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*Submitted Electronically*

December 24, 2018

Flathead National Forest

Swan Lake Ranger District

Attn: Rachel Feigley

Mid Swan Project

24 Fort Missoula Rd.

Missoula, MT 59804

Via e-mal to: bslrp@fs.fed.us

Re: Scoping Comments on Mid-Swan Landscape Restoration and WUI Project Submitted to bslrp@fs.fed.us

Dear Ms. Feigley,

Please accept my comments on the Scoping Document for the Flathead National Forest’s proposed Mid-Swan Landscape Restoration and Wildland Urban Interface Project (Mid-Swan Project).

I am a retired forest service employee who has worked on project and forest planning in the Northwest and Northern regions. As a geologist in Region 6, I worked as an IDT member at the district and zone levels, and as project leader for riparian road decommissioning and relocation, and riparian restoration projects. I also served on watershed and roads analyses, and Burn Area Emergency Rehab teams on the Wenatchee, and on an Ecologic Unit Inventory team for three forests in North Central Washington, the Wenatchee, Okanogan and Colville national forests. On watershed and EUI teams I mapped landforms and landtype associations, and interpreted landscape response including soil sensitivity, hydrologic properties, slope stability, and channel morphology and function.

While in the Northern Region, I worked on the Western Montana Planning Zone Forest Plan Revision Team, which produced the 2004 Analysis of the Management Situation and Proposed Action, and the 2006 proposed plans for the three forests in Western Montana, the Lolo, Flathead and Bitterroot. Working on ID teams broadened my understanding of resources beyond my area in geology and physical sciences.

Since retiring I have provided input on proposed national forest projects in Montana, and on forest plans in Montana and Idaho. Please accept my comments on the Mid-Swan Landscape Project, in context of my education and experience. With that background I offer the following comments on this scoping document, and appreciate that my comments will help formulate an alternative analyzed and addressed in the Environmental Impact Statement (EIS).

**Timing of release and public comment period for the Mid-Swan Project conflates the transition between the existing and revised Flathead National Forest land management plans and undermines the ‘public’s’ ability to provide meaningful comments.**

The Notice Of Intent for the Mid-Swan Project published in the Federal Register October 23, 2018, provided the public with a 30-day comment period despite the scope and complexity of the project. One month later on November 23, a 30-day extension was ‘granted’. The same day EPA published Notice. “EIS No. 20180281, for the Final, Flathead National Forest Land Management Plan and the NCDE Grizzly Bear Plan Amendments, Review Period Ends: 12/24/2018”, which is the day the extended comment period for the Mid-Swan ends.

Footnote 5 (pg 5), referring to stormproofing roads consistent with plan objectives, states this and “all other references to the Forest Plan is in anticipation of the revised, …..pending signature, unless otherwise noted. Analysis will be consistent with whichever plan is current.” Given the NOI publication date of October 23, 2018 and initial November 23 deadline, public comments would have been clearly guided by the 1986 Flathead National Forest Plan, as the revised plan had not yet been finalized. The fact that the EPA released notice of 30-day review period on November 23, the deadline stated on the Mid-Swan PA, further conflates the issue of which plan is binding and raises the question: does the forest service have the option to pick and choose which plan to apply?

Since the NOI was published on October 23 prior to the EPA notice and without benefit of a record of decision, then or at the time of this writing, there is acknowledged confusion as to which plan guides the Mid-Swan analysis.

It is my understanding that there is a 10-year time limit under Collaborative Forest Landscape Restoration Act (CFLRP) for funding to implement ‘landscape restoration’ projects. The SWCC is up against that deadline. I encourage the forest service to be prudent and analyze the EIS under the standards of the existing forest plan, including INFISH and Amendments A-19 and A-21, which the reviewing public is most familiar.

**Inequity in opportunity for public comments.**

The Mid-Swan project evolved as part of the Southwest Crown of the Continent Collaborative, giving those involved from 2010 to 2018 a far greater period of time and opportunity to provide ‘meaningful’ input. This process put the general public at a disadvantage to provide comment and input as compared to the collaborative.

Comments submitted by South on December 3, 2018 state, “The Southwestern Crown Collaborative (SWCC) CFLRP appreciates the opportunity to comment on the Scoping Document for the Proposed Action for Mid-Swan Landscape Restoration and Wildland Urban Interface Project. This project originated with the purpose and need statement dated October 7, 2014 which stated “The purpose of this project is to reduce the risk of uncharacteristic wildfire and conserve terrestrial and aquatic biodiversity across the Southwest Crown Collaborative (SWCC) landscape, taking into account potential influence of climate change.” We are very pleased that this project is making progress towards tangible outputs with the release of this scoping document. We also appreciate that the Forest Service listened to those that asked for an extension to the comment period.”

