October 13, 2020

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

Re: Comments on the Mid-Swan Project Draft Environmental Impact Statement

Dear Mr. Krueger,

American Rivers appreciates the opportunity to submit the following comments on the Mid-Swan Project Draft Environmental Impact Statement (DEIS).

Founded in 1973, American Rivers is the leading conservation organization working to protect and restore the nation's rivers and streams. Our mission is to protect wild rivers, restore damaged rivers and conserve clean water for people and nature. Currently we have more than 355,000 members, supporters and volunteers throughout all 50 states, thousands of whom value the clean, free-flowing rivers and streams of Montana's Swan Valley.

The Mid-Swan Project Draft Environmental Impact Statement (DEIS) proposes a wide range of restoration and management activities, some of which would require the construction of new road segments and various vegetation treatment activities within Wild and Scenic eligible stream corridors. American Rivers asks that the Flathead National Forest further analyze and provide documentation on the potential impacts of these activities on water quality, habitat, wildlife and the outstandingly remarkable values (ORVs) of eligible stream segments. Furthermore, American Rivers requests that the Final Environmental Impact Statement (FEIS) include further analysis and explanation of the concerns outlined below and modify alternatives and analysis to fully address and minimize potential impacts to water quality and ORVs on Wild and Scenic eligible stream segments.

The Swan Valley is Home to Some of the Nation's Most Important Headwaters

Located within the Crown of the Continent Ecosystem and home to some of the most pristine headwaters of the Columbia River watershed, the Swan Valley is one of the most vital and integral landscapes in the northwestern United States. Large tracts of intact and connected wildlands and rivers provide habitat for an array of rare, threatened and endangered species including bull trout, westslope cutthroat trout, water howellia, grizzly bears, wolverine, and Canada lynx. Each of these species and many more depend on clean, free-flowing water for everything from habitat, to food sources, to ensuring genetic diversity and habitat connectivity.

On a broader scale, these rivers and streams are the birthplace of the Columbia River watershed. Impacts to water quality in the Swan Valley could have significant and lasting effects on the rivers that feed some of the most important wild and working landscapes in the northwestern United States.

Extensive Scale of Project Proposal Would Benefit From Additional Analysis

With a variety of management activities proposed across 174,000 acres to be implemented over a period of 15 years, the spatial and temporal scope of the Mid-Swan Project is immense. While cohesive, large-scale landscape management is an ideal outcome, the magnitude and variety of management activities proposed within this project raise concerns that it lacks sufficient attention to detail. In short, a lack of attention to any one component of this ecosystem could result in serious and irreversible impacts that not only affect the local landscape, but the larger Columbia River watershed.

American Rivers believes the DEIS warrants additional analysis and further consideration of potential impacts and mitigation measures for the benefit of impacted rivers and streams (regardless of whether they have been found to be Wild and Scenic eligible) as described below:

(1) Sedimentation: The USFS acknowledges that sedimentation is one of the most significant impacts to water quality in the project area. While modeling has been conducted in an attempt to understand and mitigate potential impacts, we are concerned the DEIS does not set in place a protocol for monitoring realized impacts resulting from sedimentation as well as a framework for adaptive management to address these concerns.

The DEIS acknowledges the significant impacts already resulting from stream sedimentation stating,

> "Recent stream condition inventories throughout the Mid-Swan project show that increased fine-grained sediment in stream systems can reduce habitat availability and habitat quality for native fish and reduce their spawning success, potentially reducing the aquatic biodiversity within the project area. Bull trout are a native fish found throughout the project area (listed as a Threatened species under the Endangered Species Act) and sensitive to the level of fine-grained substrate in its habitat, especially stream reaches used for spawning and juvenile rearing.
>
> A likely source of the higher than natural levels of fine-grained sediment in the aquatic ecosystem is the existing road system (U.S. Department of Agriculture 2018b, p.62). There are 567 miles of Forest Service-managed roads in or accessing the project area. Of those miles, the location of 133.1 miles are within the RMZs and there are 619 road/stream crossings resulting in a substantial contribution to sediment" (DEIS p18).

While the DEIS admirably attempts to model and mitigate these potential impacts through "stormproofing" (i.e. decommissioning, storing, or improving other existing system roads), American Rivers is concerned that the modeling may be insufficient to fully address resulting impacts from described management activities.

Please explain how the USFS will monitor potential impacts that may result from sedimentation moving forward as well as the framework that will be used in order to initiate adaptive management mitigation measures.

(2) Potential impacts resulting from noxious weeds warrant further explanation. The DEIS acknowledges proliferation of noxious plants as an area of major concern. As the DEIS states, "Other foreseeable actions include noxious weed control"...yet the DEIS fails to explain when, where, and how such determinations would be made (p153).

Please make clear when, where, and how the agency will assess the need for additional mitigation measures and the criteria that will be used for assuring their efficacy.

