

Data Submitted (UTC 11): 12/24/2018 11:00:00 AM

First name: stephen

Last name: braun

Organization:

Title:

Comments: To whom this does concern, please accept these questions and comments for the overly large and unrealistic timber sale called Mid- Swan Timber Sale.

It is confusing on what Forest Plan this falls under. This project has already taken years of planning. So will the present forest plan be the template for this sale?

If not, how could years of planning be done under the new forest plan when it was not finalized and institutes? This makes this timber sale arbitrary and capricious as:

How could public comment on the new forest plan really be respected, when this timer sale was designed under what standards?

How could planning for a timber sale be planned under a forest plan, when the plan was not completed?

What is the duration of this timber sale if approved? If it has a long duration of over 5 years or longer, how will new science be integrated into on the ground activities? If the duration is longer and a new forest plan is completed in ten years, will this timber sale change?

How will grizzly bears be treated under this plan, as a listed species? Will all road density protocols be used using amendment 19?

Global warming and climate change is evident in NW Montana. Since I moved here in the 70[rsquo]s there are over thirty more days a year that are frost free. The recent UN report on climate change has dire warnings on our climate if changes of CO2 emissions are not immediately lowered. One of the recommendations is to stop harvesting and clear cutting forests. Has this UN report been integrated in this timber sale? Or even considered?

How much CO2 is projected to be emitted through this timber sale? Please include building of roads, rehabbing roads, cutting of trees, transport and milling of trees, slash burning, proscribed burning and heavy equipment uses.

It appears that the new forest plan ignores past court rulings, in ignoring amendment 19 and stream side set back protocols , both of which improved or at least stabilized a trend toward fragmentation through logging and road building in places that are critical for griz and water quality. What legal decisions, rulings or ne science support this timber sale? Is this another example of the USFS being a scofflaw agency?

Weeds: The USFS has failed miserable in controlling weeds. Weed spread should be listed as a preferred outcome and desired future condition for any future FNF project. It should state clearly that a desired future condition and outcome is to spread exotic plants(weeds) throughout the entire project area. If this is not the case what will the USFS do to really programmatically not spread weeds on this timber sale?

How many new staff will the USFS hire to do proper ground truthing on a timber sale of this scale. How will the USFS adequately analyze and look at on the ground conditions to see what the present baseline is?

What monitoring is presently being done to identify present water quality trends? What monitoring will be done to see if the old new, [ldquo]let[rsquo]s see what happens if we log in riparian set backs and build roads there? It is nothing we have ever tried in the past. Do you think it could in any way harm water quality, fisheries, increase

sediment, increase water temperature, reduce large woody debris, create dust from roads that settle into water ways and harm soils, spread weeds and fragment wildlife corridors? Let[rsquo;s try it again and see if there is a new preferred desired outcome that ignores past practices.[rdquo] [ldquo] Let[rsquo;s see if we maximize timber production and road building( when we can[rsquo;t afford our present road system) over any other uses of the forest and see if this does improve habitat, reduce a needed back log of road maintenance needs and road removal, improves habitat, decreases fragmentation{as everything has been logged, problem solved} and not do a below cost timber sale in the process.

Will the Roadless Rule be respected and enforced in this timber sale?

At past meetings with the Flathead NF, I have asked how much old growth is on the flathead NF and where is it, I have gotten an answer of [ldquo]about 10%. [rdquo] When I asked, where is it on the land scape and can you show me a map of old growth forests on the FNF, I have been told no. there is no map.

Please do a map that shows all old growth in this sale area and map all connectivity corridors and please inform the public on what condition these wildlife connectivity corridors are in. Also include what activities will be excluded in the future in these corridors.

What areas, mapped, are set aside as future potential old growth areas and how will these areas be treated for the next 100 years?

BMPs: Best management practices were put in place to improve the public image of the timber industry many years ago. What successes have there been using them on the FNF and what improvements are needed to be the best? The best 20 years ago probably are not the best now as science has identified what was good then sucks now and should not be done again.

What pre and post harvest monitoring will be done to prove that this project attains its desired future conditions? When there were failures in the past to attain desired future conditions, what steps were taken to address this? Was there anything ever done to remedy past failures?

What was the logic to do a timber sale of this magnitude? What decisions were made to even come up with this plan? Who came up with this proposal and where did it come from?

