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Rachel Feigley – Team Leader

Thank you for the opportunity to comment on the Mid-Swan Landscape Restoration and Wildland Urban Interface Project. This is a major effort and the team is to be commended for the complex assessment work on this landscape.

I have several comments on the proposed action which I describe below.

One of the major components of this project concept at its beginning was that of adaptive management. The proposed action does not contain a description of the monitoring plan and how it will be used to adapt management practices over the life of the project to achieve management objectives. The monitoring plan is needed in the proposed action to fully understand the intent of the project and describe environmental effects in the project area. The public also needs this plan to understand the full intent of the landscape restoration effort.

A second major component needed in the proposed action is the implementation guide describing the project action decision tree that land managers will use when laying out treatment units and project activities. The tables in the proposed action appendix provide general description of intent. However, they don’t describe the thinking or set of actions project designers will use to layout units to achieve landscape restoration objectives. This information is also needed to describe effects.

Major emphasis is needed to design resource management roads that will be self-maintaining once the project is complete. Road maintenance money is scarce. Therefore roads will need to be carefully designed so they can be put into storage for decades upon completion of project work and not require maintenance action. In many cases this will mean removal of water crossings, out-sloping the road template and re-contouring road entrances to prevent motorized use.

It is my hope that the concept of a temporary road is not abused to avoid having to designate the road as a forest system road. By this I mean that temporary roads should be short (usually less than a quarter mile long), not require full bench construction, and not require major water crossings. Upon completion the road is re-contoured to natural conditions. On projects in the past, long temporary roads were constructed to avoid designation as system roads. After obliteration, the agency would construct new temporary roads on the same corridors sometimes as soon as ten years after completion of obliteration work. This constant land disturbance degrades water quality and other resources.

I look forward to participating with this project in the future.

Sincerely,

*/s/ Richard Kehr*

Richard Kehr