

Swan View Coalition

Nature and Human Nature on the Same Path



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Wilderness Evaluation
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Delivered via email as a PDF to flatheadplanrevision@fs.fed.us

Dear Supervisor Weber and folks at FNF;

Please accept these comments on the Flathead Wilderness Inventory and Evaluation into the public record. These comments will be divided into several parts: 1) remaining issues with the Wilderness Inventory, 2) general comments on the evaluation criteria/measures, and 3) our comments on areas that we consider suitable for designation as Wilderness. We incorporate by reference comments submitted by Friends of the Wild Swan.

1. Wilderness Inventory

Firstly, let us say we appreciate most of the changes made from the draft to final Wilderness Inventory and many of the Flathead's responses to our concerns. We appreciate that the Flathead took a look at how wildfire can ameliorate the visual appearance of logging units and that it has also included in the final inventory many roadless lands we indicated had been omitted from the draft. However, there remain areas of serious concern that we will discuss here, before moving on to the issues of Evaluation. We ask that these shortcomings be corrected before you finish conducting your Evaluation.

1.a We object in the strongest of terms to breaking the former BMSSHH area into 4 separate areas as though they are no longer contiguous, when they in fact are. We similarly object to shifting the contiguous Middle Fork Flathead portion of the BMSSHH, without footnote or explanation, to make it appear contiguous with the Essex area when it in fact is not (though it is via the existing Great Bear Wilderness).

Whether or not roadless and potential wilderness suitable lands are contiguous to one another and/or to existing Wilderness is a very important issue, both in terms of wildlife connectivity and management. The fact that the BMSSHH is the largest such area in the Wilderness Inventory should be honored and highlighted, not disregarded.

We agree that the term and acronym BMSSHH is unwieldy and that better descriptors are needed. But we think the names of these areas should be derived from their adjacent Wilderness areas and the mountain ranges that harbor the core of these areas, not from a 23,000-acre reservoir that divides them. A naming system is needed that clearly denotes which potentially suitable wilderness areas are adjacent to one another and/or to existing Wilderness.

We suggest that the BMSSHH be renamed the Bob Marshall Great Bear to reflect the existing Wilderness areas to which they are contiguous. The BMGB could then be subdivided in a way that makes it clear that the subunits are parts of a larger, contiguous area. We suggest that these subunits be named the BMGB Swan and the BMGB Flathead (with the subdivision occurring at the South Fork Flathead River).

Similar consideration should be given to the Essex, Sky West, and Puzzle areas, which should be attached to the prefix GB to indicate they are contiguous with the Great Bear Wilderness. And so should all the Swan Valley areas contiguous to the Mission Mountain Wilderness be preceded by the prefix MM.

The above naming system will much better identify those areas adjacent to existing wilderness and better contrast them from the Crane Porcupine, Lebeau, Canyon, Demers, Coal, Whale, and Tuchuck areas that are not.

This is far more than nitpicking over names. It is essential that these areas be described in terms that make it clear they are contiguous with one another as well as with existing Wilderness areas. To describe them otherwise will bias the entire evaluation process, in part by making them appear separate from one another and with little in common. As will be discussed below, those areas that are contiguous with existing Wilderness and other potentially suitable wilderness areas should be given the highest rankings in terms of their contributions to wildlife connectivity and manageability as wilderness.

1.b We appreciate that the logging units on the east side of Sullivan Creek were included in the wilderness inventory due to the effects of wildfire. However, the logging units on the west side of Sullivan Creek should also be included in the wilderness inventory because they are no longer “substantially noticeable.”

We visited the Quintonkin and Sullivan Creek areas on July 16 and 17, 2014, to photograph old logging units from the mid- and fore-ground, as defined in the Inventory Process Paper. We’ve attached as Exhibit A a map on which we’ve assigned numbers to the logging units in the Sullivan Creek watershed and several photos of those units still inappropriately omitted from the final Wilderness Inventory.

Exhibit A-1 is the map key, with the logging units provided a distinct prefix number followed by the unit’s harvest date. We included a few logging units older than 40 years for comparison purposes and simply ascribed them an unknown harvest date of -0000.

Exhibit A-2 is a photo taken from Quintonkin Road 381 some quarter-mile away. It shows that logging Unit 2 (>40 years old, photo center and right) with its old jammer roads is more noticeable than the 2005 Unit 4 pictured on the left-most shoulder of the

ridge. Nor are stumps visible in Unit 4 from this foreground view, yet it is still excluded from the Wilderness Inventory.

The 1975 Unit 1 is so indistinguishable from surrounding mostly-mature forest when viewed from Road 2816 and elsewhere that it was not possible to get a photo contrasting it with surrounding forest. Nor is Unit 1 distinguishable using Google Earth. It should be included in the Wilderness Inventory.

Exhibit A-3 is a photo taken facing uphill from Road 2816, showing that tree regeneration and brush screen stumps from view in the adjacent 2005 Unit 4, which should be included in the Wilderness Inventory.

Exhibit A-4 is a photo taken from slightly less than one-half mile away on Sullivan Creek Road 547, of Units 1, 3 and 4. It shows that stumps are not visible from this still-foreground view. It also shows that the unlogged doughnut hole surrounded by Units 3 and 4 is not distinguishable from the logged units. All three of these units should be included in the Wilderness Inventory.

Exhibit A-5 is a photo taken facing downhill from Road 2816, showing that tree regeneration and brush screen stumps from view in the adjacent 1976 Unit 3, which should be included in the Wilderness Inventory. Visible less than one-half mile across Sullivan Creek is the junction of Roads 547 and 975, along with parts of <40 year old logging Units 19-22, which are now appropriately included in the final Wilderness Inventory.

Exhibit A-6 is a photo of Unit 5 taken from Road 2816. It shows that it is difficult to tell burned stumps from burned stobs and snags from this foreground distance. This unit should be included in the Wilderness Inventory.

Exhibit A-7 is a photo of the mid-slope 1976 Unit 6 and the 1982 Unit 8 near the crest. No stumps are visible from this some half-mile viewpoint, the units are hardly discernable from surrounding areas, and they are not “substantially noticeable.” They should be included in the Wilderness Inventory.

Exhibit A-8 is a photo of the 2005 Unit 9 taken from Sullivan Creek Road 547 less than one-half mile away. Due to regeneration, burned stobs but not burned stumps are visible. Nor is Unit 9 discernable from the unlogged area to its left/south (Unit 9 does not include the southern portion of the Ball-Branch face, visible at left). The discernable line near the top of the face is the boundary of the 2003 Ball Creek wildfire. Unit 9 should be included in the Wilderness Inventory.

Exhibit A-9 is a telephoto shot from the same location as Exhibit A-8, showing that stumps are indeed hidden from view by tree regeneration. Unit 9 should be included in the Wilderness Inventory.

Exhibit A-10 is a photo of the 1976 Unit 10 barely visible some half-mile away in the “crotch” of Branch Creek canyon. In this view, as when using Google Earth, jammer and skid roads in Unit 10 are less visible than those in the older logging unit immediately uphill. Unit 10 is not substantially noticeable and should be included in

the Wilderness Inventory. It most certainly deserves the “pass” or exception given to <40 year old logging units in the upper fork of Bunker Creek and Middle Fork Creek, as well as in the Tuchuck area along the old Frozen Lake Road 114A.

1.c The final Wilderness Inventory, like the draft, fails to include the entirely roadless and unlogged lands on Battery Mountain, which are contiguous with the larger Swan Crest (BMGB Swan) Inventory area. This is a failure to maintain the connection via the qualifying area/“isthmus” between a 1975 logging unit on the Wheeler Creek side and a 1976 logging unit on the Quintonkin Creek side - though similarly narrow areas are included in the Inventory in Coal and Canyon areas - and especially in the Crane Porcupine area, which has an even narrower “isthmus” connector in a more heavily roaded and logged area. This Battery Mountain omission also fails to recognize that the constricting logging units on Battery Mountain, accessed by already decommissioned roads, will no longer be <40 years old by the time the Forest Plan is finally revised.

1.d The final Wilderness Inventory fails to include the lower Bunker Creek watershed from its confluence with Middle Fork Creek down to the current berm closure on Bunker Creek Road 549. We visited this area on August 27-28, 2014, and find the effects of the Chipmunk Fire, time and other natural features render past logging substantially unnoticeable. In fact, it is nearly impossible to distinguish the logging units <40 years old from older units or to find any of the old spur roads in the area. Attached as Exhibit B are a few photos that raise the issue of whether human-caused changes in vegetation are substantially more noticeable than natural changes.

Exhibit B-1 is a photo looking down Bunker Creek through old logging units that show burned stobs but not burned stumps, toward the <40 year old logging units near Razzle Creek. Are the edges of those logging units any more noticeable than the edges of the natural avalanche chutes? Similarly, are they substantially more noticeable than the edges of old wildfire burns like those shown in Exhibit B-2? And, finally, Exhibit B-3 shows how the Chipmunk Fire in 2000 has helped obscure the difference between logged and unlogged areas.

1.e We have lingering concerns with the integrity of the Inventory process. While we support the inclusion of numerous <40 year old logging units in the Wilderness Inventory, we remain concerned that a clear and transparent rationale is not being provided for why some unburned <40 year old logging units (like those in Bunker Creek, Middle Fork Creek and the Tuchuk area mentioned above) are being included in the Wilderness Inventory and others are not. Simply stating that some areas were “identified during the assessment phase to be included in the inventory” does not explain how and why they were so identified and other areas were not. This instead makes it look like the assessment phase was used to arbitrarily front-load the process and that the subsequent inventory and evaluation processes are of little consequence.

Similarly, the reaffirmation to exclude all ML-2 roads from the Wilderness Inventory does not square with the Forest’s lack of road maintenance funding when it claims all these roads are likely to get some form of “mechanical treatment” during the life of the Revised Forest Plan. This instead gives the impression the Flathead simply doesn’t want to make the effort to truly plan ahead how it intends to manage the Forest.

2. Evaluation Measures

We are disappointed to see that many of the Evaluation Measures appear designed to demote an area's values and qualities as wilderness-suitable. For example measures of invasive plants, fish and animals would appear poised to counter or demote the composition of native species.

Similarly, measuring what percent of an area is affected by decommissioned or ML-1 roads appears poised to counter the very wilderness suitability criteria that requires they be included in the Inventory in the first place. Why conduct a Wilderness Suitability Inventory and then turn around and apply the same measures/criteria to disqualify areas from the resulting recommendations for wilderness during the Evaluation process?

