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Re: Objection to Draft Record of Decision, Mid-Swan Landscape Restoration and Wildland Urban Interface Project

Objections Reviewing Officer:

I am submitting an objection for the Draft Record of Decision, Mid-Swan Landscape Restoration & Wildland Urban Interface Project.

The key area that I'm addressing is:

The proposed planting of hybridized blister rust resistant whitebark pine (WBP) seeds in the Mission Mountains Wilderness (MMW) and the Swan Front, recommended wilderness status. Wilderness should not be used as a "treatment plot," but instead as a "control." We don't need to introduce hybridized species into designated or recommended wilderness as it negatively affects the "natural" and "untrammeled" qualities of wilderness as stated in The Wilderness Act (PL 88-577).

There are healthy WBP in the MMW that survived the blister rust attack. Was any effort made to collect seed cones from trees within the MMW? Or are these seeds raised in a greenhouse and are not collected from the MMW or Swan Front?

The preferred alternative would result in 1,860 acres of direct seeding WBP in the Mission Mountains Wilderness and 7,788 acres on the Swan Front (p. 2). The Swan Front is recommended wilderness and should be managed as wilderness until a final determination is made by Congress to formally designate as wilderness or released for multiple use. I object to the Record of Decision Alternative for the following reasons and offer scholarly literature to support my objection as well as my on-the-ground knowledge of the proposed WBP seed planting areas in the MMW and Swan Front.

In the rationale for the Decision (p. 9) it states, "I made this decision in consideration of the increasing effects from a changing climate... I believe less active management to be irresponsible given the existing and expected future conditions for this landscape."

I offer scholarly literature that challenges this rationale.

1. Wilderness areas are not places to experiment with hybridized WMB seed caches. "Look for opportunities outside of wilderness first" (Belote, Dietz, David-Chavez, & Aplet, 2018).
2. "Uncertainty and complexity are, in many ways, part and parcel of nature. Wilderness ecosystems exist in a state of constant flux, whose constituent parts interrelate in ways not fully understood (Franklin & Aplet, 2009, p. 254). Such complex dynamism warrants careful examination of a wilderness area before deliberate intervention" (p. 251-274).
3. "Intervening in an ever-changing and complex natural order could manifest consequences direr than doing nothing. Accordingly, wilderness managers "should

be...very wary about intervening in wilderness” (Stephenson, Millar, & Cole, 2010, p. 50-66).

4. Planting rust-resistant WBP seeds would not help preserve the biodiversity within the MMW. It is critical to conduct an inventory of the restoration treatments conducted outside designated and recommended wilderness, and based on the effectiveness of those interventions determine whether a balance can be achieved between an ecosystem that is unique and self-willed or one that is manipulated and controlled.

“The non-intervention approach provides the opportunity for wild nature to adapt to climate change and encourages greater biodiversity (Long & Bieber, 2014, p. 659-660).

5. Howard Zahniser, author of The Wilderness Act said, “In regard to areas of wilderness we should be guardians not gardeners” (Zahniser, 1963).

6. This proposed action violates the mandates of The Wilderness Act where the forces of nature should prevail. See Section 1(c) ‘...undeveloped federal land ... without permanent improvements ...’ “A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man,... “An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions...” In Section 2.(a) of the Wilderness Act it calls for the preservation of wilderness character. Section 2.(c) the Act defines wilderness as possessing the five qualities of Wilderness Character as: natural, solitude or primitive and unconfined recreation, undeveloped, untrammeled, and other features of value. Section 4(b) states that each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area (PL 88-577). Thus, federal management agencies that have wilderness management responsibilities are required by law to monitor wilderness character.

7. If you review the initial comments to the Mid-Swan Scoping Summary sent in by McAllister, Gale, Ryan, Schlenker, Gunderson, & Zbsyzewski, we cited the proposal to seed WBP in the Pasayten Wilderness. That decision was canceled by the Regional Forester due to wilderness character considerations being negatively affected. Was this management decision reviewed to understand why this proposal was rejected in a designated wilderness?

8. This proposed action should be assessed through the Supplement to Minimum Requirements Analysis/Decision Guide (MRA/MRDG): Evaluating Proposals for Ecological Intervention in Wilderness authored by Beth Hahn and Peter Landres, Aldo Leopold Wilderness Research Institute, November 2017.
<https://wapps.umn.edu/winapps/media2/wilderness/toolboxes/documents/restoration/Supplement%20to%20MRA-MRDG.pdf>

9. The rust resistant hybridization of WBP in British Columbia and Alberta to date have either failed or produced inconclusive results.

http://www.whitebarkpine.ca/uploads/4/4/1/8/4418310/promoting_recovery_in_bc.pdf

https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_Whitebark%20Pine_0810_e.pdf

10. Hybridized WBP seedlings grown in greenhouses in Idaho have been found to live only 35 years (Ed Krumpe, personal communication, 2018, University of Idaho, College of Natural Resources & Society, Professor Emeritus). So does that mean the Forest Service goes into the MMW every 35 years to plant more hybridized WBP seeds and further trammel the wilderness? Are we guardians or gardeners?

Thank you for your consideration.

Kari Gunderson, PhD.
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List of References

Belote, T., Dietz, M., David-Chavez, D., & Aplet, G. (2018). Should guardians ever garden? The dilemma of whitebark pine and wilderness. Power Point presentation.

Franklin, J.F. & Aplet, G., 2009. In: C. P. Dawson & Hendee (Eds.), *Wilderness Management* (p. 251-274). Fulcrum Press.

Long, E., & Bieber, E. (2014). The wilderness act and climate change adaptation. *Environmental Law*, 44, 623-694.

Stephenson, N. L., Millar, C. & Cole, D.N. (2010). Shifting environmental foundations: The unprecedented and unpredictable future. In D. N. Cole & L. Yung (Eds.), *Beyond naturalness: Rethinking park and wilderness stewardship in an era of rapid change* (p. 50-66). Island Press.

U.S. Public Law 88-577. The Wilderness Act of September 3, 1964. 78 Stat. 890.

Wilderness Connect. 2017. Hahn, B. & Landres, P. Supplement to Minimum Requirements Analysis/Decision Guide (MRS/MRDG): Evaluating Proposals for Ecological Intervention in Wilderness.
<https://wapps.umn.edu/winapps/media2/wilderness/toolboxes/documents/restoration/Supplement%20to%20MRA-MRDG.pdf>

Zahniser, H. (1963). Guardians not Gardeners. Editorial in *The Living Wilderness*. 83 (Spring to Summer): 2.)