
To: Joe Krueger, Forest Planner

flatheadplanrevision@fs.fed.us

Subject: Forest Plan Revision – Flathead National Forest

From: Greg Warren

Date: May 13, 2015

Scoping Comments - Federal Register / Vol. 80, No. 84 / Friday, May 1, 2015 / Notices

Forest Plan Revision, Flathead National Forest

Contents – Observations and Recommendations

Proposed Management Areas	2
Bob Marshall and Great Bear Wildernesses	3
Flathead Wild and Scenic River	6
Backcountry	6
National Scenic Trails – CDNST and PNNST	7

The following comments are submitted in response to the Notice of Intent to revise the Flathead National Forest Land Management Plan and prepare an associated Environmental Impact Statement.

Flathead National Forest Proposed Action

<p>Related to (part of the plan, or plan component identifier code)</p>	<p>Comment</p>	<p>Proposed Solution</p>
<p>Chapter 3, page 84</p>	<p>Proposed Management Areas I am generally supportive of the Management Area allocations in the Proposed Plan. However, and specific to the Spotted Bear area, I recommend that the allocation in the vicinity of the Meadow Creek Airstrip and upper Spotted Bear River be changed from 6A to 1b or 5A.</p>	<p>These specific areas have been flagged on the Flathead mapping webpage.</p>

Chapter 3,
page 85

**Bob Marshall and
Great Bear
Wildernesses**

Please reference and ensure that the proposed action and alternatives are consistent with FSH 1909.12 part 24.41.

**1a Designated
Wilderness**

Desired Conditions
(MA-1a-DC)

I am generally supportive of the Desired Conditions statements, except as noted below.

I value the historic and administrative purposes of facilities in the BMWC; however, the appropriateness of these facilities should not be addressed in the Plan, but instead through site-specific analyses with

MA 1 Proposed Plan Direction

Please include in the proposed action and alternatives all of the plan components that are found in the Bob Marshall, Great Bear, Scapegoat Wildernesses Recreation Management Direction. This BMWC Management Direction should only be modified during a multi-forest BMWC process that is similar to the process being used for the Grizzly Bear amendment.

BMWC Recreation Management Direction

Standards for Resource and Social Indicators for Each Opportunity Class in the BMWC

Indicators	Opportunity Class I	Opportunity Class II	Opportunity Class III	Opportunity Class IV
Social: 1. Number of trail encounters with other parties	80% probability of 0 encounters per day	80% probability of 1 or fewer encounters per day	80% probability of 3 or fewer encounters per day	80% probability of 5 or fewer encounters per day
2. Number of other parties camped within sight or continuous sound	80% probability of 0 parties per day	80% probability of 0 parties per day	80% probability of 1 or 0 parties per day	80% probability of 3 or fewer parties per day
Resource: 3. Area of barren core (sq ft)	100	500	1000	2000
4. Number of human impacted sites per 640 acre area	1 permitted	2 permitted	3 permitted	6 permitted

