

the Montana Sierran

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SIERRA
CLUB

the Sierra Club Comments on Proposed Action **Flathead National Forest** Forest Plan Revision

by Claudia Narcisco

The importance of land management plans to our national forests cannot be overestimated. Mandated by the 1976 National Forest Management Act, forest plans are legally binding and often remain in effect for 20-30 years, as with the 1986 Flathead Forest Plan. Currently, forest planning is guided by the 2012 Planning Rule, which provides for sustainability, connectivity for imperiled wildlife, and climate change.

We all know the unique roles and contributions of the Flathead National Forest (FNF): its location on the Crown of the Continent, its ecologically intact landscape, and its proximity to Glacier Park and the Bob Marshall Wilderness. Just as important is its place in the Northern Continental Divide Ecosystem (NCDE), where the U.S. Fish and Wildlife Service is preparing to delist the grizzly bear and remove protections of the Endangered Species Act. A lot is at stake and it's critical we get it right!

The Montana Chapter has been following the Flathead National Forest Plan Revision since development of its 2006 Proposed Plan. As reported in the Spring 2015 Montana Sierran, the FNF released the Proposed Action (PA) - Revised Forest Plan for public comment in March and with it The Grizzly Bear Management Amendments to Lolo, Helena, Kootenai, and Lewis & Clark Forest Plans. We issued an Action Alert detailing the major issues and encouraged comments.

The FNF received 20,000 comments. Of these 370 were from individuals or commercial interests, seven from public agencies, 30 from non-profit organizations including the Sierra Club, and the remainder mostly form letters. You can view comments through the Forest Plan Revision Website: <http://1.usa.gov/1liVwUc>.

Preparing the Sierra Club's comments for the FNF PA and Grizzly Amendments was a group effort. We assembled a team of volunteers who wrote comments for various sections, and contracted with Brian Peck, independent consultant on grizzly bear issues. We very much appreciated the support of the Center for Biological Diversity and Western Watershed Project, which joined Sierra Club's comments. Provisions for ecosystem sustainability and connectivity were threads throughout our comments. photo credit: Mark Hufstetler, www.pitamakan.com

WILDLANDS

We requested the FNF:

- Develop a Draft Plan consistent with its unique roles and contributions and use these criteria to compare and evaluate Alternatives;
- Provide for connectivity and ecosystem integrity by recommending all eligible roadless areas for wilderness designation and eligible streams to the Wild and Scenic River System;
- Emphasize ecosystem sustainability in its Proposed Plan by reducing regularly scheduled logging, road density, and motorized recreation;
- Strengthen grizzly bear management standards;
- Retain The Inland Native Fish Strategy (INFISH) and Northern Rockies Lynx Management Direction (NRLMD);

- Develop Alternatives around the Citizen's ReVision and the 2006 Flathead Proposed Plan and compare these in the Draft Environmental Impact Statement analysis of Alternatives; and
- Redefine the economic analysis area to include all counties within the FNF, and not arbitrarily base it on a county's logging history.

We also expressed concerns about the public involvement process (see related article on collaboration). Our full letter can be found on montana.sierraclub.org/comments-forest-service. The FNF will identify significant issues, develop and analyze alternatives, and release a Draft Environmental Impact Statement for public comment in January 2016.

The Montana Chapter and Sierra Club will review and comment at this critical stage. If you are interested in helping, please contact Claudia Narcisco at: cdnarcisco@gmail.com or Bonnie Rice at: bonnie.rice@sierraclub.org.

Collaboratives Out of the Closet

by Claudia Narcisco

The collaborative, a group of diverse interests brought together to find so-called "solutions to public land management problems," has been a growing trend. The same people or organizations often serve on multiple collaborative groups and are sometimes paid to do so. Rather than be a strong voice for diverse interests, participants risk becoming partners. Diversity of interests, considered a requirement of the collaborative, blurs.

Initially, it was understood that collaborative groups would not avoid environmental and public participation laws. Unfortunately, the situation has deteriorated. In January 2015, a large group of collaborative participants, including some environmental organizations, wrote to Senator Daines requesting that he, "Work with coalitions of the willing. Deference to organizations and individuals who oppose collaborative approaches to forest management and reform merely maintains a status quo that does not serve the interests of most Montanans." Clearly, collaborative

advocates are avoiding our public participation laws and abridging the public's rights, even its responsibility.

