

Commentary on the Proposed Forest Plan April 2015

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CONSERVATION LEGACY ON A FLAGSHIP FOREST: WILDLIFE AND WILDLANDS ON THE FLATHEAD NATIONAL FOREST, MONTANA



By John L. Weaver

Proposed Action - Revised Forest Plan FLATHEAD NATIONAL FOREST

Commentary by John Weaver, Ph.D.
Wildlife Conservation Society
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Introduction

In June 2014, the Wildlife Conservation Society (WCS) released its report entitled: *Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana*. The report focused on a suite of vulnerable fish and wildlife species, several of which have been vanquished or diminished elsewhere across much of their historic range: bull trout (*Salvelinus confluentus*), westslope cutthroat trout (*Oncorhynchus clarki lewisi*), grizzly bear (*Ursus arctos horribilis*), wolverine (*Gulo gulo*), and mountain goat (*Oreamnus americanus*). Remarkably, there are 478,754 acres of inventoried roadless areas (IRA) - and many thousand acres with fading roads - still remaining on the Flathead National Forest (FNF). These roadless areas present a large-scale opportunity to complete the legacy of conservation first started a century ago in this spectacular and treasured landscape.

Based upon a synthesis of the latest scientific data and/or habitat models, WCS identified key conservation areas for these species in each of 6 Geographic Areas across the Flathead National Forest. We found that the Flathead National Forest is a nationally-important stronghold ... “one of the last, best places” ... for these species, and ranks as one of the most important National Forests in the entire country for wildlife and wildlands. In accordance with this significant finding, WCS proposed that 404,208 acres be recommended for Wilderness designation by Congress and that another 130,705 acres be managed as Backcountry/non-motorized year-round.

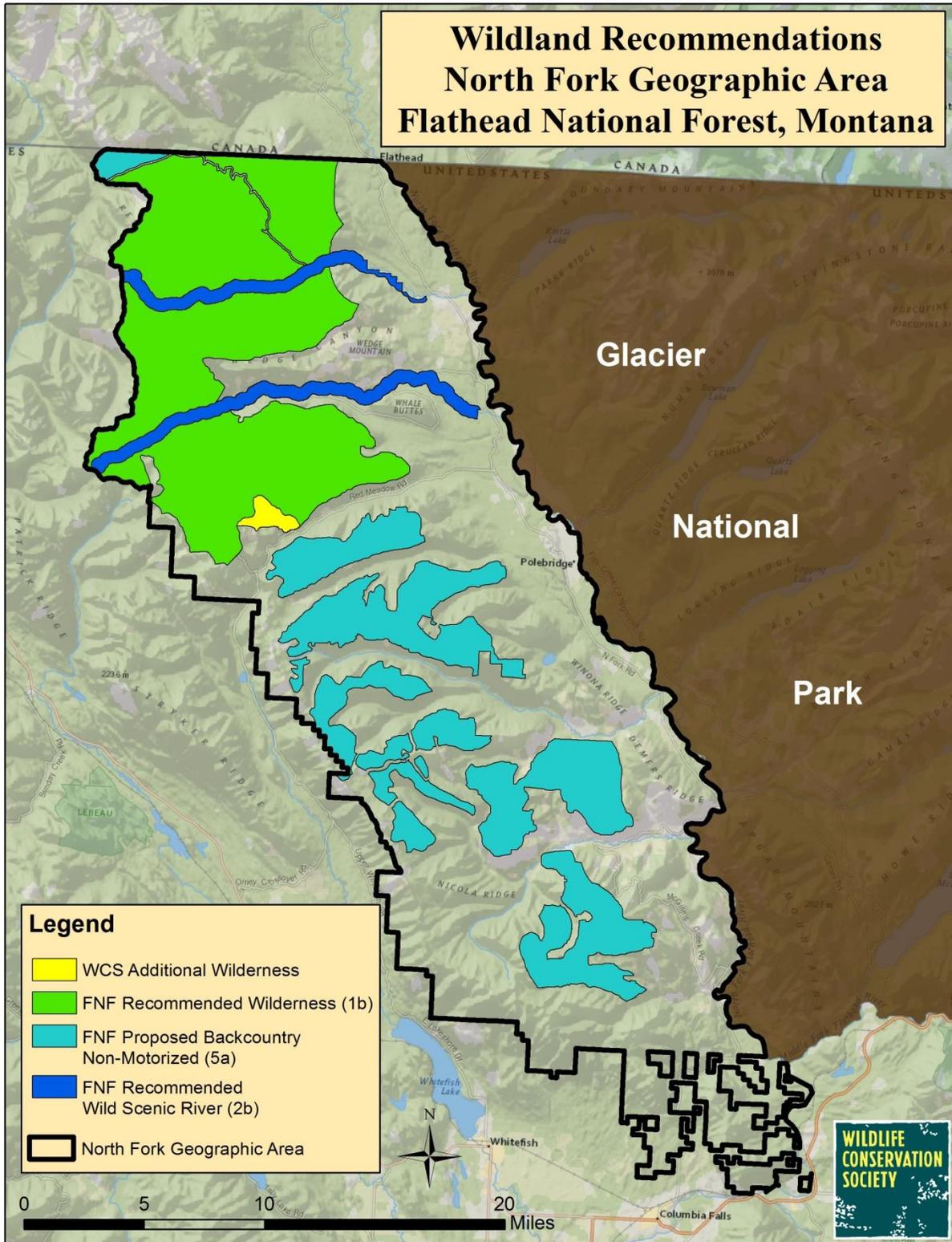
In March 2015, the Flathead National Forest released its Proposed Action for the Revised Forest Plan (‘Proposed Plan’). It recommended 188,206 acres (39% of IRA) for Wilderness (Management Area 1b) and 148,318 acres (31%) for Backcountry/non-motorized year-round (Management Area 5a) for a total protected area of 336,524 acres (70% of IRA). The Wildlife Conservation Society commends the Flathead National Forest for this initial proposal (much of which followed our earlier recommendations) but finds several important shortcomings, too.