<p>evaluation processes that are consistent with the requirements of the Wilderness Act.</p> <p>Outfitter and guide services should be addressed through site-specific analyses and need assessments.</p> <p><u>Standards (MA-1a-STD)</u></p> <p>I am generally supportive of the standards and guidelines, but additional plan components need to be added from the Bob Marshall, Great Bear, Scapegoat Wildernesses Recreation Management Direction. Some of these plan components are listed here.</p>	<p>5. Number of human impacted sites above a particular condition class index per 640 acres</p>	<p>No moderately or highly impacted sites per 640 acre area</p>	<p>No more than (1) moderately impacted site and (0) highly impacted sites per 640 acre area</p>	<p>No more than (2) moderately impacted site and (0) highly impacted sites per 640 acre area</p>	<p>No more than (3) moderately impacted site and (0) highly impacted sites per 640 acre area</p>																																		
	<p><u>Standards for Range Indicators for Each Opportunity Class in the BMWC</u></p> <table border="1"> <thead> <tr> <th>Indicators</th> <th>Opportunity Class I</th> <th>Opportunity Class II</th> <th>Opportunity Class III</th> <th>Opportunity Class IV</th> </tr> </thead> <tbody> <tr> <td>Range:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>1. Degree of forage utilization</td> <td>No more than 20% forage utilized</td> <td>No more than 20% forage utilized</td> <td>No more than 40% forage utilized ***</td> <td>No more than 40% forage utilized ***</td> </tr> <tr> <td>2. General range trend</td> <td>Static or improving</td> <td>Static or improving</td> <td>Static or improving</td> <td>Improving</td> </tr> <tr> <td>3. Overall range condition</td> <td>Excellent</td> <td>Excellent</td> <td>Generally good or better</td> <td>Generally good</td> </tr> <tr> <td>4. Visual Appearance ** (Maximum Impact)</td> <td>Lightly grazed</td> <td>Lightly grazed</td> <td>Moderately grazed</td> <td>Moderately grazed</td> </tr> <tr> <td>5. Forest succession, Vegetation changes</td> <td>Maintain natural ecological processes and conditions as they existed prior to fire suppression</td> <td>Maintain natural ecological processes and conditions as they existed prior to fire suppression</td> <td>Maintain natural ecological processes and conditions as they existed prior to fire suppression</td> <td>Maintain natural ecological processes and conditions as they existed prior to fire suppression</td> </tr> </tbody> </table>					Indicators	Opportunity Class I	Opportunity Class II	Opportunity Class III	Opportunity Class IV	Range:					1. Degree of forage utilization	No more than 20% forage utilized	No more than 20% forage utilized	No more than 40% forage utilized ***	No more than 40% forage utilized ***	2. General range trend	Static or improving	Static or improving	Static or improving	Improving	3. Overall range condition	Excellent	Excellent	Generally good or better	Generally good	4. Visual Appearance ** (Maximum Impact)	Lightly grazed	Lightly grazed	Moderately grazed	Moderately grazed	5. Forest succession, Vegetation changes	Maintain natural ecological processes and conditions as they existed prior to fire suppression	Maintain natural ecological processes and conditions as they existed prior to fire suppression	Maintain natural ecological processes and conditions as they existed prior to fire suppression
Indicators	Opportunity Class I	Opportunity Class II	Opportunity Class III	Opportunity Class IV																																			
Range:																																							
1. Degree of forage utilization	No more than 20% forage utilized	No more than 20% forage utilized	No more than 40% forage utilized ***	No more than 40% forage utilized ***																																			
2. General range trend	Static or improving	Static or improving	Static or improving	Improving																																			
3. Overall range condition	Excellent	Excellent	Generally good or better	Generally good																																			
4. Visual Appearance ** (Maximum Impact)	Lightly grazed	Lightly grazed	Moderately grazed	Moderately grazed																																			
5. Forest succession, Vegetation changes	Maintain natural ecological processes and conditions as they existed prior to fire suppression	Maintain natural ecological processes and conditions as they existed prior to fire suppression	Maintain natural ecological processes and conditions as they existed prior to fire suppression	Maintain natural ecological processes and conditions as they existed prior to fire suppression																																			

Schafer Meadows Wilderness Airstrip

The Forest Service recognized the Congressional Direction established in the House Committee Report accompanying the act establishing the Great Bear Wilderness. This report directs that the airstrip remain open to aircraft use, but that such use may be regulated in the Future if it is greatly expanded.

In developing this management direction, managers and users chose not to define the term of “greatly expanded use” since early use figures for the Schafer airstrip are incomplete or unavailable. In place of this concept, members of the task force (including pilots) agreed to a general management philosophy for the airstrip. They set the acceptable level of aircraft use in terms of impacts on the wilderness resource and experience. This philosophy and the accepted indicators and standards are shown below. Members of the task force agreed that management actions are appropriate when the level of use exceeds that shown in the standard.

The primary function of the airstrip will be that of a trailhead for wilderness users. Its main use will be for general wilderness dependent activities, river access, and Forest Service administrative activities. In order to insure continued use of the airstrip by the flying public with a minimum impact on other wilderness visitors and a minimum of restriction on aircraft users, the following steps will be taken:

The following indicators and standards will be adopted:

- Indicator: 1) The number of aircraft landings per day. A landing includes touch-and-go approaches for training or practice as well as landings where the plane remains on the ground for any length of time.
- 2) The total number of landings per year.
- Standard: 1) A ninety-percent probability of having no more than a total of 5 aircraft landings per day.

