death. <u>There is no safe way to run in bear habitat.</u> There have been extensive efforts for many years by both state and federal agencies (including the USFS) to educate the public on ways to recreate safely in bear habitat. There are 5 basic recommendations for the public when hiking in bear habitat (included in the Board of Review Recommendations regarding the fatality of Mr. Brad Treat, see link below) that agencies have promoted for years:

1 **Be Vigilant**– Being vigilant for bears and bear sign (tracks, scat, feeding sites) can reduce the chances of stumbling onto a bear at a close distance, thereby reducing the risk of bear attack. Be especially vigilant if hiking off-trail. Bears may be more likely to respond aggressively in off-trail areas where they don't expect to encounter people. However, bears frequently use maintained trails and encounters may occur anywhere. The BOR encourages hikers to remain vigilant while hiking in all bear country.

2 **Carry Bear Spray**– Bear spray has proven to be effective at stopping aggressive bear behavior during surprise encounters when the person involved has time to deploy it. The public should be made aware of this fact and encouraged to carry bear spray and to be familiar with how to rapidly deploy it.

3 **Make Noise**– Making noise while hiking is an effective method of forewarning bears of your presence, thereby reducing the chances of surprise encounters and related attacks.

4 **Don't Run**– Running during an encounter can trigger a chase response in a bear. In addition, jogging in bear country increases the odds of surprise encounters at close distances and surprised bears are more likely to be aggressive.

5 **Do not Hike Alone**– Hiking in group sizes of 3 or more people or traveling by horseback is known to reduce the risks of bear attack. Larger groups are more intimidating to bears and more likely to have at least one member making noise or being vigilant, thereby reducing the risk of bear attack. Horses are more likely to smell, hear, or see a bear before a person does, reducing the likelihood of surprise encounters. Horses are also more intimidating to bears and if needed, unlike humans, are capable of outrunning and outmaneuvering bears.

Recommendation #4 is <u>do not run</u> in bear habitat.

For the USFS to issue a permit to allow and therefor promote what all state and Federal agencies have been telling the public not to do will negate years of public education efforts. Issuing such permits will send the public a very conflicting message about how to recreate in bear habitat and send a bad message about the veracity of agency advice about how to recreate safely where there are bears.

Regarding the permit for a Whitefish Shuttle Livery and Guiding Service, if the USFS decides to permit this activity, I recommend that the permittee be required to conduct this biking guide service in accordance with the recommendations for mountain bikers contained in the Board of Review Recommendations regarding the fatality of Mr. Brad Treat (see link below). Linking this permit to the recommendations for safe mountain biking in bear habitat will provide an opportunity for the permittee to inform and educate the public on the importance of riding slowly (and other ways for safe biking in bear habitat). These recommendations for mountain biking in bear habitat are:

1 We recommend that mountain bike-specific signs be placed at maintained system trailheads on public lands in bear habitat. These signs should carry the specific messages below aimed directly at mountain bikers, and would provide

information in addition to that deemed necessary for other kinds of trail users. Since it is not possible to post and maintain mountain bike-specific signs on every trail that might be used by mountain bikers, we also recommend the development of brochures and posters with these same messages about mountain biking in bear habitat. These brochures and posters should be distributed to all bike shops, sporting good stores that sell bikes, and bike rental shops, and should also be used in outreach presentations to recreational groups and clubs. This information should also be available on websites targeted to mountain biking groups.

2 Suggested messages for signs and educational materials aimed at mountain bikers:

a **Be Vigilant**– Be alert for bears and bear sign (tracks, scat, feeding sites) where you ride. Do not ride in areas where you see fresh bear sign like scats and tracks. Avoid riding in areas where there are rich bear foods like huckleberries in late summer when bears are very likely to be present. Bears frequently use maintained trails and encounters may occur anywhere at any time of the day. The BOR encourages mountain bikers to remain vigilant while biking anywhere in bear country.

b **Slow Down**- Encounters with bears are much more likely to occur when riding at high speed. Surprised bears are more likely to be defensive and to cause injury to bike riders. High-speed encounters can cause enhanced aggression in bears and may cause bears to chase you and possibly knock you off your bike. Riding at high speed can be especially dangerous where there is little sight distance ahead or to the sides of the trail where you can surprise a bear at close range. Areas with curves in the trail or thick vegetation require slow speeds and making noise as you ride to alert bears to your presence.

c **Carry Bear Spray**– Bear spray is effective at stopping

aggressive bear behavior during surprise encounters when the person involved has time to deploy it. Carry bear spray on your person, not in your pack, and in a place you can reach it in a few seconds. Should you encounter a bear, bear spray is an essential deterrent to enhance your safety. Also, should there be an incident with a bear, riding partners can aid injured riders by deterring bears with spray and this may save their life.

d **Make Noise**– Mountain biking is a quiet and fast activity that may cause you to get much too close to a bear before either you or the bear knows it, resulting in a surprise encounter and a defensive attack by a surprised bear. Surprised bears are more likely to be agitated, dangerous, and aggressive. Making noise while riding is an effective method of forewarning bears of your presence, thereby reducing the chances of surprise encounters and related attacks. You can make noise by riding with bells, other noisemakers, and/or shouting when in or approaching areas of thick cover or at blind corners in the trail. If you can't make noise and you are in bear habitat with limited sight distance along the trail, slow down and be alert.

e **Do Not Ride Alone**– Single riders are much more likely to surprise a bear and be injured or killed if there is an attack. Riding in groups of 3 or more people can reduce the risks of bear attack. Larger groups are more likely to make more noise and are intimidating to bears should a bear be encountered. Also, if there is an incident with a surprised bear and there is injury to a rider, the other riders can help by deterring the bear with bear spray, going for help, and offering first aid to the victim until help arrives.

f **Never Ride at Night or at Dusk or Dawn** – Riding at night or during early morning or before dark will greatly

increase your risk of encountering and surprising a bear. Bears tend to be more active at these times. Your ability to be vigilant and aware of your surroundings is greatly reduced when you cannot see bear sign or bears in low light or in darkness.

g **Don't think: "It won't happen to me"**. That kind of attitude is what can get you into serious trouble whether you are mountain biking or doing any other potentially dangerous activity. Be prepared and be safe. That way you can enjoy your activity and you and the bears will be safe.

h **Remember the bears live there and you are just a visitor**. Taking these precautions will help keep you safer and reduce the stress and disturbance to bears that live in these places where you choose to occasionally recreate.

