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

November 23, 2016

Flathead National Forest
Attention: Forest Plan Revision
650 Wolfpack Way
Kalispell, MT 59901

Re: Tidbits and Overall Complexity
Submitted via flatheadplanrevision@fs.fed.us

Dear Folks;

This letter is prompted by our November 2 attendance at the Pacific Northwest National Scenic Trail Advisory Council meeting in Whitefish, for which we submitted a letter on November 1 and supplemented it with a second letter on November 2. We enclose those letters in this pdf and intend them as further comment on the Flathead Plan revision process and draft planning documents.

We have since November 2 revisited the Flathead Plan revision planning documents and find scant mention of the Pacific Northwest Scenic Trail. Nowhere do your documents mention that this Trail will penetrate existing grizzly bear Security Core and other important wildlife habitats. We go into this violation of Security Core in detail in our enclosed letters.

Your DEIS Volume 2, pages 83-87, however, correctly concludes "recreational use may increase on the trail, with users having more contact with other visitors which may affect the solitude characteristics." We agree that solitude will be diminished and along with it wildlife security, as explained in our enclosed letters.

We urge you to read the following article in the New York Times, which confirms that Scenic Trail designation can lead to overuse:

> "Fewer people have hiked the full Pacific Crest Trail than have reached the summit of Mount Everest. Yet, this year, so many want to hike it that a limit has been placed on permits so that no more than 50 thru-hikers can begin at the Mexican border each day."

http://www.nytimes.com/2015/05/17/opinion/sunday/nicholas-kristof-what-wild-has-wrought.html

Is this what we want happening at Polebridge; hikers and mountain bikers lining up to head up Hay Creek over decommissioned roads and trails, through what is supposed to be grizzly bear Security Core? Hardly!

It was clear from the November 2 meeting that the cart is way ahead of the horse where planning of the PNW Trail is concerned. Booster clubs are already urging people to use the Trail and bragging about its alleged economic benefits to local economies, yet there is hardly a mention of the negative effects of trail crowding and impacts to wildlife and backcountry solitude.

We note on the PNW Trail Association web site, however, that in 1980 a joint National Park Service and U.S. Forest Service study found the trail was "neither economically feasible nor desirable." So where is discussion of these findings in the Flathead's planning documents? It appears what we have here is another bad idea that found its way into legislation through a backdoor attachment to the 2009 Farm Bill.

We will let our enclosed letters speak for themselves but here ask that the Flathead NF clearly disclose the negative consequences of this Trail designation in its FEIS and disallow its location in the backcountry of the Forest.

Thank you for this opportunity to comment.

Sincerely,

Keith

Keith J. Hammer
Chair

Enclosures: November 1 and 2, 2016, letters to the Pacific Northwest National Scenic Trail Advisory Council

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

November 1, 2016

Pacific Northwest National Scenic Trail Advisory Council
Comments submitted as pdf via email to pnnstcomments@fs.fed.us

Dear Advisory Council members;

We have visited the web site and reviewed the map of the proposed Trail. We have grave concerns about the impacts this trail would have on fish, wildlife and other public resources in addition to the already substantial press of backcountry recreation resulting from increased human populations and new technologies like mountain bikes and e-bikes (electric-assist mountain bikes).

For the reasons that follow, we would urge you to shift the location of the Trail to front-country roads and bike paths, rather than add impacts to backcountry trails that should remain secure habitats for fish and wildlife and offer less frequently visited trail experiences for those seeking quiet backpacking and hiking. We will speak mainly about the Flathead National Forest, which we know best, but our comments can be applied to other public lands as well.

The Trail is inappropriately planned to run through high-value roadless lands and wildlife habitats in the Flathead's North Fork and Whitefish Range. In the upper end of Hay Creek, for example, the Trail would run along a portion of Road 376 that was decommissioned to provide Grizzly Bear Security Core habitat as required by Flathead Forest Plan Amendment 19. While the decommissioned road may be used as a non-motorized trail following consultation with Fish and Wildlife Service, if any trail receives more than 20 parties per week of non-motorized use it is considered to have impacts similar to a motorized trail and hence disqualifies habitat 500 meters on each side of the trail from being considered Security Core.