WCS recognizes that the Forest Service is charged with managing for a diverse portfolio of values and land uses for the American public. Nonetheless, there are vital areas on the Flathead National Forest which did not receive adequate or enduring protection in the Proposed Plan. Hence, the purpose of this Commentary is to prioritize the most important remaining areas for stronger protection in accordance with the national significance of this wild and beautiful landscape for present and future generations. For each Geographic Area, we map the remaining priority area and provide a scientific rationale for greater protection. Where appropriate, we followed the FNF mapping lines to facilitate the recommended changes. We show those Backcountry/non-motorized allocations proposed by the Forest Service, which WCS supports. WCS requests that these recommendations be part of 1 or more alternatives in the DEIS.

North Fork Flathead Geographic Area

- For the North Fork Flathead Geographic Area, the Forest Service IRA tallied 136,659 acres. There are also several areas with Level I roads that could be eligible for Wilderness designation.
 - In its 2014 report, WCS recommended 137,872 of these roadless acres be recommended for Wilderness and another 26,341 acres as Backcountry non-motorized year-round - for a total of 164,213 acres.
 - In the Proposed Action, the Flathead National Forest recommended 80,662 acres for Wilderness (MA 1b) and another 55,685 acres for Backcountry/non-motorized year-round (MA 5a) - for a total of 136,347 acres in some protection designation (83% of WCS recommendation and 100% of IRA). It identified Trail Creek and Whale Creek as eligible for Wild and Scenic River (WSR).
- ★ WCS endorses the areas recommended for Wilderness (1b), WSR (2b) and Backcountry non-motorized (5a) for the North Fork Flathead GA in the Proposed Plan. The North Fork Geographic Area has high conservation value for a suite of vulnerable fish and wildlife species, especially in the northern portion of the unit. A strong Wilderness recommendation also supports the vital bi-national conservation effort by the U.S. and Canada for this trans-boundary Flathead area.
- ★ However, WCS recommends that 1,220 acres in the Chain Lakes basin near Nasukoin Mountain be changed to **Recommended Wilderness (1b)** rather than Back-country snowmobiling (5c) (Figure 1). Although the area is small, it has high suitability for denning by wolverines – which are susceptible to human disturbance and may vacate. Nasukoin Mountain is the dominant feature in this landscape and appears integral to its wilderness character.

