



P.O. Box 4310, Whitefish, Montana 59937

Mr. Joe Krueger, Plan Revision Leader  
Flathead National Forest  
650 Wolfpack Way  
Kalispell, MT 59901

Delivered Via E-mail

June 3, 2014

Dear Joe:

Thank you for providing the “Assessment of the Flathead National Forest” (April 2014) on the FNF forest plan revision website. We wish to provide some comments on this important document that establishes the need for change and guidance for the development of the revised Flathead Forest Plan. Please include this letter in the FNF plan revision record.

In general, the FNF has done a good job of collecting and assimilating information in its Assessment. The Assessment represents a considerable advancement in national forest evolution using science to guide management. The Assessment should provide an excellent foundation upon which to build a revised forest plan.

We have limited our comments to areas of emphasis or where we think a modified emphasis needs to be considered. Comments follow the order of the Assessment.

### **Chapter 1**

**Climate Change:** The Assessment identifies possible changes and impacts of climate change based on current and ever-changing models. While the application and interpretation of these models is appropriate, a trend in the science of climate change indicates a persistent understatement of future conditions. This should be taken into consideration.

**Insects and Disease and Root Pathogens:** Insects and disease are indeed drivers and stressors on NFS lands. They constitute natural agents influenced by environmental factors including human impacts to the environment, such as climate change. The FS continues to consider these agents “pests” that “break out” and pose a “hazard” and that will inflict “damage” to the forest. The language used to describe insects and disease are loaded with negative connotation. The FNF should consider adopting language that reflect a more objective point of view and the reality that these natural processes remain largely out of human control. We agree with the language at p. 77 that describes the historic, natural role of these organisms in the environment.

While not always desirable, the significant effects of, say the mountain pine beetle, may be *the* appropriate and even *best* results of environmental stressors and factors under evolving conditions of climate change. Thus while the death of a majority of lodgepole pine trees on a mountain slope may not be necessarily desirable and may elevate fire hazards in the short term, the ‘treatment’ applied by pine beetles essentially ‘re-sets’ the landscape. Fire hazards drop as trees drop their needles (over just a year’s time); new forest cover begins to grow. Given the considerable scale of the consequences of climate change across the FNF that may occur over the

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

coming century, insects will likely induce ‘undesirable changes’, but may represent a long term beneficial change at no real management cost. And because insects and even root diseases are climate and environment-responsive, it may be appropriate to consider insects and disease as first and foremost ‘natural’ and neither positive or negative, and then at two distinct scales: (a) landscape scale where the FNF has little influence on outcome and where no investment of resources would be applied; and (b) local scale where management of insects and disease may produce benefits associate with the suitable timber base or other finite resource goals and where an investment in a response to insects or pathogens can be shown to produce desired benefits.

With more specific reference to white pine blister rust, we support efforts to develop disease resistant strains in order to perpetuate this important key species on the higher elevation landscape.

**Invasive or Non-Native Species** We agree with the perspective stated at page 82, that “*The desired condition inferred from EO 13112, FSM 2900, and the 2001 Flathead NF Noxious and Invasive Weed Control Environmental Assessment and Decision Notice (NIWC EA/DN) is the prevention of new infestations (within the area where activities would occur or from the use of travel routes associated with those activities) and to manage the infestations currently established on the forest through control measures.*”

**Terrestrial Ecosystems:** We generally agree with the statement made in the Assessment at page 88, that “*The conservation strategy for the Flathead NF plan revision is to maintain and/or restore the full spectrum of ecosystem biodiversity in the planning area.*” (Emphasis added)

This strategy poses certain challenges. Change is constant and climate change represents a challenging phenomenon that will dominate most other forest drivers into the future. The Assessment has done a good job delineating and explaining the stressors that influence the forest environment given the current state of knowledge. However, given the FNF’s limited resources to control Nature - and the climate (as noted in places in the Assessment) - it may be appropriate to explicitly include climate change in the FNF conservation strategy:

*“The conservation strategy for the Flathead NF plan revision is to maintain and/or restore the full spectrum of ecosystem biodiversity in the planning area given the challenges posed by a rapidly changing climate and ecosystem responses to those changes.”*

**Horizontal patterns and forest landscape connectivity:** We appreciate the inclusion of Figure 56, “Montana FWP large, intact block (LIB) least cost corridors for forest specialists.” (p. 145) We would encourage the FNF to employ this information when designating MA between adjacent jurisdictions, particularly with the Kootenai National Forest between the Whitefish Range and the Tally Lake Ranger District. Improving wildlife connectivity, especially for wide-ranging corridors, would considerably assist species persistence over time with regard to climate change.