The same holds true where the Trail is proposed to run along Whitefish Divide Trail 26 north from Red Meadow Road. This trail is similarly located in Security Core habitat that will be secure no more if human use is boosted above 20 parties per week - something this Trail designation may very well do.

We have attached Amendment 19's Appendix D so you can read how roads and trails must be managed to provide Security Core habitat. We have also attached a 7/18/94 Interagency Grizzly Bear Committee report describing how non-motorized human access indeed has impacts to grizzly bears in terms of both displacement and actual mortality:

> As more people penetrate into grizzly bear habitat, more bears are killed or removed from the population as the number of bear/human conflicts rises. The correlation between increased visitor use and grizzly bear problems has been documented in many areas. Encounters are especially common when recreation occurs within or near prime grizzly bear habitat.

More recently and more particularly, Montana Dept. of Fish, Wildlife and Parks has found mountain biking poses a serious threat to both riders and bears:

> In recent years, technology has created mountain bikes that are able to be ridden on a wide variety of trails and terrain. This has caused an increase in negative encounters between mountain bikers and grizzly bears, often resulting in a very bad situation for the mountain bikers. While there is always the potential for conflicts between recreationists and grizzly bears, mountain bikers provide a unique situation. Mountain bikers typically travel quietly, at fast speeds, with their attention on the immediate trail in front of them, rarely able to scan the trail and surrounding area for bears. This type of activity in prime grizzly bear habitat is a recipe for disaster.

(Tim Manley letter attached). Indeed, an off-duty Flathead National Forest law enforcement officer was killed this summer when he ran into a grizzly bear while mountain biking at high speed. (http://flatheadbeacon.com/2016/07/02/search-bear-killed-man-near-glacier-park-winds/). We can expect the mountain bike community to press for access to the proposed Trail, other trails and even existing Wilderness areas, as it already has in numerous comments on the proposed revised Flathead Forest Plan. (https://cara.ecosystem-management.org/Public//ReadingRoom?Project=46286).

To view using Google Earth how the Flathead displays and buffers out Security Core habitat by 500 meters from any motorized road or trail OR any high-use (>20 parties per week) non-motorized trail, use the appropriate kml files provided at:
http://www.fs.usda.gov/detailfull/flathead/landmanagement/gis/?cid=fsm9_042517&width=full
View the Jewel Basin Hiking Area in the northern Swan Range, for example, to see how high-use hiking trails disqualify the heart of the Hiking Area from being considered Security Core. Then view the proposed route of the Trail to see the amount of Security Core habitat at stake there.

Also at issue here is the fact that 96% of Americans appreciate designated Wilderness and 70% of them want more of it (DEIS Vol. 2, page 56, Revised Flathead Forest Plan). Similarly, some 35,000 Americans recently told the Flathead National Forest they want all roadless lands recommended and managed as wilderness and want Amendment 19 grizzly bear management carried forward into its revised Forest Plan. (https://cara.ecosystem-management.org/Public//ReadingRoom?Project=46286).

In short, the Trail is proposed to run through Inventoried Roadless Areas, other areas the Flathead has identified as suitable for wilderness via its planning process, and areas it has said it may very well recommend as wilderness in various alternatives in its DEIS. Americans seek out wilderness for non-mechanized backcountry experiences and solitude. The Trail will detract from these wilderness attributes and experiences even if it doesn't allow mountain bikes - and all the worse if it does!

Listen to the 35,000 people who recently commented on the Flathead Forest Plan: help maintain the wilderness attributes of all roadless lands, help keep all uses that don't conform with The Wilderness Act out of those roadless lands, and help continue securing more grizzly bear habitat through Amendment 19.

Glacier National Park and the Flathead National Forest are already experiencing record numbers of visitors as outdoor recreation is promoted and businesses continue to develop more expedient ways for the public to visit their lands. This area frankly does not need the "booster club" of a Scenic Trail designation in the backcountry.

What America and this area do need are safer opportunities for people to enjoy the front-country on foot and bike through a better system of foot and bike trails that allow them to travel off-highway. We urge you to pursue this route for connecting Glacier Park to the West Coast, rather than promote a largely backcountry trail that will bring more and more people into conflicts with wildlife and one another's solitude.

