

Joe Krueger, Mid-Swan Project Team Lead  
650 Wolfpack Way  
Kalispell, MT 59901

October 12, 2020

Re: Southwestern Crown Collaborative Comments on Mid-Swan project

Dear Mr. Krueger

The Southwestern Crown Collaborative (SWCC) would like to thank the Mid-Swan project team for all of their difficult work over the last six years to keep this unique landscape-scale project moving forward. We appreciate the continued openness to the participation of the SWCC and the public in planning this project. SWCC members have gotten to know the team members over the past many years and find them to be dedicated scientists and managers. We found both of the virtual open houses held recently to be well-organized (though additional time for questions would have been nice) and helpful. Here we share our concerns, suggestions, and comments for the Draft Environmental Impact Statement for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project.

The SWCC supports the landscape perspective that this project is addressing. The complexities of landscape approaches make development of management actions more challenging, 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 5) as “the variety and variability of native plants and animals that inhabit an environment.” 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. We suggest that a different more encompassing definition of biodiversity be inserted to replace the definition currently included.

The SWCC does not believe that Alternatives A, B, or C are the single correct alternative for action. There are components of all three alternatives that we believe have merit. In general, we particularly support activities in the WUI to reduce fuels and the application of prescribed fire in appropriate stands throughout the landscape. We also hope the Forest Service uses Stewardship Contracting whenever possible and the use of local contractors to benefit the local economy when implementing actions under this project.

We have arranged our comments to address the primary issues with which we are concerned.

**Treatments in Canada lynx habitat:** In general, the SWCC understands, and supports, the need for some treatments in lynx habitat. We would like to see the USFS move away from single species management approaches and constraining all designated lynx habitat from management does not allow for a true biodiversity-driven landscape approach to restoration. Evidence from our meso-carnivore monitoring over the past eight years shows limited occupied habitat in the Swan Valley, and this could improve with proper management. We would recommend the team look at recent data from GPS-collared lynx collected by the Rocky Mountain Research Station to avoid currently used habitat. Lynx need a dynamic landscape with a variety of age class stands and we believe some work in the areas will be good for lynx

in the long term. An area where particular improvements may be gained over the long term appears to be in the higher elevations on the west side of the landscape along the Mission Mountain front. It is here where a proliferation of large patch sizes from prior regeneration harvests on former Plum Creek lands created an excess of uniform age classes. Future lynx habitat may be compromised without additional treatments in these uniform stands in the near- and mid-term time horizons.

**Treatments in riparian management zones (RMZ):** The SWCC supports some work in RMZs, where appropriate. Proper areas for thinning in Outer RMZs are those where the bank from the riparian area climbs up to a bench containing upland habitat, especially if large trees are present. In fact, the SWCC in the past has recommended work in some RMZ's such as areas in the Beaver Creek project where very large trees, particularly ponderosa pine and larch, are at risk from wildfire due to the in-growth of a high density of shade tolerant smaller trees. We feel there should be minimal work in the Inner RMZs, although under the right topographic and weather conditions, creeping understory burns may be appropriate. We would like to see an example of this work early on, perhaps in the Piper or Porcupine-Woodward watersheds. We suggest not doing this work along any bull trout spawning streams or in designated Wild and Scenic River corridors. We encourage water quality monitoring that will inform adaptive management over the 15-year implementation window if these RMZ treatments do occur. We also strongly support the use of Beaver Dam Analogs in appropriate places on the landscape as described in the DEIS.

**Treatments in Designated Wilderness, Recommended Wilderness, and Inventoried Roadless:** We view all three of these designations as similar and our comments are the same for them all. Although we support some treatments in these areas, we do not support the proposed amendment for mechanized and motorized transport in recommended wilderness. We support prescribed burning and non-mechanized hand treatments in these areas. We would like clarification that the significant acres of hand treatments in the designated Wilderness areas (20,000+ acres) do not include chainsaws. We support planting of whitebark pine seedlings where appropriate site conditions exist and also support thinning around existing stands prior to burning.

**Treatments in large tree structures and old growth:** We recognize that designations of "old growth" stands are often artificial and limiting. One priority of the SWCC has always been to identify, protect, and restore the remaining large tree components on the landscape. Therefore, the SWCC supports thinning treatments in forest types of ponderosa pine and western larch that would have traditionally burned more frequently without fire suppression. Treatments are appropriate when the understory of these stands has grown in with shade-tolerant species, and would be in danger of losing the large tree components if they burned. We do not support treatments in old growth stands of other forest types including western red cedar (e.g., units associated with Roads 113 and 114 in Cold Jim watershed).

**Road management and new road construction:** New road construction has always been a concern of the SWCC, especially within a landscape already fragmented with hundreds of miles of roads. When this project was initially developed it was under the guidelines of the Collaborative Forest Landscape Restoration Program (CFLRP) which prohibits the building of new permanent roads. We also know that the USFS cannot currently manage their existing road systems (i.e., weeds, illegal access) with their current budget. We realize the CFLRP funding has ended in our landscape, but we still think new road construction should only be undertaken when the benefits are clear. We support new roads only where they provide the opportunity to move a road from a riparian area or allow for the decommissioning of a

significant number of adjacent roads. There would have to be a compelling reason to build a new permanent road just to reach a stand for treatment, especially outside the WUI. New roads proposed in previously un-roaded, higher elevation areas adjacent to wilderness areas (e.g., Roads 87 and 88 in Goat Creek) or near bull trout spawning streams (e.g., in Goat, Elk, and Jim Creek drainages) are particularly problematic for us. We believe using prescribed fire in these areas would be a more appropriate treatment method. We do support all opportunities for road improvements and decommissioning to reduce sedimentation and all improvements for fish passage.

There are very limited locations of new roads that we support at this time. Road #185, which would re-route an access road to private property, seems to make sense. The current road goes through a wetland and is prone to erosion every year and we assume this would be removed as part of the new road construction. We would like to visit any new road locations in the year they are proposed and discuss their value at that time.

**Monitoring:** Monitoring will go a long way toward determining the success of this project and we encourage its use within an adaptive management framework. We will be interested in tracking the “mandatory” monitoring and encourage the Flathead National Forest to make all results available to the interested public on an annual basis. We appreciate the team identifying opportunities for public engagement in monitoring activities and we encourage partnering with local non-profits and citizen scientists. The SWCC may be interested in taking part in some of these joint monitoring opportunities.

**Further public involvement:** The SWCC believes that a key to the success and support of this project will be further public involvement. We applaud the team for listening to public comment on this matter and ensuring there will be annual opportunities to provide input. However, we have some concern about how the new information will be presented and how new input will be considered and incorporated. The level of detail on such things as specific locations of appropriate RMZs, old-growth, and large tree stands for treatment will only become available as field surveys occur prior to beginning work. As we have been told on past projects, the NEPA document analyzes the maximum amount of work that can be completed, but not all of it has to be completed. With a project this large, we think it will be imperative to review work proposed in each watershed annually.

We also believe more specific desired conditions should be presented for each drainage prior to the commencement of work. There needs to be a clear opportunity for the public to review more detailed descriptions of desired conditions that specific management actions are designed to produce and for the Forest Service to truly consider inputs from the public concerning the desired conditions and treatment specifics. The SWCC would like to play an active role in further refinement of the specific treatments each year. We would like to see more details on how the public participation process will unfold in the final EIS and decision document.

Thank you for the opportunity to engage in and provide input on this important project. Please let us know if you have any questions about our comments.

Thank You,

Jim Burchfield and Jon Haufler, Co-Chairs

On behalf of the Southwestern Crown Collaborative