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Organization:
Title:
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USDA-Flathead National Forest (FNF)

Swan Lake Ranger District

Attn: Sandy Mack, Team Leader

Region 1 Office

24 Fort Missoula Road

Missoula, MT 59804

Re: Comments for Proposed Action for Mid-Swan Landscape Restoration and Wildland Urban Interface Project.

*These comments are my own personal opinions and not that of the organization I work for or any collaborative group that I am a part of.

General Comments:

-I am very pleased that the public comment period was extended beyond the original 30 days to allow for more time to study the proposal and digest the information.

-I am thankful for the Mid-Swan team helping the public better understand the proposal with the open house at the Swan Valley Community Hall and the field tour. I would encourage the team to host other public meetings and field tours as the process moves forward. I would encourage the USFS to partner with community-based organizations and entities on these opportunities.

-I am supportive of the USFS trying to conduct restoration projects at a landscape level and applaud the idea and effort. However, I have concerns about some proposed actions and the methodologies used to get to these proposed actions.

-I believe that the PI analysis used to determine historical conditions and the range of variability is flawed and echo the comments that the Southwestern Crown Collaborative (SWCC) has provided as part of the process. The flaws that exist with the PI analysis will result in flawed analysis for the desired future range of variability, which in essence flaws the entire analysis and desired outcomes on the ground. I would encourage the team to ground-truth these modeled outputs to determine if the proposed actions are the right treatments needed.

-I also echo the comments that the SWCC provided regarding doing one big EIS for this project. The USFS will most likely get litigated over this proposal and will take many years to work through that process. An implementation goal of 2020 is extremely wishful. Why not do multiple EA[rsquo]s and CE[rsquo]s for projects that have social license (fuels reduction in the WUI, legacy tree retention, whitebark pine restoration, etc) and in the meantime work on an EIS for more contentious areas (example: logging in lynx habitat)? This would enable actual work on the ground to be accomplished within the foreseeable future.

-Since this 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[rsquo]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).

-How will the public be informed about the timeline of on-the-ground project work after the decision process? I would suggest that an email list be created, so that members of the public can receive updates when projects near implementation dates.

-The proposed mechanical vegetation treatments are really vague and do not give enough specificity to enable the general public to know what will actually occur as mechanized on-the-ground prescriptions. How will the USFS be able to make calls on effects to Threatened and Endangered Species when there isn[rsquo]t enough detail provided to even say what the on-the-ground treatment or prescription will be?

-It is extremely hard to focus in on fine scale areas without section lines and numbers listed on the maps. That[rsquo]s not conducive in helping the general public provide comments for specific areas. Please provide better, more detailed maps during this comment period, or during the next public comment period after an EIS is completed so that more detailed comments can be made.

-I am supportive of sustainable logging and the work it provides to local contractors as well as the wood it provides to local mills. I request that these sales be stewardship contracts that will better enable local logging companies to receive the contracts.

-By proposing this work at a landscape scale, there is a great opportunity to identify additional Primary Lines of Defense, particularly along the foothills of the Mission Mountains where catastrophic wildfire is most likely to originate. One of the lessons learned from the 2017 Rice Ridge Fire was that it would have been beneficial to have shaded fuel breaks in strategic locations before the fire started, rather than trying to put in place while fighting the fire. There are opportunities along certain roads in this project area to implement shaded fuel breaks to provide Primary Lines of Defense in the foothills of the Missions. An example would be the road that connects Piper and Fatty Creek Roads (Road# 10381), among others. I request that the USFS works with the Seeley-Swan Fuels Mitigation Task Force to identify and implement strategic locations to provide shaded fuel breaks along certain roads as part of this project.

-The categories of Non-Treatment and Patch Retention appear to be the same thing. Why not combine those and make the maps less busy?

-Obviously site conditions are always changing through natural succession, insects/disease, blowdown, wildfire, etc. So, when conditions change in a particular treatment area that would necessitate a change in management actions outlined in this proposal, is that possible? Or is that treatment locked in and not adaptable within the 15-year project window?

Aquatic Biodiversity:

-I am highly supportive of stormproofing all road systems (improvements, storage, or decommissioning) that are causing sediment, fish passage, or other issues to aquatic biodiversity. On the proposed action maps, I would like to see specific actions for what stormproofing each road is. I would like to see which roads are going to be decommissioned or improved, as those are two vastly different management actions.