The USFS has done a great job of using fire to scare people. Fire is a natural feature upon the land scape. All forests have evolved with fire. What specific science is the FNF using to be able to state that these specific actions will reduce the [ldquo]threat[rdquo] of fire. After all of the fires in recent years, what monitoring has the FNF done to show on the ground that past harvest treatments were successful or a failure in reducing fire spread?

Many people have moved into the wild lands interface. The FNF did a giant timber sale , the valley face around here I live. It was funded with a rider from Senator Burns. It opened up the canopy, spread weeds everywhere and left a degraded tree farm condition. It did nothing to protect my house. It probably made it worse if a fire came through as weed spread was everywhere, blow down is everywhere, it reduced snow intercept and thermal cover below the forest plan standards for deer and elk, and dried the forest out. There were also many not cut trees cut. From my approximation it was about 20%. If this is the case, how can the FNF attain desired future conditions when 20% more trees were cut than was marked on the ground?

The FNF could really save much money on projects that are designed to fail and try to educate the public that to save one[rsquo;s house deal with vegetation around the house. Do not live in the wildland interface and if you do be a responsible land owner and build your house out of fire resistant materials and modify the landscape 0 to 50

feet from your house. This would save the usfs from doing the shell game of-["this timber sale activity will protect you from fire"]]. And it would also put responsibility on land owners to be responsible and treat their private property.

From the beginning, the USFS has been great at creating a welfare system for communities by giving them and timber mills discounted taxpayer subsidized trees at the expense of water quality, soils, fisheries, supported weed spread, wildlife and a diminished forest due to fire suppression. Counties were in on the game too as they taxed the timber being cut. It allowed for people to live in places they should not have lived. It also created a false economy as when the going was good local people and especially the timber companies made lots of money. Then all of the trees were cut and the welfare system, while still in place{{PILF}} money started shrinking. The USFS is definitely on the side of the timber companies. Citizens started using the courts to slow down the destruction of our public trust, the lands to be managed for all US citizens. The courts agreed and there were some changes, not enough for many species, and now this plan comes out and pretends that the past is the past and we are professionals. We will do what we want and ignore the past[...] start with a clean slate and pretend that we, the usfs can do it better this time doing the same actions that failed before.

Please do a better job than you have done in the past and try a new approach. Remove yourself from your caviler past. Try something new on this 70,000 acre treatment.

Realize that it is going to be subsidized by tax payers.

Do no harm. In the case of lynx, they may not survive this timber sale, meaning it will take up to 20 years or more to recover from your actions, don't log or build roads there. If you were having survival issues and were told, wait 20 years and it will get better, hen ou don't even live that long[...].

Remove culverts and roads where they impact water quality.

Map old growth forests {{a fragment of what they were}} and design to allow for future old growth and connectivity corridors,

Stop fragmentation.

Stop weed spread and spend the time to remove weeds from 70,000 acres.

Build no new roads.

Repair past mistakes.

Clean up your mess.

Stop any plan that increases co2 releases.

Do one plan that does not have a road building or logging component. Maybe just get the whole forest under amendment 19 standards. Not have activities in old growth or riparian areas.

Do a real plan that improves the environment for all us citizens. Many taxpayers would rather see on their lands griz, lynx, wolf, mountain lion, a sensitive plant or weed free forest, than another clear cut.

It is your choice on how to proceed, for future generations of taxpayers. Do you want to leave them a bill to clean up your mess or leave future generations a choice. To leave future generations a choice you need to leave them a functioning system, something this plan does not do. Instead of this terrible timber sale, try to enhace the forest

functions.

For years the USFS has determined that the only activity appropriate is to cut trees. Bugs- cut trees, fires cut trees, hazard trees, cut them, roads, cut them, riparian zones, cut trees, post fires, cut trees, fuel reduction cut trees. It seems like trees are your enemy. Are there cases where trees don't deserve this fate? I am sure you can add many more examples where it is appropriate to cut trees. Where is it inappropriate to cut them?

I hope you can sleep at night, well really if you run this plan through your process, I hope you can never sleep at night again,

Stephen braun

Po box 5614

Whitefish, mt 59937

Since you are a taxpayer subsidized part of government, it would be better for our shared trust that you go home, I would support your salary as a tax payer until you retire, and do no more harm. This is for sivilculturists, engineers, road builders, and timber sale planers.