

December 3, 2018

## Comments on the Proposed Action for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project from the Southwestern Crown Collaborative

Dear Rachel Feigley and Mid-Swan Project Team,

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.

The SWCC enthusiastically supports the landscape perspective that this project is addressing. Management actions need to consider the overall setting and context, and incorporate the integration of terrestrial and aquatic biodiversity with the realities of public lands occurring within and adjacent to wildland urban interfaces. The complexities of landscape perspectives make development of management actions more challenging, and this project is breaking new ground in using this approach, but it is essential for designing future management directions.

As stated, a major purpose of the project is to conserve the terrestrial and aquatic biodiversity of the landscape. The scoping document defines biodiversity (Page 4 footnote) as “the variety and variability of all living organisms, including fish, wildlife and plants.” This is not a generally accepted definition of biodiversity. This definition does not include mention of processes, functions, or structures or the consideration of the genetic, species, ecosystem, and landscape levels that are part of accepted definitions of biodiversity. Further, the document never identifies what strategy or process it is using to address its purpose of conserving terrestrial and aquatic biodiversity. While the methods used for terrestrial components make clear that correcting deviations from historical conditions are the underlying strategy, this is never clearly articulated. In fact, the original purpose and need statement provides a clearer description of the expected process than the scoping document.

The project was initially identified as part of the SWCC CFLRP, and the SWCC has provided input and technical advice for the project over the past 4 years. The SWCC greatly appreciates that the project team has been very willing to discuss the project with the SWCC and considered our suggestions. However, the SWCC would like it clarified that the proposed project is the work of the USFS and the specifics of the Proposed Action have not been endorsed by the SWCC.

However, it is unclear if this project is being designed to continue in the future under the guidelines established by the Collaborative Forest Landscape Restoration Act. For example, CFLRP projects are precluded from using this funding for building of new roads, yet 60 miles of new roads are proposed in the scoping document. We suggest that as this project was initiated under the SWCC CFLRP and continues to be developed under this project, that it should adhere to the guidelines that the SWCC has followed since the SWCC CFLRP began in 2010.

The SWCC has commented in the past about its concerns for the photo interpretation (PI) methodology used in this project for identifying historical and future reference conditions. We continue to have concerns about this methodology, and caution about its use in the mid-Swan Project (our more detailed comments on this approach were outlined in our August 29, 2018, letter to Region 1). We note that the Scoping document bolsters its analysis of historical and future conditions with additional sources of information, and we encourage the Project to continue to rely as much as possible on such other sources of information for the setting of reference conditions. We also note that the Project's proposed actions also recognize the limitations of the PI method for future range of variability, and include actions such as restoring western white pine that the PI process would exclude.

The proposed vegetation treatments are fairly vague. While flexibility is needed in applying treatments to specific sites given the scale of the proposed actions, the Project leaves a very large range of possible on-the-ground outcomes that might be produced due to the flexibility included in the proposed actions. We question whether the proposed actions have enough specificity to adequately address likely outcomes when considering potential impacts that will be addressed in the EIS. The scoping document identifies that it will generate an implementation guide that will set the expectations for future survey work for such things as soils, botanical and wildlife work to be conducted on sites before treatments take place, but the amount of variability that this could produce may make development of an acceptable EIS problematic. One way to address this concern would be to more specifically identify the reference conditions that are to be restored for different forest ecosystems that would be the desired outcomes of the treatments, and thus could be better interpreted through an impact assessment.

We do support the use of prescribed fire at high elevations to help restore whitebark pine communities, reduce risk of large, catastrophic fires, and to restore natural fire regimes. We also encourage its use for underburning where appropriate following mechanical treatments, which is being shown to be most effective at altering subsequent wildfire behavior.

The SWCC supports the proposed stormproofing of roads as a needed action. Reducing existing impacts to streams from selected sections of roads that have been identified as being likely sources of sediment is important.

As stated previously, we do have concerns with the proposal to build 60 miles of new roads in an already heavily-roaded landscape. We support that the Project proposes to maintain current public access, but the suggested new roads are inconsistent with SWCC CFLRP guidelines. If

additional roads are needed in certain areas to conduct treatments, other methods of treatment should be considered, or at the least roads should only be developed as temporary roads. Some of our membership that is familiar with the area also has questions about the proposed placement of new roads into areas they consider to be sensitive from either a terrestrial or aquatic biodiversity standpoint. Regardless of whether the Mid-Swan project is under the guidelines of CFLRP, the SWCC does not support any new, permanent roads unless they are built to replace poorly constructed, sediment-producing road stretches.

The SWCC also supports the idea of beaver dam analogs (BDAs) as a treatment to improve stream functions and aquatic habitat for native fish. Creating only 9 dam analogs seems to be a limited use of this treatment given the scale of the Project. We hope the use of BDAs will encourage actual expansion of beaver populations and eventually lessen the need for artificially inserting structures in streams.

In the DEIS, we hope to see how treatments will be implemented within an adaptive management cycle. What resources would be monitored and how will those results influence the next round of treatments? We believe this could also include 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 continue to 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.

As stated, the SWCC supports the landscape approach used in this Project. We continue to have concerns that the scale (both spatial and temporal) of proposed actions may delay initiation of on-the-ground implementation of this project. With this project already entering its fifth year, we could easily see its completion still several years out given possible challenges to the EIS or final documents. The SWCC is very anxious for on-the-ground work moving forward. We recommend that components of the Project, for example, protecting/maintaining large trees within the WUI, establishing shaded fuel breaks in key locations, and much of the road stormproofing, could be accomplished quickly with smaller, more focused environmental analyses. While we support moving forward with the bigger landscape assessment, we recommend advancing selected components on a smaller scale.

Again, the SWCC appreciates the opportunity to comment on the Scoping document. We will continue to look forward to working with the Project team on completing this critical work.

Sincerely,

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SWCC Co-chair

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SWCC Co-chair