

Joe Krueger, Mid-Swan Project Team Lead
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Re: Comments on Mid-Swan Project by Nick Gistaro

Dear Mr. Krueger:

Thank you for the opportunity to comment on this Project. I have a home and live in the lower swan river ecosystem and spend significant amounts of time throughout the year recreating in both the Swan and Mission ranges and on the valley floor. **I want to express my strong opposition to Alternative B. I support Alternative C as long as some extensive modifications I'll describe here are made to the plan.** Below I have provided some general comments which speak to issues in both alternatives, and some site-specific comments.

GENERAL COMMENTS

1. Project scope, plan of execution and public input.

A single NEPA document for a 15-year project is completely insufficient. So much could change over this timeframe that one NEPA analysis could not possibly predict and address. It is very possible that details will be overlooked in this focus on generalities, including the grounding definition for biodiversity, which is not only about "the variety and variability of native plants and animals" (p. 5) but also the variety of life across the genetic, species, and ecosystem scales, and the processes, functions, and structures required for that life to thrive. I am concerned that the extent and number of project deliverables will lead to confounding on-the-ground impacts that lack nuance, collaboration, and care.

There has not been a sufficient or adequate process for public input, particularly given the impact of COVID-19 confounded by technical issues given our rural nature. For example, the most recent public input meeting was switched to an on-line format due to COVID-19 restrictions. I tried to participate as did my neighbor but we were unable to due to our poor internet service. This is a common issue in our rural area of Montana. I suspect I was not the only member of the public that tried and was unable to get into the meeting. These factors combine to further limit and degrade public input in a process that is already too short given the scope of this project. I feel very strongly that you should extend the public input timeframe and do more to inform the public on the project.

Since this project will be implemented over a 15-year period and is almost impossible to thoroughly digest all proposed actions across the entire project area, and that there aren't actual thinning prescriptions or detailed mechanical thinning treatments to review, I would encourage collaborative public participation in crafting treatments/prescriptions as implementation of the on-the-ground work approaches (i.e. collaborative participation after the scoping and decision process). I would suggest hosting annual field trips with interested members of the public and collaboratives, public meetings and updates to the Condon Community Council or other appropriate entities, and an email chain for interested parties that outlines timelines and updates as parts of the project's implementation nears.

2. New road construction.

I am deeply opposed to all new, permanent roads proposed in this project, both in Alternative B and C. I cannot support Alternative B in any form based on the amount of new roads and the detrimental effects they would have to biodiversity. Building temporary roads for project implementation is acceptable as long as they are properly reclaimed. We already have a dense network of existing roads in the Swan, we don't need 31.1 miles of new, additional permanent roads that will negatively impact the very aquatic and terrestrial biodiversity that this project aims to restore. Furthermore, new roads in drainages that are bull trout spawning or rearing streams and westslope cutthroat conservation population streams will have potential negative impacts to those streams and populations. Swan Lake and the Swan River watershed are listed by the EPA/DEQ as a threatened waterbody due to exceeding Total Maximum Daily Loads of sediment, primarily caused by the legacy road network in the Swan Valley. It doesn't make any sense to spend the time and money to decommission some roads to decrease sediment delivery into waterbodies or promote habitat quality, and then create new roads that will increase sediment delivery into the same waterbodies or degrade habitat quality.

There has been a big effort to reduce road sediment delivery via road decommissioning and BMP work across the broader Swan Valley landscape, and specifically in the Jim Creek watershed and has led to that stream being taken off the EPA/DEQ's list of impaired waterbodies. So now you are proposing to build new roads in the Jim Creek drainage, which makes no sense.

I am against the building of any new roads into previous unroaded areas, especially near the Mission Mountains Wilderness (MMW) boundary, or high on the Swan Front near the recommended Wilderness boundary. These roads would decrease secure habitat for grizzly bears as well as big-game, provide a vector for weeds to colonize pristine areas, and provide access points for illegal snowmobile and other motorized use into these areas. Creating a road to reach the last patches of big timber in the valley doesn't sound like sustainable forestry is occurring on the rest of the landscape. If these high elevation patches pose such a significant threat due to fuel accumulations, then please just reduce those fuel loads using prescribed fire.