It's been two years since the Montana Chapter of the Sierra Club discussed collaboratives at our annual meeting. Ideologically, we found it problematic that collaboratives are limited to local so-called stakeholders. The few participants do not represent the many citizens not present. Our wild lands, wildlife, waters, soils, and even laws can be left without a voice. The National Environmental Policy Act (NEPA), our flagship public participation law, provides for public involvement of activities on public lands. We were concerned that collaboratives undermine NEPA and other laws.

The Chapter developed a statement to address some of our concerns: When we participate, we do so with reservation. Local collaboratives do not represent all stakeholders of public lands – the U.S. citizens. The collaborative should not replace or under mine NEPA. When we participate, we do so to give a voice to the voiceless – wild lands, wildlife, soil, water, etc. The topic of the collaborative is more complicated than these few words allow. We believe the collaborative is a controversial topic that would benefit from open discussion in the light of day.

Newsletter Information

the Montana Sierran (TMS) is published twice a year by the Montana Chapter of the Sierra Club, a division of the National Sierra Club.

Submission deadlines are April 1 for the Spring/Summer issue and October 1 for the Fall/Winter issue.

Please send relevant articles and photos by the deadlines to kiersten.iwai@sierraclub.org or The Montana Sierran P.O. Box 7201 Missoula, MT 59807

The Montana Sierran reserves the right to edit or reject submissions at its discretion. Submissions must include first and last name, city, phone number and email address.

Send digital photographs at 300ppi in .jpg format. Photos must include credit (e.g. photographer's name and/or source). Please also provide text describing the photo.

Newsletter Committee

Jonathan Matthews (Chair), Diana Vanek, Liz Rantz, Kiersten Iwai (Staff Advisor)



For more information about Montana Chapter activities and Meetings, contact Rod Jude at 406.579.7627 or visit montana.sierraclub.org.

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Youth Outings in the GYE

by Diana Vanek

This past summer the Sierra Club and the Human Resource Development Council in Bozeman started a new outings program to take youth groups out into nearby wilderness areas within the Greater Yellowstone Ecosystem. Wilderness outings provide a powerful opportunity for therapeutic escape to rejuvenate minds and bodies and build skills in self-reliance.

Sierra Club partnered with HRDC's youth development program in a three-county area, targeting young people ages 14-24 from various demographics, including low-income families, school dropouts, youth with disabilities, pregnant teens, foster youth, homeless youth, and/or youth who may lack basic life skills.

The outings were co-led by a Sierra Club and HRDC staff member, along with a team of Sierra Club volunteers who range in age and gender to

provide a diversity of role models and mentors for youth participants. Outings in the Absaroka Wilderness and Hyalite area were designed to educate young people about environmental issues that tie in with the conservation goals of the Our Wild Greater Yellowstone Campaign.

As their confidence and enthusiasm grows, local youth are being encouraged to take ownership of the program by becoming part of our planning team to help organize future outings as well as recruit their peers during the upcoming hiking season. We also hope to build on our initial success by offering other experiences involving a wider network of volunteer mentors, to deepen participants' connection with the outdoors, inspire dedicated stewards of wilderness, and create an enduring desire to protect our wild spaces.



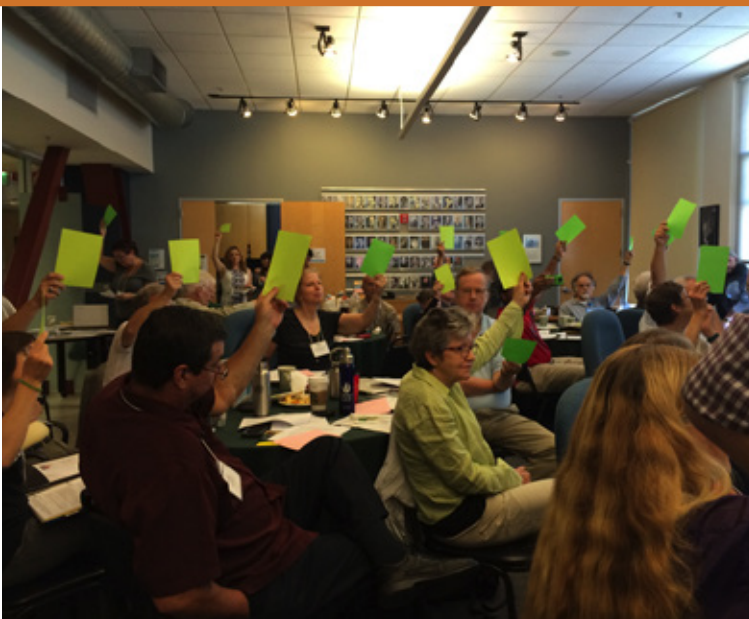
During the outings youth and volunteers participated in creative skills-building activities focused on leadership development and team building. photo credit: Diana Vanek