(3) Impacts to carinate mountainsnail (Lion Creek): While Lion Creek has been determined to possess a wildlife ORV due to the importance of the stream and adjacent habitat for carinate mountainsnails, it remains unclear that the current understanding of potential impacts and mitigation measures (avoiding disturbance of primary habitat, i.e. talus slopes) from impacts resulting from fuels reduction efforts or road building is sufficient to protect the rare species' wellbeing. While we appreciate the Forest Service's effort to not disturb primary home habitat for the carinate mountainsnail, there may be significant impacts from management actions resulting from disturbances occurring between talus slope and river, changes to vegetation or riparian habitat, or water quality.

Please disclose the potential impacts and mitigation measures that may be considered for actions that disturb connection between talus slope home habitat and important riparian habitat.

(4) Explanation of potential impacts and mitigation measures for ORV determination on lower Swan River: While the DEIS as well as 2018 Forest Plan recognize the lower Swan River as possessing a wildlife ORV, the DEIS does not explain the reasoning behind the ORV determination or potential impacts to the species that led to such determination.

Please explain which species resulted in the determination of this ORV as well as the potential impacts and mitigation measures that will be put in place (via an adaptive management framework) in order to ensure that this ORV is not diminished.

Wild and Scenic Eligible Streams within the Mid-Swan Project Area

The 2018 Flathead National Forest Plan found a total of 24 streams to be eligible for potential inclusion in the National Wild and Scenic River System (NWSRS). Each of these streams was found to be free-flowing and possess one or more outstandingly remarkable value (ORV) for which they were deemed eligible and granted protections to safeguard said characteristics. Of these 24 Wild and Scenic

eligible streams, three are within the proposed Mid-Swan project area. An overview of these segments is below:

River	Segment	Preliminary Classification	ORVs	Length (miles)	Acres
Elk Creek	Headwaters to Forest boundary	Scenic	Fish (bull trout and westslope cutthroat trout)	10	2,636
Lion Creek	Headwaters to Lion Creek Trailhead	Scenic	Wildlife (Carinate mountainsnail)	11	3,315
Lower Swan River	Swan River State Forest to Swan Lake	Recreational	Wildlife	11	1,432

Potential Impacts to Wild and Scenic Eligible Streams

Elk Creek

Elk Creek has long been recognized by the US Forest Service and others as one of the most important bull trout streams on the Flathead National Forest. The DEIS states, "Elk Creek is the most productive stream for the threatened bull trout in the Swan River watershed and is an eligible wild and scenic river with the outstandingly remarkable value for fish" (DEIS pg 303). The 2018 Forest Plan lists Elk Creek as one of eight watersheds included in the Flathead NF Conservation Watershed Network (CWN) to manage for the conservation and recovery of native fish. The Montana Department of Fish Wildlife and Parks, local organizations, and the Confederated Salish and Kootenai Tribes (CSKT) also recognize the stream as one of the most important bull trout spawning grounds in the state. In 2006, CSKT and the Swan Ecosystem Center (now Swan Valley Connections) acquired Section 35, a 320-acre parcel of land situated at the confluence of Elk Creek and the Swan River, in the interest of conserving vital fish, wildlife, and plant habitat. The mission statement of the Elk Creek Conservation Area Management Plan is to:

> *Allow dynamic processes to create and sustain habitat for all bull trout life stages. Protect and promote habitat for all native plant and animal species in a naturally functioning forest. Recognize that this forest is part of a larger landscape that supports humans. Considering that not all natural processes (such as wildfire) can be allowed to proceed, we will follow a well-defined process for decision making to identify management interventions that simulate a naturally functioning forest.* (p. 2)

While the Mid-Swan project area does not include the Elk Creek Conservation Area (ECCA), it does propose a variety of vegetation treatments and road building activities on Sections 3, 4, 9, 10, 16, and 17, all of which are directly upstream of the ECCA. Alternative B proposes a significant amount of commercial mechanized harvest with activity fuels treatment on Section 3, directly adjacent to and upstream of the ECCA, a portion of which would require the construction of a new road. Alternative C, while proposing far less mechanized treatment on adjacent Sections, would still allow for significant hand treatments within the eligible Wild and Scenic River corridor, as well as some mechanized treatments abutting the corridor. The proposed activities within both Alternatives B and C pose potential threats to the critical bull trout habitat and spawning grounds for which Elk Creek was found to be an eligible Wild and Scenic River, and for which the Elk Creek Conservation Area was created and is managed to protect.

Furthermore, management activities proposed within Alternatives B and C pose threats to other aquatic species and habitat types. Cottonwood and willow streamside areas from the headwaters of Elk Creek to its confluence with the Swan River provide important low-elevation habitat for grizzly bears, as well as winter range for deer and elk. The streamside and stream itself are also important habitats for a number of aquatic plant species. Objective 3 under Goal 1 of the Elk Creek Conservation Area Management Plan directs to:

> *Minimize the presence of non-native plant species, especially noxious weeds, focusing on road verges, landing areas, disturbed riparian areas, and other disturbed sites.* (p. 3)

Mechanical vegetation treatment activities pose the threat of introducing and spreading non-native plant species and noxious weeds, which in turn may threaten native aquatic species along and within Elk Creek.