Four years have passed since October 2014 and the ‘public’ is only now being given the opportunity to comment on the outcome of this important landscape. The Proposed Action for the Mid-Swan project (pg 1), characterizes this proposal as ‘concepts’, as has Supervisor Chip Webber, even though it was published in the NOI as a proposed action. Based on the detailed modeling and maps, and comments of the SWCC co-chairs, this project has been in development for years and is well beyond the ‘conceptual’ phase. Please understand that from my perspective characterizing it as ‘conceptual’ could be disingenuous and that I fear the dye is already cast, and decision already made.

A minor point regarding a statement on page 1, that this is the first project in the SWCC to take a large landscape approach across multiple watersheds is accurate. I believe that Colt-Summit on the Lolo National Forest and Center Horse on the Helena – Lewis and Clark might also qualify as large-scale projects under CFLRP and the SWCC and 10-year, $40 million funding.

**Project does not adequately achieve the identified purpose and need; to restore and maintain aquatic and terrestrial biodiversity; and reduce the risk from wildfire in the wildland urban interface.**

The Mid-Swan proposal appears to be business as usual, with too much reliance on outputs rather than outcomes, on products rather than processes. The Mid-Swan could be ‘at risk’ of losing key habitat components for native aquatic and terrestrial species due to the Mid-swan project. The proposed action is displaying a similar mindset and toolset that created the damage to begin with; more logging and roads.

“The definition of **insanity** is doing the same thing over and over again, but expecting different results”. Credited to Einstein.

Details on the existing road system and proposed actions are vague and disjointed

According to the PA, the analysis area has 1240 miles of road in all ownerships with 570 miles on forest service lands, resulting in a very high road density of 3.1 mi/mi2. Other than references to a 2015 Watershed Condition Framework (WCF) that found Cold and Jim Creek watersheds functioning at risk due to high road density, little detail is provided. Both Jim and Cold Creek support declining bull trout populations. The WCF identified restoration activities primarily on Plum Creek lands to reduce sediment delivery to streams and that ongoing work will likely result in improved condition to properly functioning, assumedly in those creeks.

There is reference to 67 miles of road having been decommissioned but no details as to what work has been done and where. Beyond that, it appears that a survey was done through photo interpretation and modeling. The forest must provide a detailed road-by-road assessment. If that level of detail is not available, the project is premature. I strongly encourage the forest service to apply existing Flathead forest plan Amendment 19 standards for grizzly bear recovery in any roads analysis and planning, as this is considered the most science based road density standard.

Reduce sediment delivery to streams

The proposed action would stormproof approximately 167 miles (appx 30%) of existing forest service road, including 20 miles in riparian areas. It sounds good but the definition of stormproofing is vague and details lacking. It would be good, if this meant decommissioning; pulling culverts, recontouring, revegetating, and addressing any hydrologic connectivity; in effect permanently removing the road prism from the network. Gating or berming, and putting into long-term storage for repeated access for logging, is not restoration.

However, the forest service is proposing to construct 60 miles of new road plus some temporary roads. Map 01 shows much of the road construction on the west side, inching up to the Mission Mountain Wilderness boundary, including lengths in both forks of Cold Creek and in Jim Creek, which are functioning at risk. Extensive new road systems are also proposed in Fatty and Woodward Creeks, and on the east side in Napa Creek and Squeezer Creek.

Road construction is likely to increase sediment delivery in the short term during and following construction. Considering the issues with the existing road system, depending on maintenance, increases in sediment could continue as a result of the new construction. This is not restoration and not only could road construction be precluded from using CFLRP funding, but could preclude the Mid-Swan from being considered a restoration project.

I encourage you to remove new road construction from the project, to focus on a roads analysis that would identify the minimum road network needed, and to apply A-19 road density standards to best secure habitat for grizzly bear recovery and to benefit other wide roaming species.

Removing Fish Barriers

The propose action identifies removal of 5 barriers to improve fish passage. I find it amazing that out of a road system in excess of 570 miles, there are only 5 barriers. I suggest look for more.

Beaver Analogue Structures

Beaver are indeed important to riparian function as described in the proposed action, and it is a concern that 32 of 36 dam sites in the Mid-Swan are inactive. As far as number declining, perhaps hunting and trapping has had an effect. The near absence of beavers is a threat to riparian health and function. I do have some concerns regarding first modeling to determine the best location for analogue dams and second, the analogue dams themselves.