In an effort to reduce trail conflicts between mountain bikers and bears, this Board of Review makes the following trail recommendations:

1 Before new trails are opened to mountain biking in bear habitat, particularly grizzly habitat, there should be careful evaluation of the safety and reasonableness of enhancing mountain bike access in these areas where bear density is high. These evaluations should include:

2 Evaluation of the sight distance along trails due to vegetation density (i.e. does the trail traverse riparian zones with limited sight distance and high ambient noise levels from running water in streams), or dense vegetation due to early successional stage vegetation, or extremely curved trail segments (tortuosity) where surprise encounters are likely.

3 Evaluation of the productivity of bear foods along trail routes (i.e. does the trail traverse productive huckleberry fields or avalanche chutes?).

4 Evaluation of the application of seasonal closures of trails for mountain bikes during key seasons and the management

capacity of agencies to maintain and manage such seasonal closures should the trail be opened for mountain bike use.

I recommend that each trail used by this Shuttle Service be evaluated as per the four recommendations above and that the permit specifically allow permitted bike use only on trails that have passed this evaluation.

As per the Board of Review recommendations, I also assume that each trail on the Flathead National Forest accessed by this Shuttle Service (and other system trailheads used by mountain bikers) will have in place appropriate signs addressing safe mountain biking in bear habitat.

In summary, I recognize that agencies cannot tell the public they cannot run in bear habitat or tell the public that they cannot mountain bike (other than in Wilderness) at high speeds in bear habitat, but agencies can refuse to permit and thereby endorse such running and high-speed biking when doing so will contradict years of agency educational efforts to help the public recreate safely in bear habitat.

I am available to discuss this further if you would like and to assist in USFS bear management and public messaging efforts regarding bears.

Sincerely,
Chris Servheen
406-240-6506

Treat BOR recommendations:
http://igbconline.org/wp-content/uploads/2016/03/160629_BOR_Recomm_Treat_NCDE.pdf

ATTACHMENT 3

From: **Davies, Robert -FS** robert.davies@usda.gov
Subject: FW: Response to Keith Hammer's inquiry
Date: April 24, 2020 at 2:16 PM
To: Keith Hammer keith@swanview.org
Cc: Mulholland, Bill -FS bill.mulholland@usda.gov, Dowling, Chris -FS chris.dowling@usda.gov, Steele, Kurt -FS kurt.steele@usda.gov, Draggoo, Michele -FS michele.draggoo@usda.gov, Wehunt, Sadie A -FS sadie.wehunt@usda.gov

DR

Keith,
Please see responses to your questions below (responses are in red text). The attachments should accompany the responses and should help make things more clear.
Please call or email if you have further questions. I hope this helps you understand the proposals better.
Thanks
Rob

Rob Davies
District Ranger
Forest Service
Flathead National Forest **Hungry Horse-Glacier**
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Caring for the land and serving people

From: Keith Hammer [mailto:keith@swanview.org]
Sent: Thursday, April 23, 2020 3:12 PM
To: Davies, Robert -FS <robert.davies@usda.gov>
Cc: Draggoo, Michele -FS <michele.draggoo@usda.gov>; Mulholland, Bill -FS <bill.mulholland@usda.gov>; Wehunt, William T -FS <william.wehunt@usda.gov>; Dowling, Chris -FS <chris.dowling@usda.gov>; Butterfield, Anthony -FS <anthony.butterfield@usda.gov>; Crandall, Michael J -FS <michael.crandall@usda.gov>; Steele, Kurt -FS <kurt.steele@usda.gov>; Pargman, Beth A -FS <beth.pargman@usda.gov>; Cranmer, Sean M -FS <sean.m.cranmer@usda.gov>
Subject: Re: Recreation Events and Guiding Special Use Permits

Dear Flathead NF Folks;

1. I still don't have a map of whatever "Guided Bike Tours" are being proposed for SLRD.
Adventure Cycling Association maps are attached. (ACA_swan, ACA_map_TLGV)

2. Is the Cycle House bike tour simply an out-and-back from Whitefish to Red Meadow Lake (that's all that is shown on the map)? Will there be overnight camping at Red Meadow Lake or elsewhere? Is this a proposed SPU for a single tour or multiple tours and dates?
The Cycle House is an out-and-back tour from Whitefish to Red Meadow Lake on 6/10 and 6/17

The Cycle House is an out-and-back tour from Whitefish to Red Meadow Lake on 6/10 and 6/17. There is also a trip from Whitefish to Fish Creek that includes the Red Meadow Road through to the North Fork Road. This trip was added after the application was submitted. We inadvertently sent the map of the route originally proposed. We have attached a new map to reflect the route to include Red Meadow Road to the North Fork. (CycleHouse_map2)

3. The five Spotted Dog bike tour maps are dated for July 22, 23 and 24. Is this a one-time tour for those dates? Map 3 indicates an overnight stay for 7/22/20 at the North Fork Hostel. Map 4 ends at Red Meadow Lake, implying an overnight camp there. Is that so? Where does this tour actually begin and end?
Yes; this is a one-time tour for those dates. Their proposal indicated they would either overnight at Red Meadow Lake Campground or at Upper Whitefish Lake Campground on the night of 7/23/20. Next day 7/24 onwards to town of Whitefish. Tour will begin and end in town of Whitefish. Their itinerary is attached. (Spotted Dog Itinerary)

4. Are the NW Adventure Sports Guided ATV Tours and Action Rentals ATV Tours day tours or are there overnight stops and camping involved?
Both are day tours. There is no overnight stops or camping involved.

5. Given we still lack some of the Guided Bike Tours maps, will all those tours be on roads open to motor vehicles? Will any roads closed to motor vehicles be used?
All routes proposed from Spotted Dog Cycles are on roads open for motor vehicle use. Adventure Cycling has an approximately 2.5 mile stretch on a closed road 9814 (South Owl Side) which connects to Clearwater Lake Loop (4370). The rest of ACA route is on roads open to motor vehicles. Cycling House tours are all on roads open to motor vehicles. Whitefish Shuttle proposed routes include roads open to motor vehicle use and trails (some are motorized and some are non-motorized).

6. If you have more detailed descriptions of the 12 proposals listed in your scoping document, please email them to me ASAP. This would include any descriptions submitted by the party requesting the permit and any application for the permit.
Attached is a document containing additional detailed descriptions. (Additional Detail Descriptions) It includes descriptions and references to documents submitted by the proponent. These documents are attached to this email. The application forms will be sent to you separately as they need to have PII redacted. Please note that application forms were not submitted for KRMC Journey to Wellness, Adventure Cycling, and Whitefish Bike Retreat.