Most importantly, the Evaluation should clearly distinguish between long-lasting human impacts (like roads and logging) that take some time to heal and transitory impacts (like intrusions by motorcycles, snowmobiles and mountain bikes) that can be corrected and eliminated by a stroke of the Forest Service's pen. What is most important here is the land's underlying wilderness characteristics and values and that is what should be emphasized during Evaluation, not human impacts that can be corrected either by nature over time or by the Forest Service via prompt written orders. After all, it is the overriding thrust of the Wilderness Act to protect public lands from "an increasing population, accompanied by expanding settlement and growing mechanization" - and in this the Forest Service should be a true collaborator rather than a detractor.

It is easy to sit in an armchair or desk chair and rattle off all the reasons an area should be considered unsuitable and not recommended for wilderness. But get out there and hike some of the old decommissioned and ML-1 roads and it becomes readily apparent that many of these areas remain "affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." Exhibit C-1, for example, show how the ML-1 Middle Fork Road 2820 up Bunker Creek is largely overgrown. Exhibit C-2 shows how the upper fork of Bunker Creek Road 549 has been decommissioned and converted to serve as Trail 101 as it approaches Thunderbolt Mountain. The handsome and rugged nature of the surrounding lands in most cases renders the imprint of man insignificant and transitory.

The Flathead should recognize that wildland management is far less expensive than the more intensive construction and maintenance of roads and logging programs. Indeed, the FEIS for the 1985 Flathead Forest Plan shows that it requires a far smaller budget to manage for more wilderness and fewer roads (see pages II-66 thru II-68 and pages II-163 and II-164).

We ask that the Evaluation utilize several measures that would highlight an area's wilderness and wildlife values and its overall contribution to better connect and more easily manage wilderness areas:

2.a Was the area included in the 1988 Wilderness Bill that passed both houses of Congress (vetoed by President Reagan for political reasons, not substantive concerns over wilderness suitability)? This speaks highly of the included areas' wilderness suitability.

2.b Was the area included in the subsequent 1994 Wilderness Bill crafted by Representative Pat Williams which, among other things, purposefully re-connected the Swan Crest wilderness north of Jewel Basin where an illegal snowmobile trail had been cut through Krause Basin and resulted in the death's of five snowmobilers by snow avalanche? This Bill also included the Lebeau area among other improvements to better represent various wildlands and ecotypes as Wilderness. This also speaks highly of the included areas' wilderness suitability.

2.c Is the area included as Wilderness in the Northern Rockies Ecosystem Protection Act, a bill introduced into each successive Congress and subject to two formal hearings thus far? (As a general rule of thumb, NREPA protects all Inventoried Roadless Areas as Wilderness).

2.d Is the area recommended for wilderness by Dr. John Weaver in either his "Conservation Value of Roadless Areas for Vulnerable Fish and Wildlife Species in the Crown of the Continent Ecosystem, Montana" or his "Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana?" His recommendations speak to the conservation value of these areas to bull trout, westslope cutthroat trout, grizzly bear, wolverine, and mountain goat - though conservation values would likely be higher if the habitat requirements of lynx and other species were also included. We've included Weaver's Flathead National Forest recommendations map as Exhibit D-1.

2.e Does the area contribute to the Squires et al 2013 finding that "Maintaining the integrity of these connectivity corridors is of primary importance to lynx conservation in the Northern Rockies?" (Combining resource selection and movement behavior to predict corridors for Canada lynx at their southern range periphery; Biological Conservation; 157 (2013) 187-195). We've adapted a graphic from the above paper and include it as Exhibit D-2. It shows that, where Weaver's five-species rankings and subsequent recommendations for the northernmost Swan Range and southernmost Whitefish Range suffer, these very same areas are instead absolutely critical to maintaining adequate summertime and wintertime lynx movement corridors. (The wintertime corridor graphics in Squires et al 2013 show them to be equally as important as summertime).

2.f Does the area provide persistent spring snow habitat that the scientific literature has shown is absolutely essential to wolverine survival? These areas should be made off-limits to snowmobiles and recommended for wilderness. (See for example page 185 of Part 1 Assessment of the Flathead National Forest; April 2014; included here as Exhibit D-3).

2.g Does the area include lynx "critical habitat?"

2.h Does the area include watersheds contributing to bull trout "critical habitat?"

2.i Does the area include old-growth forest habitats, which are in most places below the historic range of variability due to logging - in spite of their essential contribution as habitat to a wide range of wildlife species?

2.j Is the area within the Wildland Recovery Areas identified in the Citizen reVision of the Flathead Forest Plan? (Friends of the Wild Swan and Swan View Coalition; March 2014; summary map included here as Exhibit D-4). These Wildland Recovery Areas were delineated in a manner that would simultaneously protect and reconnect wildlife movement corridors, make wildland and wilderness areas more manageable in size and shape, and reduce the Forest's road system to a more environmentally and fiscally sustainable level. The Citizen reVision currently enjoys endorsements by some 100 people, groups and businesses.

2.k Is the area

2.l Is the area recommended by the Forest Service for Wilderness in either its 1986 Forest Plan or its 2006 Draft Revised Forest Plan? This of course would indicate the agency has considered these areas worthy of Wilderness management and designation in prior evaluations.

3. Wilderness Characteristics and Values

Our evaluation of wilderness characteristics and values will take two forms. Both will utilize the Wilderness Inventory Area names suggested at the outset of this letter, but will include the Flathead's Inventory Area names when possible to help in the translation and groupings.

Our evaluation of the Swan Range from Swan Peak to Columbia Mountain (Hungry Horse Reservoir West and Bob North) will be presented via brief descriptions accompanied by photos included as Exhibit E. Our evaluation of other areas will be more brief and largely poised in terms of the Evaluation criteria we set forth above.

3.a Bob Marshall Great Bear

This is the largest contiguous Wilderness Inventory Area on the Flathead and is also contiguous with the Bob Marshall and Great Bear Wilderness Areas. For this reason alone the area should receive the highest of points for having the least fragmentation from roads open to motor vehicles, the greatest connectivity for wildlife habitat, and its practicality for management as wilderness.

The BMGB Swan lies west of the South Fork Flathead River and the contiguous BMGB Flathead lies east of the South Fork. These areas are identified in the final Inventory as Swan Face South, Bob North, Hungry Horse Reservoir East and West, and part of Essex.

The Citizen reVision recommends all of this area for Wilderness and Wildland Recovery Areas and NREPA would designate all IRAs as Wilderness. Weaver

recommends either Wilderness or Backcountry Conservation for virtually this entire area, having shifted his wilderness priorities somewhat toward the northern Swan Range and away from the areas east of Hungry Horse Reservoir in the transition from his Crown report to his more specific Flathead National Forest report. As noted earlier, the northern Swan Range and the more southern Swan Front are both essential as a primary north-south movement corridor for Canada lynx per Squires et al 2013. The 1988 and 1994 Wilderness Bills included virtually all of the Swan Front and Swan Crest IRA's - and included both forks of Bunker Creek and the Limestone Cave area as Wilderness.

We also note that the Bob North portion of the BMGB is especially critical to wildlife habitat connectivity as it provides some of the lowest elevation habitats in the Spotted Bear area. It's management and recommendation as Wilderness would greatly narrow the gap for wildlife needing to cross the South Fork Flathead River area south of Hungry Horse Reservoir.

More specifically regarding the Swan Range from Swan Peak to Columbia Mountain, as illustrated in Exhibit E:

Exhibit E-1 is an evening photo of Swan Peak taken from Napa Ridge, indicating rugged country of splendor does not end at a Wilderness boundary nor does one's appreciation of it.

Indeed, Exhibit E-2 shows the terrain remains remote, rugged and scenic as Alpine Trail #7 leads north past Inspiration Pass toward Warrior Mountain. The wild headwaters of Middle Fork Creek can be seen in the left portion of the photo.

Exhibit E-3, though seen through a hazy early morning sun, shows that Alcove Mountain and the headwaters of Middle Fork Creek remain wild, rugged and remote.

Exhibit E-4 looks north from the shoulder of Warrior Mountain along the Swan Crest and Alpine Trail #7 past Gildart and Thunderbolt Mountains. During a 4-day backpack trip from Napa Ridge to Trinkus Lake August 17 - 20, 2014, we saw seven mountain goats on Warrior Mountain and four on Thunderbolt Mountain. Friends reported seeing a pair of wolverine on Warrior Mountain earlier this summer. We saw no mountain bikes or motorcycles the entire trip and nowhere did we hear motorized vehicles other than jets and airplanes until reaching our car at the Bond Creek trailhead. We ran into only one backpacking party of two exiting via the Napa Ridge Trail and one party of six exiting via the Bond Creek Trail. This is a great stretch of wild country for peace, quiet and a true wilderness experience!

Exhibit E-5 looks down Warrior Creek, past Lower Gildart Lake to Bunker Creek from Alpine Trail #7 on the shoulder of Warrior Mountain (at right). More wild, rugged country "with the imprints of man's work substantially unnoticeable."

Exhibit E-6 shows that, with ancient seabed riffles displayed on boulders along Alpine Trail #7, the Swan Crest is an outstanding outdoor classroom!

Exhibit E-7 shows that, while mortality to whitebark pine has been heavy, the Swan Crest continues to harbor enough healthy whitebark that we saw a single flock of thirty Clark's nutcrackers (to whom whitebark pine cone/nuts are a key food) during the above backpack trip. This is the largest group of nutcrackers we've ever seen, in spite of our extensive hiking in Glacier, Waterton and Yellowstone National Parks. A multiple day backpack trip in the Anaconda Pintlar Wilderness several years ago failed to reveal such an abundance of nutcrackers, even though the overall whitebark pine population there remains healthy due to its relative isolation from other populations.

In Exhibit E-8, the vast splendor of Bunker Lake, Bruce Mountain and Bruce Ridge render "the imprints of man's work substantially unnoticeable" further down-country.

Exhibit E-9 shows that the upper forks of Sullivan Creek and Bruce Ridge display no imprints of man's work whatsoever. These are the headwaters of the most important bull trout spawning stream in the South Fork Flathead outside the Bob Marshall Wilderness and indeed deserves protection as designated Wilderness!

Even in South Fork Lost Creek, along the southern flank of Thunderbolt Mountain (Exhibit E-10), the effects of wildfire render "the imprints of man's work substantially unnoticeable" in comparison.