		<p>2) No more than a total of 550 landings per year of which no more than 6% will be administrative landings.</p> <p>Exceeding standards because of bona fide emergency landings (search and rescue, fire, etc.) will not lead to restrictions on private flights.</p> <p><u>1b Recommended Wilderness</u></p> <p>A standard should be added that restricts the use of bicycles.</p>
<p>Chapter 3, page 89</p>	<p>Flathead Wild and Scenic River</p> <p>Please reference and ensure that the proposed action and alternatives are consistent with FSH 1909.12 part 24.42.</p>	<p>Please include all of the plan components that are found in the Flathead Wild and Scenic River Comprehensive Management Plan. The W&SR management direction should only be modified during a process that revises the Wild and Scenic River Comprehensive Management Plan and the direction found in Federal Register Notice—Vol.43, No. 117, page 26092.</p> <p><u>Guideline (MA2-GLD)</u></p> <p>The Flathead Wild and Scenic River Comprehensive Management Plan is more than mere guideline. What is described as Guideline 01 needs to be a standard.</p>
<p>Chapter 2, page 59</p> <p>Chapter 3, page 102</p>	<p>Backcountry</p> <p>Please reference and ensure that the proposed action and alternatives are consistent with FSH 1909.12 part 23.23a.</p>	<p>Descriptions of MA 5a, 5b, 5c, and 5d need to clearly identify the desired ROS class. In addition, direction needs to include indicators and thresholds for each ROS setting to ensure the achievement or movement toward the desired ROS class. ROS components are access, remoteness, naturalness, facilities and site management, social encounters, visitor impacts, and visitor management.</p> <p>Page 60 part 03: New roads should not be constructed in MA 5a.</p> <p>Page 60 part 04: Add: Mechanized vehicle use may be managed to prevent degradation of pedestrian and equestrian user experiences.</p>

<p>Chapter 2, page 71</p>	<p>National Scenic Trails – CDNST and PNNST</p> <p>Please reference and ensure that the proposed action and alternatives are consistent with FSM 2353.42, FSM 2353.44b, and FSH 1909.12 part 24.43.</p>	<p>The revised LMP needs to identify Management Area corridors of sufficient width to encompass resources, qualities, values and associated settings and the primary use or uses that are present or to be restored along the NST travel routes. The Forest Plan needs to include a map that displays the extent of NST Management Areas to ensure that the nature and purposes of the NSTs are promoted and protected. The Management Area needs to describe nature and purposes desired conditions that are supported by appropriate standards and guidelines. The following are a few broad NST Management Area recommendations that on the Flathead National Forest would be mostly applicable to the PNNST due to the wilderness location of the CDNST:</p> <ul style="list-style-type: none"> • The extent of the NST Management Area needs to be at least one-half mile on both sides of the NST travel route following topographic features where it is reasonable to do so, while additional management direction is prescribed for adjacent areas to assure that the NST Scenery Management standards are met. This recommendation is based on ROS criteria that identify remoteness for a Semi-Primitive Non-Motorized setting as: An area at least 1/2-mile but not further than 3 miles from all roads, railroads or trails with motorized use; can include the existence of primitive roads and trails if closed to motorized use. More than 3 miles would tend to classify the area as Primitive another desirable setting. The Forest Service Scenery Management System identifies that the middleground begins at 1/2-mile of the travel route. • Management of activities and uses within this Management Area need to focus on providing for the nature and purposes of the NST (FSM 2353.11 and FSM 2353.42). The nature and purposes of the NSTs are to provide for high-quality, scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the NST corridor. Other recreation and resource uses along the NST may be allowed only where there is a determination that the other use would not substantially interfere with the nature and purposes of the NST. • Location and management factors must be considered, such as, the NST needs to be located in more primitive ROS classes where available and once located the management of the NST corridor (rights-of-way) must provide for a primitive or semi-primitive non-motorized
-------------------------------	--	---