My problem with analogue dams is that in the long term they are poor substitutes for beaver because analogue dams are fixed structures. Flood plains and other riparian environments that beaver inhabit are dynamic over time. Changes to a floodplain can be acute in response to pulse events. Rivers and stream channels can change course. Even overflow channels vary. Beaver have the capacity to relocate their dams in response to this dynamic landscape. It’s this dynamic nature which offers refugia for fisheries during these extreme disturbances.

People have a tendency to try to shoehorn natural processes to our preferences. Dynamic systems such as floodplains are the last place this will work in the long term. Identifying and mitigating the reason beaver are in decline followed by a program to relocate beaver to the area, is more consistent with floodplain and riparian processes than analogue dams.

Vegetative treatment in Riparian Areas

Riparian areas have dynamic disturbance regimes. While fire is one form, most disturbances in riparian areas are associated with flooding and possibly unstable slopes. But any form of disturbance is typically associated with recruitment of wood to the stream channel. It is clear that treatment on the 3300 acres of the Inner Riparian Management Zone would be limited to controlled burn. But it is not clear whether the 8,650 acres of proposed vegetative treatments, including 5,000 acres of thinning would recruit or remove wood from riparian areas. Also, other than the fact that some riparian areas may be overgrown, no mention is made about the large woody debris component in the channels, and whether this is sufficient to help maintain channel function. Large woody debris plays an important role in channel geomorphology, fish habitat, and system productivity. If large wood debris is deficient it may be necessary to recruit larger wood to streams from the outer RMZ, or tipping trees[[1]](#footnote-1) into the channel if available immediately adjacent to the stream or river.

**Vegetative Treatments Must be Focused More on Ecological Processes and less on Logging as Restoration**

Commercial Thinning and Logging

Of the nearly 70,000-acre analyses area, 37,400 (54%) would be commercially logged at varying intensities over a protracted period of time. The projected ‘volume’ is 40 to 60 MMBF. Only 2400 acres would be non-commercially thinned.

The analysis area boundary overlaps in part with the Lake County Conservation District’s proposed ‘conservation forest’, which would have been managed to provide income to the LCCD. The LCCD proposal including, 60 or more MMBF and was strongly opposed by the majority (80%) of those commenting, including most of the mid-Swan community.

I am disturbed by an open-ended prospect of commercial logging as part of restoration, within the 60,000 acres with this proposal and the potential for treatment to extend across the 246,000 acres of the Mid-Swan project area over an extended timeframe.

It cannot be emphasized enough that great care must be taken in planning and implementing any activities in this area. I urge the forest to employ rigorous science based landscape analysis to get a clear and comprehensive perspective. Ideally, I would like to see an approach that incorporates conserving and rewilding of the Swan Valley, and minimizes the likelihood of individual projects cumulatively resulting in significant adverse impacts.

Controlled Burns

It is encouraging to see that controlled burn would be the only treatment on 28,600 acres (41%) of the analysis area. The proposed action recognizes the historical role of fire in the Swan drainage. Ayers (pg 10) noted that, “Probably 90 percent of the valley has been burned over within the past one hundred years.” (Ayres 1900, p. 77). The PA documents recent fire research in similar forest types as the Swan Valley, indicate a range of historical fire regimes. Freedman and Habeck (1985) found abundant evidence of frequent fire of low to moderate severity in valley bottom areas of the Swan Valley. Native Americans also played a role, especially low to moderate severity fires. There is evidence of less frequent mixed and high severity fires at middle and high elevation areas (page 11). On page 11, Ayers notes that the “northern half is patched with burns”, the “southern half has been much burned and has a dense network of fallen trees over a large part of the surface”.

These describe a reference historic fire regime and vegetative condition. At one time there were large volumes of coarse woody debris on the forest floor. While downed wood on today’s forest surface is undoubtedly smaller diameter, it is all that we, the forest service and other ‘managers’ of the land have made available to serve terrestrial ecosystem functions. I encourage the Flathead to recognize the important function of coarse woody debris for soil health, shading and moisture retention to enhance site regeneration, as habitat for a variety of wildlife, and other purposes and clearly incorporate and analyze in the EIS.

