

October 12, 2020

United States Forest Service
Flathead National Forest
Supervisor's Office
650 Wolfpack Way
Kalispell, MT 59901

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

Introductory Statement

On behalf of Montana Wilderness Association, we thank you for the opportunity to provide comments on the Mid-Swan Landscape Renewal and Wildland Urban Interface Project (Mid-Swan Project).

Montana Wilderness Association (MWA) is a non-profit 501(c)(3) organization that works with communities to protect Montana's wilderness heritage, quiet beauty, and outdoor traditions, now and for future generations. Over 5,000 MWA members enjoy hiking, hunting, fishing, horseback riding and exploring the solitude offered by Montana's public lands. Our members and supporters treasure the Swan region for its unique ecological and wildlife values and its important connectivity role in the Northern Continental Divide Ecosystem (NCDE), as well as for the outstanding scenic and recreational opportunities it provides. As an organization, we're proud of a long track record of working with the U.S. Forest Service across the state to assist in national forest stewardship, promoting collaborative approaches to Montana's public land management, and working to protect wild places as they are today for the next generation of forest users.

MWA staff and volunteers have actively participated in the Flathead National Forest's recent forest plan revision process, and have offered input on other proposed National Forest projects in the area. We value this opportunity to continue a constructive dialogue with the FNF's planners and managers. We hope you will find the comments below helpful as you move forward with implementing the Mid Swan Project. We ask that you consider our suggestions and objections, and remain open to adjustment as you absorb the public feedback. The amount of work that has gone into this landscape-scale project has not gone unnoticed and we appreciate the work of the staff of the Flathead National Forest. The interactive and earnest tone of this public involvement process has been well received.

MWA's key priority is the protection of wild lands, ensuring that the forest - especially the areas suitable for wilderness - remain intact, connected, and resilient in the face of growing

communities and a changing climate. Our comments are aimed at finding a balanced approach that includes: 1) the conservation of roadless areas and ecologically rich habitat; 2) meeting the needs of our members and collaborative partners who live and work in the Swan Valley; and 3) adherence to the 2018 Flathead National Forest Land Management Plan. We also continue to be interested in the management of at-risk species in Montana, especially threatened bull trout, grizzly bears and Canada lynx. We know that the Swan is an area facing substantial management challenges due to complex land ownership patterns, a history of extensive timber harvest, and a variety of other environmental and socioeconomic issues. It is extremely important that forest management actions be undertaken with a clear understanding of the broader context of the region's natural and human environment.

Wilderness

MWA supports management actions within Wilderness boundaries that are pursuant to the 1964 Wilderness Act. Any management action taken within Wilderness boundaries "should avoid undermining the ecological processes that create the interconnected web of life in wilderness" (Kloepfer and Marsh 1992). We urge the Forest to consider utilizing the minimum requirements for management prescriptions, and using the minimum tool principle when implementing management actions within the Mission Mountains Wilderness, to result in the lightest impact on the land.

We understand that the decades of fire suppression in the Mission Mountains was, in and of itself, an action against the natural quality of wilderness and that to introduce prescribed fire will be an action against the untrammeled quality of wilderness (U.S. Department of Agriculture 2012). However, it is important to acknowledge that historically, Native Americans had a major impact on the NCDE by systematically setting fires for a wide variety of reasons (Bonnicksen 2000). In fact, our American vision of ideal wilderness was carefully crafted and tended by native people (Hamel and Buckner 1998). We support Alternative B for the application of fire in the Mission Mountain Wilderness. It is time to recognize the importance of historic native burning practices, or our protected and wild areas will continue to lose the biological diversity and ecological integrity they once had (Kay 1998).

Whitebark pine is a key species in high-altitude areas of the Western United States. It is a critical food source for Clark's nutcrackers, grizzly bears, and other animals. Within the Mid-Swan project area, 2,534 acres of live whitebark pine have been mapped, along with 1,015 acres of whitebark snags, an indicator that the trees have experienced high mortality due to white pine blister rust and a mountain pine beetle outbreak. Whitebark pine and wilderness have a mutually beneficial relationship because more than half of whitebark pine's range is in wilderness, whitebark pine forests have high recreation value, and whitebark pine landscapes

contain unique ecological processes (Keane 2000). We support Alternative B's efforts to restore whitebark pine communities through blister-rust resistant plantings, reintroduction of fire, and seed caching. Whitebark pine ecosystems often require a physically demanding hike to reach their scenic bastions. People are taken with the twisting beauty of the tree, the rugged high mountain landscape and the open nature of such a forest, inviting exploration and off-trail travel. Losing the high mountain whitebark pine forest would not only shift the very foundations of this ecosystem, it would also change the human visitor's wilderness experience (McCool and Friedman 2001).