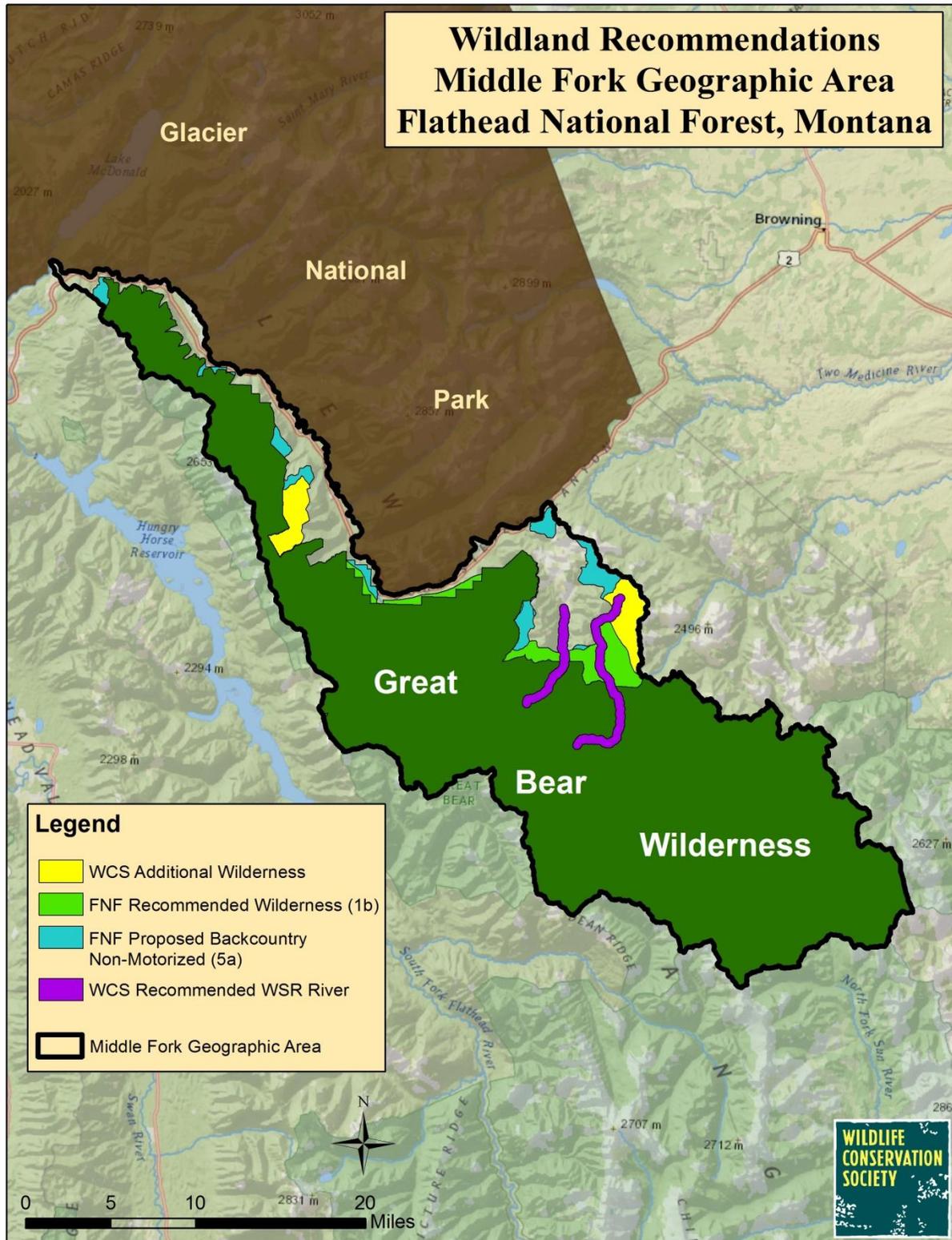
Figure 1. Areas recommended for Wilderness and Backcountry by the Wildlife Conservation Society in the North Fork Geographic Area of the proposed Forest Plan, Flathead National Forest, Montana.



Middle Fork Flathead Geographic Area

- For the Middle Fork Geographic Area, the Forest Service IRA tallied 42,765 acres. There are some areas with Class I roads that could be eligible for wilderness designation as well.
 - In its 2014 report, WCS recommended 30,229 of these roadless acres as additions to the Great Bear Wilderness and another 16,060 acres as Backcountry non-motorized year-round - for a total of 46,289 acres.
 - In the Proposed Plan, the Flathead National Forest recommended 9,161 acres for Wilderness (MA 1b) and another 12,156 acres for Backcountry/non-motorized year-round (MA 5a) - for a total of 21,317 acres in some protection designation (46% of WCS recommendation).
- ★ WCS endorses these areas recommended for Wilderness (1b) and most of the Backcountry non-motorized (5a) in the Proposed Plan. However, some areas warrant stronger protection, and we recommend that an additional **8,523 acres** be changed to **Recommended Wilderness (1b)** as additions to the Great Bear Wilderness (Figure 2).
- ★ Changes Needed to Proposed Plan:
- ✓ *Slippery Bill area* (Puzzle WIA): We recommend an additional 4,799 acres be proposed for **Recommended Wilderness (1b)** in this area to include the headwaters of Morrison Creek and all of Puzzle Creek. This would enhance the value of the adjacent Slippery Bill Mountain area recommended for Wilderness by the Flathead National Forest in the proposed Forest Plan. Morrison Creek has been designated as critical habitat for bull trout and sustains a high count of redds. It harbors native westslope cutthroat trout assumed to be genetically-pure. Moreover, Morrison Creek and Granite Creek could be recommended for Wild and Scenic River designation. Nearly all of this recommended addition has been identified as high-value maternal habitat for wolverine. Much of it has been identified by the Forest as Security Core Area for grizzly bears, but the Puzzle Creek portion needs stronger protection. The area around Crescent Cliff is key habitat for mountain goats, too. Finally, much of this recommended addition is part of the Badger-Two Medicine Traditional Cultural District of significant cultural value to the Blackfoot Tribe. The entire Badger-Two Medicine area has significant value for fish and wildlife, and there is a renewed effort to secure long-term protection of its wildlife, cultural, and wildland values.
 - ✓ *Essex*: We recommend an additional 3,724 acres be proposed for **Recommended Wilderness (1b)** in the headwater basins of Paola, Dickey, and South Fork Dickey Creek (Figure 2). Most of this area has been identified by the Forest as Security Core Area for grizzly bears, but the South Fork valley area above the confluence needs stronger protection. This area has numerous avalanche chutes, which are a primary habitat component for grizzlies. Nearly all of this recommended addition has been identified as high-value maternal habitat for wolverine, and the more rugged sections provide key habitat for mountain goats, too. The recommended addition has high composite scores.

