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Comments: Mid-Swan Landscape Restoration & Wildland Urban Interface Project

Personal comments and recommendations from Roger Marshall

I applaud the Forest Service for undertaking a project that is truly at the landscape scale. In order to be effective at reducing the effects of severe wildfire, treatments of this scope and scale need to be completed. Not just in the Mid-Swan area, but in the entire Southwest Crown of the Continent landscape. There are additional areas in this state and the nation that would benefit from projects that are completed at this landscape scale.

#### Restore and Maintain Aquatic Ecosystem Resilience

I support the intent of this action. Removing fish passage barriers where it is beneficial to maintain native fish species is a great objective. I caution that removing barriers that allow non-native invasive fish into an otherwise native fish system is not warranted and may in fact be detrimental to the native species. Treatments in riparian management zones are appropriate and as outlined should help reduce the risk of damage to watersheds from severe fire. Thinning and prescribed fire will help stabilize forest conditions where extreme or severe fire might be a threat to ecosystem stability.

Management of existing roads is extremely important and critical to clean water and protection of wildlife habitat. I support storing and decommissioning of roads as needed where it reduces point source sedimentation to streams and rivers and the road will not be needed for active forest management in the next several decades if ever. I advise that many of the roads mapped in the scoping document for treatment are overgrown with native shrubs, forbs and grasses. I do not think that moving heavy equipment into many of these legacy roads is a good idea. Unless there is a specific point source of sedimentation to repair, disturbing the re-vegetated system may only encourage more sediment and erosive runoff. Each road system that is proposed to be [ldquo]stormproofed[rdquo] should be carefully and completely evaluated and rated as to the need and effectiveness that disruption of the current vegetated surface will benefit. If there a current [ldquo]no effect[rdquo] condition on the road, leaving that segment alone would be best. Maintaining and upgrading to the highest and best management practice for existing roads that will be used for active forest management and general public access, is a necessary and continuing need. This work should always be a priority where it protects ecosystem function and resilience.

I support and encourage the placement of beaver dam analogs. As a lifelong fisherman, I have witnessed the benefit that beavers have on our streams and rivers. Storing water is beneficial to native fish and their habitat. I hope you can place the nine analogs as suggested and do more in the future where it is appropriate.

#### Restore and Maintain Terrestrial Ecosystem Resilience

The success of fire suppression within the last 10 to 12 decades has allowed forests within the scoping area, and others within the western U.S., to become filled in with excess trees that have raised the fire risk and potential, suppressed the growth of individual trees, and hastened tree mortality from insects, disease, storm damage and fires when they escape initial attack. In many places fire regimes have moved into high or severe burn intensity and the possibility of burning out and killing the entire stand of trees is highly likely. This would be outside the normal range of variability for much of Swan Valley. Active and applied vegetation management is warranted and needed to protect public and private forest land from harm.

Reducing the threat of severe fire to protect mature and old growth trees is appropriate. Addressing fire return interval deficit is a key to this outcome. Cutting a tree to save the forest is appropriate and can be backed up with a lot of good science.

Planting blister rust resistant western white pine would be beneficial and should be implemented. The Inland Empire Tree Improvement Cooperative has been providing seedlings of that nature for planting for several decades. Some of the Plum Creek legacy sections were planted with rust resistant white pine in the Piper Creek and Cold Creek area. The success of those plantings could be evaluated for reference.

Whitebark pine restoration is a must. The suggested treatment of 2400 acres is only a token amount for what is needed. Warmer winters since the mid 1990's allowed for an explosion of mountain pine beetle over the following decades. Those beetles, attacking in epidemic numbers along with the introduced blister rust, have virtually wiped out whitebark pine across the entire Swan mountain range and other mountain ranges of the west. It is sad to see but if a person hikes over some of mountain passes into the back country along the Swan range, you will see thousands of whitebark pine trees that have died in the last 20 to 25 years. And, these are trees that were perhaps from 500 to 1000 years old! I directly attribute this to a global warming and it is my evidence that it is happening now and has been since the late 1900's. I would strongly encourage monitoring this forest ecosystem type for its recovery and future ability to restore itself either through human or natural methods. I would recommend treatments as possible now and in the future to aid in this trees recovery.

#### Reduce Risk from Fire in the Wildland Urban Interface

I strongly support vegetation management by mechanical treatment and prescribed fire within the wildland urban interface of forest stands and stand conditions where it will reduce fire severity and leave a mix of fire tolerant trees. This type of treatment can and will help in the protection of the forest for current and future generations.

Treatments should be applied where the lack of fire from suppression has moved the fire regime above or beyond the historic norm. Specific places where I suggest treatment as a high priority would be adjacent to private landowners where the fire risk and potential is high or severe and that will effectively protect that infrastructure. Shaded fuel breaks along the boundaries of private properties should be implemented. They should also be placed where there is an opportunity to create strategic fuels breaks or primary lines of defense to help stop the spread of fire from one side to the Swan Valley to the other. This would be consistent with the objectives of the Seeley-Swan Fire Plan. Additionally, treatments adjacent to but outside the wildland urban interface boundary should be applied. The goal would be to provide fire protection to the edges of that interface and keep uncharacteristic severe fire minimized.

We need to protect the forests of Swan Valley from severe fire. Healthy forests with green trees are important for clean air, clean water, fish and wildlife habitat, and our quality of life. Unnatural and overstocked dense forests that are at risk from severe fire should be thinned to lessen the risk that the forest is completely burned out. Thinning and prescribed fire to remove ladder fuels, reduce crown bulk density, and opening up tree spacing is effective and needs to be applied in Swan Valley and across the western U.S. Using the logs created from such thinning will help pay the cost for the treatments.

#### Road Construction

The ability to negatively impact water and wildlife habitat can happen quickly from roads. Simply put, in my mind a road is a road, temporary or permanent. Impacts are significant and placement, location, need and purpose, cost, construction standards all need careful consideration. Past road building from historical access including homesteading and logging used methods and techniques that do not stand up to today's practices and standards. Correcting those mistakes is important. Not making new mistakes is even more important. The need for higher standard roads with careful placement and building has become well recognized. Mitigating the impact

of existing roads and minimizing new roads for applied forest management has to be a central and continuing focus.

#### Collaboration

Engaging in a collaborative manner with the interested public to discuss the desired outcomes for the project needs to be a paramount endeavor. There is a need to step up the pace and scale for these landscape scale projects. Perhaps creating a stakeholders coalition might be wise.

#### Additional comments

Should there be a tour of some of the proposed work this coming year (2019), I would like to see where and how lynx habitat can be improved or protected as the proposal suggests. I know that in the recent past, habitat conservation plans using best science practices for grizzly bear and bull trout helped protect and restore suspected diminishing populations of those species, primarily by managing vegetation. Additionally, I would like to see where and how the fire return interval deficit would be mitigated as well as multi-story forest conversion of over abundant cover structural stage combinations.

The single greatest threat to the forests of Swan Valley is a warming climate. Already significant disturbances have occurred because of this. The forests in this valley are some of the most productive in the state of Montana. Growth and yield potential is high to very high below 6000 feet elevation. This tremendous growth increases biomass on each acre every year and as such also increases the fuel loading for fires. Applied and continuous forest management can and will mitigate the fire risk. It can direct growth into trees and increase carbon sequestration and storage. Sustainable growth and yield through applied forest management can help offset climate change and needs to be brought to the forefront on both public and private forest lands, not only here, but around the planet.