Thank you for this opportunity to comment.

Sincerely,

Keith

Keith J. Hammer
Chair

Attachments:

Flathead Forest Plan Amendment 19's Appendix D
7/18/94 Interagency Grizzly Bear Committee report by Kate Kendall
7/11/13 MDFWP letter by Tim Manley

INTRODUCTION - This appendix has been added to the amended EA in response to public comments. The definitions of restricted and reclaimed roads have been modified to more clearly express the intent of Alternatives 3-Corrected, 4-Corrected, and 5. Implementation direction has been added regarding administrative use, closure devices, duration of restrictions, and calculation methods for open and total motorized access density in order to address public concerns.

APPENDIX D - FOREST PLAN APPENDIX TT DEFINITIONS AND IMPLEMENTATION DIRECTION FOR RESTRICTED ROADS, RECLAIMED ROADS, AND SECURITY CORE AREAS

RESTRICTED ROAD

Definition:
A road on which motorized vehicle use is restricted during the entire non-denning period. The road requires physical obstruction and motorized vehicle use in the non-denning period is legally restricted by order.

Administrative Use:
Administrative use includes contractors and permittees in addition to agency employees. Administrative activities should be planned so as to not preclude use by bears of important or limited habitats.

(a) Within security core areas, motorized administrative use may not occur on restricted roads during the non-denning period.

(b) Outside of security core areas, motorized administrative use is acceptable at low intensity levels, as defined by either: (1) existing cumulative effects analysis models (currently 1-6 vehicles/week for the NCDE WEST CEM); or (2) minor activities that do not exceed 30 days duration. If administrative use must exceed low intensity levels, reconsultation with USFWS will occur.

Closure Device:
A legal closure order and a physical obstruction must be in place for all restricted roads. The closure device should be of a type and design that is capable of precluding use by the type/class of motorized vehicle expected to be using the site or area. If physical control of motorized vehicles is not possible and rates of use are unacceptable, law enforcement activities should be utilized to enhance success.

(a) Within security core areas, the obstruction must be permanent and includes tank traps, large boulders, and dense vegetation. Although restricted roads are acceptable within security core areas, reclamation is the preferred treatment method.

(b) Outside of security core areas, gates and other more portable closure devices are acceptable.

Duration of Restriction:

(a) Within security core areas, the restriction must be in place for a minimum of 10 years. Due to this time frame and the lack of administrative motorized access for inspection and maintenance, strong consideration should be given to treating road drainage similar to that used for reclaimed roads. If road drainage is not reworked, a monitoring plan must be developed and its implementation assured.

(b) Outside of security core areas, restrictions for an individual road must be in place for a minimum of one year, but may be changed between years so long as BMU Subunit objectives are maintained.

Use of Restricted Roads in Calculations:
All restricted roads will be included in calculating total motorized access route density. Seasonally restricted roads, that are open during the non-denning period, will be considered open for the purpose of calculating open access density.

RECLAIMED ROAD

Definition:
A reclaimed road has been treated in such a manner so as to no longer function as a road or trail and has a legal closure order until reclamation treatment is effective. This can be accomplished through one or a combination of treatments including: recontouring to original slope, placement of natural debris, or revegetation with shrubs or trees.

Administrative Use:
Administrative use of reclaimed roads may not occur.

Closure Device:
A legal closure order should be utilized until the reclamation treatment is effective. Naturally occurring local materials and native plant species should be utilized in the creation of barriers and revegetation of roadways. Minimum treatment requirements include:

(a) The entire road will receive treatment such that maintenance or entries to maintain "road drainage" is not needed. This will require removal of culverts or other water passage structures that are aligned with stream channels. In most cases this will also require that road related sediment sources be repaired and the road reworked to eliminate ditch water flow without the aid of cross drain culverts.

(b) The first portion of the road (typically 200 to 600 feet) will be treated in such a manner so as to preclude its use as a motorized or non-motorized travel way. This will include: (1) making the road junction area unattractive as a travelway, and (2) treating the remainder of the first portion to make awareness of the road improbable and preclude motorized or non-motorized use.