MISCELLANEOUS

2015 Sierra Club Council of Club Leaders

The Montana Chapter was one of over 60 at the 2015 Sierra Club Council of Club Leaders (CCL). The 2-day event was mostly a work session, with training on the 2016 political spectrum, fundraising, and increasing diversity, equity and inclusion in the Club. A perennial highlight is voting by CCL delegates on resolutions submitted by chapters from

across the country as shown in this photo. One resolution that the MT Chapter strongly supported asked the Club to reject the International Panel on Climate Change proposed temperature threshold of 2 degrees celsius and to instead request a cap of 1 degree celsius. Unfortunately, this resolution failed to pass.



THE TONGUE RIVER RAILROAD MUST NOT BE BUILT

by Jonathan Matthews

photo credit: Alexis Bonogofsky

ENERGY

During the recently closed comment period, the Montana Chapter of the Sierra Club urged the Montana Surface Transportation Board to choose the No-Action Alternative for the proposed Tongue River Railroad, explaining that the likely harms that would be caused by all of the other alternatives far outweigh any potential benefits. Our arguments to the Surface Transportation Board follow.

Only the No-Action Alternative protects the beautiful alluvial valleys of the Tongue River and Otter Creek from future coal mining that the railroad would make possible and from the harms connected with the daily operation of the railroad. Only the No-Action Alternative protects the productive ranches and the ranch families who have lived along the Tongue River and Otter Creek for generations from having their land destroyed by open-pit coal mining and the daily actions of the railroad. Only the No-Action Alternative protects the richly diverse ecosystem that is the alluvial valleys of the Tongue River and Otter Creek: riparian areas home to birds, mammals, reptiles, amphibians, fish, insects, and diverse plant species.

Only the No-Action Alternative protects down-track communities throughout Montana, Idaho, Washington, and Oregon from the disruptions and pollution of an estimated 26 additional trains each way per week hauling 20 million tons of coal annually through the hearts of many communities. These trains would be over 100 cars long and take many minutes to travel through the grade crossings in these communities. The diesel-electric engines that pull these trains would be highly polluting, with visible, sooty exhaust streaming from the engines into air of the communities. Also, the documented decrease in the load-weight of the cars from when they are loaded in Montana to when they are offloaded at Pacific coast ports prove that coal particles are leaving the cars as they travel on the railroad, bringing their mercury and other heavy metals and toxins to the communities that they pass through. How many additional cases of lung diseases would be initiated and exacerbated if the Tongue River Railroad were built? How many emergency vehicles, ambulances and fire trucks, would be seriously delayed

by the many additional long trains that the Tongue River Railroad would cause to pass through dozens of communities? How many homes and businesses would burn and how many people would be seriously harmed or die due to the delays of these emergency vehicles? And if the mined coal that the Tongue River Railroad would make possible would be transported by train to the east, these same harms would impact the dozens of communities the long trains would pass through heading to the Midwest and East.

Finally, only the No-Action Alternative would keep from being released into the atmosphere the huge quantities of carbon dioxide that would come from burning the estimated 20 million tons of coal per year that the Tongue River Railroad would place into the environment each year.

Approximately 6,000 pounds of carbon dioxide are produced from each ton of Montana coal burned. This means that if the Tongue River Railroad is built, approximately 120 billion pounds of CO₂ would enter the atmosphere each year just from the coal being burned.

An additional large amount of CO₂ would be put into the atmosphere due to the manufacture of the heavy equipment used to mine the coal, the fuel burned in the operation of this heavy equipment, and the fuel burned by transporting this coal to where it is burned in power plants, including trains, trucks, and the highly polluting fuel burned by the massive ships that would transport the coal from U.S. Pacific Coast ports to Asia, and then the fuel burned in transporting the coal from Asian ports to power plants potentially thousands of miles from the ports.

