

Data Submitted (UTC 11): 12/14/2018 11:00:00 AM

First name: Mark

Last name: Benedict

Organization:

Title:

Comments: Comments on the Mid-Swan Landscape Restoration & Wildland Urban Interface Project (Scope)

Dear Sandy Mack & Mid-Swan Team,

Thank-you for your public service on this proposed project. I strongly support sustainable (per FSC) forest management and hope this project can move forward with public support. My comments on the scoping document are attached in Adobe PDF format. Please contact me if you have any questions or need clarification about them.

Please acknowledge receipt of this message.

Sincerely,

Mark Benedict

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Comments: Mid-Swan Landscape Restoration & Wildland Urban Interface Project [ndash] 12/14/18 Mark Benedict

General Comments

1. This project is based on a hypothesis that natural fires have shaped the terrestrial and aquatic environments of the Swan Valley to a major extent and that human interference with fires beginning about 100 years ago has resulted in the present landscape that now needs to be [lsquo]restored[rsquo]. While I have no doubt that fire suppression has had a significant effect on our forests, the evidence and anecdotes cited in the scoping document do not lead to a definitive methodology on how to turn the clock back hundreds of years on 65% of the Mid-Swan managed forest with modern forest management techniques. It would be helpful if the cited references could be made available in the Supporting Documents section of the project website.

Issue/Cause/ActionDescriptionPossible Adverse Effects

Artificial tree species selectionPromote ponderosa pine, larch, and douglas-fir due to their fire-resistance using regeneration areas within thinning units. The promoted species are upland species and much of the project area is wet lowland. In addition, multiple site factors affect differential survival of tree species. This could actually reduce biodiversity in regeneration openings if misapplied to incompatible sites. If regeneration fails or is delayed on a site, invasivespecies including weeds and non- native grasses will invade.

Eliminate fire deficitControlled burning on terrestrial and aquatic sitesPerennial and shrub species that are not fire-adapted will be eliminated along with the undesired, fire-prone and shade-tolerant tree species (subalpine & grand fir, spruce, lodge pole pine, et al). In accessible units, burning dry downed trees wastes lumber or firewood (suggest salvage log sales or pre-burn firewood saleswhere appropriate). Burning also generates greenhouse gases (CO2).

New Roads (p. 21)Under Connected Actions, it is proposed to construct 60 miles of new roads. Forest roads once constructed take on a life of their own, regardless of their management status. Even decommissioned roads are navigable by the range of specialized ATVs currently available. I have never seen a forest road that would not allow passage of a small motorized AT vehicle (unless rock slides had buried it!). No more roads please or plan to deconstruct & reforest them afterwards (expensive).

Specific Questions & Comments

1. Climate Change [ndash] The scoping document repeatedly mentions climate change as a principal reason for the need to restore our forest. (In fact, if climate change was not happening, we probably wouldn't be considering this type of forest management project.) What measures is the U.S. Forest Service taking to reduce the agency's greenhouse gas emissions?
2. Beavers [ndash] On page 6 of the scoping document it is stated that 32 of the 36 documented beaver dam sites in the mid- Swan area are inactive. What was the cause of this and why do you propose analog beaver structures instead of reintroduction of actual beavers?
3. Section Map Overlay [ndash] Can an overlay map be provided so property owners can see more accurately where project units are located with respect to their private properties?
4. Timeline [ndash] What is the overall time frame for this project, have the proposed treatment units or areas been prioritized?
5. Cold Jim Fuels Reduction Project [ndash] What is the relationship between this Mid-Swan project and the Cold Jim Fuels Reduction project? On two management units adjoining our property the two projects propose different or no treatments.
6. Terrestrial Biodiversity Challenges [ndash] On page 8 you list the following: Overabundance of young forests with multi- stories and shade tolerant species, in particular sub-alpine fir. Can you quantify this statement by stating what percent of forest in the mid-Swan you believe should be composed of this forest type?
7. Historical Reference Conditions [ndash] On page 10 of the scoping document you state that the mid-Swan is dominated by multistory forests composed of small to mid-sized shade tolerant conifers including subalpine fir, Engelmann spruce, western red cedar and grand fir. This is a departure from historical and future reference conditions. What historical references did you use to arrive at this conclusion and what should the dominant tree species numerical composition be?
8. Glossary [ndash] Please create a Glossary for your terminology: i.e. fire return interval deficit, special departure, regenerationhellip
9. Regeneration Areas [ndash] How is regeneration to fire resistant species (P. pine, larch, DF) proposed to occur, through reforestation or natural reseeding?

{{End}}

Mark Benedict

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