Figure 2. Areas recommended for Wilderness and Backcountry by the Wildlife Conservation Society in the Middle Fork Geographic Area of the proposed Forest Plan, Flathead National Forest, Montana.



Hungry Horse Geographic Area

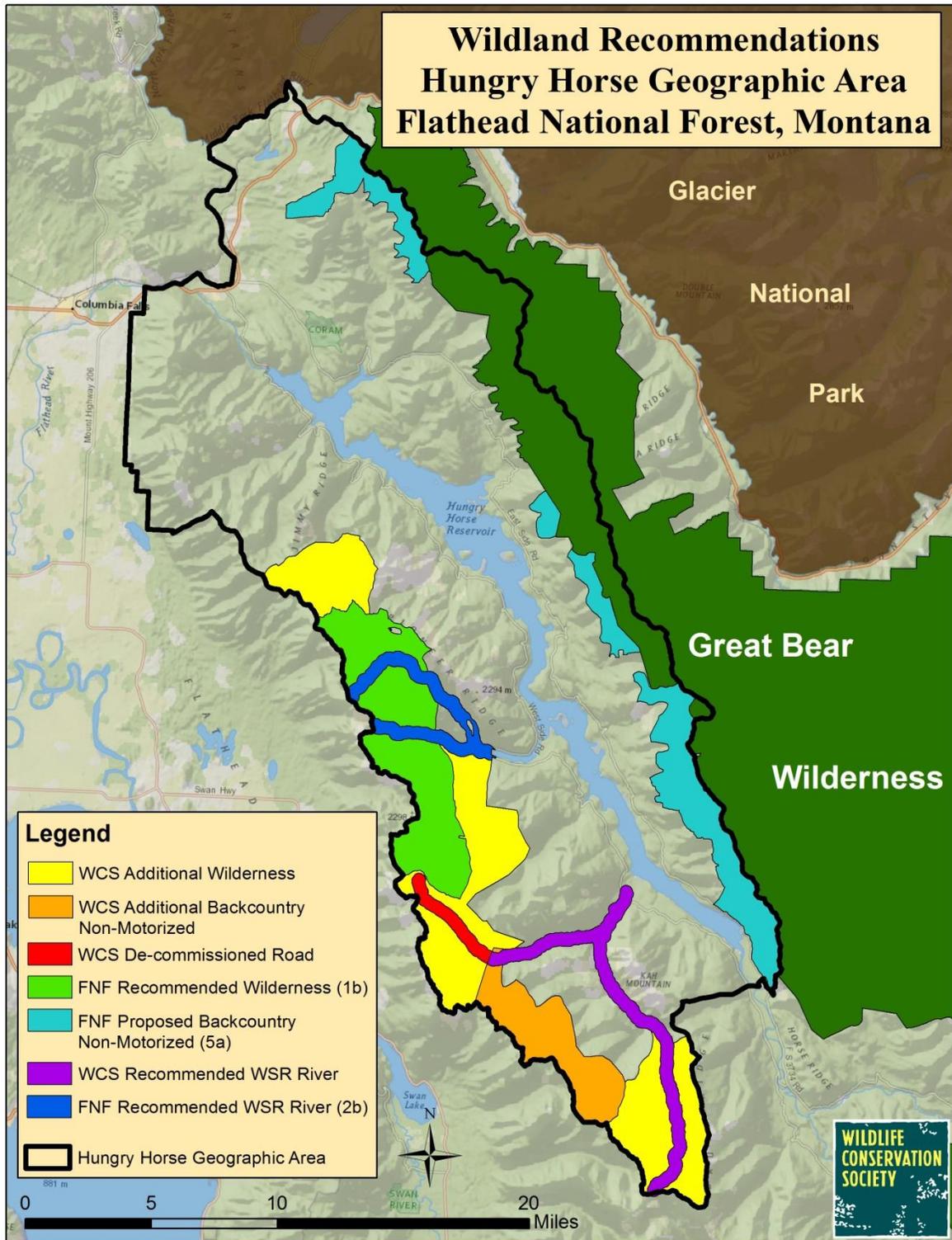
- For the Hungry Horse Geographic Area, the Forest Service IRA tallied 127,129 acres. There are several areas with Class I roads that could be eligible for wilderness designation as well.
- In its 2014 report, WCS recommended 93,350 of these roadless acres as additions to the Bob Marshall Wilderness and another 58,374 acres as Backcountry non-motorized year-round - for a total of 151,724 acres.
- In the Proposed Action, the Flathead National Forest recommended 19,669 acres for Wilderness (MA 1b) and another 30,356 acres for Backcountry/non-motorized year-round (MA 5a) - total of 50,025 acres in some protection designation (33% of WCS recommendation and 39% of IRA).
- ★ WCS endorses the areas recommended for Wilderness (1b), WSR (2b) and Backcountry non-motorized (5a) in the Hungry Horse GA in the Proposed Forest Plan. However, additional areas warrant stronger protection, and we recommend that an additional **31,061 acres** be changed to **Recommended Wilderness (1b)** (Figure 3).
- ★ Changes Needed to Proposed Forest Plan:
 - ✓ We recommend an additional **11,213 acres** be changed from Backcountry (5a) to **Recommended Wilderness (1b)** in the upper Sullivan-Slide Creek area (Figure 3). All of Sullivan Creek has been designated as critical habitat for bull trout, and it sustains one of the highest annual counts of redds on the Flathead. Westslope cutthroat trout populations in both drainages are considered genetically pure. All of this high country is primary habitat for wolverine, and much of it is maternal habitat. It is a core security area for grizzly bears, with diverse habitats; and numerous telemetry locations of collared grizzly bears have been recorded throughout the area. Moreover, Sullivan Creek and Quintonkon Creek could be recommended for Wild and Scenic River designation.
 - ✓ We recommend an additional **19,849 acres** be added to the recommended **Recommended Wilderness (1b)** for the greater Jewel Basin area, including the headwaters of Quintonkon Creek and Posey Creek (south), Wheeler and Forest Creek (east), Wildcat and Wounded Buck Creeks (north) – all of which share similar high-value habitats for fish and wildlife (Figure 3). Quintonkon, Wheeler, and Wounded Buck Creeks have been designated critical habitat for bull trout. Quintonkon, Forest, Wildcat and Wounded Buck Creeks have populations of westslope cutthroat trout considered genetically-pure. Much of the high country is maternal habitat for wolverine, and several occurrences have been recorded. Avalanche chutes, important spring habitats for grizzly bears, are a notable feature in: north side of upper Quintonkon Creek, north side of Wheeler Creek and headwall of Baker Creek, and east side of Wildcat Creek and west side of Wounded Buck Creek. Much of the area is core security for grizzly bears, but the upper valleys need stronger protection; numerous telemetry locations of grizzlies have been recorded throughout the area. For mountain goats, a continuous band of high-quality habitat occurs from above Margaret Lake westward to Big Hawk Mountain in Jewel Basin.
 - ✓ We recommend that the road in upper Quintonkon Creek be de-commissioned from the junction with Posey Creek up to the end (approximately 4.0 miles).