(c) Treat the road, other than the first portion, in a way that will discourage its use as a motorized or non-motorized travelway. Treatment should include: sporadic placement of natural debris over most of the road length, and surface treatment to encourage natural, planted or seeded revegetation.

(d) It is the intent in many cases that the reclaimed road no longer function as a road again. Recontouring should be considered where resource protection and economics are favorable.

(e) The acceptable lag time for the treatment to become effective and the expected persistence of people to continue to use a road should dictate the amount and type of initial, and perhaps follow-up, treatment required. Greater initial revegetation and barrier work will be required if the expectation is to meet reclaimed road criteria in one year as opposed to ten years, or if heavy ORV pressure is expected on the barrier structures. These factors should be described and considered in the design of treatments for each site.

Use of Reclaimed Roads in Calculations:
Reclaimed roads that fully satisfy the definition of a reclaimed road will not be included in calculations of open motorized access density, total motorized access density, or security core area. Roads that have been treated, but that do not yet fully satisfy the definition of a reclaimed road will be included in calculations for total motorized access route density. These roads will not be included in calculations for open motorized access route density, or security core area if use is low-intensity and non-motorized.

Conversion of Reclaimed Roads to Trails:
Roads scheduled for reclamation to meet total motorized access density objectives may be converted to trails if necessary to maintain access to the existing trail system. Other actions to convert a reclaimed road to a trail must be made in consultation with the U.S. Fish and Wildlife Service.

SECURITY CORE AREA

Definition:
An area that is at least 0.3 miles from open roads and high-intensity, non-motorized trails. Restricted roads may occur within the security core area, provided they have substantial immobile closure devices and legal closure to motorized use during the non-denning period. Legal closure orders for individual roads or trails, or an area closure, may be utilized. Areas must be at least 2500 acres in size, and once established and effective, remain in place for at least 10 years.

Restricted Roads in Security Core Areas:
Restricted roads may occur within security core areas, but they may not receive motorized use during the non-denning period. The number of restricted roads in security core areas should be minimized, with reclamation of roads the preferred treatment. Restriction of roads in security core areas requires adequate permanent physical barriers and legal closure order(s). Restricted roads within security core areas may not receive high levels of non-motorized use. High-intensity non-motorized use is defined as receiving 20 or greater parties per week, based upon the unified Cumulative Effects Model (April 1990) values.

Duration of Security Core Areas:
A security core area once established and effective must remain in place and operational for a minimum of 10 years. The 10 year period begins at the time all criteria for the security core area are met. Lag time required for management actions to become effective (ie,

revegetation or road reclamation) will not be considered a part of the 10 year period, but will be in addition to the 10 year period.

Size and Proximity of Security Core Areas:
The minimum size for a security core area is 2500 acres. It is desirable to have large, contiguous blocks of security core area within each BMU Subunit. If a block straddles a BMU Subunit boundary, consider the whole security core area when determining size, but only the amount within an individual Subunit when determining percent quantities.

Composition of Security Core Area:
Security core area within a BMU Subunit should contain seasonal habitat approximately proportional to its availability in the BMU Subunit. Seasonal availability (snow cover) of spring habitat should be considered in addition to habitat value.

Vegetation Management Within Security Core Areas:
Vegetation management may occur within security core areas so long as the objective and criteria for security core area continues to be met. Access use levels must be met during the non-denning period, and requires that many planned activities, and all motorized activities, occur during the denning period. Exceptions to established criteria require reconsultation with the U.S. Fish and Wildlife Service.

REPORTING REQUIREMENTS:

A monitoring report outlining activities and progress towards objectives for open motorized access, total motorized access, and security core areas will be developed annually, with a copy submitted to the USFWS in December of each year.