The USFS cannot maintain the current transportation system (spraying weeds and fixing illegal motorized access issues), so why would you want to create up to 31.1 miles of new road issues that would exacerbate these problems?

3. Scope and pace of forest management, in general.

I am very concerned with the possibility of landscape homogenization and overharvest in the name of an idealized fire-adapted forest community. The language of "replacing" or "converting" one forest community to an entirely different one seems impractical at best, ecologically destructive at worst. I also do not endorse the project-specific amendments to the Forest Plan for management in lynx habitat outside the WUI, where fire (not mechanized treatment) is needed to create the mosaic of habitat that lynx require. I fear there are many top-down pressures that are intensifying mechanized commercial "fuels reduction" in the guise of fire adaptation, but the best available science increasingly shows that this view is short-sighted and wrong. Wildfire was, is, and always will be the chief architect of our resilient forest, and stewardship around human infrastructure with smarter/reduced private land development in the Wildland Urban Interface are the keys to safeguard human lives and livelihoods.

Despite the rejection on p. 88, I ardently believe that prescribed fire should be prioritized over mechanical and commercial treatments. Prescribed fire should be far more influential in the forest management of Alternative C, especially through broadcast or small pile burning to reduce unnatural soil/microclimate sterilization. Simply put, commercial, mechanized forestry on public land will not be leading solution for fire resiliency or

enhanced biodiversity, and I am disappointed that there is not more acknowledgement of this fact in this DEIS, both in theory and practice.

4. Riparian Management Zone (RMZ) treatments.

Alternative B is particularly unacceptable due to its intensified activities in the RMZ. I do not have confidence in the need for, or validity of, commercial, heavy-equipment-based forestry activities in the RMZ, and I strongly disagree with any RMZ management activities in river corridors eligible for Wild & Scenic protections. I support Alternative C's deferral, though I am concerned with the intensification of the RMZ roads that Alternative C still includes.

Fire may offer some benefits in the outer RMZ, but this remains a contentious practice without widely accepted and locally adapted evidence. If the project wants to prove the efficacy of RMZ management, I would urge that it only be conducted in the outer RMZ, with only prescribed burning, and only as a small-scale experimental analysis. Conducting these experimental RMZ burns in sites with differing fire regimes might enhance understanding of this treatment in the Mid-Swan. This experimental RMZ work would ideally be conducted early in the project, allowing for extensive monitoring across the project's 15 years to gauge impacts.

5. Designated Wilderness (DW), recommended wilderness (RW), inventoried roadless areas (IRA).

I am vehemently against the Forest Plan Amendment to land helicopters in designated or recommended Wilderness areas, as that directly contradicts the Wilderness Act and Forest Plan. I am also strongly opposed to any motorized or mechanized treatments (masticators/excavators) in Inventoried Roadless Areas, as these activities would directly conflict with the values that led to these designations. The only activities that I support in designated or recommended Wilderness in this proposal are prescribed fire and whitebark pine restoration, as long as they are carried out with non-motorized or mechanized tools. I am ok with aerial ignitions of prescribed fire in Wilderness if other minimum tools cannot be utilized.

6. Old growth settings. I endorse Alternative C's refusal to meddle with old growth habitat, and I am disturbed to find the notion in Alternative B that old-growth alteration would be even considered prior to on-the-ground awareness and mapping of habitat extent. The microclimates, thermal refugia, and moisture gradients that old-growth habitats provide are poorly understood, and I think it is grossly mistaken to assume that we can "protect" these rare communities by pruning away the very wildness that makes them so diverse and distinct. Forest types do not create old forest structure in equal ways, and I would like to see more nuance between management strategies that reflect the differences across natural communities (e.g., how could old growth larch trees be managed differently from an old growth cedar grove?) I do not support the 0.8 miles of roads through stands with old forest structure that is proposed for Alternative C on p. 114.

7. Beaver restoration. I am very supportive of the beaver habitat restoration (described on p.70) in this proposal and the removal of fish passage barriers. However, given the BDAs' most important potential role – to be a short-lived enticement for natural beaver populations to expand, which is accurately described here – I suggest calling it "Building Starter Beaver Habitat" or "Mimicking Beaver Activity," rather than "artificial" beaver habitat. I also applaud the efforts to avoid heavy machinery and road building in all aspects of the proposed beaver restoration activities.