We would appreciate if each of you would determine who is responsible to answer each of these questions and that those people respond with answers ASAP.

We've spent the majority of the day working on this and still have no clear idea of what it is you are proposing.

That is why we asked in our initial email on 4/20/20 that you back up and do this process right by placing all the relevant descriptions and maps on your web site.

We have a responsibility to our members to provide them a meaningful summary of what you are proposing in a timely manner so they also have time to comment if they wish. A mere 14-day

comment period is inadequate, especially when it takes a week or more to secure the details from the agency.

Thank you,

Keith

Keith Hammer - Chair
Swan View Coalition
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http://www.swanrange.org
http://www.facebook.com/SwanViewCoalition
http://www.youtube.com/user/swanviewcoalition

"Nature and human nature on the same path."

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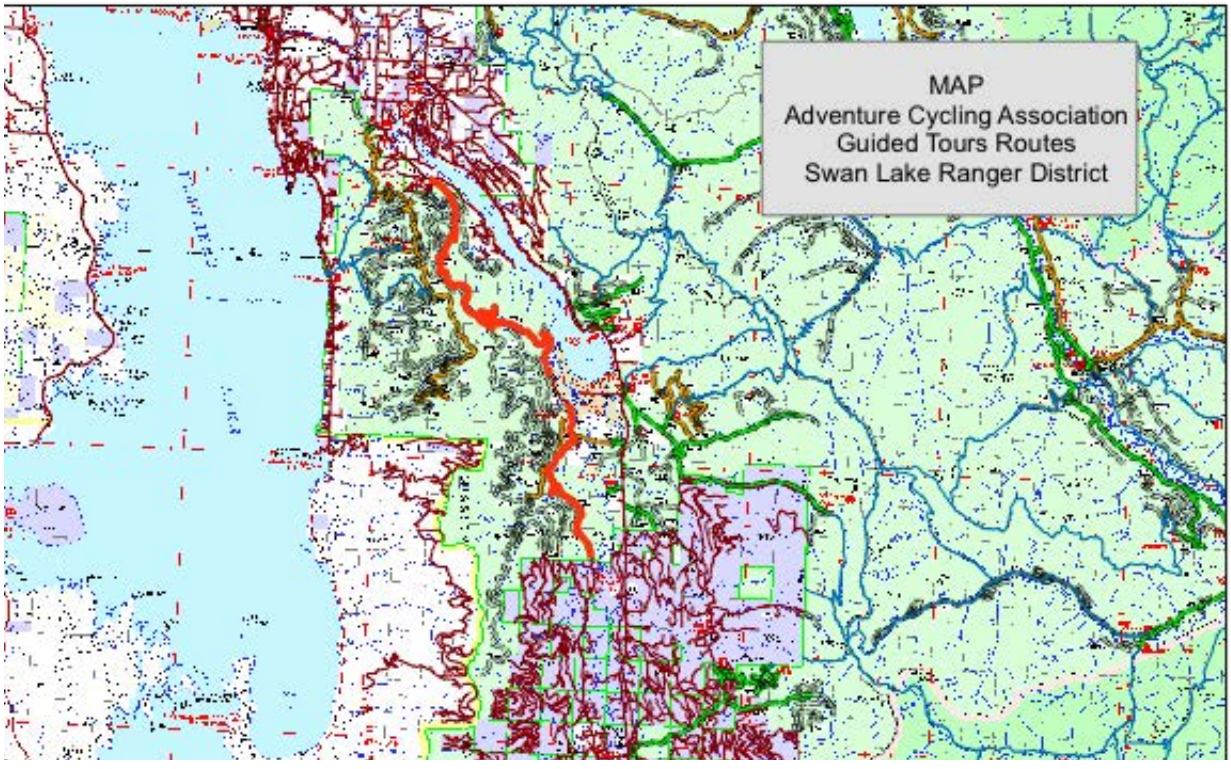

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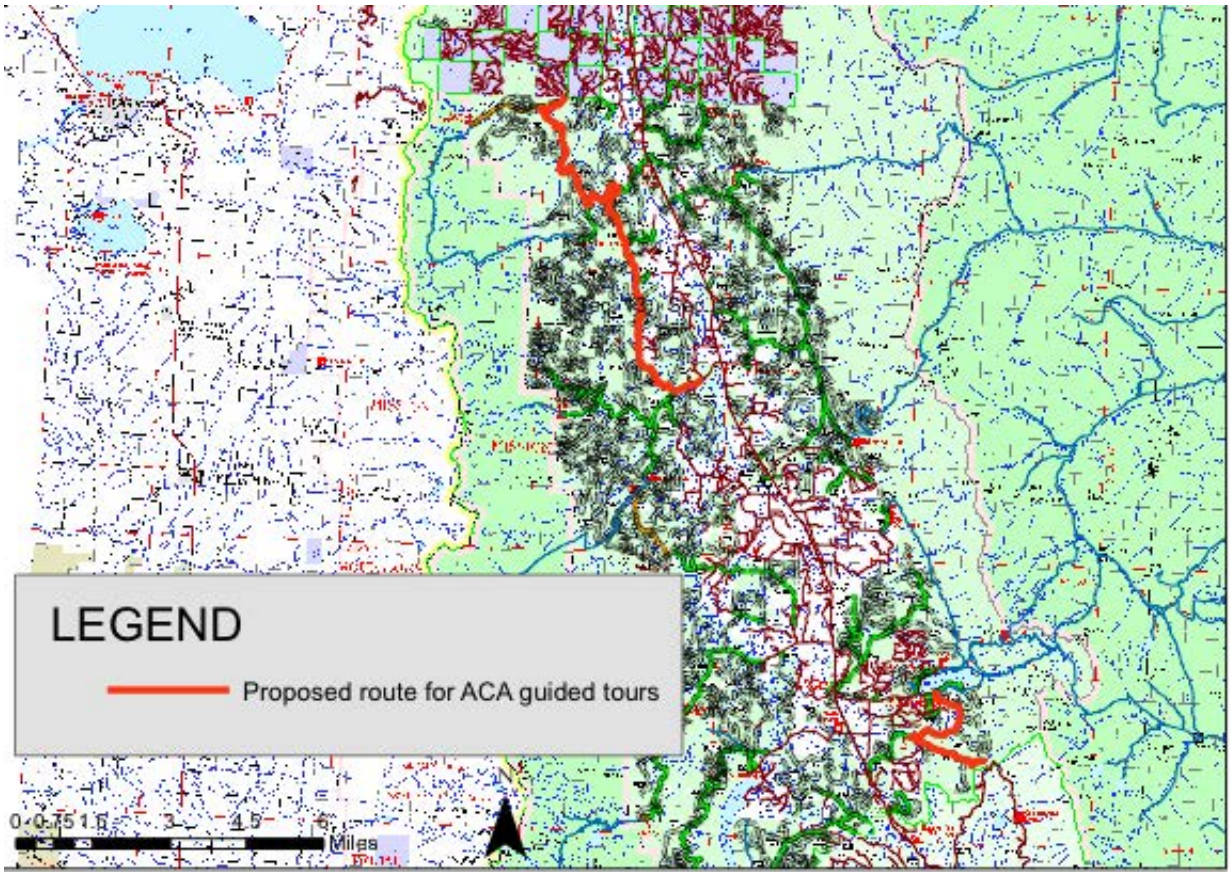