United States Department of the Interior

NATIONAL BIOLOGICAL SURVEY
National Ecology Research Center

Glacier Field Station

July 18, 1994

Memorandum

To: IGBC members

From: Chair, Research Subcommittee K.C. Kendall

Subject: Effects of trail use on grizzly bear habitat use

At the March 20, 1994 IGBC meeting in Anchorage, Alaska, Tom Puchlerz gave a presentation on the task group report on access management. The group asked for guidance on whether to just address roads or expand coverage to include trails. The meeting participants concluded that there was insufficient information on the effects of trail use on grizzly bear habitat utilization on which to base trail access management. Through Tom, you have asked the Research Subcommittee to prepare a problem description with recommendations on how to proceed. Attached is our problem analysis on the effects of non-motorized human activity on grizzly bears.

EFFECTS OF NON-MOTORIZED HUMAN ACTIVITY ON GRIZZLY BEARS

Problem statement and analysis
IGBC Research Subcommittee
July 18, 1994

Background:

Research conducted on the impacts of highways, roads, and industrial and recreational development on grizzly bear habitat use patterns and mortality levels has provided a basis for road access management to protect grizzly bear populations. Although less information is available on the effects of non-motorized recreation, it has been clearly demonstrated that even low levels of human use can disturb and displace grizzly bears. On the Rocky Mountain Front, bears tended to use areas near low and moderate use trails more than areas near heavily used trails. Grizzly bears in the South Fork of the Flathead avoid trails and backcountry campsites. Gunther found that the number of bears sighted per day was inversely related to the number of people using an area and that fewer bears were observed near campsites when they were occupied by people than when vacant. Bear fishing activity on Yellowstone Lake spawning streams was at its lowest levels when angler numbers peaked in years of highest spawning runs. After those areas were closed to fishermen, bear use rose to the highest level in seven years of monitoring.

The predictability and intensity of disturbance influence the degree and duration of the displacement. In an experimental study, a hiker approaching grizzly bears in the backcountry or erecting a camp nearby, caused immediate and rapid displacement of bears. These bears moved further and more often and used lower quality habitat than undisturbed bears for at least two days after the disruption. Haroldson and Mattson predicted that Yellowstone bears were likely to be disturbed more than was indicated by this study because the backcountry received more sustained use than was simulated by the tests. Disturbance response is likely to be greater for non-habituated bears and those in open or productive habitats. People hiking more than 500m from primary and secondary roads elicited strong flight responses from bears while people walking on these roads produced a more moderate response. In evaluating displacement effects of human recreation development in Yellowstone, Mattson found that disruption of bear activity extended much further in the backcountry than from roads, presumedly, because of the greater human densities and persistently high levels of human activity at night around developments. Other factors contributing to bear response to recreational activity are the bear's dominance status, physiological state, and foraging strategy.

Grizzly bear survival is compromised by recreational activity, particularly where people are allowed to carry firearms. In Alaska, 31% of all non-sport grizzly bear deaths were caused by hunters, most of whom claimed defense of life or

property. Sport fishermen and hikers were responsible for 8% of the non-hunting grizzly bear deaths. In Alberta from 1972-84, excluding legal hunter take, grizzly bear mortalities were tallied as follows: 60% by hunters in self-defense, 30% by hunters mistaking a grizzly bear for a black bear, and 10% were problem bears killed in recreation or tourist camps. Hunter activities are also a source of grizzly bear mortality in Montana and Wyoming.

As more people penetrate into grizzly bear habitat, more bears are killed or removed from the population as the number of bear/human conflicts rises. The correlation between increased visitor use and grizzly bear problems has been documented in many areas. Encounters are especially common when recreation occurs within or near prime bear habitat. Because superimposing high recreational activity on preferred grizzly bear habitat results in direct mortality and reduced habitat effectiveness, concern about expanding human use in productive bear habitat has been expressed for many locales.

Non-motorized use restrictions have been deployed in various locations to protect grizzly bears from human disturbance. Seasonal closure of various areas instituted in Glacier and Yellowstone National Parks in the early 1980's, protect bears frequenting favored feeding sites. The Salish-Kootenai Tribe closed McDonald Peak to climbers in the late summer to ensure that human use did not preclude grizzly bears from feeding on army cutworm moths. It is clear that bears use the areas closed to people but the effect of the closures has not been quantified.