I would also suggest collaboration with Montana Fish, Wildlife & Parks' (FWP) Nongame Wildlife Biologist Torrey Ritter (Region 2) to explore the possibility for beaver trapping closures in BDA project sites. I believe

this policy would help to incentivize natural recolonization and, as part of monitoring efforts, help to gauge project impacts. Torrey should also be consulted if the project does seek to relocate live beavers as a complementary effort.

8. Eligible Wild and Scenic River Corridors

The proposed activities inside eligible wild and scenic river corridors also directly conflict with the values that led to these designations. Please eliminate these activities (road building, mechanized treatments) from the proposal.

9. Monitoring and citizen-science.

As a certified Montana Master Naturalist, I am pleased by the opportunities described for collaborative monitoring and citizen-science described in the IG. It is absolutely essential to ground-truth all models used for prescriptions in this project, as well as to conduct robust consultations with stakeholders and experts, especially where the resource objectives transcend boundaries. The USFS' Citizen Science Competitive Funding Program will provide ideal scaffolding for this approach.

SITE-SPECIFIC COMMENTS

Road #94 Alt B: I am vehemently opposed to this 1 mile of new, permanent road that would create a new road high onto the Swan Front into previously unroaded country and near the recommended Wilderness boundary. The current stored road system that this addition would lengthen is full of knapweed and a chronic road system that receives much illegal OHV use that the USFS is currently unable to fix. This new road would extend the weed infestation and illegal motorized trespass higher on the mountainside. With this level of maintenance of the current road system, it makes no sense to extend the problems. This road would not promote terrestrial biodiversity or create a more efficient transportation system. The fuel loading is very high, but since it is high on the mountainside and is adjacent to the Condon Mountain Fire perimeter, why not just use prescribed fire there to promote biodiversity and reduce fire danger?

Road #156 Alt B&C: I do not understand the need to create 'loops' with the current transportation system. This road doesn't make sense since you are decommissioning a road to the south where this new road would end up. The vegetation management activities in the area can be accomplished without a new road via the open Falls Creek Road or gated road system to the south.

Road #152 Alt B&C: This road already basically exists if you were to go cut down about six trees. Again, I don't understand the rationale for 'loop' roads, as timber can be reached from both sides of the current road systems. If you go visit the site on the ground you will find that what you are seeking is basically already there.

Road #153 Alt B&C: I am vehemently opposed to this as it makes no sense to punch a new road through what is a superb block of big-game winter range and previously unroaded habitat. Also, it is drawn on maps as a straight line, but since there is topography in that country, would end up being longer than .6 miles. I would suggest two alternatives to this proposed road: 1) connect roads 9815 and 90392 to the west of the proposed road, where they come within 200-300 yards to touching, or 2) don't decommission the segment of road on 90392 over Falls Creek to maintain access into the north part of Section 19. Falls Creek contains brook trout, so the fisheries habitat values aren't that high. This would also maintain a valuable road just east of private property that may come in handy during a wildfire. In my opinion, I think the proposed new road #153 would have more detrimental effects to biodiversity and fire-fighting capabilities than if you were to just leave road 90392 over Falls Creek.

Road #151 Alt B&C: I am strongly opposed to this road. This is another new road that I don't understand the need to connect the two separate road segments to create a 'loop'. I feel that the terrestrial biodiversity habitat degradation that this new road would create would outweigh any possible reason for creating this road. This road would cut through some critical big-game winter range.

Road #150 Alt B&C: I am opposed to this road, again for the unknown positive benefits of creating a 'loop.' Both current road systems that this would connect are so grown over you wouldn't even realize there is a road there, so why the need to create a loop?

Road #149 Alt B&C: I am strongly opposed to this new road, as timber management can occur via both road systems and I don't understand the reason to connect them. It again punches a road through a nice wildlife corridor where there aren't roads and is high quality big-game winter range. Also, Road 9835 is open to seasonal access by ambulatory hunters, so would this proposal increase the number of roads that would now receive that seasonal access too? It seems like that might create problems with grizzly bear core habitat calculations. Also, there is a loop road that does already connect into this road system (not shown on the USFS interactive map) in the SE corner of Section 1.

Road #155 Alt B&C: Again, this new road would connect into the current road system that is open to season access by ambulatory hunters and is high quality big-game winter range. Would this seasonal motorized access be allowed into the road system that this would connect?