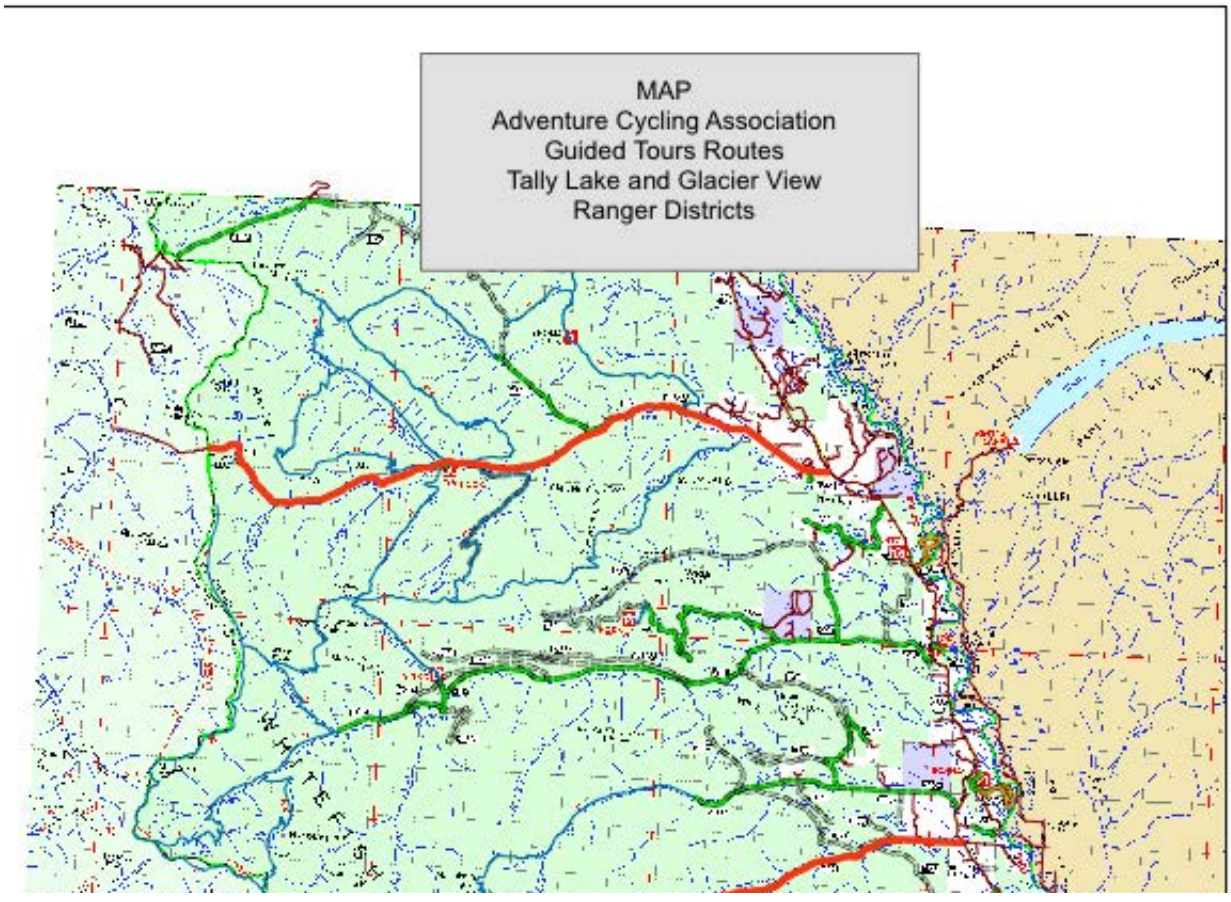

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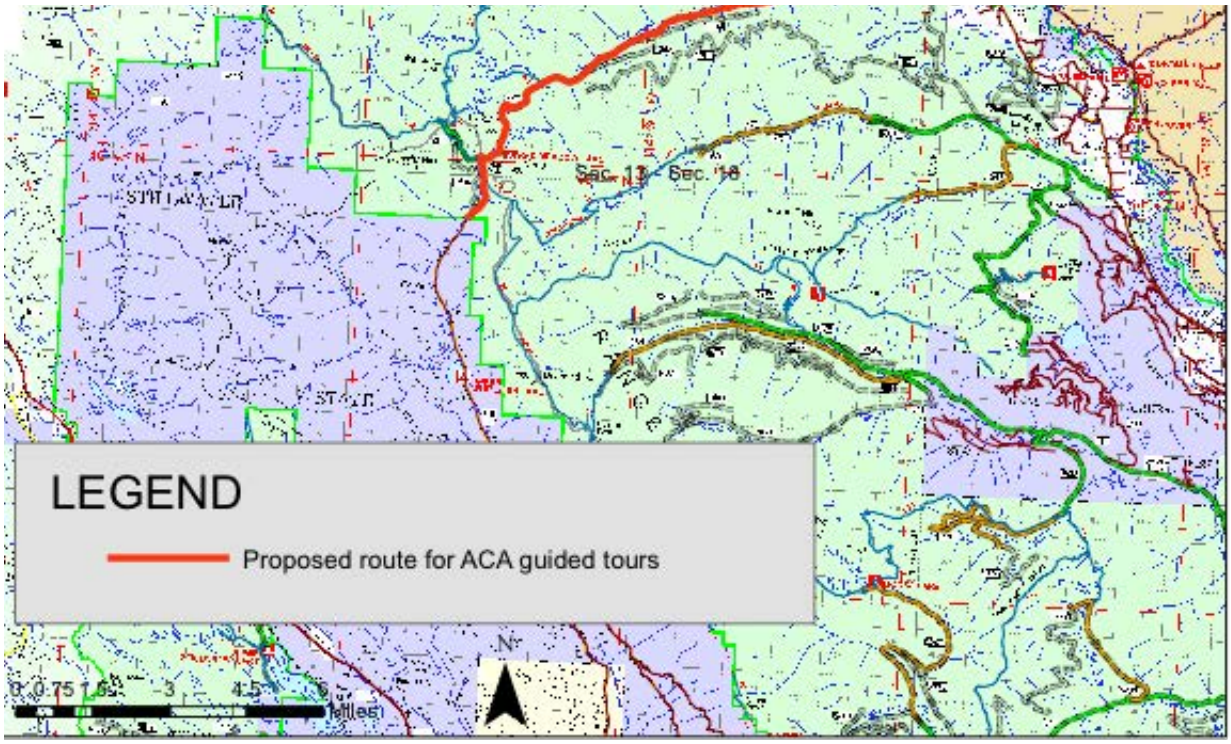