Though a bit further between than the lakes in Jewel Basin, wild and remote lakes like Gildart, Crevice (Exhibit E-11), Trinkus, and Bond are no less deserving of special protection as Wilderness!

Exhibit E-12 shows that the view from Alpine Trail #7 down Slide Creek to Sullivan Creek renders "the imprints of man's work substantially unnoticeable." The Swan Crest/Range, simply put, has a preponderance of beautiful wilderness quality country!

Exhibit E-13 shows what happens when motorcycles are allowed to access alpine country, where they are entirely inappropriate and the land unsuitable for their use. This photo shows how motorcycles are rutting up this steep meadow along the Swan Crest above and east of Trinkus Lake, rather than using the gentle switchback in the trail running from lower left to center right. This type of abuse and inappropriate land allocation can be remedied with the stroke of a pen, just as the Flathead did when it banned motorcycles from the Napa Ridge, Bruce Creek and Alpine 7 Trails as far north as Crevice Lake. Wilderness designation would make the prohibition all the better understood and more easily enforced.

Exhibit E-14 is a view down the wild country of (South) Conner Creek toward Sullivan Creek and Kah Mountain from Alpine Trail #7. The Swan Crest is a much broader swath of truly wild country than the 1988 and 1994 Bills recognized as Wilderness.

Exhibit E-15 is a view down the wild country of North Conner Creek toward Sullivan Creek and Kah Mountain from Alpine Trail #7. The Swan Crest is a much broader swath of truly wild country than the 1988 and 1994 Bills recognized as Wilderness.

Exhibit E-16 is a photo of Warrior Creek taken from Bunker Creek Trail 101, demonstrating that exceptional beauty and unique natural features are not limited to the high elevations of the Swan Crest but also extend down “the gut” of its watersheds.

Similarly, Exhibit E-17 is a photo of Bunker Creek taken from Trail 101.

Middle Fork Creek is equally gorgeous in its lower reaches (Exhibit E-18).

Exhibit E-19 is a photo taken from the junction of Alpine Trail #7 and the Sixmile Trail. It shows that the country between Sixmile Peak, Hall Peak (left) and Con Kelly Mountain (center in clouds) is rugged and unsuitable for motorcycle use.

Exhibit E-20 is a photo taken from Sixmile Peak and shows that the Swan Crest is rugged, remote, and contiguous wildlands all the way to the distant Bob Marshall Wilderness!

Exhibit E-21 is a photo taken from Sixmile Peak of the avalanche chutes above the upper stretch of Quintonkin Road 381. This is an area where Weaver’s Flathead National Forest report recommends a Wildland Restoration Zone through closure of Road 381, as does the Citizen reVision in its Wildland Recovery Zone.

Exhibit E-22 is a photo of Quintonkin Creek, bull trout “critical habitat.”

Exhibit E-23 is a photo of the Peterson Creek Trail on the southern shoulder of Broken Leg Mountain, approaching the Swan Crest and its pass into Quintonkin Creek, where Alpine Trail #7 resumes its trek northward after a short break since Sixmile. This high country is unsuitable for motorcycles, nor would they be allowed in Weaver’s Wildland Restoration Zone in Quintonkin. They can be removed with the stroke of a pen.

Exhibit E-24 is a photo of Broken Leg Mountain, taken from Alpine Trail #7 near the southern end of Jewel Basin. This rugged Swan Crest mountain stretches from Wolf Creek to Quintonkin Creek and has portions of Alpine 7 receiving little enough use that cairns are needed to mark the trail tread location. This is an especially wonderful stretch of wild solitude recommended for Wilderness in the current Flathead Forest Plan as an expanded Jewel Basin!

Exhibit E-25 is a view up Wolf Creek Canyon from the Echo - Broken Leg Trail of Three Eagles and Big Hawk Mountains in the south end of Jewel Basin, an area recommended for Wilderness in the current Flathead Forest Plan!

Exhibit E-26 is a photo of a young woman enjoying peace, quiet and solitude at Crater Lake after an invigorating off-trail hike in from Wolf Creek. Mount Aeneas is in the distant center and this entire area is recommended for Wilderness in the current Flathead Forest Plan!

Exhibit E-27 is the view south along the Swan Crest from Mount Aeneas, which runs wild and rugged all the way to the Bob Marshall Wilderness in the hazy distance. Jewel Basin’s Birch, In-thlam-keh and Crater Lakes stretch from fore- to mid-ground, then it’s Broken Leg Mountain to the right and Three Eagles and Big Hawk Mountains to the left

- a wild area that deserves and is recommended for Wilderness in the current Flathead Forest Plan!

Exhibit E-28 is a photo taken from the shoulder of Mount Aeneas of mountain goats above Picnic Lakes, with the Jewel Lakes partially hidden in the distance. Mountain goats have rebounded in Jewel Basin after having been overhunted due to a miscalculation in their reproductive rate. This entire area deserves and is recommended for Wilderness in the current Flathead Forest Plan!

Twin Lakes demonstrate the high alpine sparkle that gave Jewel Basin its name! (Exhibit E-29).

Exhibit E-30 looks past Twin Lakes to Tongue Mountain and, beyond that at right, Pioneer Ridge. The current Forest Plan would expand Jewel Basin to include much of Pioneer Ridge and recommends the expanded Jewel Basin for Wilderness.

Exhibit E-31 is a photo of Clayton Lake and Pioneer Ridge taken from Tongue Mountain. The current Forest Plan would expand Jewel Basin to include most of Pioneer Ridge shown here - and recommends the expanded Jewel Basin for Wilderness.

Exhibit E-32 is a photo of Wildcat Lake taken from atop Tongue Mountain and looking north along the Swan Crest beyond the Jewel Basin boundary. More rugged and wild country deserving Wilderness protection!

Exhibit E-33 shows Strawberry Lake as first seen hiking Alpine Trail #7 north from Wildcat Lake. Strawberry Lake is a popular hiking and backpacking destination that offers a respite from the busy Flathead Valley the moment one passes through the mountain notch at the lake's outlet!

Exhibit E-34 is a photo taken from atop Peters Ridge of the Wounded Buck (foreground) and Wildcat (middle-ground) drainages. Wounded Buck Creek is bull trout "critical habitat" and FWP's Tim Manley reports up to twelve grizzly bears occupy this area at one time due to the excellent interspersed bear foods and hiding cover provided by the 2003 wildfires mosaic (personal communication 2012 and 2013).

Peters Ridge Trail offers views of Flathead Lake and the Flathead Valley as it switchbacks to top the Swan Crest, but out of reach of all that racket! (Exhibit E-35). This trail and these switchbacks are simply not suited to motorcycles - and the damage and disruption they cause can be eliminated with the stroke of a pen.

Exhibit E-36 shows Jimmy Ridge running east from the Swan Crest opposite Peters Ridge, with Hungry Horse Reservoir and Great Northern Mountain in the distance. This ridge divides the Wounded Buck and Lost Johnny drainages and is heavily used by both bears and birds making good use of the habitats provided by the 2003 wildfires. Our hike up this ridge on September 14, 2013, found strong evidence supporting Tim Manley's finding of up to twelve grizzly bears in the Wounded Buck drainage at one time - in terms of bear foods, bear scat and bear tracks.

Exhibit E-37 shows an abundance of both young and mature bear tracks on the Jimmie Ridge Trail. This area and trail is totally unsuitable for motorcycle use and they should be banned with the stroke of a pen! This is among the most wildlife-rich areas I have hiked anywhere in the Swan Range and the wildlife sign there last September rivaled any hike I've taken in Glacier National Park.

Exhibit E-38 is a view of Lamoose Lake and the upper Lost Johnny watershed, where the Flathead years ago conducted watershed restoration work to help reclaim old logging units from motorized use and secure the area as grizzly bear security core.

Exhibit E-39 is a view from atop Hash Mountain down Otila Basin and Lost Johnny, where signs of past logging are substantially unnoticeable.

Exhibit E-40 is a view looking back from atop Columbia Mountain towards Doris, Blaine and Hash Mountains - all rugged and wild country.

Alpine Trail #7 offers many views of the Flathead Range and Great Bear Wilderness, their outstanding Great Northern Mountain, and even larger peaks in Glacier National Park. Exhibit E-41 is one such view taken from atop Columbia Mountain!

Exhibit E-42 is but one example of the tremendous and repeated damage motorcycles are causing to the Columbia Mountain Trail, wearing switchbacks into hip-deep ruts.

Exhibit E-43 shows that deep, narrow rutting is also being caused along the straight-away portions of the Columbia Mountain Trail, making it difficult to hike on and repeatedly destroying outcroppings of the trail tread by trail crews and trail contractors. This trail is unsuitable for motorcycling and is consuming an inordinate proportion of limited trail maintenance funds due to their use of it. This could and should be resolved by closing the trail to motorized uses, then managing and recommending it as Wilderness.

Exhibit E-44 is a reminder that, while most photos get taken during the summer, the Swan Range is incredibly popular with backcountry skiers and snowshoers - with these shown atop "Infinity Ridge" above Wildcat Lake, the wild Swan Crest stretching out behind them to the south!

In summary the Swan Range from Swan Peak to Columbia Mountain is an incredibly wild, rugged and contiguous chunk of landscape crossed nowhere by a logging road. The core of it was proposed for Wilderness in both the 1988 and 1994 Wilderness Bills, as was the Swan Front to the south - and sizeable chunks of it are recommended for Wilderness in the current Forest Plan. By redirecting snowmobiling away from these habitats critical to denning and emerging grizzly bears, wolverine, lynx, fisher and other wildlife, the Flathead will be able to manage and recommend these areas as Wilderness and be doing the right thing for our kids and grandkids. Similarly, motorcycles and mountain bikes can be redirected to less remote areas to truly safeguard these wildlands from "an increasing population, accompanied by expanding settlement and growing mechanization" as envisioned by the Wilderness Act.

There is nothing flawed about the underlying wilderness characteristics and values of these incredible wildlands. We urge the Forest Service to do the right thing by removing the transient mechanized human impacts that may compromise them and to recommend them for Wilderness.

3.b Great Bear

The Essex, Sky West and Puzzle areas are all deserving of Wilderness protection and should be given high marks for being contiguous with the existing Great Bear Wilderness both in terms of wildlife connectivity and ease of management. They are recommended as either Wilderness or Backcountry Conservation areas in Weaver's Flathead National Forest report. They are recommended as either Wilderness or Wildland Recovery Areas in our Citizen reVision. The IRAs are all Wilderness in NREPA. Both the 1988 and 1994 Wilderness Bills designate the Slippery Hill portion of the Puzzle area Wilderness.