**Wildlife Species:** Under this section of the Assessment we strongly agree with the following statement: “*While the Forest Service cannot control climate change, general measures, as well as some species-specific measures, have been identified to help reduce species vulnerability to climate change (Shoo et al. 2013). General measures include: 1) secure and restore “refugia” that are within the species current range, 2) secure and restore “refugia” that are outside the*

*species current range, 3) secure and restore movement paths so that species can migrate and/or interbreed, 4) develop assisted colonization plans.” (p. 161)*

**Lynx:** Under this section we agree that *“The majority of least cost paths crossed the Highway 2 transportation corridor to the north of the Hungry Horse reservoir near the town of Hungry Horse, Montana. The existing NLRMD management direction provides for maintenance of conditions providing habitat connectivity (USDA FS 2007).” (p. 179)*

**Wolverine:** With respect to wolverine we found useful Figure 62, *“Wolverine persistent spring snow habitat and over-snow use allowed on Flathead NFS lands only.” (p. 185)* This information puts into context the extent of spatial conflict (or lack thereof) between natal needs of wolverine and the sport of snowmobiling. However, we remain very concerned that winter ‘snow bikes’ (motorcycles modified as over-snow vehicles) and other technological advances represent a new class of winter motor vehicle that the FNF will need to address very soon, perhaps with an interim directive, and concurrent with the forest plan revision. We also remain concerned about use of snowmobiles in wilderness areas and in areas beyond the routes and play areas in the Whitefish Range, and beyond season restrictions.

## **Chapter 2**

**Sense of Place:** We have observed that with respect to ‘sense of place’, chambers of commerce and real estate offices refer to northwest Montana’s ‘pristine’ water, wildlife, and open space, as well freedom, national forests, Glacier Park, and “wilderness.” The public appears to identify quite strongly with a healthy and wild outdoors. Private focus group work in the Flathead Valley identified “freedom”, “community”, “nature”, “prosperity”, and “family” (in that order) as top issues.

**Wildland Urban Interface:** The economic cost of fighting wildfires in the WUI is appropriately noted in the Assessment. We hope the plan will address outreach to counties on the need to find ways to contain these cost or reverse the trend, or to transfer the cost of fighting structure protection from the public sector to the private landowner who should assume more of the risk and cost.

*“[the] 10-year average federal suppression expenditures nationally have increased from \$620 million a decade ago (1990 through 1999) to \$1,580 million (2000 to 2009) (inflated to constant 2009 dollars) (Gebert and Black 2012). Many studies have delineated the rising costs of forest and other wildland fires, and all point to the expanding pattern of residential development adjacent to public lands as a significant contributing factor.” (Chapter 2, p. 15)*

**The Agricultural Sector:** Table 86 on page 40 (Chapter 2) appears to omit data related to Flathead County.

**Non-Labor Income:** We agree. It could be added that identifying and protecting the values that attract people to the Flathead region should be a significant consideration in the FNF revision.

*“When investigating non-labor income some important issues for public land managers include whether the area is attracting retirees and people with investment income, the role public lands play in attracting and retaining people with non-labor income, how these people use or enjoy public lands, and whether these uses or ways of enjoying public lands are at odds with current uses or management. If public lands resources are one of the reasons*

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

*growing areas are able to attract and retain non-labor sources of income, then public lands are important to local economic well-being by contributing to economic growth and per capita income. If, on the other hand, contracting populations or industries result in a shrinking labor market, non-labor income may be important as a remaining source of income and can help stabilize downturns.” p. 55*

**Wildland Dependency:** Table 95 shows a comparison of “wildland dependency”, the measure of a community’s reliance on industries tied to natural resource-based industries. We were particularly struck by the decrease for “recreation” between 2000 and 2011 from 5.09 to 1.30 percent. Are these data correct? While the economy ‘stalled’ because of the “Great Recession”, other data provided in the Assessment would seem to indicate that amenity migrants are enlarging the economy via transfer payments, dividend and interest income, number of visits and per capita spending, etc. These migrants are likely highly recreation-focused, and a good percentage probably recreate on Flathead National Forest lands.