Region1_Itineraries_ACA_2020.pdf

GLACIER GRAVEL						
DATE	Ride Details	Ride with GPS Link	Start Location	Finish Location	Number of Clients	Overnight Location
6/9/2020	21 Miles (Out & Back)	https://ridewithgps.com/routes/31605470	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/10/2020	57 Miles (Out & Back)	https://ridewithgps.com/routes/31605509	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/11/2020	52 Miles (Loop)	https://ridewithgps.com/routes/31605716	Fish Creek in Glacier	Fish Creek in Glacier	16-20	Lodge at Whitefish Lake
6/12/2020	34 Miles (Loop)	https://ridewithgps.com/routes/31605846	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/13/2020	77 Miles (Point to Point)	https://ridewithgps.com/routes/31606373	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/14/2020					16-20	Lodge at Whitefish Lake
6/16	21 Miles	https://ridewithgps.com/routes/31605470	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/17	57 Miles (Out & Back)	https://ridewithgps.com/routes/31605509	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/18	52 Miles (Loop)	https://ridewithgps.com/routes/31605716	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/19	34 Miles (Loop)	https://ridewithgps.com/routes/31605846	Fish Creek in Glacier	Fish Creek in Glacier	16-20	Lodge at Whitefish Lake
6/20	77 Miles (Point to Point)	https://ridewithgps.com/routes/31606373	The Lodge at Whitefish Lake	The Lodge at Whitefish Lake	16-20	Lodge at Whitefish Lake
6/21					16-20	Lodge at Whitefish Lake
GLACIER ROAD						
DATE	Ride Details	Ride with GPS Link	Start Location	Finish Location	Number of Clients	Overnight Location
6/16	21 Miles (Out & Back)	https://ridewithgps.com/routes/30199685	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/17	80 Miles (Point to Point)	https://ridewithgps.com/routes/30423491	St Mary's	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/18	30 Miles (Loop)	https://ridewithgps.com/routes/30594211	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/19	104 Miles (Point to Point	https://ridewithgps.com/routes/27157177	Lake Koocanusa	Trego, MT	16-20	The Lodge at Whitefish Lake
6/20	50 Miles (Out & Back)	https://ridewithgps.com/routes/27157143	Spencer Lake	Spencer Lake	16-20	The Lodge at Whitefish Lake
6/21						The Lodge at Whitefish Lake
6/23	21 Miles (Out & Back)	https://ridewithgps.com/routes/30199685	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/24	80 Miles (Point to Point)	https://ridewithgps.com/routes/30423491	St Mary's	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/25	30 Miles (Loop)	https://ridewithgps.com/routes/30594211	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
6/26	104 Miles (Point to Point	https://ridewithgps.com/routes/27157177	Lake Koocanusa	Trego, MT	16-20	The Lodge at Whitefish Lake
6/27	50 Miles (Out & Back)	https://ridewithgps.com/routes/27157143	Spencer Lake	Spencer Lake	16-20	The Lodge at Whitefish Lake
6/28						
7/7	21 Miles (Out & Back)	https://ridewithgps.com/routes/30199685	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
7/8	80 Miles (Point to Point)	https://ridewithgps.com/routes/30423491	St Mary's	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake
7/9	30 Miles (Loop)	https://ridewithgps.com/routes/30594211	The Lodge at Whitefish Lake	The Lodge At Whitefish Lake	16-20	The Lodge at Whitefish Lake

ATTACHMENT 3

7/10	104 Miles (Point to Point	https://ridewithgps.com/routes/27157177	Lake Koocanusa	Trego, MT	16-20	The Lodge at Whitefish Lake
7/11	50 Miles (Out & Back)	https://ridewithgps.com/routes/27157143	Spencer Lake	Spencer Lake	16-20	The Lodge at Whitefish Lake
7/12						

This bicycle tour will start 7/19/20 and end on 7/24/19 with a maximum party six of 10 people. Only four of these days will take place on Flathead National Forest (7/21 - 7/24). This tour will be a loop beginning and ending in Whitefish, Montana.

The services we will offer consist of support in the backcountry, a guided route, and bikepacking instructionals which will help customers build backcountry skills. The price of this tour also includes all lodging, food, and any permit/pass fees. Our typical audience for this cycling trip are those who have touring experience with a desire to tour dirt in the backcountry. We also believe those who are looking for a Montana experience will also be interested in this tour.

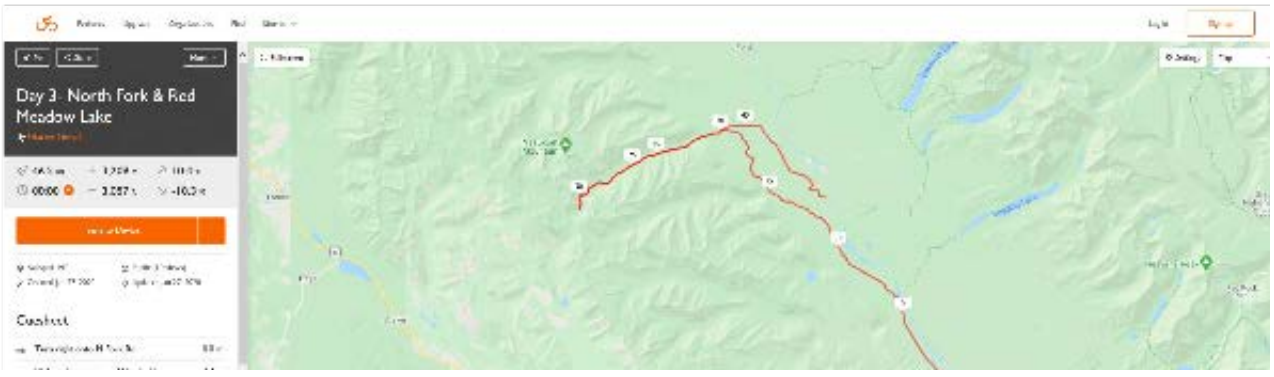
There will be no government facilities or temporary improvements or signs to be used. This tour will not involve motorized equipment and there will be no transportation of livestock.