This is another area where snowmobile use is overlapping with grizzly bear denning and den-emergence and unlawful snowmobile trespass stemming from there is occurring near females with young in the off-limits Badger-Two Medicine area. Snowmobiles should be removed from these areas to protect grizzly bear, wolverine, lynx, and other wildlife and the areas recommended for Wilderness.

3.c Mission Mountains

Several of the areas contiguous with the Mission Mountain Wilderness were recommended as Wilderness by Weaver in his Crown of the Continent report and several are recommended as Backcountry Conservation areas in his Flathead National Forest report. Both the 1988 and 1994 Wilderness Bills designate most of the Woodward Creek area as Wilderness. NREPA designates all the IRAs Wilderness. Our Citizen reVision designates all the areas as either Wilderness or Wildland Recovery Areas.

Removing motorized uses from these numerous areas and recommending them for Wilderness would go far to protect wildlife and prevent snowmobile trespassing into the Mission Mountain Wilderness. It would also help protect some exceptionally unique low-lying areas in the Glacier Creek, Meadow Lake and Lindbergh Lake areas, while also helping secure a much better Swan-Mission wildlife corridor in the Beaver Lake area.

3.d Whitefish Range

Unfortunately, the Whitefish Range has several roads that have been carved all the way over the top and Wilderness Inventory areas there are not contiguous with Glacier National Park or existing Wilderness areas. They are nonetheless of great value to wildlife and people seeking quiet, non-motorized recreation. Our Citizen reVision recommends all these areas (Tuchuck, Whale, Coal, Demers, and Canyon) as either Wilderness or Wildland Recovery Areas. NREPA designates all IRAs Wilderness. The

1988 Wilderness Bill designates all of Tuchuck and most of Whale as Wilderness. The 1994 Wilderness Bill improves upon this by increasing Wilderness acreage in Whale. While the 2006 Draft Revised Forest Plan includes recommendations for Wilderness in the north end of the Whitefish Range, this was apparently done at the expense of areas recommended for Wilderness in the Swan Range in the current Forest Plan.

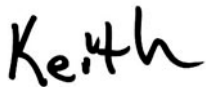
These lands are largely rugged, remote and access to them is fortunately made more difficult by an often rough and dusty North Fork Road. This parallels Glacier National Park's decision to manage its North Fork areas in a more primitive fashion that includes rough unpaved roads and lakes with limits or outright bans on boat motors. We urge the Flathead to manage and recommend all of these Whitefish Range areas as Wilderness for the sake of both wildlife and humans - and as an expression of gratitude on the part of the United States for steps being taken by Canada to conserve its North Fork Flathead lands in a more primitive condition.

3.e Lebeau

And finally we come to Lebeau, that little orphan chunk of priceless roadless lands on the Tally Lake Ranger District. This area is already a favorite due to its unique forest and vegetation types. The 1994 Wilderness Bill designates Lebeau Wilderness, as does NREPA. At over 6,000 acres it is of a manageable size and shape as a stand-alone Wilderness and we urge you to recommend so!

Thank you for this opportunity to comment

Sincerely,

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

Keith J. Hammer
Chair

Cc: Joe Krueger, Margo Mandella

Exhibits A - E attached.

EXHIBIT A-1

- 01-1975
- 02-0000
- 03-1976
- 04-2005
- 05-2005
- 06-1976
- 07-0000
- 08-1982
- 09-2005
- 10-1976
- 11-0000
- 12-Wild Omission
- 13-2005
- 14-2005
- 15-2005
- 16-2005
- 17-1984
- 18-2005
- 19-1984
- 20-2005
- 21-2005
- 22-1976
- 23-0000

Google earth

7314 ft

1990

Imagery Date: 7/25/2013 lat 47.992971° lon -113.691319° elev 4128 ft eye alt 37072 ft

EXHIBIT A-2



EXHIBIT A-3



EXHIBIT A-4



EXHIBIT A-5



EXHIBIT A-6



EXHIBIT A-7



EXHIBIT A-8



EXHIBIT A-9



EXHIBIT A-10



EXHIBIT B-1



EXHIBIT B-2



EXHIBIT B-3



EXHIBIT C-1



EXHIBIT C-2



Figure 33. Recommendations for Wilderness, backcountry conservation, and wildland restoration zone, Flathead National Forest, Montana.

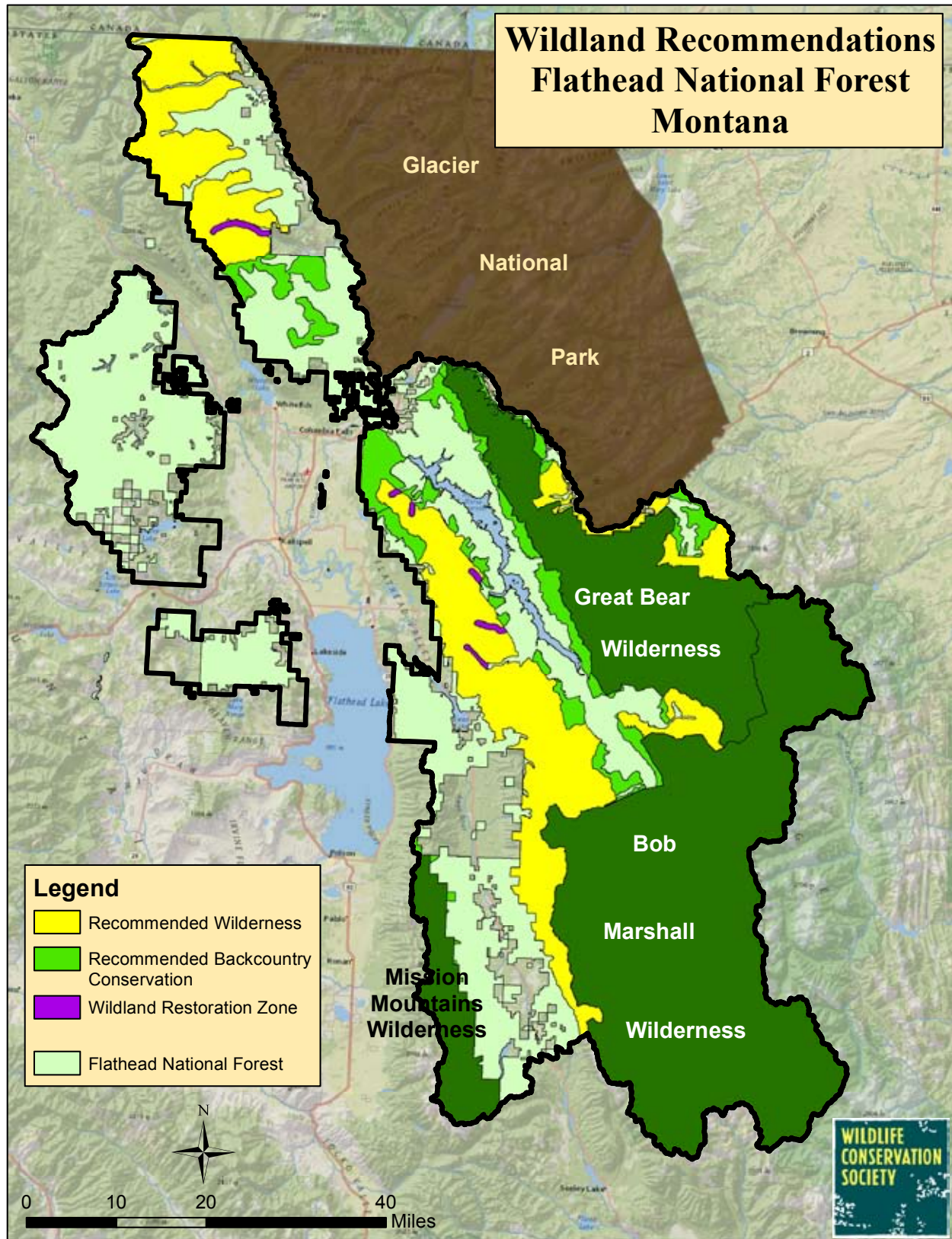
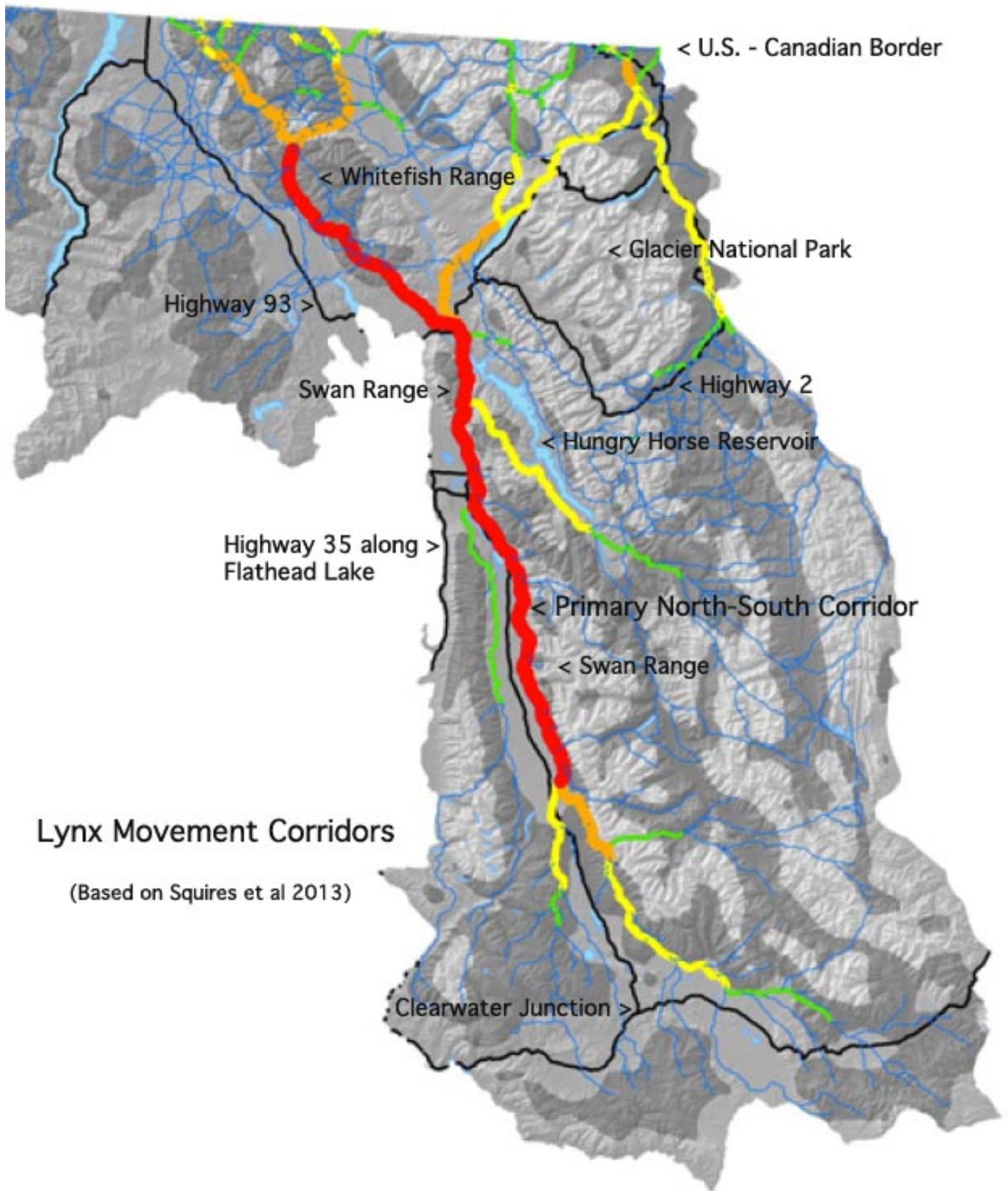