- ✓ WCS recommends an additional 8,974 acres be proposed for **Backcountry Non-motorized (MA 5a)** along the Swan Crest to encompass the headwaters of Conner Creek Branch Creek and Ball Creek (Figure 3). These tributaries flow west into Sullivan Creek, which has been designated as critical habitat for bull trout, and all of them have populations of westslope cutthroat trout considered genetically-pure. These headwater basins provide maternal habitat for wolverine. It is a core security area for grizzly bears, with diverse habitats; and numerous telemetry locations of collared grizzly bears have been recorded throughout the area. The cliffs at the head of Ball and Branch Creeks provide suitable habitat for mountain goats, too. Importantly, it would bridge the areas recommended for Wilderness to the south (Sullivan Creek/Bunker Creek) and north (upper Quintonkon/Jewel Basin) along the Swan Crest.

- ✓ We recommend that the faded roads in the upper portions of these drainages within our recommended Backcountry Non-motorized area be de-commissioned (approximately 5.9 miles in total).

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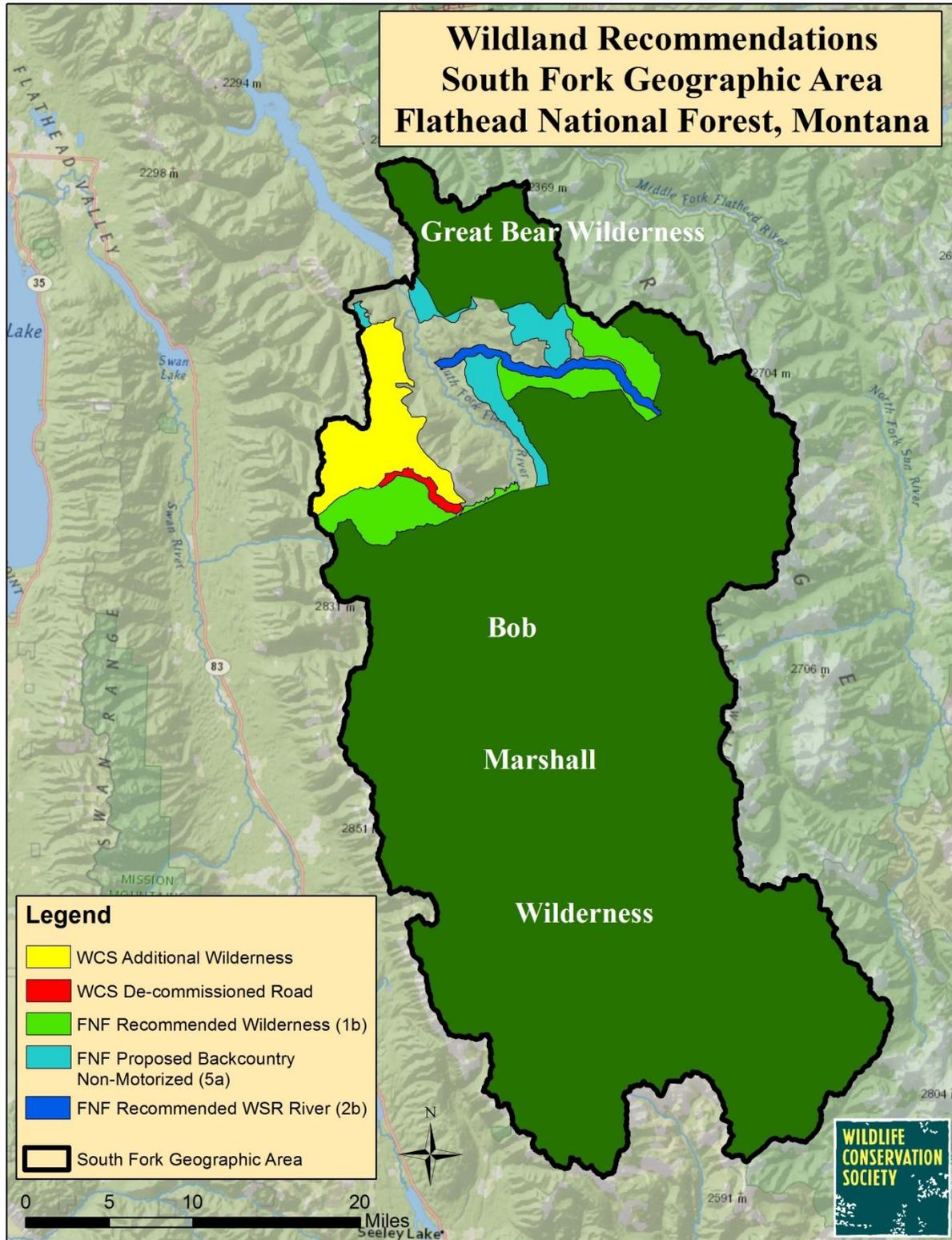
Figure 3. Areas recommended for Wilderness and Backcountry by the Wildlife Conservation Society in the Hungry Horse Geographic Area of the proposed Forest Plan, Flathead National Forest, Montana.



South Fork Flathead Geographic Area

- For the South Fork Flathead Geographic Area, the Forest Service IRA tallied 72,345 acres. There are several areas with Class I roads that could be eligible for wilderness designation as well.
- In its 2014 report, WCS recommended 57,037 of these roadless acres as additions to the Bob Marshall Wilderness and another 21,109 acres as Backcountry non-motorized year-round - for a total of 78,146 acres.
- In the Proposed Action, the Flathead National Forest recommended 27,709 acres for Wilderness (MA 1b) and another 40,829 acres for Backcountry/non-motorized year-round (MA 5a) - for a total of 68,538 acres in some protection designation (88% of WCS recommendation).
