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Organization: Sierra Club

Title:

Comments: Sierra Club Comments on Mid-Swan Project Scoping

Please accept the attached comments from Sierra Club on the Mid-Swan Project Scoping Document.

Thank you,

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Bonnie Rice

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December 20, 2018

Flathead National Forest Mid-Swan Project

Attn: Sandy Mack

24 Fort Missoula Road Missoula, MT 59804

Re: Mid-Swan Landscape Restoration and Wildland Urban Interface Project Dear Project Team:

Please accept the following comments on the Scoping Document for the Flathead National Forest's (FNF) proposed Mid-Swan Landscape Restoration and Wildland Urban Interface Project. These comments are submitted on behalf of more than 3,000 Sierra Club members in Montana and more than 3.5 million Sierra Club members and supporters across the country. Our members and supporters in Montana and nationwide treasure the Swan region for its unique ecological and wildlife values and its important role as wildlife habitat in the Northern Continental Divide Ecosystem (NCDE), as well as for the outstanding scenic and recreational opportunities it provides.

Sierra Club staff and volunteers have actively participated in the FNF's recent plan revision process, and have offered input on other proposed National Forest projects in the area. We appreciate this opportunity to continue a constructive, respectful dialogue with the FNF's planners and managers. In that spirit, we offer the following comments on this scoping document, and ask that they be fully addressed during the development of the project Environmental Impact Statement (EIS).

#### Comprehensive, Long-Range, Landscape-Level Analysis and Planning for the Swan Valley Must Be Implemented

We are supportive of the fundamental, underlying premise behind the planned EIS: the need for broad, landscape-level planning for the Swan Valley. The Swan is a region of highly-significant wildlife habitat, and is simultaneously an area facing substantial management challenges due to complex land ownership patterns, a history of extensive timber harvest, and a variety of other environmental and socioeconomic issues. Because of this, it is extremely important that even limited management actions be undertaken with a clear understanding of the broader context of the region's natural and human environment. With vision and appropriate restraint, science-based, landscape wide analysis and comprehensive long-range planning could lead to restoring the Swan Valley, and could minimize the likelihood of individual projects cumulatively resulting in significant adverse impacts.

Nonetheless, in order for this effort to be most successful, it is essential that the EIS exhibit an understanding of the key role of the Mid-Swan in the broader ecosystems of adjacent forests and wildlands [mdash] the Upper Swan region to the south; the Mission Range to the west; and the South Fork of the Flathead to the east. The role of the Mid-Swan in connecting these important natural landscapes needs to be fully addressed, and potential future impacts to those adjoining lands need to be considered when evaluating projects proposed for the Mid-Swan.

In the same vein, it is critical that planning for the Mid-Swan take into account the substantial amount of land within the planning area's boundaries that is not under Forest Service management, and the cumulative effects of management of these lands. The Swan River State Forest occupies a substantial portion of the Mid-Swan, and is mandated to be managed for timber-harvest revenue. Private land within the project area may or may not be subject to development or timber harvest, but is likely to often be of lesser value to wildlife than federal land. All of these aspects need to be considered, especially over time, when evaluating the levels and scheduling of proposed projects in the Mid-Swan. In particular, it will be important to work with state land

managers over the lifetime of the EIS to ensure that state and federal projects do not impact wildlife, separately or cumulatively.

To accomplish this, the EIS should include a detailed and mapped timeframe for individual project actions; this will allow members of the public and other reviewers to map specific projected location- specific wildlife impacts over time.

#### Vegetative Treatment and Restoration Programs Must Be Directly Tied to Site-Specific Deficits

We understand that much of the federal land in the project area has been subjected to repeated timber harvest in the past, particularly lands near the valley floor and lands formerly owned and managed by Plum Creek. The level of post-harvest restoration work on these lands over time has been sometimes inconsistent, and would often not meet current standards. The Scoping Document identifies this restoration need as being a primary trigger for many of the land management actions identified in the document. We realize the need to undertake proactive restoration work on many of these lands in order to help better restore pre-harvest landscape and vegetative species diversity. However, upon review of the Scoping Document, we have some concern that elements of the project may lead to increased timber production, rather than the restoration of dynamic natural processes and conservation values in this important landscape.