Interpretation of the impact of human disturbance on grizzly bear activity patterns is hampered by the lack of quantitative information on human use levels. National parks record the number of people registering for backcountry camping permits and thus have tracked backcountry camper levels. Backcountry day use on 60 trails in Glacier NP totaled approximately 160,000 hikers June-August in 1988. Backcountry trail use was categorized in low to high use levels from data collected on 74 trails in Yellowstone NP in 1992. But with no periodic backcountry human use level monitoring, there is no information on the intensity, type, or temporal-geographic distribution of use trends. Comprehensive backcountry use information is not available for any of the areas where intensive grizzly bear research has been conducted.

Untapped Data

We believe additional insight on the effects of backcountry use could be extracted from existing data sets. Specifically, we recommend the following analyses:

1) Describe grizzly bear mortality in the NCDE and GYE in relation to all man-made landscape features including trails and campsites.

2) In areas where grizzly bears have been studied intensively with radio telemetry,

analyze data for evidence of trail/camp avoidance, as has been done for roads. Potential study areas include South Fork, Flathead (Mace), Greater Yellowstone (Knight), Blackfeet (Carney), Cabinet/Yaak (Kaseworm), and Rocky Mountain Front (Aune).

3) For the 15 areas in Yellowstone NP where human use has been restricted since the mid-1980's, compare pre- and post-closure bear habitat use.

How to Proceed

We recommend the above analyses be completed and evaluated before new research is initiated. At the IGBC's request, the Research Subcommittee could provide guidance on analytical approach and appropriate collaborators and provide technical review of the products. Decisions to be made include:

1) Who will take the lead for each topic?
2) Can these analyses be accomplished by existing staff and funds? If not, how will it be funded?

Even if new bear research is not immediately initiated, the Research Subcommittee sees a need for more data on backcountry human use levels. At a minimum, we recommend emphasis be placed on monitoring trends in trail and campsite use. This is seen as particularly important in the NCDE and GYE, where recreational use is relatively high and is increasing.

A decision to conduct further research on the effects of recreation on grizzly bears should be made in light of the above and the amount of data managers feel they need to support trail access management. For road access management issues, managers are asking for mortality risk associated with different categories and densities of roads. Such research is very difficult and intensive. In our opinion, it research to establish a link between trail use and grizzly bear mortality would be even more difficult than that with roads and would involve a large commitment of resources. Because of the host of confounding factors, even further refinement of our knowledge of the effects of recreation on habitat use will involve intensive research spanning 5-10 years. We estimate that such a study would cost $50-100K/yr, even if conducted in conjunction with an existing study which had collared bears.

DATE: July 11, 2013

TO: Chip Weber, Flathead National Forest Supervisor

FROM: Tim Manley, Grizzly Bear Management Specialist R-1

SUBJECT: Mountain Biking in the Whitefish Range

Hi Chip,

As Grizzly Bear Management Specialist for Montana Fish, Wildlife & Parks, I wanted to write you this letter regarding mountain biking in portions of the Whitefish Range.

It was recently brought to my attention there is an interest by mountain bikers to have current and future access to trails throughout the Whitefish Range. While I fully support and encourage outdoor recreation, including mountain biking, I am concerned about the use of some of the trails in the Whitefish Range. This concern is with respect to potential conflicts between mountain bikers and grizzly bears within certain areas, especially those areas from Red Meadow Creek north to the Canadian border. My concern lies primarily with mountain bikers having serious negative encounters with grizzly bears which could result in serious bodily injury or even death to the mountain bikers.

In recent years, technology has created mountain bikes that are able to be ridden on a wide variety of trails and terrain. This has caused an increase in negative encounters between mountain bikers and grizzly bears, often resulting in a very bad situation for the mountain bikers. While there is always the potential for conflicts between recreationists and grizzly bears, mountain bikers provide a unique situation. Mountain bikers typically travel quietly, at fast speeds, with their attention on the immediate trail in front of them, rarely able to scan the trail and surrounding area for bears. This type of activity in prime grizzly bear habitat is a recipe for disaster. There have been a few cases in Canada and Alaska where mountain bikers have ran into grizzly bears and the bikers were seriously mauled.