EXHIBIT D-2



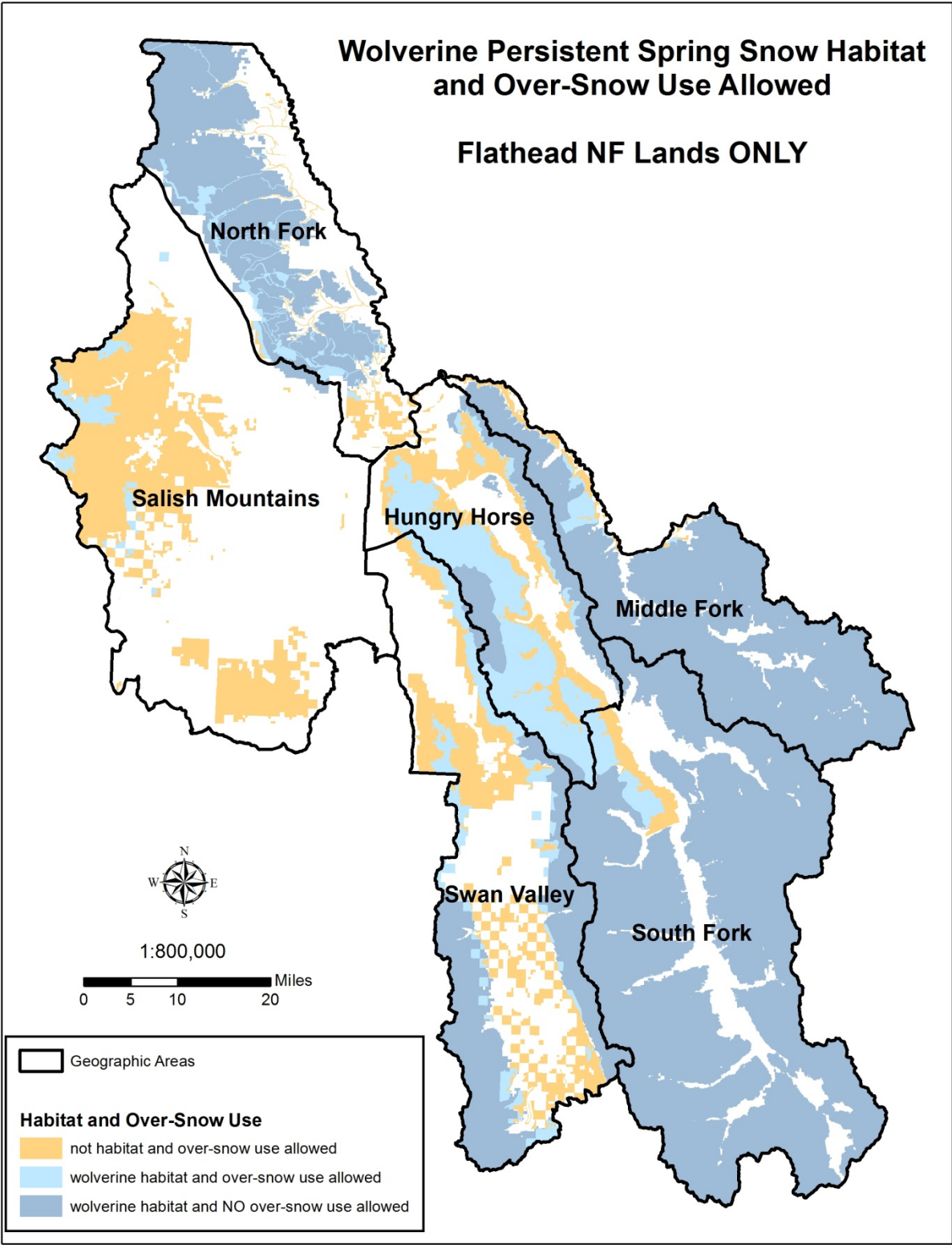


Figure 62. Wolverine persistent spring snow habitat and over-snow use allowed on Flathead NFS lands only

EXHIBIT D-4

Citizen reVision of the Flathead Forest Plan Wilderness and Wildland Recovery

Inventoried Roadless Areas and
Wildlands Recovery Areas
Recommended for Wilderness

