



December 14, 2018

Swan Lake Ranger District
Attn: Rachel Feigley, Team Leader
USDA Forest Service Regional Office
24 Fort Missoula Rd
Missoula, MT 59804

RE: Mid-Swan Landscape Restoration and Wildland Urban Interface Project Scoping

Dear Rachel Feigley,

Thank you for the opportunity to comment on the scoping phase of the Mid-Swan Landscape Restoration and Wildland Urban Interface Project. As you know, Missoula County is a member of the Southwest Crown of the Continent Collaborative (SWCC), a project funded by the Collaborative Forest Restoration Landscape Program (CFLRP). We believe the use of CFLRP funds for proposed activities designed to restore watersheds, return fire to the landscape, and reduce the risk of catastrophic wildfire events can provide benefits to both the landscape and the public. We value management of public lands that benefits our communities, water resources, forest health, and wildlife.

The proposed project is important to us as the southern portion falls into the northern part of Missoula County and it will affect Missoula County's natural resources, economy and residents. We support the large landscape approach to analyzing and addressing the biodiversity and management needs of the area. However, we reflect the concern voiced by the SWCC that the overly extensive size of this project will delay initiation of project implementation. Smaller projects would likely have greater success at moving ahead.

We highlight some of our thoughts and concerns below.

Aquatic Ecosystems

- We support improvements to roads that reduce sediment inputs into streams that will benefit the overall water quality of Missoula County's streams and therefore benefit the fisheries and economy of Missoula County.
- We support tools like removal of fish barriers and mimicking beaver activity for water quality and fish habitat improvements. Creating only nine beaver dam analogs seems a low number for the size of the project.
- The proposed 5,000 acres of thinning within the outer Riparian Management Zones (RMZ) concerns us due to the sensitivity of riparian habitat. We suggest the EIS include a close

analysis of how proposed actions adhere to Montana's existing streamside management zone legislation. We support that the only vegetation management in the inner RMZ is controlled burning.

Roads

- We are concerned by the high number of road miles involved in this project. With 60 miles of roads constructed, this will increase the likelihood of negative impacts to wildlife habitat and water quality. We encourage prioritizing forest management treatments that do not require new roads to be built. We note that the scoping document states that ‘upon completion of the project, these roads would be made impassible,’ but these roads will still have been newly constructed, thus damaging habitat.
- About 167 miles of roads will be decommissioned, stored, or improved; each of these approaches is quite different from the other and we wish to see a breakdown of miles and the affected locations of the three approaches. We will pay close attention to this issue.

Threatened and endangered species, species of concern and non-listed species

- This project is within high-quality occupied grizzly bear habitat. We did not see any mention of consideration of impacts to grizzly bear habitat security. We expect the Forest will complete and provide the public with such analysis. We expect the Forest to take appropriate steps to protect grizzly bear habitat and mitigate impacts regarding where and when forest management action is taken.
- We will pay close attention to the proposals for treatments in Canada lynx habitat, as the project is considering new approaches to managing lynx habitat. We support protection of sensitive wildlife habitat.
- We urge the Forest to incorporate measures in all upcoming alternatives that address issues pertaining to wildlife and wildlife habitat. Each alternative should strike a balance between the need to manage resources and protect sensitive wildlife habitat and wilderness characteristics.

Fuels Reduction/Vegetation Treatments

- We are concerned that the proposed vegetation treatments are vague. The scoping document identifies that it will generate an implementation guide that will set the expectations for future survey work to be conducted on sites before treatments take place. However, the variability that this could produce may make development of an acceptable EIS problematic.
- Treatments to reduce fuels and potential for wildfire risk in the Wildland-Urban Interface are important to Missoula County and our residents because of the associated fire-fighter and public health and safety concerns. Missoula County generally supports proposed fuels reduction projects within the Wildland-Urban Interface.
- Prescribed fire is an important tool for reducing severe fire risk and helping ecosystems adapt to future conditions. We generally support the inclusion of 28,600 acres planned for such burning. We encourage engagement with the Missoula City-County Health Department to reduce impacts of smoke to the public.
- While we value overall forest health, we support having limited treatments for areas important to the sustainability of our threatened and endangered species.

- ‘Regeneration’ treatments, basically clearcuts, at the scales proposed (large acreages, totaling 7,200 acres), are a concern for wildlife habitat and human enjoyment of the landscape.
- We emphasize the importance of snag retention within harvest units, especially large diameter snags which provide significant ecological benefits.

Noxious weeds

- We support efforts to reduce existing weed infestations and enhance natural habitat on Forest Service Lands. We expect that the Forest Service will take great precautions to reduce all potential risks for further spread of noxious weeds in Missoula County.
- We anticipate that any County maintained routes impacted by these activities will include dust abatement and coordination on maintenance activities, including details on weed management and monitoring activities.

Local involvement

- Monitoring of project implementation and effectiveness will be essential in order to assure that project goals are met and to provide valuable information for future projects similar to this one. In the draft EIS we would like to see a description of how local partners can assist in the monitoring effort and how the local public will be informed about the next stage of implementation.
- We also advocate for the use of stewardship contracting for implementing the work so that local contractors have an opportunity to receive some of the benefits of this work.
- Involving the public and local government in the planning process is a crucial element of successful resource management. Missoula County sincerely appreciates your efforts to attain this goal and looks forward to reviewing future project documents detailing specific management actions.

Thank you for the invitation to comment on the scoping phase of the Mid-Swan project. If you have any questions, please feel free to visit with me by email at kpaul@missoulacounty.us or by phone (406) 258-4869.

Sincerely,



Kylie Paul

Natural Resource Specialist
Parks, Trails & Open Lands
Missoula County Community and Planning Services

CC: Pat O’Herren, Chief Planning Officer; Board of County Commissioners