-I am against the building of any new, permanent roads as part of this project. I am fine with building of temporary roads for project implementation as long as they are properly reclaimed. We have an incredible network of existing roads in the Swan, we don[rsquo]t need 60 miles of new, additional permanent roads that will negatively impact the very aquatic biodiversity that this project aims to restore. Furthermore, new roads in drainages that are bull trout spawning or rearing streams (Woodward, Squeezer, Lion, Goat, Piper, Cold, Jim Creeks) and/or weststope cutthroat conservation population streams (Whitetail, South Cold, Cooney, Piper, Pony, Cat, Dog, Smith Creeks) will have potential negative impacts to those streams and populations. Swan Lake and 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. If any new, permanent roads end up in this final proposal, then I could not support this project in any form (unless it involves re-routing a pre-existing problem road). It doesn[rsquo]t make any sense to spend the time and money to stormproof some roads to decrease sediment delivery into waterbodies, and then create new roads that will increase sediment delivery into the same waterbodies. Also, new road construction is prohibited under CFLR funding that has supported this project, and I urge you to reconsider any new, permanent roads in this proposal.

-A new road is proposed in the very head of Woodward Creek (most westerly new road in A3, A4) and the associated treatment is [lsquo]patch retention[rsquo] which basically means no action. Why propose a road that you don[rsquo]t even have a treatment to associate with it?

-There has been a big effort to reduce road sediment delivery, specifically in the Jim Creek watershed and has led to that stream being taken off the EPA/DEQ[rsquo]s list of impaired waterbodies. So now you are proposing to build new roads in the Jim Creek drainage, which makes no sense. Please take those out of the proposed action.

-The new roads in the Goat Creek drainage also make no sense, as they are proposed on extremely steep sidehills and some cross avalanche chutes. Goat Creek is also listed as an impaired waterbody by the EPA/DEQ due to sediment issues. Goat Creek is one of the most productive bull trout spawning streams in the Swan. The USFS has decommissioned several problem roads in Goat Creek drainage to address sediment delivery to the stream. This project actually proposes two new roads that would cross previously decommissioned roads! Again, please take out all these new roads out of the proposal.

-There are hundreds of opportunities in the valley for beaver dam analogs. Only installing 9 does not seem like it will have any meaningful restoration impact at a landscape scale. Are there 9 structures, or 9 sites that would contain numerous structures? If the goal is to restore aquatic biodiversity, then there should be hundreds of beaver dam analogs in this proposal. I 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.

-Has the Mid-Swan team consulted with U.S. Fish and Wildlife Service or Montana Fish, Wildlife, and Parks to get their opinion on beaver dam analogs and impacts to native fish?

-I believe that the models used to determine which streams will be most likely to maintain cold water temperatures conducive to native fish habituation into the future are flawed. As many local residents know, there are many streams in the Swan Valley that receive cold water input from upwellings and springs that maintain cold water temperatures that benefit our native fish. These cold water inputs are not accounted for in the models and Mid-Swan management decisions are being based on these models. If your models predict that certain streams will stay cold into the future despite climate change, focus on those streams with management actions that will help. But please don[rsquo]t ignore streams that currently maintain cold water temperatures and are productive bull trout or westslope cutthroat streams that your models predict will warm over time. Many of these streams do receive cold water inputs that aren[rsquo]t accounted for in your models. An example is Elk Creek, which has many cold water upwellings and springs that help maintain cold water temperatures that benefit native fish. Many biologists and researchers voiced these same concerns to Mid-Swan staff about the models used to determine the conservation focus streams at Swan Valley Native Fish Committee and Swan Valley Bull Trout Working Group meetings. Please don[rsquo]t ignore conservation measures and potential actions that could be taken on

streams that are currently productive native fish streams.

-I feel uneasy about the amount of thinning treatments proposed within RMZ[rsquo]s. How will these treatments in the RMZ comply with Montana[rsquo]s 310 law? There are good reasons to keep mechanized equipment out of sensitive riparian areas, and I worry that damage could occur that would contradict the states goals of restoring aquatic biodiversity.

Terrestrial Biodiversity:

-I highly support any efforts to restore whitebark pine communities through blister-rust resistant plantings, reintroduction of fire, or seed caching. However, only doing 900 acres of whitebark pine caching seems extremely minimal and doesn[rsquo]t seem on the surface to be enough to be meaningful on a landscape scale.