**Federal Land Payments to States:** Congress determined some time ago (1976) that the federal government should make payments to states in lieu of taxes. The Assessment states, “In recognition that states cannot tax federal lands within their boundaries and that these lands create a fiscal burden on the states.” (Emphasis added.) We wish to be on record that all federal lands provide a huge net benefit to states and the communities they serve, not a burden. The multiple benefits include salaries and benefits for federal employees (e.g. Table 98), purchase and maintenance of equipment through local vendors, income derived from sale and processing of natural resources, federal spending for wildfire response, federal revenue sharing, maintenance expenditures for roads and infrastructure, habitat provided for wildlife that form an important cultural context for the state and local communities, and vital environmental services such as clean water and air.

Some interest groups have cultivated the idea that national forests represent burdens to the local economy. The Assessment shows that revenue sharing and PILT payments have varied and fluctuated over the years, due to a decrease in timber harvested or the economic recession and the response to it. Some of this reflects the significant social adjustment that has occurred because of changes in the timber industry - everything from mechanization that reduced the labor force significantly, to legal challenges to the national forest timber sale program that resulted in a decrease in timber volume sold and cut. PILT has been a response, in part, to these changes.

We can appreciate the interest expressed by the timber industry to increase the harvest, or at least stabilize and make harvest levels predictable and reliable. However, the USFS should not be faulted - or help perpetuate the sense of blame - for the sense of ‘burden’ fostered by some. One way or another, society has directed the FS to change the way it operates and to take into consideration fish, wildlife, water and other non-commodity resources. This has propagated a new approach to national forest management. The 2012 planning rule - and the criteria for this very Assessment - exemplify this change. As society and the FS emerge from decades of social turmoil we trust the public will cast off the idea that national forest lands represent a ‘burden’ and recognize them for the local and national treasure that they represent.

**Climate Change:** The Assessment seems to miss the point that more economic activity equates to more carbon-based energy inputs to the system that will in turn add to carbon emissions that

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

drive climate change and its adverse effects (e.g. “Forestry and Timber”, “timber supply will expand nationally due to climate change,” p. 95, but also true for all economic activities like tourism that is highly energy intensive). The Assessment considers some of the impacts to the economy without stating that these activities at local, regional, and national scale *cause* climate change. Technologies that deliver greater carbon efficiency may be emerging. However, [Jevons Paradox](#) states, “that as technology progresses, the increase in efficiency with which a resource is used tends to increase (rather than decrease) the rate of consumption of that resource.” If correct, then the concept of “[Occam’s Razor](#)” should then be considered. Occam’s Razor states, “that among competing hypotheses, the one with the fewest assumptions should be selected. Other, more complicated solutions may ultimately prove correct, but—in the absence of certainty—the fewer assumptions that are made, the better.” The FNF should therefore assume that the more carbon-base energy inputs into its management, the more the FNF will contribute to the adverse effects of climate change. Management should be reduce carbon emissions and the revised plan should reflect this.

**Multiple use and ecosystem services:** The Assessment states, that “the 2012 planning rule for NFS land management planning recognizes that ecological, social, and economic systems are interdependent and equally important; *none has priority over the other...* The rule also states that forest plans must ‘contribute to *economic and social sustainability* and must provide for ecosystem services and multiple uses in the plan area.’” (*Emphasis added*)

Laws and regulations define certain terms like “multiple use”, “sustained yield”, and “sustainable”. We don’t expect the FNF to solve economic or climate change challenges. But we do ask that the FNF quantify carbon energy inputs and federal financial “subsidy” inputs that may reasonably be classified as ‘un-sustainable.’ Local management should strive to be energy and revenue conservative and/or neutral (or in the case of revenue, revenue positive). We recognize that some of these factors remain out of the control of local FNF management.

