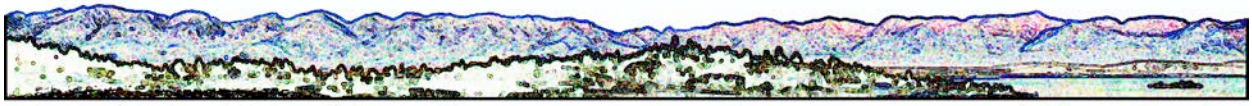
Swan View Coalition *Nature and Human Nature on the Same Path*



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

July 28, 2012

Chip Weber
Flathead Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Att: Shawn Boelman sboelman@fs.fed.us

Re: Comments on draft Travel Analysis Report, as PDF to cweber@fs.fed.us

Dear Mr. Weber and Mr. Boelman;

Please accept these additional comments on your draft FNF Travel Analysis Report (TAR) into the public record. We previously submitted comments via our TAR letter of 7/11/14, our 7/21/14 letter concerning the recent landslide on the Sullivan Creek Road, and via comments on your interactive map. We incorporate by reference all comments submitted in this matter by Friends of the Wild Swan.

Executive Summary

In our previous letter about the draft TAR, we made the case that the Flathead cannot simply demote more roads to ML-1 as though those are properly "stored" roads, when they in fact are not. This letter will focus more on the Benefit and Risk "questions" you used to rank the Forest's roads, concluding these questions and rankings are wholly inadequate to support the TAR's recommendations and any future decisions about which roads to keep and which to decommission. A few site-specific examples will be provided to demonstrate just how inaccurate the TAR's ranking system is.

Overall Problems With the Ranking Questions and Recommendations

An overall problem with the ranking questions is that the results are not adjusted by/divided by the road length. This makes longer roads appear to have greater risks simply because they are longer, rather than because they do or do not cross unstable soils, for example.

Other questions fail to recognize the best available science and management requirements. Question 6, for example, fails to note the A19 subunits where Forest Plan standards have been lowered from the prior conservation standard of "19/19/68." Just because the reduced/amendmended Forest Plan standards are being met in those subunits, it does not mean that grizzly bears and other wildlife in those areas are not subject to greater

displacement and other effects than the conservation standard allows. Similarly, there is no risk question detailing where roads occur in critical bull trout habitat and where culverts and ditches are or are not receiving the annual inspections required by prior FWS biological opinions. (See our 7/11/14 letter and the letter submitted by Friends of the Wild Swan for more detail on this point).

In the end, however, all is for naught because the TAR simply recommends keeping the vast majority of roads having low overall benefit in spite of moderate or high overall risks. No amount of assessment is going to correct for the Flathead's underlying bias that it wants to keep the vast majority of its road system regardless of the costs to taxpayers and the environment.

Site-Specific Examples

An example of the above retention of low benefit roads in spite of moderate or high risks would be the roads up tributaries to Sullivan Creek. While South Fork Connor Creek Road #2801 is of low overall benefit and high overall risk, it is nonetheless retained for future use. While the roads up Ball and Branch Creeks are of low overall benefit and moderate overall risk, they are both nonetheless retained for future use. Why aren't these roads tributary to Sullivan Creek "not needed for future use," as with the Bunker Creek Road?

Our previously submitted letter regarding the landslide and failure of Sullivan Creek Road #547 provides an example of how flawed the TAR is in ranking this road low in overall risk. (Our 7/21/14 Sullivan Creek landslide letter can also be located at http://www.swanview.org/reports/Sullivan_Landslide_SVC-FOWS_140721.pdf). Sullivan Creek Road was obviously built across unstable soils already prone to slumping and the road has now contributed to a mass failure directly into Sullivan Creek.

Attached as Exhibit A is a Google Earth image of the Sullivan Creek Road about one-quarter mile north/"down-road" from the recent landslide. Note the road crosses an identifiable historic slump in this location and shows evidence of more recent slumping of the road fill. This road should be among the highest overall risk due to its active slumping, potential mass failure, adjacent critical bull trout habitat, and excellent wildlife values. Instead it is falsely ranked as having low overall risk.