-I am very supportive of high elevation prescribed fire within the Mission Mountains Wilderness and proposed Wilderness areas of the Swan Front. I am 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. I am also supportive of prescribed fire in mature ponderosa pine/Douglas fir forest types that historically experienced frequent, low intensity wildfire.

-I do think more thought needs to be put into some of the prescribed burns proposed that are relatively small, are oddly shaped, and surrounded by [lsquo]patch retention.[rsquo] How will these burns be kept to those polygons? (Example: NE [frac14] of B2 on map Condon, Lion, and Pony Creek)

-To prove my point that the PI analysis and models used are flawed, I[rsquo]ll give an example of the Lion Creek Face (specifically T22N, R17W, S11). This was historically mature and/or old-growth ponderosa pine (you can see the stumps out on the ground) that was clearcut by Plum Creek Timber Company. A good portion of this section contains a SW aspect that receives more direct sunlight than any ridge in the Swan Valley. Not surprisingly, snow on this ridge melts off faster than any other ridge face, providing valuable big-game winter range. Big-game ungulates suck into this area, especially during deep snow conditions. High use in this area has led to over-browsed conditions of woody shrubs and conifer regeneration. Ever since this face has been clearcut, it has remained stagnant and has not produced conifer regeneration. Given that this project is supposed to restore biodiversity within a natural range of variation, I am disappointed that the proposed action for this area is [lsquo]patch retention[rsquo] and appears that the models used to come to this proposed action are either incorrect or have not been ground-truthed. Historically, this area was not a grassland/shrub field with a bunch of large diameter stumps. I can guarantee that the conditions in this area are nowhere near the historic range of variation and are about as far from natural conditions as will be found in the valley. The proposed action for this area should be tree planting (specifically ponderosa pine) and possibly some ungulate exclusion fencing to promote tree and woody shrub regeneration and growth. I believe this project proposes only whitebark pine and western white pine planting, but if the goal is terrestrial biodiversity restoration, then planting of any tree species

should be an option.

-Again, if you[rsquo]re attempting to restore biodiversity within a range of natural variation, then forest stand types such as large diameter ponderosa pine/Douglas fir that historically experienced high frequency, low intensity fire every 10-15 years (see Steve Barrett[rsquo]s fire history data) that have been recently thinned to restore historic stand type conditions, should also be burned with prescribed fire at some point in this 15 year project implementation window. An example is off Condon Loop Road in an area that was thinned as part of the Meadow/Smith project to promote legacy tree retention (specifically northern parts of T21N, R17W, S12). The proposed action is [lsquo]patch retention[rsquo]. If the intent of this project is actual restoration, then your proposed actions need to incorporate actual restoration activities.

-The decline of aspen stands throughout the West has been well documented, and I have not heard about any aspen restoration opportunities with this project, despite ample opportunities across the landscape. I would encourage the Mid-Swan team to identify aspen stands that could be restored with help from conifer encroachment removal, prescribed fire, ungulate exclusion fencing, or other actions.

-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. 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 use into the MMW. Examples can be found in the upper Cedar, Fatty, Woodward, Smith/Cooney drainages.

-There are multiple proposed actions directly along almost the entire length Elk Creek. This is one of the Swan[rsquo]s most productive bull trout spawning streams. Furthermore, parts of this creek are classified as proposed Wild and Scenic in the Forest Plan and management shouldn[rsquo]t be allowed within a quarter mile buffer. Also part of the area with proposed timber harvest actions along Elk Creek near the wilderness boundary aren[rsquo]t anywhere near road access. How would this be thinned if it[rsquo]s not accessible by mechanized equipment? Please take out treatments that aren[rsquo]t feasible.

-The Condon Mountain Fire resulted in a nice mosaic of burned and unburned green patches. This proposed action would burn off the remaining green patches and some areas that previously burned. Please take that out of the proposal.

-There are many former Plum Creek Timber Company lands within this project area that are at various stages of condition and regeneration. A common theme among most of these lands are that the old, mature fire-resistant species (ponderosa, larch) have been cut. I would hope part of this landscape scale restoration would entail selectively thinning some regeneration patches to promote those tree species that were historically there so that over time they may once again thrive.

I appreciate the opportunity to comment on the Mid-Swan project. Should you have any questions or comments, please contact me.

Thank you for your consideration,

Luke Lamar