

September 29, 2020

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P.O. Box 9765 Moscow, ID 83843 Mr. Kurt Steele, Forest Supervisor Flathead National Forest 650 Wolfpack Way Kalispell, MT 59901

Re: Mid-Swan Landscape Restoration and Wildland Urban Interface Project

Sent via email: <u>kurt.steele@usda.gov</u>

Dear Supervisor Steele,

On behalf of our 65,000 members and supporters, Wilderness Watch requests a 60-day extension of time for the public comment period for the Draft Environmental Impact Statement (DEIS) for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project.

The DEIS is voluminous (379 pp. plus lengthy appendices A and B), covers a huge landscape, and the Forest Service has spent years developing it. The public needs and deserves more time to review the Forest Service work, review the information upon which the agency relied, review the literature the Forest Service didn't adequately cite or make available (see below), and provide meaningful comments.

In addition to the complexities of this plan, the massive extent of acreage involved, the significant and novel impacts to designated Wilderness, and the reliance of the Forest Service on papers that are not available to the public in the DEIS and must yet be obtained, we believe it would serve the broader public for an extension of time.

As examples, we cite the following instances on the critically important topic of fire regimes in the area:

• Barrett 2002 is referenced on page 15 of the DEIS but not included in the Literature Cited section.

- Barrett 2008 is referenced on page 16, but again is not included in the Literature Cited section.
- Barrett 1998 is referenced on page 20, but again is not included in the list in the Literature Cited section.

Only Barrett's 1980 paper is cited and included in the Literature Cited section on page 366 of the DEIS.

The public needs access to these papers to better understand their contents, and to analyze whether the papers support the Forest's direction for this project. For all the reasons stated above and since we are unable to find, access, and study these documents, we believe that an extension in the public comment period is well-justified.

Thank you for your consideration of this request, and please provide us with the missing Barrett papers.

Sincerely,

Kevin Proescholdt Conservation Director

Kevin Proescholdt

cc: George Nickas Dana Johnson