The Whitefish Range north of Red Meadow contains some of the best grizzly bear habitat on the Flathead National Forest, especially during the summer months when huckleberries are ripe. That is also the time when the snow has melted from the high elevation trails and presents the most opportunity for conflict between mountain bikers and grizzly bears.

I have discussed the use of mountain bikes with other grizzly bear biologists in Alaska, Alberta, British Columbia, Idaho, Montana, and Wyoming. None of the biologists I spoke with felt that mountain biking in areas with a high number of grizzly bears is a good idea.

I'm sure there are areas that are suitable for mountain bikes within the Whitefish Range, but I think areas which are known to be prime grizzly bear habitat should be avoided. The lower density of grizzly bears in the southern portion of the Whitefish Range and the adjacent Tally Lake District may provide a lot of options for mountain bikers. The area from Red Meadow north would not be a good place for mountain biking on narrow, winding, mountain trails.

Please let me know if you have any questions.

Sincerely,

Tim Manley
Grizzly Bear Management Specialist
Montana Fish, Wildlife & Parks
490 N. Meridian
Kalispell, MT 59901
406-250-1265
tmanley@mt.gov

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

November 2, 2016

Pacific Northwest National Scenic Trail Advisory Council
Comments submitted as pdf via email to pnnstcomments@fs.fed.us

Dear Advisory Council members;

This letter and attached maps are intended to supplement our letter to you of yesterday. We wanted to provide for your convenience the two Google Earth views we asked that you engage online per the following paragraph:

"To view using Google Earth how the Flathead displays and buffers out Security Core habitat by 500 meters from any motorized road or trail OR any high-use (>20 parties per week) non-motorized trail, use the appropriate kml files provided at:
http://www.fs.usda.gov/detailfull/flathead/landmanagement/gis/?cid=fsm9_042517&width=full
View the Jewel Basin Hiking Area in the northern Swan Range, for example, to see how high-use hiking trails disqualify the heart of the Hiking Area from being considered Security Core. Then view the proposed route of the Trail to see the amount of Security Core habitat at stake there."

The Google Earth image on the following page shows Grizzly Bear Security Core (beige color) and how high-use non-motorized trails (blue lines) in Jewel Basin (just left of center) negate that wildlife security while less-used trails do not.

The next Google Earth image shows the area where the PNNS Trail is proposed to cross the Whitefish Range via Hay Creek and the Whitefish Divide Trail. Existing Security Core is again shown in beige color. As the open Hay Creek Road (yellow line) enters from the mid-right edge, one can see how it negates Security Core for 500 meters on each side. Travelling west/left, where the Hay Creek Road has been decommissioned (green line), human impacts are considered reduced enough to not negate Security Core (provided use is kept below 20 parties per week).

Where the Trail route would cross the open Red Meadow Road at the center of the image (yellow line) one can see the Whitefish Divide Trail 26 continuing to the northwest through Security Core along the border between the Flathead and Kootenai National Forests. It is important to note that Security Core does not simply end 500 meters west of the Whitefish Divide Trail/Forest boundary - it only looks that way because the Flathead's mapping file for Security Core does not continue into the Kootenai.

What we wanted to demonstrate here is the fact that there are plenty of motorized roads and trails, and even a number of high-use non-motorized trails, which negate and fragment Security Core on the Flathead National Forest and in its Whitefish Range. We urge you to anticipate that Scenic Trail designation would very likely boost human use levels of the Trail to where it no longer provides Security Core and instead fragments it.

Security Core provides secure habitat not only for grizzly bear but also serves as a proxy for secure habitat for lynx, wolverine and a host of species sensitive to human disturbance. This makes it paramount that the Trail not fragment or intrude upon Security Core.

So we again urge you to locate the Trail in the front-country along road and trail corridors that already compromise wildlife security. It should not be located where it compromises wildlife security and the ability of people to seek solitude in the backcountry.

Again, thank you for this opportunity to comment.

