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December 24, 2018

ATTN: Sandy Mack / Rachel Feigley  
Mid-Swan Project  
24 Ft. Missoula Rd.  
Missoula, MT 59804

Re: Mid-Swan Landscape Restoration & Wildland Urban Interface Fuels Project

*Submitted via electronic mail on December 24, 2018 to: [bslrp@fs.fed.us](mailto:bslrp@fs.fed.us)*

Defenders of Wildlife is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. We submit the following comments on the Mid-Swan Landscape Restoration and Wildland Urban Interface Fuels Project on behalf of our more than 1.8 million members and supporters, including more than 5,000 in Montana

The proposed Mid-Swan Landscape Restoration and Wildland Urban Interface Project is a departure from past practice on the Flathead National Forest in two important ways – its scope and its implementation of a new forest plan. We are interested in establishing positive precedents in both respects. We also continue to be interested in the management of at-risk species in the Northern Continental Divide Ecosystem, especially threatened bull trout, grizzly bears and Canada lynx, and the Swan Valley is an important contributor to their viability.

At this point we are ambivalent about the ability of larger scale landscape “project” decisions to contribute to more effective conservation of diversity. It may offer benefits where active habitat restoration is urgent, but we want to ensure that the public is appropriately involved in each step of the process. We have two general concerns that we hope you will consider as you proceed. One is that some of the decisions being made are actually programmatic decisions for future projects that should be included in an integrated manner in the forest plan.

The other is that there may be an expectation that analysis at this scale can be a substitute for looking at the effects of actual units and treatments selected. The scoping letter says, “actions outside the scope of those analyzed in the effects analysis would not be implemented.” The analysis done here may not be site-specific enough to properly identify some important effects, and there will be changes and new information over time that would warrant reanalysis. There is an interesting slide from public presentations that says “Move fieldwork to after

decision,” which could have disturbing implications for the NEPA process. The plan is to also tier to forest plan NEPA analysis, which the EIS must explain for each resource in greater detail. The EIS should explain the entire process, and particularly its adaptive management elements.

The purpose and need for national forest projects must be based on the forest plan for that forest, particularly on its desired conditions and objectives. The scoping letter appropriately notes that the project will be consistent with whichever forest plan is current when the project decision is made. It also states that references to the plan at this point are to the revised plan, so that it must be consistent with those plan components.

We appreciate that it is difficult to design a project to implement a forest plan when the plan itself is in flux, but we hope and assume that project planners have coordinated with forest planners as the project has been developed. However, the absence of references to a forest plan is conspicuous; there are only two actual references to plan components. One involves the definition and management of riparian management zones, and the other involves lynx.

We are surprised that, while there is considerable focus on changing the vegetation conditions, and determining what the desired conditions should be, there are no references to the desired vegetation conditions established in the revised forest plan. The project purpose and need must address these and explain how the project will contribute to achieving them, and the effects analysis should support this.

The purpose of treating each area will also depend on which forest plan management area it is in and whether it is suitable for timber production. While Appendix A purports to be about “management areas,” they are not addressed there. We have a general concern about how a strategy that is designed to protect old trees and old forest structure is still able to produce a large volume of large logs. This needs to be explained and reconciled, and effects on large trees and the species that use them must be included in the EIS.

Also, while aquatic restoration is one of the project purposes, the existence of designated “conservation watersheds” is mentioned only once, and in an appendix. Table 4 states that “road stormproofing” is intended for conservation watersheds, but there is no map showing where they are. The overlap of project actions and these watersheds will be important to determining the effects on aquatic ecosystems and species like bull trout, particularly the effects of new road construction.

We are concerned that one of the only references to the revised forest plan is to the need to change it with regard to lynx management. This is especially important because the changes are being based on new research by Kosterman et al. (2018). We cited their research in relation to problems with forest plan components in our objection to the revised forest plan, and the objection reviewing officer stated, “this

new information needs interdisciplinary review to inform Forest Supervisor Weber's final decision." If the forest plan is being changed as a result of this new information, these changes would apply to more than just this project and cannot be undertaken with a project-specific amendment (improperly characterized in the scoping letter as a "suspension" of these standards). The new information should trigger a reconsideration of the forest plan revision decision, and any interpretation of new science that contradicts the consensus in prior interagency lynx conservation assessments should first be subject to a science review process.

The scoping letter acknowledges that the proposed changes in lynx standards would be "directly related to" the diversity requirements in the Planning Rule, and therefore they trigger forest-wide reanalysis of how the new plan components contribute to recovery and viability of lynx. This process should lead to a similar process as the need to reconsider the revised plan, as discussed above. As part of either process, we would expect a Biological Assessment that would enable the Fish and Wildlife Service to formally address these points. Any NEPA process must consider an action alternative that does not create new exceptions to these lynx standards.

One of our key concerns is the effect of reducing protective measures for grizzly bears in the revised forest plan, particularly those for roads, and the increased new road construction proposed for this project is heart-stopping. It's hard to imagine that in an area as heavily roaded as the Swan Valley, there is a "need" that cannot be addressed using the existing road system. That should be an alternative considered in the NEPA process.

Roads have been shown to increase mortality of grizzly bears, cause area avoidance and fragment grizzly bear habitat and can inhibit dispersal (Kasworm & Manley, 1990; Mace, et al. 1996; Proctor, et al. 2012, Lamb et al. 2018). Where the proposed 60 miles of new roads across will be in relationship to high value grizzly bear habitat remains a significant unknown. Recent studies have shown it to be important to not only manage roads below a total threshold but particularly important to manage high quality habitat for low road density or no open roads (Lamb et al. 2018; Proctor et al. 2018). This level of detail is missing in the scoping document. A recent technical report out of Canada pointed out that habitat quality is "an integral part of understanding road responses, and if integrated will increase efficiency and effectiveness of road management programs" (Proctor et al. 2018). The DEIS should include a map of high value grizzly bear habitat and overlay such a map with the plan proposal. Grizzly bear habitat should remain secure through reduced road densities and/or temporary/seasonal closures of already existing roads.

How forest vegetation is managed can also have significant impacts on grizzly bears. Research has found that forest openings could provide important grizzly bear foods but control of human access of those areas would be critical or the area could become a sink (Nielsen et al. 2004).

The revised forest plan also includes new direction to ensure restoration and conservation of landscape connectivity for at-risk species, but defers the details regarding where this would occur to project decision-making. The project analysis done here must therefore identify these areas and consider the effects of the project on connectivity. The designation of areas for “patch retention” appears intended in part to address this.

We support the use of beaver analogs to benefit aquatic resources. We would prefer an approach that includes a goal of restoring actual beavers to these areas in accordance with the requirement to provide species diversity commensurate with its natural range of variation.

We support reducing the risk of wildfire in the WUI, while preserving large trees. We would question fuel treatment actions beyond the WUI. We also point out that; while the forest plan has many plan components tied to the WUI it does not include a map showing the boundaries of the WUI. That makes it incumbent on each project to define the boundaries in the project area. We expect this project to include an analysis supporting these boundaries that is tiered to the forest plan and considers alternatives as appropriate.

We look forward to working with you on this project.

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