- ★ WCS endorses the areas recommended for Wilderness (1b) and Backcountry non-motorized (5a) in the South Fork Flathead GA in the Proposed Forest Plan. Nonetheless, a much larger area warrants more enduring and stronger protection due to significant fish and wildlife values.
- ★ Changes Needed to Proposed Action:
 - ✓ **Bunker Creek area (Bob North WIA):** WCS recommends an additional 26,470 acres in the Bunker Creek-Addition Creek area be changed from Backcountry (5a) to **Recommended Wilderness (1b)** (Figure 4). This would enhance the value of the adjacent area in Middle Fork Creek recommended for Wilderness by the Flathead National Forest in the Proposed Plan. The Bunker Creek and Addition Creek watersheds have a notable concentration of high composite scores. Bunker Creek has been designated critical habitat as a spawning stream for bull trout. Pure populations of westslope cutthroat trout have been documented in Bunker, Addition, Bruce and Tin Creeks. All of this area is primary habitat for wolverines, and the higher country is maternal habitat. Numerous locations were recorded in this area during the first-ever field study of wolverines in the 1970s, even along the bottom of both Bunker Creek and Addition Creek. Most of this area has been identified by the FNF as security core area for grizzly bears and contains diverse habitat components. Numerous telemetry locations of female grizzly bears have been recorded throughout these basins. High-quality winter and summer habitat for mountain goats occur in the rugged terrain at the head of Bunker Creek and also along cliff bands at lower elevations in Bunker, Addition, and Little Creek drainages. Several groups of goats have been observed there.
 - ✓ We recommend that the road in lower Bunker Creek be de-commissioned from junction with spur road to Gorge Creek (present location of gate) up to forks of Bunker Creek and Middle Fork Creek (approximately 5.8 miles).