Recommended Wilderness

MWA does not support a site-specific forest plan amendment to allow helicopter landings in recommended wilderness. While restoration efforts for recommended wilderness such as direct seeding, hand treatments, and prescribed fire are actions we can support, we advocate that recommended wilderness areas be managed like Wilderness areas. "Recommended wilderness areas are suitable for restoration activities where the outcomes will protect the wilderness characteristics of the areas, if the ecological and social characteristics that provide the basis for wilderness recommendation are maintained and protected (MA1b-SUIT-03)." The actions outlined in Alternatives B and C would impact the suitability component for recommended wilderness that prohibits motorized transport. We would like to see the Flathead National Forest adjust its activities to meet the purpose and need of this project while also adhering to the existing forest plan and respecting the outstanding qualities that make these areas suitable for wilderness.

Roads

The Swan Valley is home to an extensive network of maintained and decommissioned roads. We already have too many roads scattered throughout lands managed by the Forest Service in the Swan Valley. We believe that silvicultural treatments can be completed and desired conditions in the WUI can be obtained without constructing 41.7 miles of new roads. We prefer Alternative C because new roads are not proposed to be built for vegetation treatment. We especially oppose any new roads near Goat Creek, north of Lion Creek, and above Smith Creek - these are areas of steep terrain and avalanche chutes, prone to soil erosion, and currently free of dense road networks that negatively impact wildlife. Furthermore we oppose road construction near Fatty Creek, Cold Creek, and the South Fork of Cold Creek, Jim Creek, and all other new roads that would draw traffic closer to the Mission Mountain Wilderness boundary. Such roads will facilitate trespass for winter motorized recreational users into the Wilderness, a boundary that is already proven very difficult to enforce.

In both Alternative B and C, 44.1 miles of road will be decommissioned and returned to forest production, while 9.1 will be stored and made impassable, and 14.1 closed with a gate. 175.2 miles of road will be stored. MWA would like to see closed and stored roads go beyond berms and gates whenever possible and that the entrances are made truly impassable, with the first 50-300 feet of the road “intensely blocked” (pg 69 in the DEIS) with obliteration of the tread, addition of large boulders, and downing trees across the road, while simultaneously protecting fish and water quality through the preemptive removal of all stream-crossing culverts and bridges before they fail.

Beaver

We support the use of nine beaver analogs to benefit aquatic habitat but question if nine is enough to move the needle on restoring aquatic biodiversity on a landscape scale. We would also like the USFS to commit to monitoring the impacts of these structures to see how they affect water temperatures, sediment flow, beaver recolonization, fish species distribution, and to ensure fish passage. Though beaver analogs can help address impacts from reduced beaver activity, it would be advantageous to discuss or further include efforts that facilitate improved beaver populations where appropriate. We would prefer an approach that includes a goal of restoring actual beavers to these areas in accordance with the requirement to provide species diversity commensurate with its natural range of variation.

Wolverine

On the Flathead National Forest, the charismatic wolverine acts as a reliable indicator for several species who rely on remote mountain cirques, steep avalanche chutes, and quiet, deep, snow-covered acres. Montana Wilderness Association prefers Alternative C for a significantly lighter impact on wolverines, particularly female wolverines. In addition to impact on habitat stands, low elevation helicopter flights add to the wolverine’s disturbance. These helicopter flights, especially over wilderness or recommended wilderness, should be curtailed as much as possible, and eliminated from February 15 to May 15th each year “unless they include strategies or design features to mitigate disturbance to wolverines (FW-GDL-WL-04).”

Lynx

According to the USFS Northern Rockies Lynx Management Direction, Lynx are solitary creatures that thrive in remote and secure habitats with high levels of habitat connectivity. As defined in the Flathead Forest Plan, besides the developed valley floor, the entire project area is critical lynx habitat. Timber harvest is listed as the number one key stressor to secure lynx habitat, and after carefully observing the FNF project presentation videos, Montana Wilderness Association rejects Alternative B, with its Canada Lynx project-level amendment to the Flathead

Forest Plan. Intense logging and road building activities, especially winter logging, will create greater stress on this threatened species. Alternative B, as it stands, presents too high of a risk to lynx and snowshoe hare populations. We support the Alternative C actions in the WUI that would strive to create available and evolving high-quality lynx foraging and denning habitat.