We will practice Leave No Trace principles during the entirety of our tour. While in the backcountry we will bike on only designated roads and trails. We will pack out all food and waste. All care will be taken to travel responsibly.

ATTACHMENT 3

Date	Start Point, End Point	Approximate Route	Overnight Location	Number of Riders
7/19/20	Whitefish SP	Local MTB trails	Whitefish SP	10
7/20/20	Whitefish SP	Local MTB trails	Whitefish SP	10
7/21/20	Whitefish SP	Lupper Rd --> Old Frt Steele Trail --> NF 315 --> NF 3788 --> Ant Flat Rd --> Grave Cr Rd	Grave Creek CG or N. Dickey Lake CG	10
7/22/20	Grave Creek CG, NF Hostel	NF 114 --> Trail Creek Rd --> N Fork Rd	North Fork Hostel	10
7/23/20	North Fork Hostel, Red Meadow CG	N Fork Rd --> Hay Creek Rd --> NF 1685 --> Red Meadow Rd	Red Meadow Lake Campground or Upper Whitefish Lake CG	10
7/24/20	Red Meadow Lake Campground, DT Whitefish	Red Meadow Rd --> Upper WF Rd --> E Lakeshore Dr	No overnight	10

ACA_FSRegion1_Maps_2020.pdf



ATTACHMENT 3

Additional Detail Description.pdf

ATTACHMENT 4

From: **Davies, Robert -FS** robert.davies@usda.gov
Subject: FW: Recreation Events and Guiding Special Use Permits
Date: April 23, 2020 at 1:50 PM
To: Keith Hammer keith@swanview.org, Draggoo, Michele -FS michele.draggoo@usda.gov
Cc: Mulholland, Bill -FS bill.mulholland@usda.gov, Wehunt, William T -FS william.wehunt@usda.gov, Dowling, Chris -FS chris.dowling@usda.gov, Butterfield, Anthony -FS anthony.butterfield@usda.gov, Crandall, Michael J -FS michael.crandall@usda.gov, Steele, Kurt -FS kurt.steele@usda.gov

DR

These are the routes for Cycle House temporary outfitting proposed use, and Spotted Dog Cycle, temporary outfitting use. The Spotted Dog may be a duplication because these proposed uses cross District Boundaries. Adventure Cycling is also proposed on my District but I believe that will be coming in from Tally Lake District. If your missing anything or have questions please call or email. I hope these maps help you better understand the proposals.
Thanks, Rob

Rob Davies
District Ranger
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Flathead National Forest **Hungry Horse-Glacier View**
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Caring for the land and serving people

From: Butterfield, Anthony -FS
Sent: Wednesday, April 22, 2020 3:52 PM
To: Crandall, Michael J -FS <michael.crandall@usda.gov>; Davies, Robert -FS <robert.davies@usda.gov>
Subject: RE: Recreation Events and Guiding Special Use Permits

Hi Rob, attached are the maps for the Cycle House permit proposal. Thanks

Anthony Butterfield
Frontcountry Recreation Specialist
Forest Service
Flathead National Forest
Hungry Horse-Glacier View Ranger Districts
p: 406-387-3814
c: 406-210-7960
f: 406-387-3889
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Caring for the land and serving people

ATTACHMENT 4

From: Crandall, Michael J -FS
Sent: Wednesday, April 22, 2020 2:14 PM
To: Davies, Robert -FS <robert.davies@usda.gov>
Cc: Wehunt, William T -FS <william.wehunt@usda.gov>; Wehunt, Sadie A -FS <sadie.wehunt@usda.gov>; Butterfield, Anthony -FS <anthony.butterfield@usda.gov>
Subject: RE: Recreation Events and Guiding Special Use Permits

Hi Rob,

Anthony is the lead on one of these permit proposals, Cycle House. He will get you a map today so you can forward that on to Mr. Hammer.

The rest of the permit proposal maps will be handled by the SO or Tally Lake.

I think that is clear as mud.

MJ

From: Davies, Robert -FS
Sent: Wednesday, April 22, 2020 12:51 PM
To: Crandall, Michael J -FS <michael.crandall@usda.gov>; Butterfield, Anthony -FS <anthony.butterfield@usda.gov>
Subject: FW: Recreation Events and Guiding Special Use Permits

MJ and Anthony,
This note came in today from Keith Hammer….. wanting maps of all the routes of all the Rec events/SU temp outfitters.
Looks like you are working with Tad to provide maps, based on the email I see from him. Just wanted to make sure you are working on this. It should be easy to do. I do not know the timing. Its not an official FOIA but it looks like our response should be a pretty quick turnaround if possible.

Rob Davies
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ATTACHMENT 4

From: Steele, Kurt -FS
Sent: Wednesday, April 22, 2020 10:44 AM
To: Keith Hammer <keith@swanview.org>
Cc: Gerrior, Julie -FS <julie.gerrior@usda.gov>; Pargman, Beth A -FS <beth.pargman@usda.gov>; Mulholland, Bill -FS <bill.mulholland@usda.gov>; Davies, Robert -FS <robert.davies@usda.gov>; Dowling, Chris -FS <chris.dowling@usda.gov>; Draggoo, Michele -FS <michele.draggoo@usda.gov>; Wehunt, Sadie A -FS <sadie.wehunt@usda.gov>; Cranmer, Sean M -FS <sean.m.cranmer@usda.gov>
Subject: RE: Recreation Events and Guiding Special Use Permits

Thank you for your message, Rangers and/or staff will get back to you on your request individually.