March 2015 was the first month ever recorded that CO₂ levels in the atmosphere were above 400 parts per million for the entire month. According to NASA's Erika Podest, "CO₂ concentrations haven't been this high in millions of years." Though our atmosphere is already overloaded with unprecedented levels of carbon dioxide, the additional carbon dioxide that would be put into

Earth's atmosphere due to the Tongue River Railroad being built would be a large cause of enduring harm. Some of the carbon dioxide that would be put into the atmosphere if the Tongue River Railroad were built would remain there, absorbing atmospheric heat, for thousands of years. The natural processes that would remove this carbon dioxide from the carbon cycle are very slow. Returning this carbon dioxide to the earth or to the sea floor—and therefore taking it out of the carbon cycle—takes centuries.

As reported by Climate Central, whose staff and board members are among the world's most respected climate scientists, such as Princeton's Michael Oppenheimer and Stephen Pacala and Stanford's Sally Benson:

NOAA and NASA jointly released their global temperature data, indicating that this year [2014] topped both 2005 and 2010 as the hottest since record keeping began in 1880. The global temperature was 1.24°F above the long-term average, besting the previous record holders by 0.07°F.



1.24°F
above average
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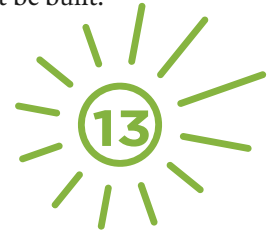


120 BILLION

of pounds of carbon dioxide entering the atmosphere if the Tongue River Railroad is built.



Record high ocean temperatures were recorded at 1.09°F above average.



number of record setting hottest years since 2000.

The global ocean temperature was also the highest on record, coming in at 1.09°F degrees above average while many land areas were also warmer than normal or set records such as many countries in Europe and the western U.S.....

With 2014 in the record books, this means that 13 of the 15 hottest years on record have all occurred since 2000. Also, this marks the 38th consecutive year with global temperatures above average. In comparison, the last time we set a global record cold temperature for the year was way back in 1911. (<http://www.climatecentral.org/gallery/graphics/10-warmest-years-globally>)<http://www.climatecentral.org/gallery/graphics/10-warmest-years-globally>

The evidence is clear. Our Earth's atmosphere cannot bear, without great harm, the massive quantities of carbon dioxide that building the Tongue River Railroad would cause to be put into it. If the decision on whether or not to build the Tongue River Railroad is based on a rational analysis of the facts, the Surface Transportation Board will choose the No-Action Alternative. The carbon beneath the alluvial valleys of the Tongue River and Otter Creek needs to stay where it is. The railroad needs to not be built.

WILDLIFE

Wolf Happenings

by Claudia Narcisco

The Montana Chapter helped sponsor the Speak for Wolves Rally, held in West Yellowstone in August. This educational event was free to the public. About 120 people attended the 2-day conference, which for the second year brought together wolf advocates from around the country. Presenters and panelists discussed the status and management of wolf populations from North Carolina to Alaska.

A presentation on the McKittrick Policy detailed its widespread abuse. This policy protects people who kill an animal protected under the Endangered-Species-Act, if they claim that they misidentified the animal.

Unfortunately, Montana continues to make it easier to hunt and trap wolves. The general

wolf-hunting season extends from September 15 to March 15, and trapping from December 15 through February 29. Children as young as 11 are eligible to hunt wolves after August 15, with a valid license. As of October 19, 31 wolves have been killed in the 2015-2016 general hunt. Landowners under Senate Bill 200 took another 3 wolves. Thirty-one wolves were trapped last season.

On a brighter note, the prerequisite wolf trapping safety and education course has recently had fewer participants. To encourage attendance, a proposal before the FWP Commission requested on-line as well as in-person classes. The Commissioners denied the request, but will revisit it at the December meeting.



The ballot initiative committee (BIC) Montanans for Trap-Free Public Lands is now collecting signatures for I-177, an initiative to ban commercial and recreational trapping on public lands in Montana. Twenty-five

thousand valid signatures must be collected by June 2016 for the initiative to make the ballot.

To help collect signatures or support this effort, visit montanatrappfree@gmail.com or www.montanatrappfree.org.