**Biodiversity:** We would hope that the FNF would adopt a policy (standard) within the revised plan of no net loss of biodiversity. Biodiversity is a component of “ecosystem services”. It plays a large cultural role in Montana (however varying interests might ascribe those values). With respect to it’s role in ecosystem functions, we are strongly reminded of Aldo Leopold’s quote in his book *Round River*:

*“The last word in ignorance is the man who says of an animal or plant, "What good is it?" If the land mechanism as a whole is good, then every part is good, whether we understand it or not. If the biota, in the course of aeons, has built something we like but do not understand, then who but a fool would discard seemingly useless parts? To keep every cog and wheel is the first precaution of intelligent tinkering.”* (*Emphasis added.*)

**Timber:** The Assessment states:

*“The period of 2007 to 2011 represents the worst operating environment experienced by the North American and Montana forest products industry since the Great Depression. It involved a two-year recession from 2007 to 2009, the related financial crisis, and a housing collapse with the lowest levels of new home construction since the Second World War (Keegan et al. 2012). Very low prices for lumber and other wood products have accompanied this broad economic downturn.”* (p. 123)

This is an excellent reminder that the most damaging influences to local community, economic well-being are larger, national business interests that influence or otherwise ‘game the system’ (e.g. the financial markets), and not necessarily conservation interests which are often scapegoated. This was the case with industrial mechanization in the last part of the 20th Century that led to the loss of thousands of forest industry jobs. “Environmentalists” were blamed by industry groups.

Then at page 125, the Assessment states, “*There has been concern among segments of the public about impacts to the local economy due to the past and potential future trend of decreased timber outputs from the Flathead NF.*” Conservation interests have undoubtedly had an impact on timber supply, as Amendment 19 demonstrates and the reduction of the ASQ as a result of that public NEPA process and further legal challenges. The Assessment correctly states that “intense interest in timber management will continue into the future, if not increase.” The industry’s situation can improve however as it continues to mature in its understanding of the public’s appreciation for the whole forest. Collaborative processes may be the best method to move forward as a community.

**Water:** Private focus groups conducted in the Flathead Valley revealed that “clean water” was the top rated publicly-valued resource, appreciated across economic and political affiliations.

**Wildlife:** Road mileage on the FNF has reached an appropriate level in most GAs because of A19. Montana FWP’s ‘objective levels’ for big game are being met (p. 140). We encourage the FNF to continue to consult with FWP in areas of the forest where motor access remains an issue (Island Unit). Additional roads should be considered for closure, storage, or decommissioning to maintain wildlife habitat and to reduce road maintenance costs.

**Baseline Carbon Stocks:** “Carbon management is, therefore, an increasingly important consideration in NFS management.” (p. 157) The FNF should consider modeling carbon for all aspects of its operation, from facilities to transportation, and vegetation management. It could then include a carbon management plan as part of the revised plan.

**Trends related to carbon stocks and HWP:** “...(Hurt et al. 2002). This analysis, which does not include projected climate changes, also concluded that U.S. forests would convert to a large carbon source if fire suppression is ineffective in the 21st century.” (p. 161) Witnessing the larger wildfire events in other parts of the west, it may be safe to assume that the FNF region will experience large fire events that escape suppression efforts. Can the FNF runs several wildfire scenarios that predict carbon escape, then factor in HWP? It would be interesting to see the effect of HWP on carbon sequestration within the range of alternatives and proposed timber base areas, *if that assessment also included* other carbon emissions for harvest, transportation, processing and distribution to markets. This we realize may not be possible within the context of the forest plan revision.

**Flathead NF Visitor Use and Satisfaction:** The information provided in Figure 119 (p. 169) prompts us to ask the question, Do FNF recreation expenditures align with forest users’ interests?