Sincerely,

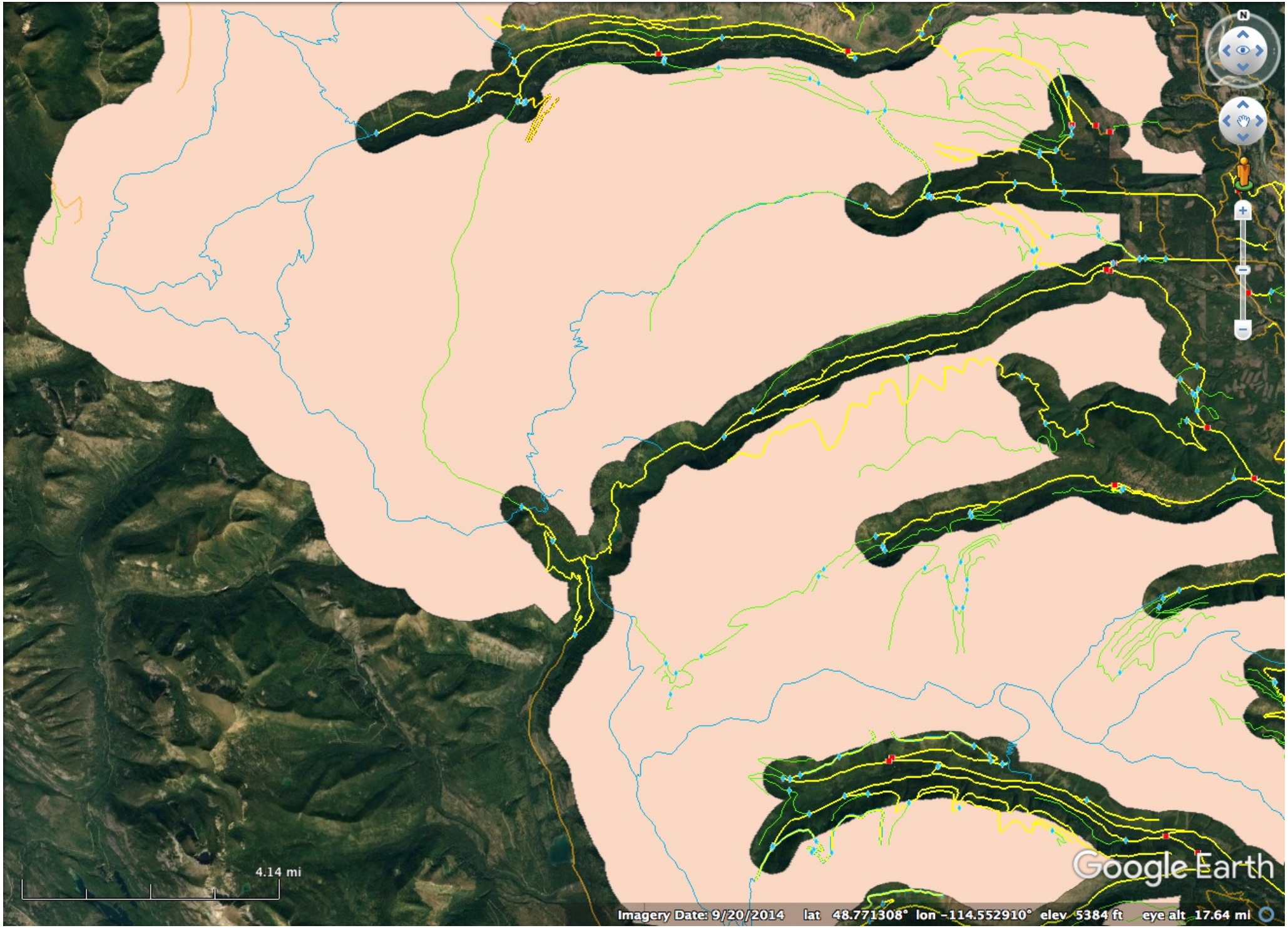
Keith

Keith J. Hammer
Chair

Attachments:

Two Google Earth images.

N
9804 ft
1991
Google Earth
Imagery Date: 7/26/2014 lat 48.156719° lon -113.915290° elev 6403 ft eye alt 45182 ft


4.14 mi
Google Earth
Imagery Date: 9/20/2014 lat 48.771308° lon -114.552910° elev 5384 ft eye alt 17.64 mi