Sierra Club Opposes Delisting of Grizzly Bears in GYE

by Bonnie Rice, Greater Yellowstone
/Northern Rockies Campaign

photo credit: Thomas D. Mangelsen

The recovery of grizzly bears in the Greater Yellowstone Ecosystem (GYE) is at a pivotal juncture. Rumors abound that by the end of this year, the U.S. Fish and Wildlife Service (FWS) will once again begin the process to remove Endangered Species Act (ESA) protections from grizzlies in the Yellowstone region (“delist”). Earlier this year, Sierra Club formed an internal committee to consider what we know about grizzly recovery in the GYE and whether or not we believe that grizzly bears are ready to be taken off the endangered species list. The committee concluded that Sierra Club should oppose delisting at this time. Though grizzlies in Greater Yellowstone have made a comeback from as low as 135 bears in the 1970s as a result of decades of ESA protection and the hard work of many people in the region, the population is still vulnerable and in need of continued federal protection:

- The growth rate of the Yellowstone grizzly bear population has been flat (and could possibly be in decline). Essentially, the population hasn’t grown over for over a decade primarily due to fewer cubs and yearlings surviving as well as higher mortality from conflicts with hunters and ranchers;
- Grizzly bears in the Yellowstone region are still completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years;

- Existing state management plans are inadequate to protect Yellowstone grizzly bears or to allow them to connect to other grizzly populations or to move into additional biologically suitable habitat;
- There is significant uncertainty about the long-term implications of the recent loss of traditional major foods, such as whitebark pine seeds, on the grizzly bear population. (Undisputed however is that bears are switching to eating more meat to replace whitebark pine seeds, and more bears are dying as a result of conflicts with hunters and ranchers);
- The U.S. Fish and Wildlife Service (FWS) has not honored commitments to Native American tribes to enter into formal government-to-government consultation on delisting;
- Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the ESA, and not delist isolated ‘segments’ (such as GYE grizzlies) of the species one at a time.

¹ Grizzly bears in the GYE were previously delisted in 2007 but ESA protections were reinstated in 2009

In order to ensure the long-term future of grizzly bears and their full recovery across the lower 48, we must have a thriving, connected, and well-distributed “metapopulation” of several thousand bears. There must be natural connectivity between Greater Yellowstone and other grizzly ecosystems so bears can find food and mates. Stronger protections for bears and their habitat is needed, particularly in linkage areas, and bears must be able to move into new areas of biologically-suitable habitat. Human-caused mortality of grizzlies must be reduced, and there should be no trophy sport hunting of grizzly bears.



photo credit: Thomas D. Mangelsen; is among the most distinguished natural history photographers in the world who has spent most of his life advocating for grizzly bears. Find out more at <http://mangelsen.com>.

Additionally, all three GYE states (MT, WY, and ID) plan to immediately initiate a trophy hunt of grizzly bears if they are delisted. Over the past several months, Sierra Club's Greater Yellowstone/Northern Rockies campaign has been at the forefront of building public awareness and engagement on the delisting issue through numerous large and small events around the region, social media, radio tours and other means. It's critical that people know what's at stake and the profound implications of delisting.

Grizzly bears are the heart and soul of this region. And to many Native Americans, the grizzly bear is the physical embodiment of the very spirit of the earth. It has taken 40 years of Endangered Species Act protections for grizzly bears to begin making a comeback in the Yellowstone region. This is not a time to take chances with this

majestic species, particularly after so much time and money has been spent to recover grizzly bears. Because grizzly bears reproduce so slowly, it takes a decade or more to discern trends in the population. More time is needed to truly understand the implications of dramatic shifts in the grizzly bear's diet and habitat, and what it means for the health of the population over the long term. We should err on the side of caution.

We need your help to ensure true recovery of grizzly bears in Greater Yellowstone! Please take action at: www.addup.org/campaigns/protect-the-grizzly-bear

And to find out more about the plight of Greater Yellowstone's grizzly bears, watch this engaging video: <http://bit.ly/1PC5FXA>

Club Offices & Staff

Missoula

Physical Address
101 East Broadway, Suite 204
Missoula, MT 59801
406.549.1142

Mailing Address
P.O. Box 9283
Missoula MT 59807

Billings

Physical Address
2401 Montana Ave. Suite 5
Billings, MT 59101

Staff

Mike Scott, Associate
Regional Representative
mike.scott@sierraclub.org
main line: 406.839.3333

Bozeman

Physical Address
4242 E. Main Street, Suite 202
Bozeman, MT 599715

Staff

Bonnie Rice, Sr. Field Organizer
bonnie.rice@sierraclub.org
Main line: 406.582.8365

Kiersten Iwai, Associate
Organizing Representative
kiersten.iwa@sierraclub.org
main line: 406.582.8365

2015 Leaders

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For More Information

about Montana Chapter
activities & meetings,
contact Rod Jude at
406.579.7627 or
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