

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



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To: anthony.butterfield@usda.gov , charles.james@usda.gov ,
william.wehunt@usda.gov , royelynn.warren@usda.gov

Re: Comments on Summer 2022 Special Use Permits on the Flathead NF

Dear Mr. Butterfield, Mr. James, Mr. Wehunt, and Ms. Warren;

1. Thank you for not proposing a permit for guided motorized dirt bike tours in the wildlife rich Krause Basin area, as you did last year. We hope that, through the Krause Basin Collaboration, NEPA and travel planning processes you will ban commercial tours, motorized vehicles and mountain bikes permanently.
2. We object to all of the permits intended to provide motorized recreation as an end in itself. It is one thing to use an automobile to get to a trailhead or lake to then hike, bike or swim. Intentionally promoting motorized dirt bike, ATV, UTV, and watercraft rentals and tours does not work toward the goal of reducing greenhouse emissions. Indeed, each gallon of gasoline burned puts 20 pounds of CO₂ into the atmosphere! Electric vehicles also have a large carbon footprint due the energy and materials used in their production, charging and maintenance.
3. We object to the permits intended to promote trail running, bike and foot races. These displace others from the trails and promote recreation that increases the risk of surprise encounters between people and bears, which have resulted in the deaths of both. An interagency team has advised against trail running and fast mountain biking at: <https://drive.google.com/file/d/0B6ZFZLDXIGzrVERWc0ozaWxDS2M/view>
4. While we are not necessarily opposed to bike tours or running events that stick to roads open to motorized vehicles, we object to those that would utilize roads closed to protect wildlife security.
5. We support the Montana Outdoor Science Academy permit for small-group hikes in quiet, unhurried nature. These stand in stark contrast to the majority of the 23 SUPs being proposed, which instead spew forth crowds (including the Highlander 100-person "hiking event"), haste, noise, and exhaust fumes that destroy other peoples' ability to enjoy their National Forests and the planet.

We ask that the Flathead recognize it is engaged in a summertime and wintertime Special Use Permit program that needs to have its cumulative impacts assessed along with other aspects of the Flathead's recreation program, such as the expansion of its

Rental Cabins program, in an Environmental Impact Statement. Some permits are being issued year after year and some permits overlap in time and/or place. All are being issued in habitats occupied by numerous threatened species.

Moreover, some of these SUPs, like Glacier Ridge Runners, appear intended to later provide tours to Bunker Park, where the Flathead has proposed four new rental cabins, toilets, a playground, and a water well. This would readily turn these daylong tours into multi-day tours on the edge of designated Wilderness. We are confident that Spotted Bear Ranger District, among others, has plans for many more new Rental Cabins in remote backcountry areas. These SUPs and Rental Cabins cannot legally be individually Categorical Excluded from the need to prepare an EIS.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and slightly slanted to the right.

Keith J. Hammer
Chair