Compiled by Swan View Coalition
February 2014

EXHIBIT E-1

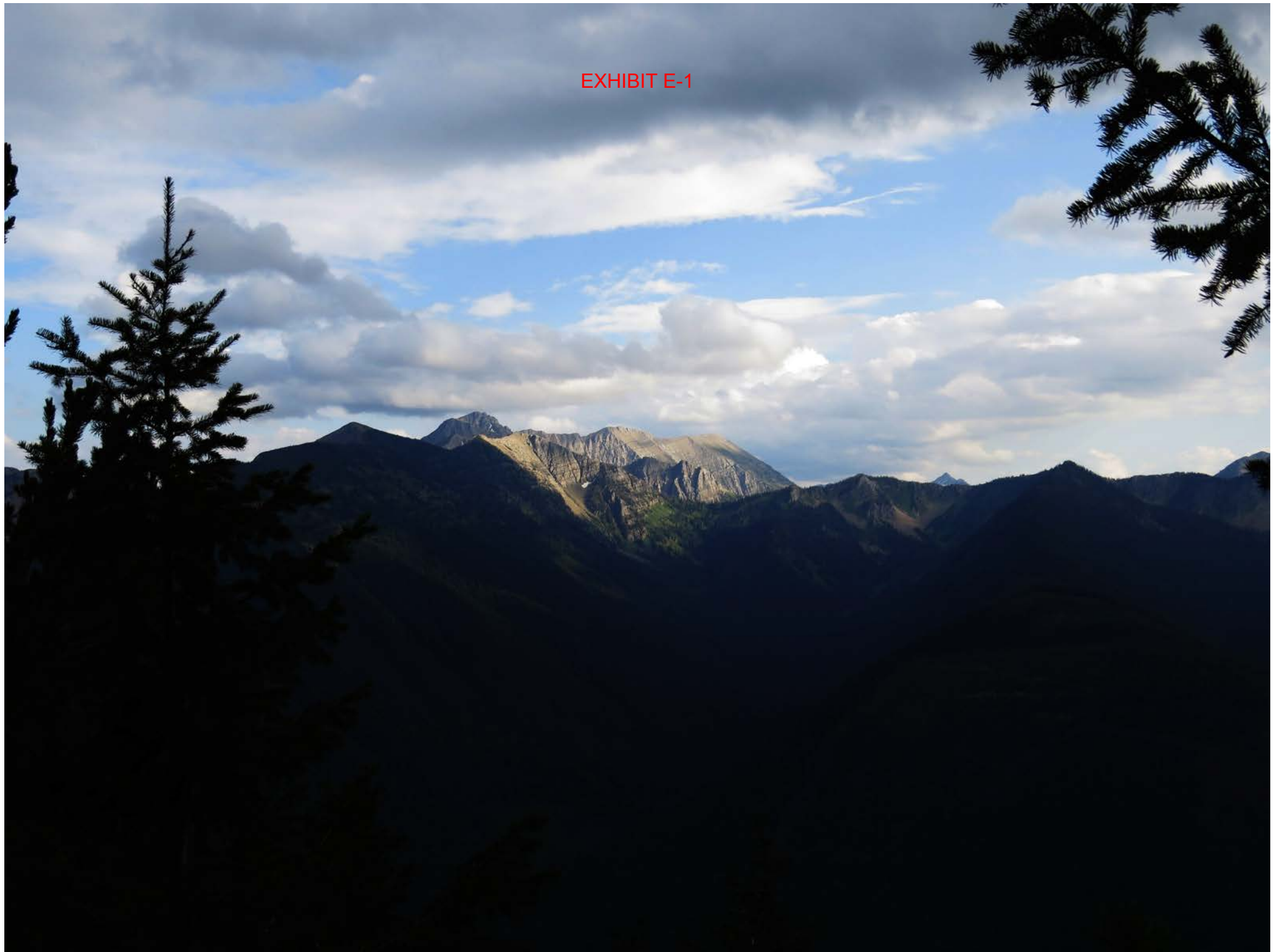


EXHIBIT E-2



EXHIBIT E-3



EXHIBIT E-4



EXHIBIT E-5

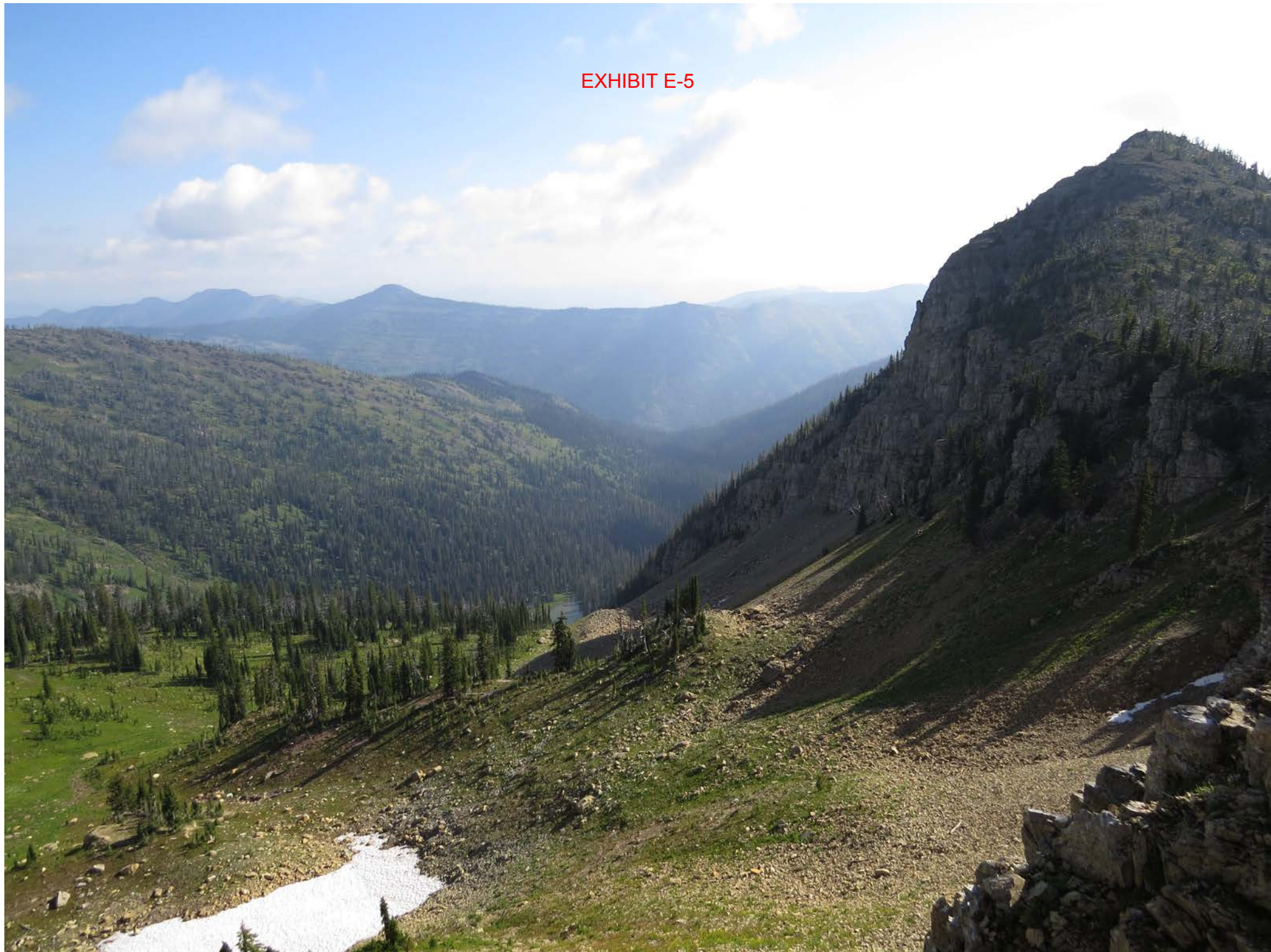


EXHIBIT E-6



EXHIBIT E-7



EXHIBIT E-8



EXHIBIT E-9



EXHIBIT E-10



EXHIBIT E-11



EXHIBIT E-12

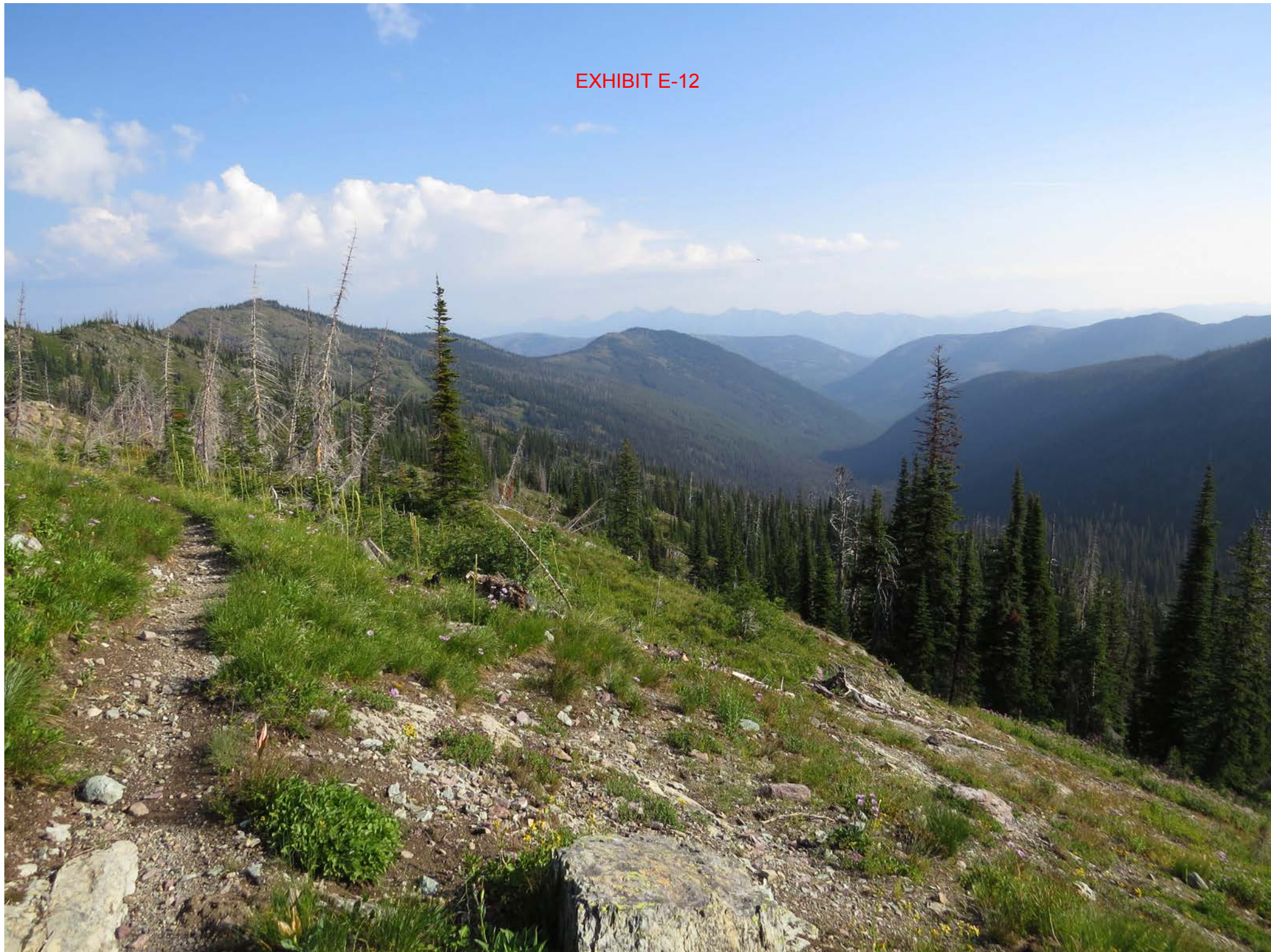


EXHIBIT E-13