**Demographics Summary and Projections:** We agree with the statement, “When we look at national recreation trends with projected population change together for Flathead and Lake Counties, we can infer a future increased demand for recreation opportunities on the forest.” (p. 175)

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

In Table 151, Percent satisfied visitors 2010, (p. 171) we humorously note that 100 percent of wilderness visitors feel safe while only 86.8 percent feel safe in developed sites. Another argument for more recommended wilderness.

**Geographic Area Scenic Character, North Fork GA:** The description in this GA described the forest types but did not include the extensive stands of lodgepole pine. (p. 187)

**Existing Scenic integrity:** Table 168. Existing scenic integrity of the Flathead NF in acres and percent of forest, (p. 193) shows that zero acres are classed as ‘very low’ for scenic integrity. Based on the photo illustrations provided on the same page, we cannot understand how these results can be accurate. Extensive areas in the North Fork, South Fork, Salish, and Swan GA’s contain clear cuts as depicted in Table 167. The paragraph below Table 168 then talks about areas on the FNF with very low integrity, but this is not reflected in Table 168.

**Infrastructure: Travel Analysis Process on the Forest** The Assessment states that the Travel Analysis will be completed in 2014. We expressed interest in this analysis through the Meridian forest plan revision collaborative process. We emphasized the need to constrain the FNF road system to what can be economically/budgetarily maintained given the maintenance backlog and declining FS budgets. Also that the FNF should provide the public with ongoing, accurate information about the challenge of maintaining over 1,400 miles of roads. For example, the Assessment states that O&M funding has decreased 56 percent over the past 5 years with only 45 percent of funds are directed to maintaining roads (p. 198), and that the FNF receives on 43 percent of funding needed to maintain its roads (p. 200). While reported in the Assessment, this information is not widely known or appreciated. With some people advocating for more open roads (and others advocating for further closures) it would seem to make sense to more assertively present this information to the public, and not keep it ‘buried’ in a massive document like the Assessment.

On page 201, The Assessment states that most road decommissioning has occurred since 1995 and mostly in griz core areas (p. 200) and also notes that 138 miles of road are scheduled for decommissioning. The A19-directed decommissioning has been very controversial and the ‘blame’ has fallen on the griz and those who advocate its conservation and recovery. What started as a wildlife T&E conservation and recovery need has morphed into a need for fiscal accountability. Yet in the public’s mind the griz is still to blame.

If additional roads need to be closed, decommissioned, or placed in storage, the FNF would do well to begin painting a different picture: one of fiscal as well as environmental accountability. The public - particularly the FS’s most vocal critics of road closures (Tea Party, federal tax protesters, and federal land ownership deniers, and motorized recreationists) - might understand fiscal responsibility if not wildlife needs.

**Recreation and Administrative Facilities:** “...deferred maintenance backlog for recreation buildings as reported in INFRA is \$2,576,000.” (p. 203) “The current total deferred maintenance backlog for buildings is \$16,000,000.” (p. 204) These again help prove the argument that the revised plan should be built around the reality of predicted budget realities and trends and the deferred maintenance situations. Why take public resources and facilities deeper in the hole?

**Lands Withdrawn From Mineral Entry or Leasing:** The Assessment notes certain areas closed or withdrawn from mineral leasing. It mentions the North Fork Watershed Protection Act

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

(NFWPA) (S. 255 and HR 2259) twice (and mis-names it as the “North Fork Watershed Withdrawal Act” (p. 216 and 217). The NFWPA has been introduced in three successive congresses. The House passed the legislation in early 2014 and Senate action is pending. *We ask that the FNF place a mineral and energy administrative withdrawal on the federal lands encompassed by this legislation as an action and outcome of the revised forest plan in light of the pending federal action.*