As described in more detail above, American Rivers believes the DEIS would benefit from more explicitly considering potential impacts and mitigation measures relating to Elk Creek and its resident fish and wildlife in the following areas:

(1) Please disclose how the USFS will monitor potential and significant impacts that may result from sedimentation moving forward as well as the framework that will be used in order to initiate adaptive management mitigation measures.
(2) Please explain when, where, and how the agency will assess the need for additional mitigation measures impacts resulting from potential proliferation of noxious weeds and the criteria that will be used for assuring their efficacy.

Lion Creek

Lion Creek supports the highest concentration of carinate mountainsnails on the Flathead National Forest. The DEIS states, “Lion Creek’s outstandingly remarkable value is for wildlife. This river corridor has the highest concentrations of carinate mountainsnails on the Forest. In addition, Lion Creek has unique habitats of cascading waterfall rock face and large cedar groves. The preliminary classification is *scenic* from headwaters to the Lion Creek trailhead” (p308).

(1) Please disclose the potential impacts and mitigation measures that may be considered for actions that disturb connection between talus slope habitat for carinate mountainsnails and their important riparian habitat.
(2) Please disclose how the USFS will monitor potential and significant impacts that may result from sedimentation moving forward as well as the framework that will be used in order to initiate adaptive management mitigation measures.
(3) Please explain when, where, and how the agency will assess the need for additional mitigation measures impacts resulting from potential proliferation of noxious weeds and the criteria that will be used for assuring their efficacy.

Lower Swan River

As acknowledged in the DEIS, the lower Swan River's "outstandingly remarkable value is wildlife, as this portion of the river has a unique mix of aquatic and riparian habitats and high species diversity associated with the adjacent wildlife refuge. The Montana Natural Heritage Program listed three wetlands within this reach as having outstanding significance (Greenlee 1999). The preliminary classification is *recreational*" (DEIS p308).

While the DEIS as well as the 2018 Flathead Forest Plan recognize the lower Swan as possessing a wildlife ORV, the DEIS does not explain the reasoning behind the ORV determination or potential impacts to the species that led to such determination.

(1) Please disclose which species resulted in the determination of this wildlife ORV as well as the potential impacts and mitigation measures that will be put in place (via an adaptive management framework) in order to ensure that this ORV is not diminished.
(2) Please explain how the USFS will monitor potential and potential significant impacts that may result from sedimentation moving forward as well as the framework that will be used in order to initiate adaptive management mitigation measures.
(3) Please make clear when, where, and how the agency will assess the need for additional mitigation measures related to potential resulting impacts from noxious weeds and the criteria that will be used for assuring their efficacy.

Conclusion

American Rivers appreciates the opportunity to submit comments on the Mid-Swan Project DEIS. Given the broad scope and timeline of this project and concerns expressed above, American Rivers encourages the incorporation of continued public participation in the design and implementation of management activities associated with this project beyond issuance of a ROD and FEIS.

The DEIS does not provide specific prescriptions for the various types of thinning proposed across this landscape. This lack of clarity makes it difficult to identify distinct impacts that certain treatments might have in a given area and, therefore, impossible to propose ways in which to mitigate those impacts. With regards to eligible Wild and Scenic River segments and their ORVs, as well as the larger Swan River

watershed, continued public participation in the design and implementation of specific treatments would ensure a more collaborative and likely less-impactful application of this project.

Despite our aforementioned concerns, American Rivers would like to express our support for undertaking fully analyzed, reasonable, and necessary actions to protect human communities from impacts of future wildfires. Additionally, we appreciate the DEIS's consideration of opportunities to promote natural ecological functions, such as restoration of beaver habitat and ecosystem participation across the Mid-Swan project area. As outlined in the DEIS, beavers play an integral ecological role in connecting stream channels to floodplains, increasing water storage and availability, supporting aquatic habitat complexity, and providing resiliency to ecosystems in the face of climate change. American Rivers also supports the proposed removal of undesirable fish passage barriers in the interest of providing full access to suitable habitat. Both of these aquatic restoration management strategies acknowledge and support the need for a cold, clean, complex, and connected river system, which in turn supports a healthy landscape. We encourage the Forest to continue exploring ways in which to support and improve the health of these cherished rivers and streams.

While these comments focus on the potential impacts of management activities to Wild and Scenic eligible stream segments and their ORVs, our concerns also extend to each of the unique and valuable tributaries within the Mid-Swan Project area. The DEIS's failure to identify a comprehensive list of potential impacts to aquatic ecosystems and strategies for mitigating those impacts is in need of additional analysis given the value of these waters as critical habitat for threatened and endangered species, potential climate refugia for coldwater species, and vital headwaters of the larger Columbia River watershed. Further project-wide analysis and consideration of impacts including sedimentation, the introduction and spread of non-native plants and noxious weeds, and other effects associated with road building and vegetation treatments on rivers and streams is absolutely necessary given the spatial and temporal scope of this project.

We look forward to working with the Forest to address the issues that we have raised in these comments.

Sincerely,

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