Kurt Steele
Forest Supervisor
Forest Service
Flathead National Forest
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c: 406-253-4819
kurt.steele@usda.gov
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Kalispell, MT 59901
www.fs.fed.us

Caring for the land and serving people

From: Keith Hammer <keith@swanview.org>
Sent: Wednesday, April 22, 2020 10:08 AM
To: Steele, Kurt -FS <kurt.steele@usda.gov>
Cc: Gerrior, Julie -FS <julie.gerrior@usda.gov>; Pargman, Beth A -FS <beth.pargman@usda.gov>; Mulholland, Bill -FS <bill.mulholland@usda.gov>; Davies, Robert -FS <robert.davies@usda.gov>; Dowling, Chris -FS <chris.dowling@usda.gov>; Draggoo, Michele -FS <michele.draggoo@usda.gov>; Wehunt, Sadie A -FS <sadie.wehunt@usda.gov>; Cranmer, Sean M -FS <sean.m.cranmer@usda.gov>
Subject: Re: Recreation Events and Guiding Special Use Permits

Dear Supervisor Steele;

Please note that our initial email was indeed addressed to the listed points of contact for each each Ranger District and group of projects/permits.

Our initial email asked them to please “email us maps of each of the 12 special use permit locations and route locations as soon as possible.”

We repeat that request here today. Certainly you don’t expect the public to sit down with a Forest map and try to find each of the individual roads and trails proposed for use under these permits?

You are doing the public a disservice by not including those maps and better descriptive information on the

You are doing the public a disservice by not including these maps and better descriptive information on the Forest's web site, forcing them to waste valuable time trying to track down what they need to know in order to provide informed comments.

Instead of "serving people" per the FS motto, you are instead impeding the public's ability to get informed and comment on FS projects and public land issues.

Keith

> On Apr 22, 2020, at 9:22 AM, Steele, Kurt -FS <kurt.steele@usda.gov> wrote:
>
> Good Morning Mr. Hammer,
> I appreciate your feedback and your continued engagement of Flathead National Forest's activities. While I understand your concern, I believe the news release and its link to the information on the Flathead National Forest webpage provides enough information for scoping these potential activities. If you have specific questions, please reach out to the point of contact or District Ranger for each project. In addition, I also believe we have provided enough time for the public to provide feedback. Finally, related to your question about COVID-19, if we issue a permit for a given activity, each permit would contain a standard provision requiring compliance with laws, regulations, and other legal requirements. If at any point the proposed event did not comply with this, the activity would need to be modified, postponed, or cancelled. Again, I want to thank you for your continued interest.
>
> <image001.png>
> **Kurt Steele**
> **Forest Supervisor**
> **Forest Service**
> **Flathead National Forest**
> **p: 406-758-5250**
> **c: 406-253-4819**
> **kurt.steele@usda.gov**
> 650 Wolfpack way
> Kalispell, MT 59901
> www.fs.fed.us
> <image002.png><image003.png><image004.png>
> **Caring for the land and serving people**

From: Keith Hammer <keith@swanview.org>
Sent: Monday, April 20, 2020 11:04 AM
To: Gerrior, Julie -FS <julie.gerrior@usda.gov>; Pargman, Beth A -FS <beth.pargman@usda.gov>; sean.m.cramer@usda.gov
Cc: Mulholland, Bill -FS <bill.mulholland@usda.gov>; Davies, Robert -FS <robert.davies@usda.gov>; Dowling, Chris -FS <chris.dowling@usda.gov>; Steele, Kurt -FS <kurt.steele@usda.gov>
Subject: Recreation Events and Guiding Special Use Permits

Dear Flathead National Forest Folks;

ATTACHMENT 4

We received your press release yesterday inviting public comment by May 1 on 12 Special Use Permits you are considering issuing for group recreation events and guiding.

While we appreciate advanced notice of these permits, we cannot find information upon which to base meaningful public comments. None of these permits are listed or described in your current Schedule of Proposed Actions at: https://www.fs.fed.us/sopa/forest-level.php?110110

None of them are listed or described on the Flathead's "Projects" planning page at: https://www.fs.usda.gov/projects/flathead/landmanagement/projects The few that are listed there are from last year and appear to be the same proposals in name only.

Your public scoping document for these 12 permits offer only brief descriptions and no maps of the proposed event or guiding routes.

We ask that you not close the public comment period until you have lodged all the necessary maps and information on your web site (with links to this information also listed in your SOPA), have announced you will prepare an adequate Environmental Assessment or Environmental Impact Statement on the effects of your permitting program, and have allowed 30 days for public scoping comment on those materials and the proposals.

We find your request for public comment on these group event and guiding proposals to be premature and rushed. Our nation is just now engaging in a discussion of how best to safely relax COVID-19 restrictions and public health experts are warning that it will be quite a while before things return to "normal" - and that the new normal may not be what it was before.

In Montana and in spite of being on the cusp of beginning to relax COVID-19 restrictions, summertime group events like the Governor's Cup Run and Montana Folk Festival have been cancelled in June and July. You need to give the public some time to become familiar with evolving COVID-19 management before asking them to comment knowledgeably about the pros and cons of the group events and guiding proposed for the Flathead this summer.

Your use of Categorical Exclusions for these 12 permits is inappropriate and certain to omit an adequate assessment of their effects on the environment both individually and cumulatively. As we made clear last year, experts advise against foot and bike races in grizzly bear habitats due to the well documented increased risks to both humans and bears. Please revisit that letter at http://www.swanview.org/reports/SVC_on_SUPs_190613.pdf and include it in the public record for this scoping invitation.

Please email us maps for each of the 12 special use permit locations and route locations as soon as possible.

Thank you,

ATTACHMENT 4

Keith

Keith Hammer - Chair
Swan View Coalition
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406-253-6536 (cell phone)
keith@swanview.org
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http://www.swanrange.org
http://www.facebook.com/SwanViewCoalition
http://www.youtube.com/user/swanviewcoalition

"Nature and human nature on the same path."