It is essential that the EIS further detail the need for restoration by identifying specific landscape and species deficiencies, tying those conditions to specific locations in the project area, and limiting treatment actions limited to those specific areas where past timber harvest practices have created conditions requiring proactive restoration. The EIS must also specifically analyze and document how the proposed actions will aid in this restoration goal, and the landscape conditions that will be expected at the end of the work. This will allow members of the public and other reviewers and project planners to determine if the proposed actions are appropriate and will in fact achieve the Forest Service's desired improved conditions. The Sierra Club opposes treatment actions in locations that do not clearly meet these criteria. The EIS should provide a range of alternatives that includes an alternative that emphasizes landscape processes including disturbance regimes such as fire, flooding, insect and disease, weed management, planting native shrub, grass, and forbs with minimal to no other vegetation treatments, as an example of more natural rewilding as compared to an active, hands-on restoration.

The EIS should also document all specific locations of old-growth forest in the project area, and ensure that those locations will not be subjected to treatments that may impact old-growth forest stands or larger- diameter trees.

#### New Road Construction Must Be Substantiated and Impacts to Wildlife Fully Analyzed

Over time, much of the valley floor of the Mid-Swan area has been subjected to very heavy road construction, primarily in association with past Plum Creek and Forest Service timber harvest. According to the Scoping Document, 67 miles of road have been decommissioned, though some of their footprint remains evident on the landscape. The network of intact roads in the valley remains substantial: 1,240 miles across all ownerships. The

existing road network [mdash] active and decommissioned [mdash] must be fully substantiated and we request that the EIS do so. We specifically request a roads analysis to identify the minimum required road network on Forest Service lands. We believe that the 3.1 mi/mi<sup>2</sup> is excessive. We encourage you consider the science-based density standards in Amendment 19 in establishing the FNF's final road network. Additionally, we request that the EIS specifically identify decommissioned roads in need of further obliteration.

The Forest Service proposes to construct 60 miles of new roads and an unspecified number of

[ldquo]temporary[rdquo] roads during the life of this project. The Sierra Club is extremely concerned about any road construction proposed in the scoping document, particularly new road construction into currently unroaded areas above the valley floor. Unroaded areas offer the most-secure wildlife habitat in the project area, and it is crucial that they be preserved.

We are very concerned about the near-lack of discussion of wildlife considerations and impacts (other than lynx) in the Scoping Document, particularly grizzly bears. The project area is within the Primary Conservation Area (PCA) for grizzly bears; as such, we are very concerned about impacts to grizzly bears and other wildlife, during road construction and subsequently. It is well-documented that roads are the number one factor in causing grizzly bear mortality. Even if roads are not accessible by vehicles by the general public, the establishment of roads can lead to displacement and increased poaching.

The Scoping Document states that upon completion of the project, there would be no net increase to the baseline for motorized route access and no net decrease to the baseline for secure core. However, during the life of the project there would certainly be adverse impacts to wildlife including habitat destruction, displacement, and, potentially, mortality.

The EIS should specifically document the project's location in regard to the PCA and requirements in regard to maintaining secure core within the PCA. All potential impacts to grizzly bears should be fully analyzed.

The EIS should specifically document the need for any new road construction and fully analyze all potential impacts to wildlife from construction and use of new roads over the life of the project, including impacts to wildlife connectivity for grizzly bears and other wide-ranging wildlife. The American Wildlands Priority Linkage Assessment gave the Swan Valley the highest score of linkage in the Crown of the Continent region and we are concerned about any actions that potentially decrease connectivity for wildlife in this landscape.

**Impacts To Wildlife of Proposed Project Actions in Riparian Management Zones (RMZ) Must Be Fully Analyzed**

The Sierra Club is also concerned about proposed project actions in both Inner and Outer RMZs, including thinning and controlled burns. RMZs are extremely important wildlife habitat and provide connectivity. As such, the EIS must fully analyze all potential impacts to wildlife from proposed actions in RMZs. The Sierra Club also

requests that an alternative in the EIS includes relocation of beavers to restore dynamic processes on the Swan Valley floor rather than constructing analogue dams.

#### Actions in the Wildland-Urban Interface (WUI) Must Be Substantiated and Public Education Expanded

We recognize that past land management practices, the impacts of climate change, and the development of private inholding parcels in the project area have created a situation where WUI fire danger is a concern.

However, any actions undertaken by the Forest Service to address fire danger should have a clear, documented WUI benefit. We urge the Forest Service to undertake an extensive education program to encourage private land development and use that helps minimize WUI fire danger over the long term, realizing that timber harvest and other land management actions do not effectively mitigate this risk.

Thank you for your consideration of our comments. Sincerely,

Bonnie Rice, Senior Representative, Greater Yellowstone and Northern Rockies Regions Our Wild America Campaign