EXHIBIT E-14

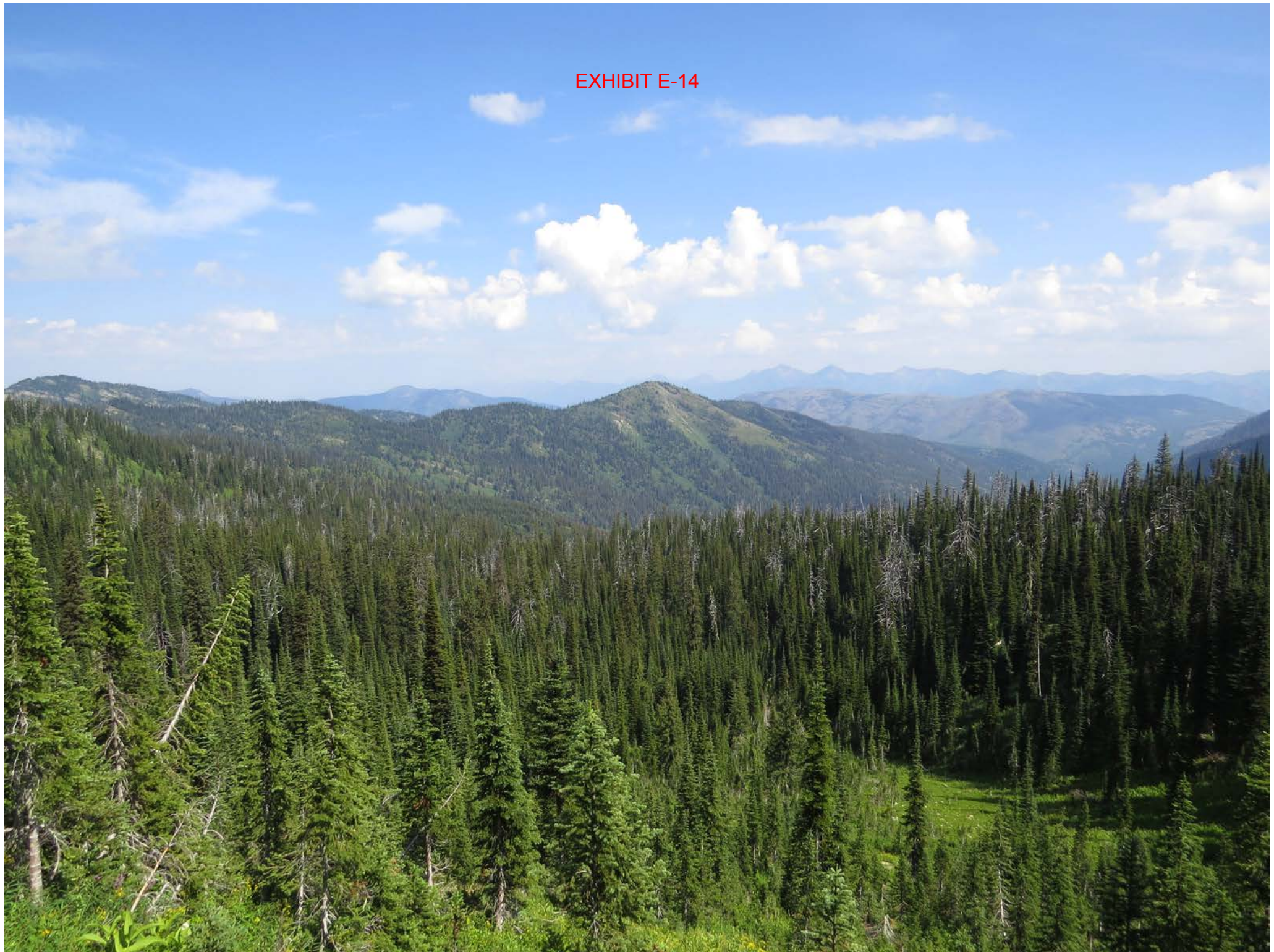


EXHIBIT E-15



EXHIBIT E-16



EXHIBIT E-17



EXHIBIT E-19



EXHIBIT E-19



EXHIBIT E-20



EXHIBIT E-21

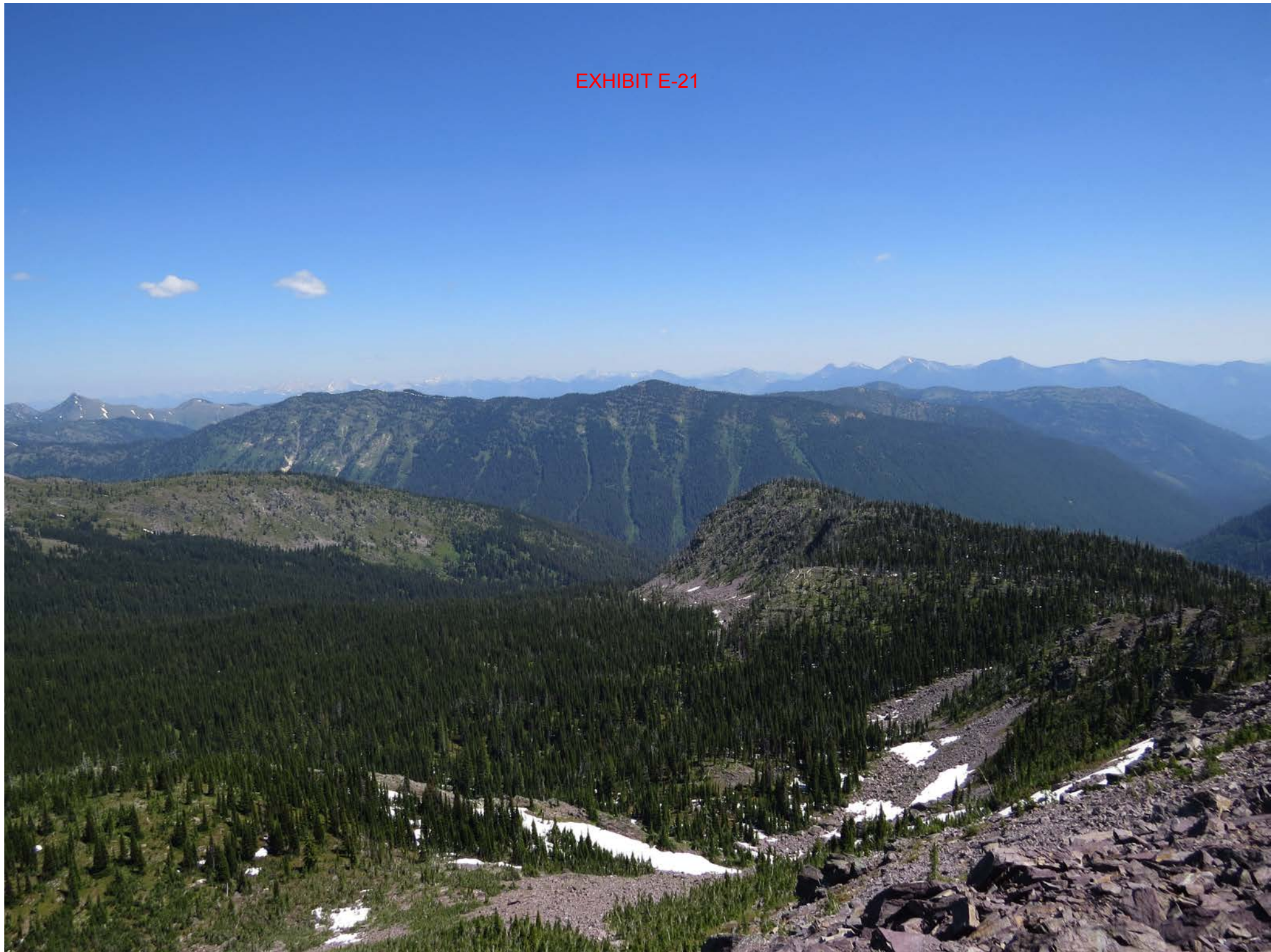


EXHIBIT E-22

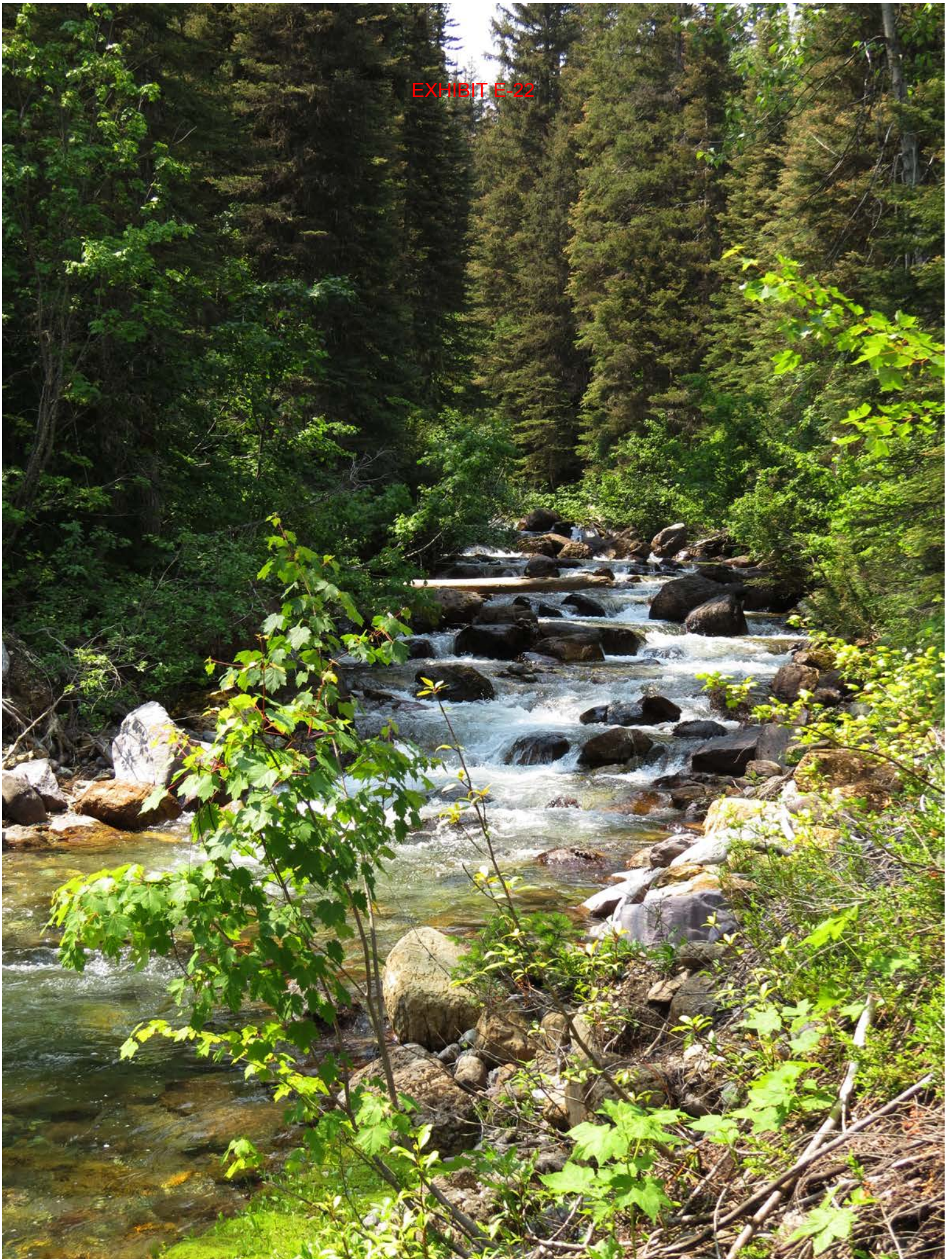


EXHIBIT E-23



EXHIBIT E-24



EXHIBIT E-25



EXHIBIT E-26



EXHIBIT E-27

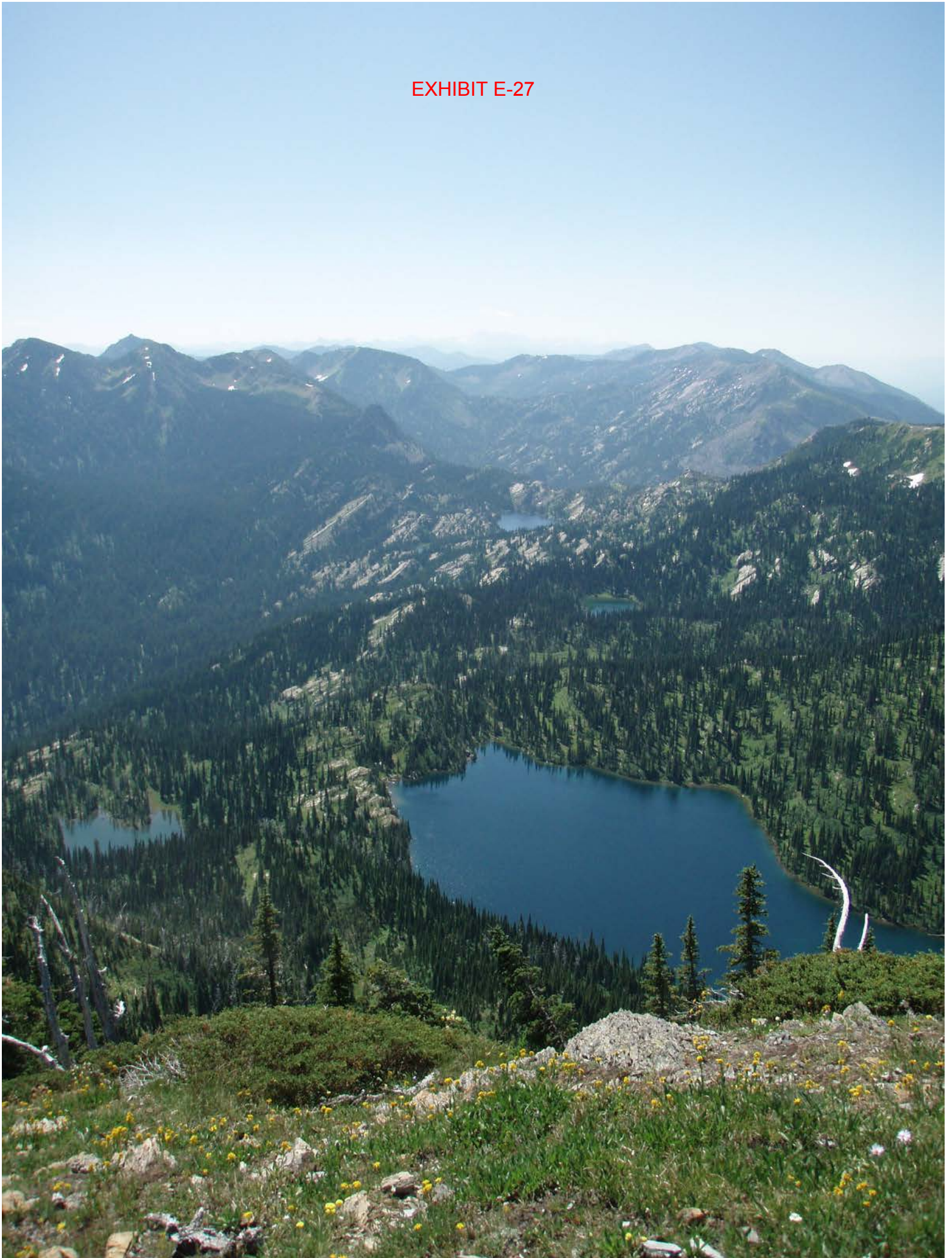