WUI

As climate change drives warmer, drier weather in the western half of the state, dense fuel beds and tree stands are producing wildfires that threaten the many small communities within the Swan Valley. We must find a balanced approach that mitigates wildfire risk while also maintaining and enhancing the many recreation and wildlife values found there. We recognize that past land management practices, the impacts of climate change, and the development of private inholding parcels in the project area have created a situation where WUI fire danger is a concern on the minds of most residents of the Swan Valley.

We support reducing the risk of wildfire in the WUI, while preserving large trees. We are also supportive of prescribed fire understory burns following mechanical thinning, as these treatments have been shown to be the most effective at altering subsequent wildfire behavior. Additionally, we support prescribed fire in mature ponderosa pine/Douglas fir forest types that historically experienced frequent, low intensity wildfire. We urge the Forest Service to work with partner agencies and undertake an education program to encourage private land development and use that will help to minimize WUI fire danger over the long term, realizing that timber harvest and other land management actions do not effectively mitigate this risk.

Closing Statement

We are conscious of the need for the Mid-Swan Project. In the executive summary of the DEIS it reads, "Many natural and human-caused factors have influenced the current conditions found in the project area today. Decades of fire suppression, road development, timber management practices, non-native species introduction, and climate change are some examples that have influenced the patterns and processes not just in the project area, but across the broader landscape." We understand that much of the federal land in the project area has been subjected to repeated timber harvest in the past, particularly lands near the valley floor and lands formerly owned and managed by Plum Creek. The level of post-harvest restoration work on these lands over time has been sometimes inconsistent, and would often not meet current standards. This restoration need has been a primary trigger for many of the land management actions identified in the document. We know that undertaking proactive restoration work on many of these lands will help restore pre-harvest landscape and vegetative species diversity. Whenever possible, we support the EIS Alternative that will restore the dynamic natural processes and conservation values in this important landscape.

We acknowledge the large scale of the Mid-Swan Project over time as well as space. We encourage the Forest to actively seek comments and input from the public throughout this process as it progresses in the years to come. We ask the agency to create opportunities for public engagement after a decision is signed and throughout the implementation process through webinar presentations, field trips, partnership monitoring projects, NPR radio stories, and social media posts.

Thank you for your consideration of MWA's comments on the Mid-Swan Project. We are supportive of collaborative solutions that incorporate wilderness values and support the socioeconomic sustainability of surrounding communities. For many of the issues closest to our heart, we feel that actions outlined in Alternative C are the more suitable. We recognize the importance of keeping our communities safe by managing the WUI in projects like this one, but we cannot support additional road construction that will unnecessarily cause more fragmentation in this rich landscape. This area is a precious resource to local residents, the State of Montana, the United States of America and beyond. We commend the Flathead National Forest staff for undertaking this herculean effort and including the public and every step of the way.

Sincerely,

A handwritten signature in black ink, appearing to read "Allie Maloney". The signature is fluid and cursive, with the first name "Allie" and last name "Maloney" clearly distinguishable.

Allie Maloney
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Kay, C.E. 1998. Are ecosystems structured from the topdown or bottom-up? A new look at an old debate. *Wildlife Society Bulletin*. 26: 484-498.

Hamel, P.B., and Buckner, E.R. 1998. How far could a squirrel travel in the treetops? A prehistory of the southern forest. *Transactions of the North American Wildlife and Natural Resource Conference*. 63: 309-315.

Bonnicksen, T.M. 2000. *America's ancient forests: from the Ice Age to the Age of Discovery*. John Wiley and Sons, New York, NY. 594 p.

Kloepfer, D., and Marsh, S.L. 1992. Keeping it Wild: A citizen guide to wilderness management. Wilderness Society.

Keane, R. 2000. The importance of wilderness to whitebark pine Research and management. USDA Forest Service Proceedings RMRS-P-15-VOL-3.

McCool, Stephen F.; Freimund, Wayne. 2001. Aesthetic and recreational consequences: A diminished landscape. In: Tomback, D. F., S. F. Arno, R. E. Keane (editors) Restoring whitebark pine ecosystems. Island Press, Arizona.