

Data Submitted (UTC 11): 12/19/2018 11:00:00 AM

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Comments: Dear Sirs, We sent our comments also by mail to Sandy Mack. Just making sure

it gets through.. Thanks

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Attn: Sandy Mack Team Leader

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Dear Sirs,

Thank you for extending the deadline to comment for the Mid Swan Resoration Document as it is quite the far-reaching and comprehensive Concept for anyone to assimilate on such short notice. We are actually quite pleased that finally such an effort as this has been undertaken to reach a consensus toward anticipating the reality of climate change, taking measures to help nature recover from past management practice and preventing catastrophic fire. In this way sustainable economic benefit can follow as well.

As the Document is framed in the spirit of Landscape Restoration all logging must be designed toward ecological recovery and in addition scenic resource recovery as well. During the Tenure of Plum Creek Timber in the valley forests were clearcut to the section checkerboard pattern, roading was evident everywhere and riparian systems suffered. During our valley presence the Jeffersonian Land Grid on the mountain slopes is slowly fading but still evident. Now that the valley is under one Umbrella the logging can conform to natural boundaries and the scars of the past can disappear. Roding the landscape is the other detriment to the scenic landscape and if anything must not remain as gouges on mountainsides (like Smith Face on the Swan Mtns).

The Document does well by discussing the negative effect of past roading on aquatic life but should also mention effects on other threatened species as well. As it is a stated purpose in this Document to reduce the amount of roading and mitigate the effect of existing roads the Document must not contradict itself and be framed to reduce the total mileage of roading. We strongly disagree that 60 miles of new roading is totally necessary. Why cannot new logging practices take advantage of ORV and winter logging to move logs to loading locations? Another Detriment of roading is ineffective enforcement of closed and even decommissioned roads from ORV

use especially during hunting season. ORV trails are evident beyond the reach of roads on the slopes of the Mission Mtns above Fatty Creek (personal communication). In addition the road densities specified in Flathead Forest Plan Amendment 19 must be adhered to for protection of wildlife and especially bears.

While there is mention about noxious weed control in new roading, any road or remnant of one is a vector for their propagation and it will be costly to monitor. It would be better to focus efforts toward control along remnant roading in the former Plum Creek Lands.

While the Urban Wildland Interface as drawn seems unnecessarily broad, it does roughly conform to the existing N-S roads along the East and West Mtn bases. Given the 30 year timeframe shaded fire breaks could be designed to coalesce to provide a continuous protective measure for the Valley Bottom. Patches of forest with big or bigger trees could be thinned so periodic controlled burns can create a limited understory and crown fire risk reduced between the big trees.

The sheer magnitude and time frame of this Scoping Document should logically preclude a single EIS to cover all of the issues and prescriptions mentioned. Indeed communication with other stakeholders has revealed that detailed analysis of this Document reveals mischaracterizations of forest type and also obviously wrong prescriptions for certain areas. In addition some of the new roading is being proposed where they would cut across roads the Forest Service has already decommissioned (Goat Creek area) or where the Document calls for [ldquo]patch retention[rdquo] or [ldquo]no action[rdquo]. These inaccuracies demonstrate the Document must be more of a Strategic Plan with anticipation of multiple EIS statements to be carried out during the 30 year timeframe. Stakeholders in the Valley can better identify key habitat characteristics in their area given the preparation of an EIS for that particular area at a given time or for even a general prescription applied over a longer timeframe. I myself would be able to detail current wildlife populations such as Lynx sightings etc in the SE Smith Creek Area where we seasonally reside. Attention to details such as these would best be served by a more piecemeal approach in the Strategic Plan.

Another issue arises in regard to the recently drawn Flathead National Plan. Measures must be taken to assure compatibility between these as there have already been resolution of many issues raised (the Elk Creek Area) during the formulation of that Plan.

Pursuing riparian habitat restoration to bring in higher Beaver activity is workable and should significantly improve the fishery, and efforts to restore Whitebark Pine will benefit the bears. But the scale of these efforts should be increased and should be begun in earnest as the results will take time to take hold.

Another issue is how can the entire Swan Front to the wilderness boundary be included in this plan? Is not the Swan Front included in the Forest Service Roadless Rule? Also the entire wild stretch of Lion Creek and Lion Creek Basin has been proposed as wilderness in every proposed wilderness bill. Certainly these lands lie within the outline of the Document but do not fit the status needing [ldquo]restoration[rdquo] and therefore should be excluded. It is understandable though to anticipate prescriptions for those former Plum Creek sections on the Swan Front which have been compromised. In addition, the Nature Conservancy Legacy Project comprising of the Plum Creek checkerboard was undertaken to both ensure the perpetuation of the natural state of the Swan and road reduction is a necessary component.

Thank you for letting us share out comments and ideas toward building a better more resilient Swan Valley.

Peter and Caroline Guynn