**Occurrence and Development Potential for Hydrocarbons:** The Assessment notes a very small part of the recent history of energy and mining proposals in the North Fork Flathead basin. The Assessment omits any mention of the strong local, non-partisan opposition to mining and energy development proposals from BC or the same level of support for protecting the watershed through legislation. The British Columbia government passed Bill 2 the Flathead Area Conservation Act in 2011, withdrawing by law minerals and energy resources from future entry. The geologic formations north of the border sequesters significant amounts of recoverable fossil carbon energy (oil, gas, coal), yet the BC government decided to remove these resources from development. In Montana, the quality and extent of fossil carbon energy is significantly less than that in BC. The state of Montana and BC made a very considerable political decision in 2010 in an MOU to ban mining and energy development in the North Fork Flathead watershed. Montana’s Congressional delegation has been tasked with legislating the US/Montana closure. The NFWPA is the first piece of conservation legislation in decades supported by all members of the Montana congressional delegation. The Assessment lamely asserts, “The energy resource potential of this basin will remain uncertain until it is tested.” (p. 215) In our opinion, the FNF should *administratively withdrawal all mineral and energy resources in the geographic area described in the NFWPA as part of the revised forest plan decision.*

**Trends in Land Status, Ownership, Use and Access:** We are concerned with the growing ‘clamor’ by some voices calling for the transfer of federal lands to state control. In this regard it is our opinion that some of those who decry road closures, declining timber harvests, or other ‘restrictions’ and changes are also the loudest voices for ownership transfer. *These interests want the most from FS resources and seem to support FS management the least.* We wish to see FS management succeed. It would seem appropriate for the FNF to emphasize the considerable financial and public benefit of federal land ownership. Our concern here mirrors our other comments (above) about providing the public with a clear understanding of the benefits, and the FS putting its best foot forward in a very public way. The Assessment contain a lot of good information about those benefits. Please bring it forward in the revised plan and promote the FNF in other media and efforts.

**Trends in Land Status, Ownership, Use and Access: Access** Under this section of the Assessment (p. 232) the FNF does not include all the reasons why road access had been reduced across the forest. It fails to mention declining road budgets as a reason for reduction in open roads, and scapegoats wildlife and resource protection. While we agree with the reasons stated in the Assessment and wildlife and resource protection are significant factors, it seems disingenuous to not also list the cost savings on maintenance of decommissioned and stored roads. As long as the FNF promotes the notion that road closures are due to wildlife concerns alone, the longer the FNF will have to contend with some very unhappy forest user clamoring for their ‘right’ to use roads built with ‘public’ funds.

*Headwaters engages citizens of the Crown of the Continent in the region’s critical conservation issues: water and wildlife conservation, and climate change.*

**Wild and Scenic Rivers:** The Whitefish Range Partnership Agreement lists additional ‘eligible’ rivers in the North Fork Flathead River watershed. We support these recommendations.

**Camas Bridge to Confluence with Middle Fork:** We ask that the FNF look at removing motorized use of this section of the North Fork River. The use is not prevalent at this time. With growing population pressure documented in the Assessment, the revised plan (or revised river management plan) would be the appropriate place to retain the current recreational experience (floating, kayaking, whitewater canoeing, and fishing) before use pressures escalate and make modifications/changes possible.

**Research Natural Areas:** We generally support the RNA concept, except to note that it is a bit of an archaic concept that has been eclipsed by modern ecology and science. While RNAs have been established “to maintain representative areas of natural ecosystems and areas of special ecological significance,” (p. 266) they actually likely function and fulfill their role only in the context of a much larger landscape. The 2012 planning rule requires that the FNF consider landscape level assessment, ecological sustainability, and connectivity. RNA’s do function to fulfill these statutory requirements.

That being said, the FNF should consider enlarging the East Shore RNA (Cougar Canyon) through acquisition of the adjoining DNRC lands. Ecologically and geologically unique, this area is subject to OHV trespass and some of its remarkable ecological values and functions may be compromised.

We also support the designation of additional RNA’s representative in Table 207 and the other listed candidates. (p. 270).

**Proposed Botanical Areas or Special Interest Area:** We support the establishment of the additional Botanical areas listed in the Assessment. (p. 273)

Thank you for the opportunity to comment on the Assessment. It made for good reading. We will look forward to standards and guidelines in the revised plan that reflect these issues and concerns.

Respectfully,



Dave Hadden, Director  
406-837-0783 / [info@headwatersmontana.org](mailto:info@headwatersmontana.org)