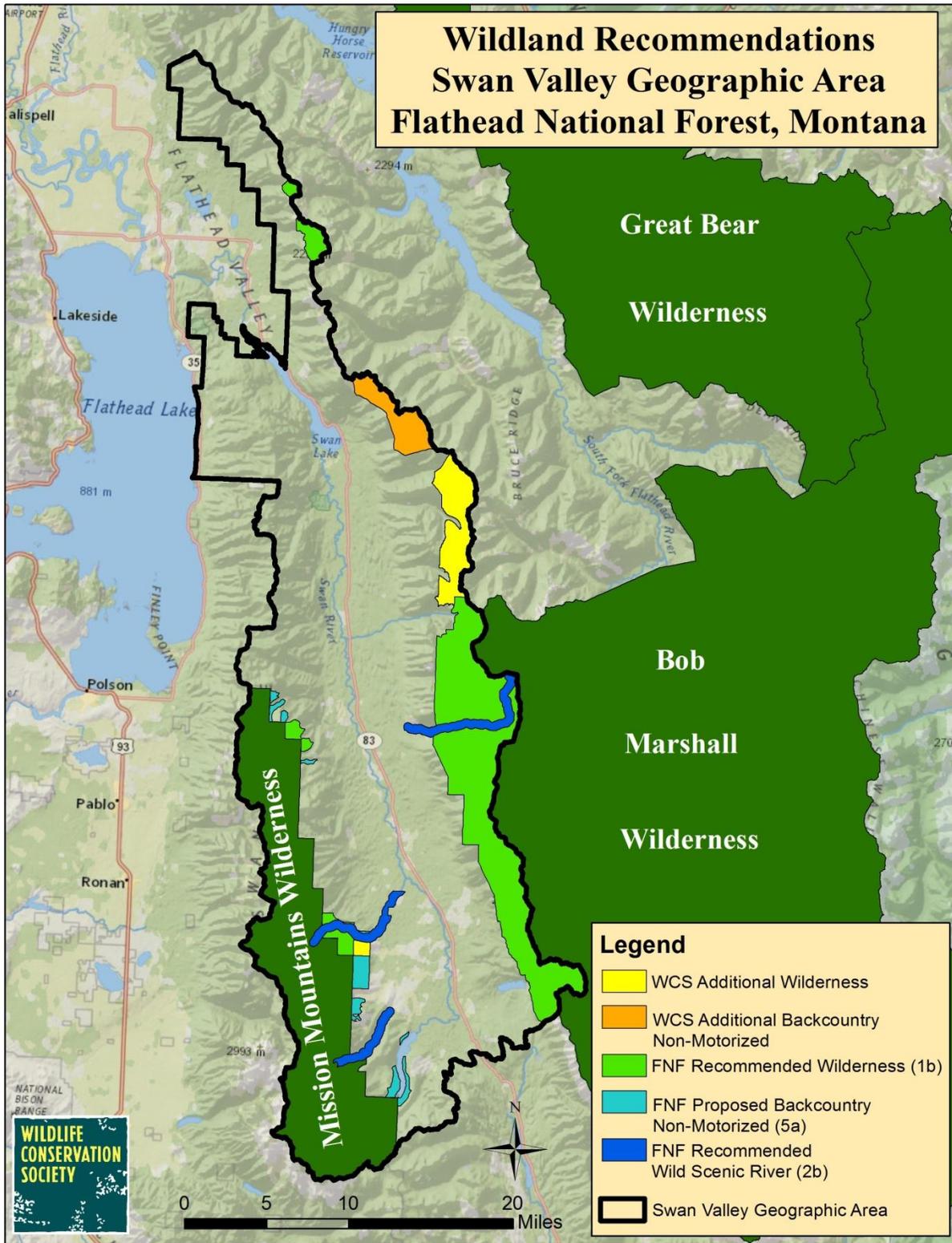
Figure 4. Areas recommended for Wilderness and Backcountry by the Wildlife Conservation Society in the South Fork Geographic Area of the proposed Forest Plan, Flathead National Forest, Montana.



