

October 11, 2021

Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Re: Comments on the FEIS and DROD of the Mid-Swan Landscape Restoration and Wildland Urban Interface Project

The Southwestern Crown Collaborative (SWCC) offers the following objection comments regarding the Final Environmental Impact Statement (FEIS) and the Draft Record of Decision (DROD) for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project (Mid-Swan Project). As you are aware, the SWCC has been operating for nearly 11 years on the Southwest Crown landscape area that stretches over three National Forests: the Swan Lake District on the Flathead NF; the Lincoln Ranger District on the Helena/Lewis and Clark National Forest; and the Seeley Lake District on the Lolo NF. The SWCC has submitted written comments on the Mid-Swan Project during scoping and the comment period of the Draft Environmental Impact Statement (see SWCC letter dated October 12, 2020), as well as engaging in frequent communication with officials from the Flathead National Forest over the previous decade throughout the various phases of project development.

The overarching response of the SWCC to the Mid-Swan Project FEIS and DROD is positive. The SWCC supports the decision to adopt a reduced Alternative B, as the actions proposed in this decision appear to advance the SWCC's goal to restore healthy, diverse, resilient, large forest landscapes in the Southwest Crown landscape.

We would also like to advance some specific comments on this complex decision for your consideration.

- Although we are generally pleased with the significant reduction of miles of new roads in the FEIS and DROD compared to the DEIS, we remain concerned about additional roads in the Goat Creek subunit. During project implementation we hope to see designs for treatments that allow for additional reductions in road mileage in the Goat Creek area.
- As our October 12, 2020, letter emphasizes, we remain very concerned about the retention of old, large trees across the Mid-Swan landscape. We observe that the treatment areas have dropped from 39,000 acres to 17,000 acres in the DROD, and we hope that those 17,000 acres slated for treatment encompass the most significant concentrations of large trees that may be at risk because of uncharacteristic fuel loads on the sites where they occur. For example, a substantial portion of the Falls Creek/Smith Creek area was not considered for treatment activities, and this area

contains concentrations of legacy trees as well as opportunities for WUI treatments. In short, we wish to see these large trees protected from potential future wildfires by ongoing, effective fuel treatments that include prescribed fire.

- We are pleased to see the efforts to encourage restoration of Whitebark pine in designated Wilderness, although we hope there isn't a temptation to utilize non-Wilderness character methods (such as helicopter transport) to complete tasks. However, if regeneration success of Whitebark pine depends on utilization of these non-Wilderness character methods, then we recognize the need for this exception.
- We hope that during project implementation the agency utilizes contracting tools that allow for local populations and enterprises to benefit from the ongoing work. The SWCC's monitoring program demonstrated a positive economic impact from the utilization of tools such as Stewardship Contracting in the implementation of prior work in the SW Crown during the decade of the Collaborative Forest Landscape Restoration Program.
- We were somewhat disappointed to see all the treatments from the Porcupine/Woodward subunit deferred to dates beyond the scope of the present DROD. However, we are well-aware of capacity issues within the agency to complete planned work, and we simply hope that this subunit is not ignored in the future.

Again, we wish to reiterate our support for this project. We are pleased to see much of the work focused on the Wildland Urban Interface, where we feel the need is greatest. The SWCC welcomes any additional opportunities to continue to observe and comment on this important project.

Sincerely,

SWCC Membership

James Burchfield, Co-Chair
Jon Haufler, Co-chair.