		<p>experiences to extent practicable. Related, scenic management objectives of high or very high need to be met along the NST travel route where on federal lands.</p> <ul style="list-style-type: none"> • Land management plans need to complete the rights-of-way (NTSA, Sec. 7), Comprehensive Plan (NTSA, Sec. 5), and E.O. 13195 requirements by addressing the following: (1) establish a rights-of-way (Management Area) that is of sufficient width and so located to provide the retention of natural conditions, scenic and historic features, and primitive character of the trail area, and (2) identify specific objectives and practices to be observed in the management of the trail, including the identification of all significant natural, historical, and cultural resources to be preserved..., and an identified carrying capacity [or visitor use management practices] of the trail and a plan for its implementation. <p>High-quality National Scenic Trail corridor locations are identified in Figures 1 and 2. Specific and recommended NST Management Area Plan Components are identified in the following table.</p> <table border="1" data-bbox="688 706 1990 1286"> <tr> <td data-bbox="688 706 1990 782"> <p>NST MA Desired Conditions</p> </td> </tr> <tr> <td data-bbox="688 782 1990 1136"> <p>The Management Area provides for the nature and purposes of the NSTs. The nature and purposes of the NSTs are to provide for high-quality, scenic, primitive hiking and horseback riding experiences and to conserve natural, historic, and cultural resources along the NST corridor. The NST corridor provides panoramic views of undisturbed landscapes in a tranquil scenic environment, and features historic high country landmarks where they occur. The corridor is of sufficient width to encompass national trail resources, qualities, values, associated settings and the primary use or uses. This includes vistas (key observation points), campsites, water sources and other important resource values.</p> </td> </tr> <tr> <td data-bbox="688 1136 1990 1213"> <p>Continental Divide National Scenic Trail Objective</p> </td> </tr> <tr> <td data-bbox="688 1213 1990 1286"> <p>Complete a CDNST Unit Plan within 3 years (FSM 2353.44b part 2).</p> </td> </tr> </table>	<p>NST MA Desired Conditions</p>	<p>The Management Area provides for the nature and purposes of the NSTs. The nature and purposes of the NSTs are to provide for high-quality, scenic, primitive hiking and horseback riding experiences and to conserve natural, historic, and cultural resources along the NST corridor. The NST corridor provides panoramic views of undisturbed landscapes in a tranquil scenic environment, and features historic high country landmarks where they occur. The corridor is of sufficient width to encompass national trail resources, qualities, values, associated settings and the primary use or uses. This includes vistas (key observation points), campsites, water sources and other important resource values.</p>	<p>Continental Divide National Scenic Trail Objective</p>	<p>Complete a CDNST Unit Plan within 3 years (FSM 2353.44b part 2).</p>
<p>NST MA Desired Conditions</p>						
<p>The Management Area provides for the nature and purposes of the NSTs. The nature and purposes of the NSTs are to provide for high-quality, scenic, primitive hiking and horseback riding experiences and to conserve natural, historic, and cultural resources along the NST corridor. The NST corridor provides panoramic views of undisturbed landscapes in a tranquil scenic environment, and features historic high country landmarks where they occur. The corridor is of sufficient width to encompass national trail resources, qualities, values, associated settings and the primary use or uses. This includes vistas (key observation points), campsites, water sources and other important resource values.</p>						
<p>Continental Divide National Scenic Trail Objective</p>						
<p>Complete a CDNST Unit Plan within 3 years (FSM 2353.44b part 2).</p>						

		<p>NST MA Standards or Guidelines¹</p> <p style="text-align: center;">Scenery Management – Outside of Designated Wilderness</p> <p>Manage the travelway as a concern level 1 travel route. Management actions are to meet a Scenic Integrity Level of Very High or High in the immediate foreground and foreground visual zones. Excepted are management activities that contribute to achieving the overall nature and purposes of the NST.</p> <p><i>Forest-wide Standard: Management activities are to meet a Scenic Integrity Level of Very High, High, or Moderate in the middleground as viewed from the existing and potential NST travel routes.</i></p> <p style="text-align: center;">Recreation Management</p> <p>Provide for the ROS class of Primitive in wilderness, and ROS class of Semi-Primitive Non-Motorized in non-wilderness. {Direction needs to include indicators and thresholds for each ROS setting to ensure the achievement or movement toward the desired ROS class. }</p> <p>Manage the NST to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities. Backpacking, nature walking, day hiking, horseback riding, nature photography, mountain climbing, cross-country skiing, and snowshoeing are compatible with the nature and purposes of the NST.</p> <p>The Management Area is not suitable for motorized use and such use may only be allowed where consistent with the NTSA Section 7(c) (16 U.S.C. 1246(c)).</p>
--	--	---

¹ See FSM 1110.8 for Degree of Compliance or Restriction “Helping Verbs” and “Mood of Verb” Definitions