The Flathead has made attempts to identify areas where fire has been deficient due to excessive practice of fire suppression in the mid to late 1900’s. I appreciate and encourage efforts to recognize the ecological role of fire and, cautiously support use of controlled burns to reintroduce fire to the landscape in ‘priority fire deficit areas’. However, I prefer to let nature take its course and request that the forest refrains from vegetative treatment, including controlled burns in areas that do not dramatically deviate from historic fire intervals on mid to upper slopes.

Wildland Urban Interface (WUI)

The Mid-Swan proposed action includes reducing risk from fire in the WUI. The WUI as outlined on Map 03, extends two or more miles on either side of Highway 83, in places coming within half a mile of the wilderness boundary. The proposed action includes treatment on up to 31,100 acres. The PA states that if no action is taken the whole area could become a blazing inferno. I am concerned that treating large landscapes is just another reason to log the landscape and encourage the forest to incorporate different approaches.

Rather than to rely on landscape scale vegetative treatment in the WUI, I urge the forest to work with county fire agencies to focus on ‘defense of structure’ applications. People who choose to live in WUI’s, and I count several close friends in the Swan, have a responsibility to incorporate fire safe practices around their homes. Practices such as clearing a substantial distance around the home, eliminating more volatile shrubs and trees from landscaping, use of fire resistant home building or modification materials such as metal roofs and fire resistant paints, removing wooden fences, and other applications.

**The Proposed Action Does Not Adequately Recognize the Dead Forest Component: the Role of Snags, Coarse Woody Debris on the Forest Floor, Large Woody Debris in Streams and other Ecological Considerations Dead Trees Provide to Wildlife, Soils and Other Forest Processes.**

A Dead forest is not a loss. Large stand replacing fires and major insect outbreaks are natural events, critical to shaping function and process of the forest ecosystem. Please incorporate a more comprehensive discussion and develop an alternative that highlights these natural large scale disturbance processes.

Chad Hanson, UC Davis researcher and Sierra Club board member, sums it up.

“We are trapped by an outdated cultural idea that a healthy forest is one with nothing but green trees. An ecologically healthy forest has dead trees, broken tops, and down logs. Such forests may not look tidy from the perception of a forester, but it (a forest with lots of dead trees) is the most biologically diverse and healthy, from a forest ecosystem perspective….Pound for pound, ton for ton, there is probably no more important habitat element in western conifer forests than large snags and large down logs.

**The Importance of the Swan Area to Wildlife and Wildlife Connectivity Has Not Been Adequately Considered in the Proposed Action**

The Swan is an area of immensely important wildlife habitat. The American Wildlands Priority Linkage Assessment has identified the Swan as the most important connectivity area on the Flathead National Forest for a number of species including grizzly bear, lynx, wolf, and wolverine. “The Swan Valley linkage area connects the Swan Range and Mission Mountains. It links the Bob Marshall Wilderness complex with the Mission Mountains wilderness areas. The linkage area also provides north-south linkage from the Northern Continental Divide Ecosystem to the Salmon-Selway and Greater Yellowstone ecosystems. It is both linkage habitat and occupied habitat by carnivores and ungulates. Biologists gave the Swan Valley linkage area the highest rating in the Crown of the Continent conservation area.”[[2]](#footnote-2)

Given the extensive timber harvest, road network and increasing human presence, the pull to this area for wildlife must be very strong. For this reason alone it was very disappointing to see a large portion of the area assigned as MA 6b and 6c.

There are numerous lakes, streams, and riparian areas in the Swan. Water reserves and deep glacial till deposits contribute to cold, well-regulated waters in the streams and productive soils. However, aside from a discussion on lynx, spurred by need for Forest Plan Amendments, there is inadequate attention paid to wildlife connectivity and other considerations. The EIS must thoroughly analysis any and all treatments in context of the importance of this landscape to wildlife. Of particular importance is continued focus on grizzly bear recovery.

I would like to see an alternative developed around a less anthropomorphic framework. I refer to it as rewilding rather than restoration. It should emphasize natural processes including disturbances, wildlife habitat and connectivity, and a lighter hand on the ground.

Thank you for the opportunity to comment. I would be happy to answer any questions and to learn more about the proposal.

Respectfully,



Claudia Narcisco

1. Thinning and in-stream wood recruitment in riparian second growth forests in coastal Oregon and the use of buffers and tree tipping as mitigation. 2016. Lee E. Benda, et.al., J. For. Res. (2016) 27(4):821–836

 [↑](#footnote-ref-1)
2. American Wildlands. 2009. *Priority Linkage Assessment: The Crown of the Continent Conservation Area*. Technical Report. Version 1.0. http://www.wildlands.org/programs/corridors/pla [↑](#footnote-ref-2)