

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 24, 2021

Scott Snelson

Spotted Bear District Ranger

Scott.snelson@usda.gov and comments-northern-flathead-spotted-bear@usda.gov

Re: Second Letter on Bunker Park Cabin Rentals Proposal

Dear Ranger Snelson;

We continue to object in the strongest of terms to your proposal to build four rental cabins at Bunker Park, as outlined in our March 10 letter (attached) and as further explained here.

We note in the Missoulian, Kalispell Daily InterLake and Hungry Horse News that you consistently refuse to name specifically who you otherwise claim is willing to help fund or build the rental cabins. This is a violation of public trust and law. We ask that you suspend the public comment period until you have clearly and publicly identified what individuals and groups you have communicated with in this regard and indicate which have promised funds, materials or in-kind labor to build and / or install these cabins and other Bunker Park improvements.

During our March 9 phone call, you stated you had support from outfitters for your cabin proposal. Are they or the Montana Outfitters and Guides Association among the folks also offering funding, materials or services?

You are wrong to attempt to use a Categorical Exclusion (36 CFR 220.6(e)) from the preparation of a full environmental analysis. Neither the 2018 version of those regulations nor the 2020 version allow for the building of rental cabins under a CE. We notice the new regulations would allow you to use a CE, however, to issue "an outfitting and guiding permit for mountain biking" in the Bunker Creek area (36 CFR 220.6(d)(12)(i)). This increases our concerns about individuals and outfitters using the proposed cabins as a destination for mountain bike (or llama or foot or horse) trips from points on the west side of the Swan Crest, such as Napa Point and Crevice Lakes. Hey, it is all downhill from the Swan Crest!

If you think you can build rental cabins at Bunker Park without increasing the human use capacity of the area, then you must also think you can do so at other developed and undeveloped campgrounds in the Spotted Bear area - such as Beaver Creek, South Creek Trailhead, and other Wilderness trailheads that already have pit toilets, fire rings, and food storage lockers. You need to conduct a full and public environmental review

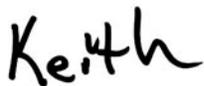
of such a program and explain to the public how this is in keeping with the Flathead's promise to keep grizzly bear habitat conditions and security at 2011 levels and to not arbitrarily increase human use capacity via developed recreation sites.

We have attached the March 14 comments of retired USFS Grizzly Bear Recovery Coordinator Dr. Chris Servheen. He is concerned your proposal violates the Flathead's commitment to the NCDE Grizzly Bear Conservation Strategy, of which he was a primary author. He is also concerned your proposal will "dramatically increase mountain bike use of the surrounding area of high density grizzly bear habitat" and he attaches the "Board of Review Recommendations Related to Mountain Bike Safety in Bear Habitat Based on the Fatality of Mr. Brad Treat on June 29, 2016."

In short, your proposal would change the entire character of recreation and its impacts in the area, without a prior public look at the potential environmental consequences in an Environmental Assessment or Environmental Impact Statement. The most recent Flathead National Forest Visitor Map and District Map do not even show a campground at Bunker Park. Nor does the Flathead's Campground Directory. If you go through with your proposal, however, it will show up on maps as not only a campground, but as a site of four rental cabins!

The public deserves to participate in a full environmental review of your proposal, not a single shot-in-the-dark opportunity to comment while you hide the most basic facts of who is behind this and what the potential environmental consequences might be.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and somewhat stylized.

Keith J. Hammer
Chair

Enclosures: 3/10/21 comments from Swan View Coalition
3/14/21 comments of Dr. Chris Servheen

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March 10, 2021

Scott Snelson

Spotted Bear District Ranger

Scott.snelson@usda.gov and comments-northern-flathead-spotted-bear@usda.gov

Re: Bunker Park Cabin Rentals Proposal

Dear Ranger Snelson;

We object in the strongest of terms to your proposal to build four rental cabins at Bunker Park, immediately outside the Bob Marshall Wilderness and the intervening strip of land that is proposed for Wilderness designation in the Flathead Forest Plan. Your proposal will replace historic primitive tent and trailer camping with cabin rentals and will discriminate against the less advantaged.

Your proposal reeks of empire building at the expense of public resources. Your scoping notice says "Recreational use of the site sharply declined following a 2015 wildfire." Why then are you proposing to spend taxpayer dollars to develop a little used site, especially when the rental of already existing cabins on the Flathead has not reached capacity?