		Special Uses Management
		Activities, uses, and events that would require a permit shall not be authorized unless the activity, use, or event contributes to achieving the nature and purposes of the NST.
		Minerals Management
		Mineral leases are to include stipulations for no surface occupancy.
		Permits for the removal of mineral materials are not to be issued.
		Timber Production
		The Management Area is not suitable for timber production. Timber harvest is not scheduled and does not contribute to the allowable sale quantity.
		Cultural and Historic Resources Management
		Protect cultural and historic resources.
		Lands Acquisition
		Provide for land acquisitions in the North Fork of the Flathead to protect the nature and purposes of the Pacific Northwest NST. Prohibit land disposals in potential Pacific Northwest NST corridors.
		Travel Routes
		Segments of the NST should fall into Trail Class 2 or 3 and have a Designed Use of Pack and Saddle Stock (FSH 2309.18).
		National Scenic Trail travel routes are marked with approved symbols. Use the blazer brand in designated and recommended wilderness.
		Other Uses Considerations

		<p>Other uses that could conflict with the nature and purposes of the NST may be allowed only where there is a determination that the other use would not substantially interfere with the nature and purposes of the NST (16 U.S.C. 1246(c)).</p> <p>National Scenic Trail Management Areas overlap with Wilderness and Wild and Scenic River Management Areas. Where this occurs, the most restrictive standards control.</p> <p style="text-align: center;">Implementation Strategies</p> <p>Partnerships and volunteers are sustained or sought to lead and assist in NST programs. Volunteer and cooperative agreements will be developed with those volunteers and private organizations that are dedicated to planning, protecting, developing, maintaining, and managing the NST in accordance with Sections 2(c), 7(h)(1), and 11 of the NTSA.</p> <p>FSM 2350 has more information about national scenic and historic trails—see FSM 2353.42 and FSM 2353.44. CDNST background information can be found on the Forest Service website: http://www.fs.fed.us/cdt/admin.htm; and the NSTrail website: http://www.nstrail.org/.</p>
Figure C-12	Consistency of Map with MA Allocations	Ensure that the Desired summer recreation opportunity spectrum on the Flathead NF map is consistent with MA allocations.
Figure C-14	Locations of the National Scenic Trails	<p>The identified PNNST location is inconsistent with the National Trails System Act unless the road is closed to vehicle use. The solution is to locate the PNNST corridor elsewhere.</p> <p>Consider locating the CDNST in the Clack Creek drainage or identify an official CDNST Side Trail along this route for recommended use by backpackers.</p>

Figure 1. Pacific Northwest National Scenic Trail Potential Segment Corridor Location

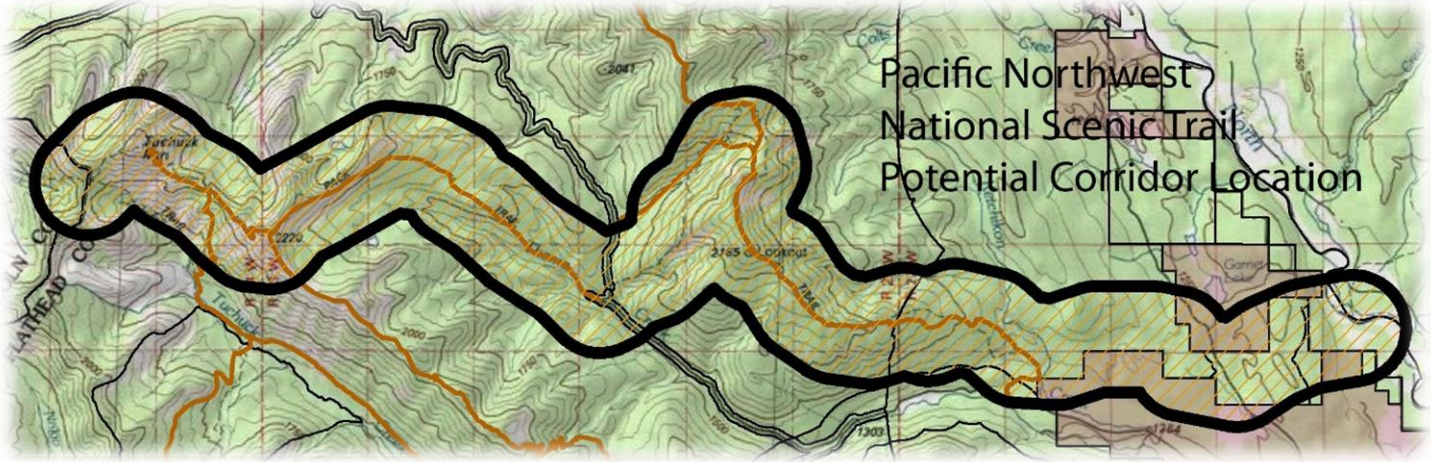


Figure 2. Continental Divide National Scenic Trail Potential Corridor Locations

