## Comments: Mid-Swan Landscape Restoration & Wildland Urban Interface Project – 12/14/18 Mark Benedict

## **General Comments**

1. This project is based on a hypothesis that natural fires have shaped the terrestrial and aquatic environments of the Swan Valley to a major extent and that human interference with fires beginning about 100 years ago has resulted in the present landscape that now needs to be 'restored'. While I have no doubt that fire suppression has had a significant effect on our forests, the evidence and anecdotes cited in the scoping document do not lead to a definitive methodology on how to turn the clock back hundreds of years on 65% of the Mid-Swan managed forest with modern forest management techniques. It would be helpful if the cited references could be made available in the Supporting Documents section of the project website.

Issue/Cause/Action	Description	Possible Adverse Effects
Artificial tree species selection	Promote ponderosa pine, larch, and	The promoted species are upland
	douglas-fir due to their fire-resistance	species and much of the project area
	using 'regeneration' areas within	is wet lowland. In addition, multiple
	thinning units.	site factors affect differential survival
		of tree species. This could actually
		reduce biodiversity in regeneration
		openings if misapplied to
		incompatible sites. If regeneration
		fails or is delayed on a site, invasive
		species including weeds and non-
		native grasses will invade.
Eliminate 'fire deficit'	Controlled burning on terrestrial and	Perennial and shrub species that are
	aquatic sites	not fire-adapted will be eliminated
		along with the 'undesired', fire-prone
		and shade-tolerant tree species
		(subalpine & grand fir, spruce, lodge
		pole pine, et al). In accessible units,
		burning dry downed trees wastes
		lumber or firewood (suggest salvage
		log sales or pre-burn firewood sales
		where appropriate). Burning also
		generates greenhouse gases (CO2).
New Roads (p. 21)	Under Connected Actions, it is	Forest roads once constructed take on
	proposed to construct 60 miles of new	a life of their own, regardless of their
	roads.	management status. Even if
		'decommissioned' roads are navigable
		by the range of specialized ATVs
		currently available. I have never seen
		a forest road that would not allow
		passage of a small motorized AT
		vehicle (unless rock slides had buried
		it!). No more roads please or plan to
		deconstruct & reforest them
		afterwards (expensive).

## **Specific Questions & Comments**

2. **Climate Change** – The scoping document repeatedly mentions climate change as a principal reason for the need to 'restore' our forest. (In fact, if climate change was *not* happening, we probably wouldn't be considering this type of forest management project.) What measures is the U.S. Forest Service taking to reduce the agency's greenhouse gas emissions?

3. **Beavers** – On page 6 of the scoping document it is stated that "32 of the 36 documented beaver dam sites in the mid-Swan area are inactive". What was the cause of this and why do you propose "analog beaver structures" instead of reintroduction of *actual beavers*?

4. **Section Map Overlay** – Can an overlay map be provided so property owners can see more accurately where project units are located with respect to their private properties?

5. **Timeline** – What is the overall time frame for this project, have the proposed treatment units or areas been prioritized?

6. **Cold Jim Fuels Reduction Project** – What is the relationship between this Mid-Swan project and the Cold Jim Fuels Reduction project? On two management units adjoining our property the two projects propose different or no treatments.

7. **Terrestrial Biodiversity Challenges** – On page 8 you list the following: "Overabundance of young forests with multistories and shade tolerant species, in particular sub-alpine fir". Can you quantify this statement by stating what percent of forest in the mid-Swan you believe <u>should</u> be composed of this forest type?

8. Historical Reference Conditions – On page 10 of the scoping document you state that the mid-Swan is "dominated by multistory forests composed of small to mid-sized shade tolerant conifers including subalpine fir, Engelmann spruce, western red cedar and grand fir. This is a departure from historical and future reference conditions." What historical references did you use to arrive at this conclusion and what <u>should</u> the dominant tree species numerical composition be?

9. **Glossary** – Please create a Glossary for your terminology: i.e. fire return interval deficit, special departure, regeneration...

10. **Regeneration Areas** – How is regeneration to fire resistant species (P. pine, larch, DF) proposed to occur, through reforestation or natural reseeding?

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