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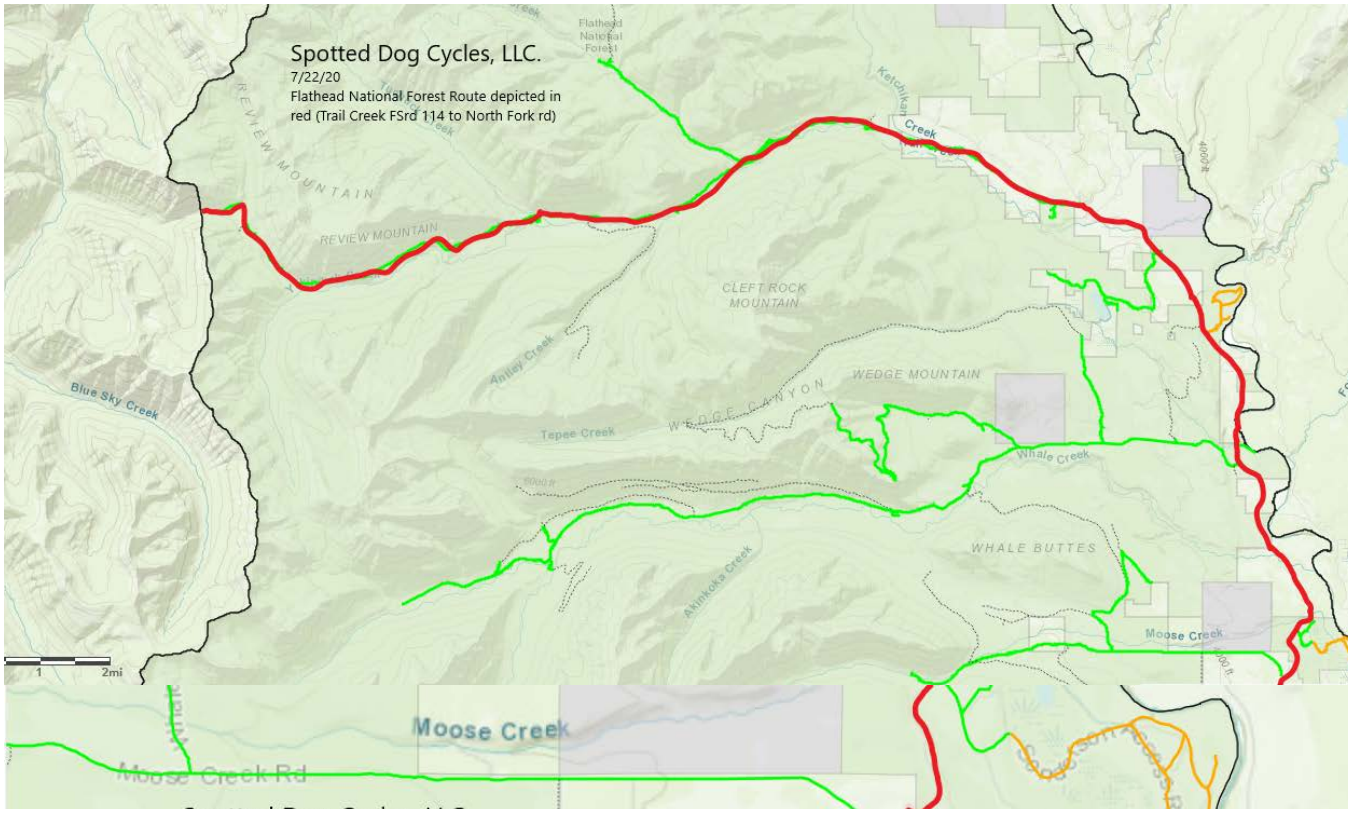
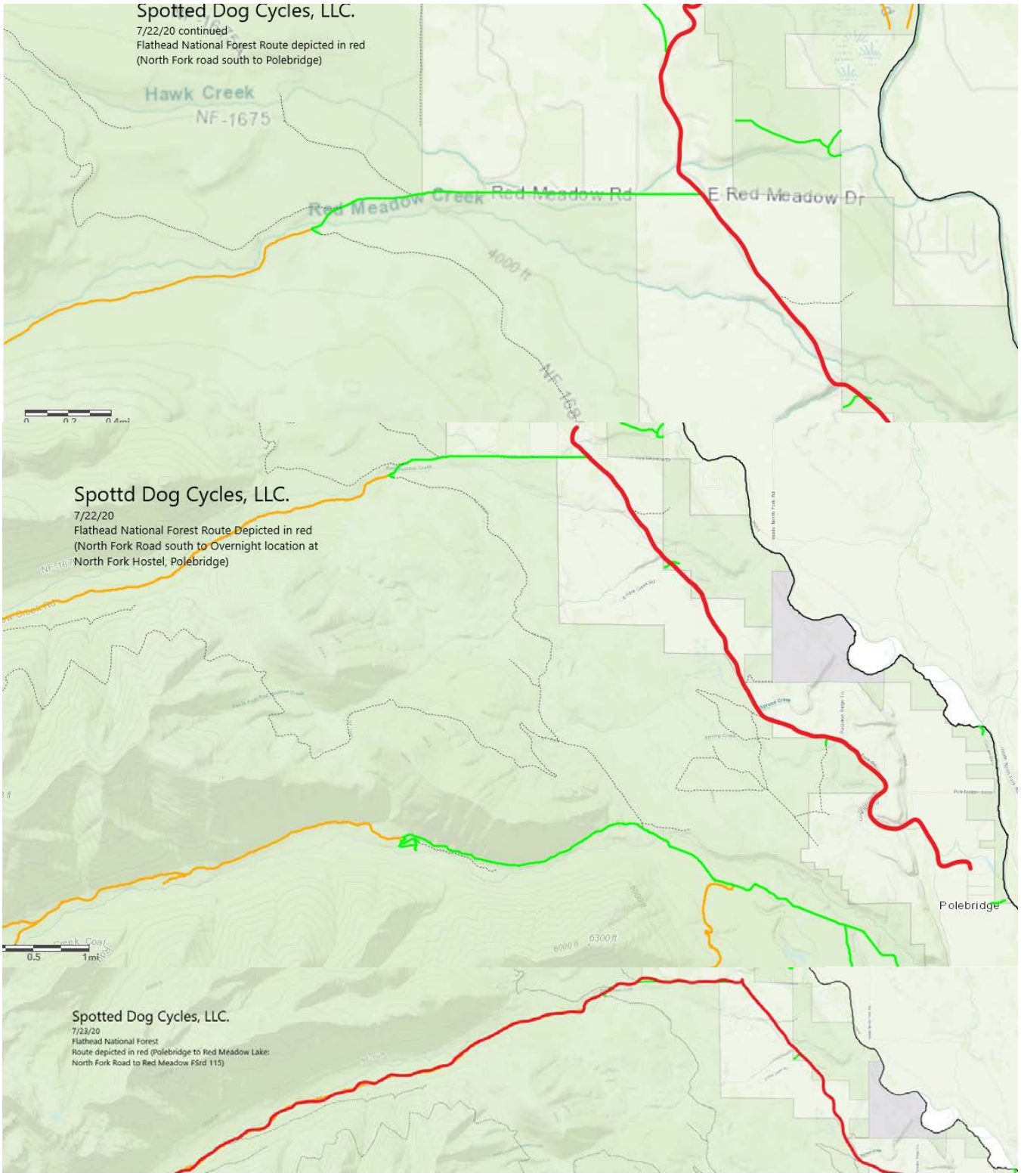
ATTACHMENT 4