EXHIBIT E-28



EXHIBIT E-29



EXHIBIT E-30



EXHIBIT E-31



EXHIBIT E-32



EXHIBIT E-33



EXHIBIT E-34



EXHIBIT E-35

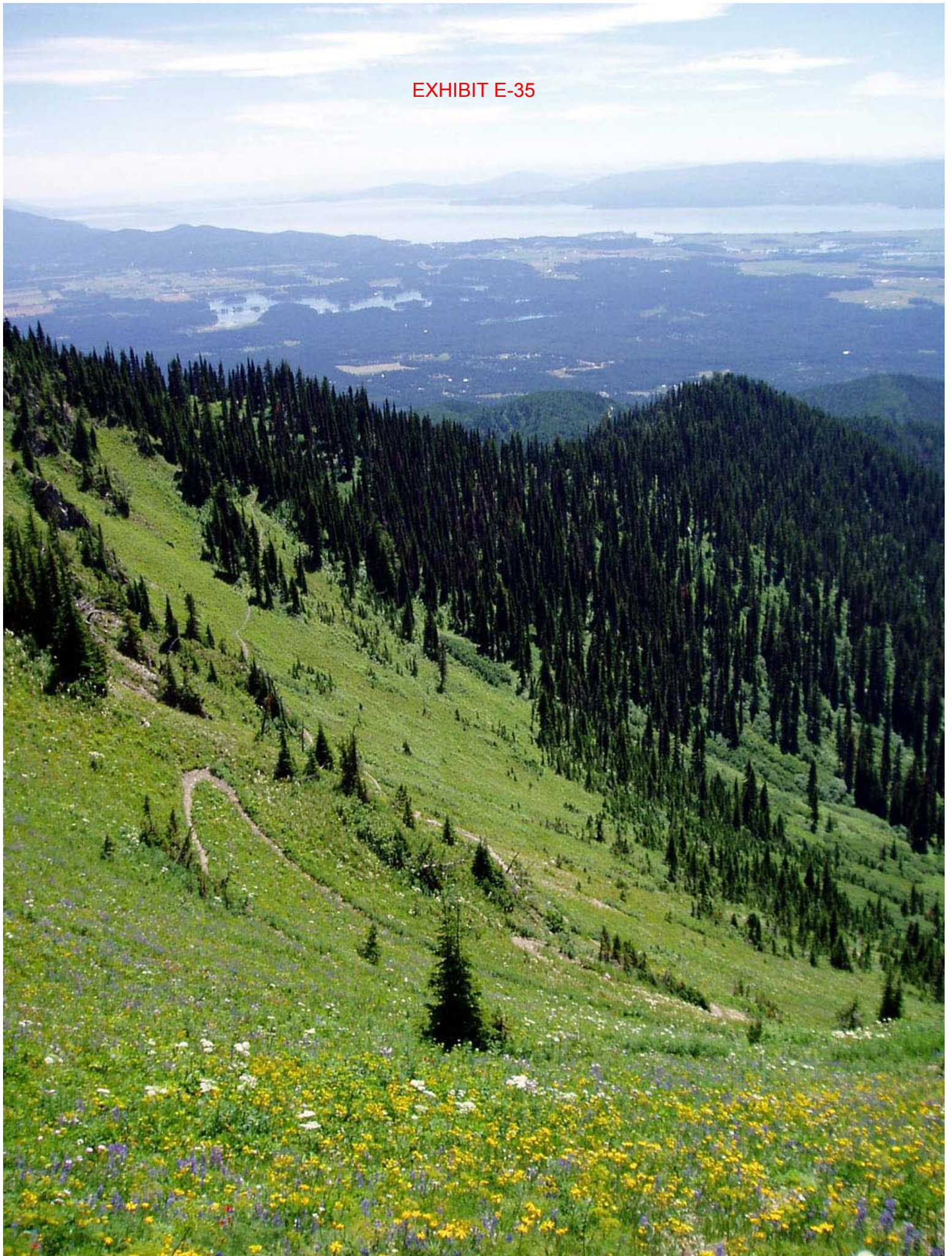


EXHIBIT E-36



EXHIBIT E-37



EXHIBIT E-38



EXHIBIT E-39

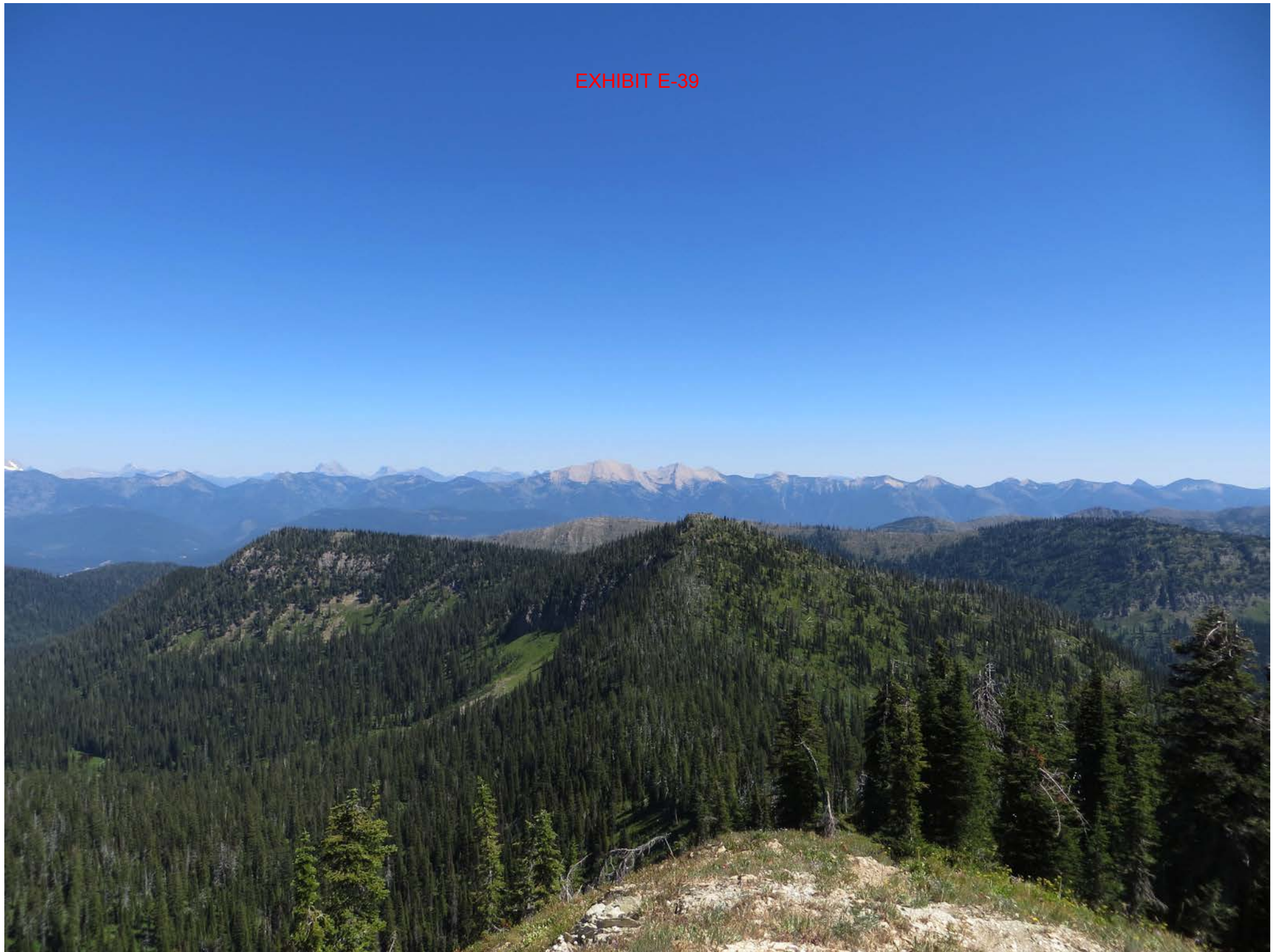


EXHIBIT E-40



EXHIBIT E-41



EXHIBIT E-42



EXHIBIT E-43



EXHIBIT E-44