Attached as Exhibit B is a Google Earth image of a slump in Quintonkin Creek Road #381. This slump is serious enough to have warranted installation of a lengthy gabion, yet the road has nonetheless sunk about 6" or more in this location directly above Quintonkin Creek (see photo Exhibit C). This road is rated as of moderate overall risk and benefit. It should instead be rated as of high moderate risk due to slumping, crossing of unstable soils, and penetration deep into key wildlife habitats and bull trout "critical habitat."

An Adequate Risk Assessment and Exit Strategy is Needed

The Flathead needs to conduct an adequate assessment of the risks its roads pose to both the American taxpayer and the environment then develop a strategy for decommissioning

roads it simply can't afford to keep. That's right; the word "afford" is defined in both financial and environmental terms.

Independent scientists like Dr. John Weaver have conducted assessments of what is needed to keep key fish and wildlife species present on the landscape. His May 2014 assessment and recommendations for the Flathead National Forest and April 2011 assessment of the Crown of the Continent can provide a better idea of the type of road risk assessment the Flathead should be conducting. While Dr. Weaver's assessment examines the needs of only five species of vulnerable fish and wildlife, it nonetheless leads him to conclude that key watershed like Sullivan and Quintonkin need to have roads put to bed and be recommended for designation as Wilderness. (Dr. Weaver's reports can be found at http://www.wcs.org).

While we lack some of the GIS and other assessment tools available to the Flathead, we have nonetheless drawn up detailed maps and provided them to the Flathead in our proposed Citizen reVision of the Flathead Forest Plan. Our proposal follows a longstanding rule of thumb for the conservation of fish and wildlife by placing highest priority on removing roads that most deeply penetrate and fragment fish and wildlife habitat, while allowing some of those less remote to remain for motorized access to timber and recreation. We contend that our Citizen reVision presents a much more fiscally and environmentally responsible road system that does the TAR. It can be found at http://www.swanview.org/reports/Citizen_reVision_Flathead_Forest_Plan.pdf).

The slumps along Quintonkin and Sullivan Creek point to the need for the Flathead to have a clear, proactive and responsive exit strategy (though there are many more slumps and mass failures associated with the Flathead's roads than these examples). With limited funds, the Flathead cannot afford to rebuild roads like Sullivan Creek #547 when they fail, when that money is badly needed for road decommissioning. It is important to be proactive in decommissioning roads in these and other watersheds while access by heavy equipment is still an option. A truthful economic analysis would show that it is far cheaper to decommission roads rather than to continually reconstruct or reroute them around mass failures - and a truthful environmental analysis would show decommissioning is also best for the land, water, fish, and wildlife.

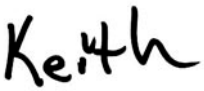
Conclusion

In the letters and reports cited above, as well as in numerous comments on Flathead Forest Plan revision, we've detailed the need for the Flathead to embark on a process of wildland recovery to reduce its network of unaffordable roads and to restore security for fish, wildlife and non-mechanized human recreation. We've provided similar rationale in our comments on the Flathead's Draft Wilderness Suitability Inventory and we incorporate those comments here by reference. Our 6/18/14 letter in this regard can be found at http://www.swanview.org/reports/SVC_on_Wilderness_Suitability_140618.pdf .

We urge the Flathead to dovetail its TAR with its Wilderness Suitability Inventory and all other elements of its Forest Plan revision so that the revised Forest Plan arrives at a road system and management emphases that are truly sustainable in terms of fish, wildlife and the American taxpayer. The draft TAR unfortunately lends itself to none of the above.

Thank you for this opportunity to comment and please keep us informed as this process moves forward.

Sincerely,



Keith J. Hammer
Chair

Exhibits:

A. Google Earth image of slumps along Sullivan Creek Road #547.

B. Google Earth image of slump along Quintonkin Road #381.

C. Swan View Coalition photo of slump in Quintonkin Road #381.

Exhbit A
N
173 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 48.005115° lon -113.704076° elev 3936 ft eye alt 4599 ft

Exhibit B
N
162 ft
1991
Google earth
Imagery Date: 7/25/2013 lat 48.013057° lon -113.810476° elev 4614 ft eye alt 5303 ft

Exhibit C