Road #154 Alt B&C: Same comments as #155. Also, what is the reason for this new road since both road segments can easily be reached just to the east via road 899?

Roads #165 & 167 Alt B&C: Same concerns regarding increased seasonal motorized access via ambulatory hunters.

Road #144 Alt B&C: I am highly opposed to this new road. This proposed segment would create a new road across Alder Creek, which seems contradictory to the stated desire to restore aquatic biodiversity. This makes no sense. Please eliminate this road from the proposal.

Road #145 Alt B&C: This would create a 'loop' for unknown purposes and reasons.

Road #146 Alt B&C: This new segment connects into 10648, which is currently so grown in you don't even know there is a road there, so what need does this 'loop' fulfill?

Road #147 Alt B&C: Again, I'm unclear why this new road is needed when timber management can be accomplished from surrounding road systems and would be created through some of the best big-game winter range in the valley?

Temp Road #143 Alt B: I am highly opposed to this temporary road since there is a road directly above it on the slope. It is a very steep slope that is a huge weed infestation, and the SW aspect provides some of best winter range and snowmelt conditions found in the valley. Punching a road down along Lion Creek, which is one of the Swan's most productive bull trout spawning streams doesn't seem like a wise choice either. Combined, the costs outweigh the benefits of this road, even if only temporary.

Road #135 Alt B: Creating this new road near Lion Creek seems like a potential risk to increase sediment into the bull trout spawning stream.

Road #134 Alt B: Combined with road #135, this would punch roads into areas that are currently unroaded, which generally in the Swan means it has high terrestrial wildlife habitat values. Is this road really necessary to accomplish vegetation management in the area?

Roads #65,66, 138 Alt B: I am highly opposed to these new roads, as they literally come within a stone's throw of the confluence of Goat and Squeezer Creeks, two of the Swan's most productive bull trout spawning streams. Please take these out of the proposal, as well as any of the other temporary roads proposed in Section 17 that would create potential sediment delivery to these streams. Goat Creek is the Swan's only remaining impaired tributary according to the EPA/DEQ and there have been great efforts over time to improve the water quality and reduce sediment delivery over time. These actions seem contradictory to those previous efforts.

Roads #87 & 88 Alt B: I am highly opposed to these new roads, as they occur on incredibly steep slopes high above Goat Creek. In fact, areas above these proposed roads regularly avalanche every year and seem like very poor places for roads that could potentially contribute sediment delivery to Goat Creek.

Road #53 & 54 Alt B: Both these roads appear to cross small creeks or riparian areas and #54 in particular appears to cross three separate seeps in addition to bordering on the edge of a very large wetland complex. This seems to directly contradict one of the stated purposes and needs of restoring aquatic biodiversity. Please remove these from the proposal.

Road #61 Alt B: This road appears to be proposed to be built over a creek, or in an RMZ, which again would be a negative impact to aquatic biodiversity. Please remove this from the proposal.

Roads #39, 40, 41, 43, 44, 46, 51, 172 Alt B: All of these new roads encroach into the upper North Woodward Creek drainage that is currently unroaded, providing secure habitat for big-game and grizzly bears. Woodward Creek is also one of the Swan Valley's premiere bull trout spawning streams, and the sedimentation caused by all these new roads at the head of the watershed would potentially have serious negative consequences for bull trout. Road #41 actually crosses a fork of North Woodward Creek. Please remove these from the proposal.

Roads #38 & 184 Alt B: These new roads encroach into the upper South Woodward Creek drainage and that is currently unroaded, providing secure habitat for big-game and grizzly bears. Woodward Creek is also one of the Swan Valley's premiere bull trout spawning streams, and the sedimentation caused by all these new roads at the head of the watershed would potentially have serious negative consequences for bull trout.

Roads #27, 28, 31, 171 Alt B: Section 34 is one of the few sections of the Swan Valley outside designated or recommended Wilderness or Inventoried Roadless, that doesn't have a single road going through it, which generally equates to high quality terrestrial wildlife habitat. Also, roads 28 and 171 appear to cross a small creek or riparian area, which would have negative consequences to aquatic biodiversity, which again contradicts one of the stated purposes and needs of this project.