The proposal will greatly increase the season of use by providing hard-sided living quarters during the winter months. Bunker Park would likely become a snowmobile outpost where fuel can be cached for multiple days of snowmobiling in the area. Your scoping letter is wrong in claiming "the area that surrounds the cabin is open to snowmobiling from December 1 through March 31." According to your maps, the areas to the east and south, across Bunker Creek, are closed to over-snow vehicles (and are either proposed or already-designated Wilderness, where mechanized uses are not allowed by the Forest Plan and/or law).

The proposal will also greatly expand the day-reach and fuel-reach of over-snow vehicles into the upper reaches of both forks of Bunker Creek, which are critical wildlife habitats, closed to over-snow vehicles and designated in the Forest Plan as the Alcove-Bunker proposed Wilderness. You would be creating a law enforcement nightmare far from law enforcement officers, and you are flat wrong to think that snowmobilers are going to self-police themselves and not venture into closed areas once they have the nearby fuel reserves and overnight shelter that allow them to do so.

The proposal will also greatly encourage hikers and mountain bikers to descend from Alpine Trail #7 to Bunker Park cabins, which relieve them of the need to pack shelter

with them. This will essentially replace backpacking trips from Napa Point with doable day-hikes and day-rides to Bunker Park cabins. And lets not overlook the temptation for motorcycles, which have legal access to Crevice Lakes via Alpine #7, to make Bunker Park cabins their destination via trespass down Bunker Creek or Bruce Ridge trails - which has happened before with one of the Spotted Bear guest ranches the overnight party destination.

Simply put, your proposal is an unwarranted development in a far backcountry area that is as important to fish and wildlife as the adjoining Wilderness. It will increase human use in the area and very likely be utilized by outfitters and their clients as an outpost. Your proposal stands to have significant impacts on the recreating public, which has in the past been able to camp at Bunker Park without cabin rental fees, as well as significant impacts on fish and wildlife that include threatened grizzly bear, threatened bull trout, threatened lynx, wolverine, elk, and many other species sensitive to human intrusion and most vulnerable during winter. It is also dishonest to claim you are not increasing the capacity of developed recreation sites in grizzly bear habitat when you are proposing to build 4 cabins, a corral, a play area, a second pit toilet, and to drill a freshwater well at Bunker Park.

Your proposal does not qualify for the use of a Categorical Exclusion from the preparation of an Environmental Assessment or an Environmental Impact Statement, due to the existence of extraordinary circumstances that include those we describe above. Please either drop this ill-conceived proposal altogether or proceed with the preparation of an EA in order to determine if an EIS is required due to significant impacts.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and somewhat stylized.

Keith J. Hammer
Chair

From: **Chris Servheen** <chrisservheen@gmail.com>
Date: Sun, Mar 14, 2021 at 11:24 AM
Subject: comment on Bunker Parks Cabins #59643
To: <James.Flint@usda.gov>

Dear Mr. Flint,

I wish to register my objection to your proposal to build 4 cabins at Bunker Park. This is a remote area and the resources and value of the area benefits from this remoteness. Building rental cabins adjacent to the wilderness and the access to Bunker Creek and the remote areas north of the wilderness boundary will only result in abuse of public resources.

This project is a direct increase in human use capacity in grizzly bear habitat, which is supposed to be prohibited by the USFS agreements to the NCDE grizzly bear conservation strategy.

This project will bring a whole new class of resource users into one of the most remote and important wild areas of the Flathead outside wilderness. This project will increase the numbers of users, the season of use, the types of use, including more snowmobilers, mountain bikers, and day users with little or no knowledge of recreational challenges in grizzly bear habitat.

There is no justification for this type of enhanced development right in the middle of some of the most dense grizzly bear and carnivore habitat on the Flathead Forest. You are creating a destination "resort" in the most inappropriate place and it is sure to be used by commercial operations, snowmobile clubs, mountain biking organizations.

Regarding mountain bikes, this proposal will likely dramatically increase mountain bike use of the surrounding area of high density grizzly bear habitat. Have you implemented the trail evaluation and closure recommendations for all the surrounding trails that are contained in the report by the BOR on the death of Mr. Brad Treat (attached)?

In summary, this proposal is an inappropriate development in a very sensitive area. It will increase use and likely abuse of valuable and rare public resources for no good reason. Rental cabins are not needed or wanted in this place.

I respectfully request that you withdraw this proposal.

Sincerely,
Chris Servheen, Ph.D.
FWS Grizzly Bear Recovery Coordinator (retired)