Swan Valley Geographic Area

- For the Swan Valley Geographic Area, the Forest Service IRA tallied 95,019 acres.
- In its 2014 report, WCS recommended 85,720 of these roadless acres as additions to the Bob Marshall Wilderness and another 8,821 acres as Backcountry non-motorized year-round - for a total of 94,541 acres.
- In the Proposed Action, the Flathead National Forest recommended 51,005 acres for Wilderness (MA 1b) and another 9,292 acres for Backcountry/non-motorized year-round (MA 5a) - for a total of 60,297 acres in some protection designation (64% of WCS recommendation).
- ★ WCS endorses the areas designated as Recommended Wilderness (1b) and Backcountry non-motorized (5a) in the Swan Valley GA in the Proposed Forest Plan. However, a rugged area of high-value habitat along the Swan Crest warrants more enduring protection.
- ★ Changes Needed to Proposed Action:
 - ✓ We recommend an additional 9,343 acres be proposed for **Recommended Wilderness (MA 1b)** along the Swan Crest from Inspiration Pass north to Thunderbolt Mountain (Figure 5). This would enhance the value of the area along the Swan Crest further south and part of the Bunker Creek watershed recommended for Wilderness by the Flathead National Forest in the Proposed Plan. It would help protect the headwaters of both North and South Fork of Lost Creek, which have been designated critical habitat as spawning streams for bull trout. The South Fork Lost Creek contains pure populations of westslope cutthroat trout, too. Much of the Swan Crest is maternal habitat for wolverine, with several locations recorded in this section. Although some of this area has been identified by the FNF as security core area for grizzly bears, the section along the Swan Crest needs stronger protection. In particular, there is a notable concentration of avalanche chutes in the headwaters of the South Fork Lost Creek. High-quality winter and summer habitat for mountain goats occur in rugged terrain along the Swan Crest, especially around Thunderbolt Mountain and Warrior Mountain.
 - ✓ WCS recommends an additional 5,832 acres be proposed for **Backcountry Non-motorized (MA 5a)** along the Swan Crest from Con Kelly Mountain north to Hall Lake (Figure 5). This section has some high values for wolverine, grizzly bear, and mountain goats. Importantly, it would bridge the areas recommended for Wilderness to the south and north along the Swan Crest.
 - ✓ On the west side of the Swan Valley at the base of the Mission Mountain Wilderness, Elk Creek is the most productive stream for the threatened bull trout in the entire Swan River watershed. We endorse the FNF's Recommended Wilderness (1b) for the small roadless area around Elk Creek. We suggest, however, that the adjacent sec. 20 (553 acres) also be **Recommended Wilderness (1b)** as it includes a tributary to Elk Creek.

Figure 5. Areas recommended for Wilderness and Backcountry by the Wildlife Conservation Society in the Swan Valley Geographic Area of the proposed Forest Plan, Flathead National Forest, Montana.



Summary and Closing Thoughts

The Flathead National Forest is one of the crown jewels in the entire National Forest system. It has a stellar history of protecting wild lands and wild rivers, which has provided key refuge for vulnerable fish and wildlife through turbulent periods of habitat loss and population declines elsewhere. Now, a new challenge of climate warming has emerged. A smart strategy for resiliency going forward is to protect and connect large landscapes with high topographic and ecological diversity. The diverse and complex terrain across the Flathead National Forest offers a notable range of future options for plants and animals during climate change. But such advantageous resiliency can be fully realized only if fish and wildlife have room to move unfettered across large, protected and connected landscapes.

The Flathead National Forest has recommended 188,206 acres for Wilderness, compared to the 404,208 acres initially proposed by the Wildlife Conservation Society – a shortfall of 216,000 acres. With careful examination of the scientific data, WCS has prioritized a few areas totaling 77,170 acres and urges the Forest to recommend these additional areas for Wilderness (Table 1, Figure 6). Note that one area including upper Bunker Creek, upper Sullivan Creek, and adjacent areas west of the Swan Crest transcends the boundaries of 3 Geographic Areas.

Coupled with the areas proposed for Wilderness and Backcountry non-motorized in the revised Forest Plan, these prioritized additions would enable the Flathead National Forest to complete the legacy of wildlife and wildland conservation not only for local Montanans but for all America’s citizens, thereby securing a ‘geography of hope’ for generations yet to follow.

Table 1. Area (acres) of additional Wilderness and Backcountry (non-motorized) recommended by the Wildlife Conservation Society (in yellow) for each Geographic Area (GA) on the Flathead National Forest, Montana. The changes from other Management Area allocations in the Proposed Forest Plan are tallied for each WCS addition to Recommended Wilderness and Backcountry (non-motorized).

Management Area	North Fork GA	Middle Fork GA	Hungry Horse GA	South Fork GA	Swan Valley GA	TOTAL
1b - FNF	80,662	9,161	19,669	27,709	51,005	188,206
1b - WCS	1,220	8,523	31,061	26,470	9,896	77,170
1b - TOTAL	81,882	17,684	50,730	54,179	60,901	265,376
MA 5a		3,994	11,213	26,341	5,601	47,149
MA 5b			3,986			3,986
MA 5c	1,220	2,082	9,405		902	13,609
MA 5d					3,268	3,268
MA 6a		2,316	3,706		24	6,056
MA 6b		86	2,752	129	98	3,067
5a - WCS			8,974		5,832	14,806
MA 5b			429		2,152	2,581
MA 5c			5,452		14	5,466
MA 5d			639		3,659	4,298
MA 6a			2,454		0	2,454
MA 6b			0		7	7
subtotal			8,974		5,832	14,806

Figure 6. Summary of areas recommended for Wilderness (1b), WSR (2b) and Backcountry non-motorized (5a) by the Wildlife Conservation Society for the proposed Forest Plan, Flathead National Forest, Montana.