Road #25 Alt B: There is no reason to punch this new road nearly to the Mission Mountain Wilderness boundary. The road leading to this location is so overgrown with vegetation you can't even walk down it, which creates a very nice, secure chunk of wildlife habitat for big-game and grizzly bears. Creating a new road will encourage even more illegal snowmobile access routes into this area, which is already problematic and the U.S. Forest Service does not have the funding or personnel to curtail. This would also potentially be a weed vector to inside the Wilderness, which is currently mostly weed-free. If the fuel loading in this location is undesirable, then use prescribed fire as the tool to reduce it.

Road #24 Alt B: This road segment crosses a small creek, again creating negative consequences to the aquatic biodiversity. There are already existing roads just above and below it, so why not utilize those?

Roads #2 & 3 Alt B&C: Again, Section 12 is one of the few sections in the valley bottom without a road and because of that, very high wildlife habitat values. Road #2 crosses two small creeks or riparian areas. Road #3 would extend existing road 90992, which currently has an illegal OHV trail cut out around the gate. Please remove these roads from the proposal, or at the very least fix the illegal OHV trail before creating a new problem.

Roads #8,9, 10, 12, 170, 197 Alt B: Again, Section 30 is one of the few sections in the valley bottom without a road and because of that, very high wildlife habitat values. Those habitat benefits outweigh the cost of new roads and associated habitat degradation that comes with them.

Roads #6, 103, 111, 112, 113, 179: Alt B: There has been a big effort to reduce road sediment delivery via road decommissioning and BMP work, specifically in the Jim Creek watershed and has led to that stream being taken off the EPA/DEQ's list of impaired waterbodies. So now you are proposing to build new roads in the Jim Creek drainage, which makes no sense. Jim Creek is also one of the Swan Valley's most productive bull trout spawning streams and these roads would increase sediment delivery and harmful associated effects. Roads #6, 103, 179 all cross small creeks or riparian areas, which would have negative effects on aquatic biodiversity. Please remove them from the proposal.

Road #162 Alt B&C: I am vehemently against creating this road. This location is a bottleneck between the Swan River and Cold Creek, and is a major wildlife migration route. Please don't sever this high quality habitat with a road. The 9767A Road is already grown-in and if you leave the area alone, nature will continue to restore this road for you.

Roads #157 &169 Alt B&C: These roads would cross a riparian area and would sever a big-game migration corridor. Please remove from the proposal.

Road #164 Alt B&C: I don't understand the need to create this small loop road. It also would create a road through an area that is a premiere big-game migration corridor. Please remove it from the proposal.

Temp Road #95 Alt B: There was previously a big collaborative effort to come up with the thinning design in this area as part of the Windfall/Elk Project. The patch of timber that this temporary road would access was specifically left for its wildlife habitat values as part of that design. Please remove this road from the proposal.

Road #185 Alt B&C: Out of the hundreds of proposed new road segments, this is the only one that I support. I strongly support this new road, as long as the associated 90124 segment is fully removed and decommissioned. This is the one new road that makes sense as it would remove a problem road segment that washes away an incredible amount of sediment every year that is built over Condon Creek and through a wetland where a road should never have been built in the first place. This is a great example of promoting aquatic biodiversity and is one of the few examples that makes sense in this proposal. Please make this your top priority of any new road that may be constructed as part of this project.

Questions

1. Regarding the Public Engagement Opportunities (2.1) described in A-3 and A-4 of the IG, how will the public be assured that their comments are heard and addressed throughout the entirety of the project? If "it will be

considered informal in that there are no regulations requiring comment during Mid-Swan implementation,” and if “it needs to be clearly understood that public engagement is not intended to ‘re-scope’ or re-analyze potential environmental effects,” what form of comment solicitation and incorporation should the public expect? What type of comments will the implementation team see as substantial and relevant?

2. I am pleased by the inclusion of prescribed fire throughout the project, and it would like to see it prioritized as I described in above. But given the purpose and need of this DEIS, I also believe this project should more explicitly describe a plan for the increased allowance of wildfire, which I see as the greatest restoration possible on our landscape. Will suppression of lightning-caused fires that do not endanger homes remain the status quo? Would wildfire be allowed to burn as a proxy for prescribed treatments or mechanical forest management?

Thank you for considering these comments. Please contact me if you have any questions.

Sincerely,

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