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Comments on Mid-Swan Landscape Restoration & Wildland Urban Interface Project: Attention Sandy Mack

1. Forest Restoration; The restoration of current forest conditions to simulate historical conditions is not necessarily in the best interest of wildlife nor in the best interest of people dependent on natural forest resources. Historical conditions were largely the result of somewhat random ecological forces. The randomness of wildfire supplemented by Indian burning did not necessarily contribute to optimizing habit for any one

species nor for optimizing a diversity of species. Certainly, the harvesting of forest resources that benefit mankind was not a part of the natural ecological forces that influenced historical stand conditions. The Mid-Swan should be managed just as ardently to maintain an optimum flow of forest resources that benefit mankind as the effort to maintain an optimum diversity, and distribution of wildlife habitat.

1. Canadian lynx; Expending large amounts of time and money to maintain and restore present and future habitat conditions for Canadian Lynx may be an exercise in futility. Canadian lynx studies have repeatedly shown lynx to be migratory in areas of marginal habitat due to cyclical whether patterns. Canadian lynx cats were abundant throughout the Mid-Swan through the 70's and 80's. We then entered a cycle of mild winters, and lynx nearly disappeared from the Mid-Swan. The identification of potential Canadian Lynx habitat should include a projected progression of global warming, milder winters and less powder snow conditions; conditions all unfavorable for the restoration of Canadian Lynx in the Mid-Swan. The substantial reduction of Canadian Lynx in the Mid-Swan has been offset by a corresponding increase in the bobcat population in the Mid-Swan. Continued warming trends will contribute to further improvingenvironmental conditions for bobcats while degrading environmental conditions for Canadians Lynx.

1. Control Burning; Whether a planned burn was controlled cannot be determined until after the fire is out; until then the planned burn is only prescribed. Controlled burning on the Mid-Swan is proposed on 28,600 acres. Despite huge advances in modeling fire effects, planned burning is still not an exact science. Every planned burn will likely either under[shy] achieve burn objectives or overachieve burn objectives. Because obtaining specific burn objectives are substantially uncertain, mechanical manipulation of vegetation through a variety of silivicultural prescriptions should be preferred wherever the terrain allows.

1. Wildfires; In recent years large wildfires have been used to promote burning areas that contribute to planned burn objectives. Instead of fighting fire aggressively, helicopters have been used to expand the spread of burned areas. Using helicopters to ignite additional acreages is incredibly expensive and substantially contributes to the

total cost of managing the fire. The cost of using helicopters to ignite additional burn area is hidden under the guise of fire suppression costs. The inflated costs of fire suppression are then paid for by taking money that had been allocated for other beneficial management projects. Fire suppression costs are then blamed for not implementing other beneficial management projects. This practice has been deceptive and represents gross mismanagement of public tax dollars and natural resources.

1. Storm proofing; Storm proofing of roads will reduce available access for both timely initial attack on new wildfire starts as well as for extended control actions on large fires. Access for the timely salvage of insect, disease, and blowdown events will also be hindered. Maintaining access for currently planned and future potential management actions contributes to promoting management efficiency. The initial investment in the development of existing roads has been substantial. Protecting those financial investments may be better served by implementing Road Best Management Practices rather than Storm Proofing. An economic analysis should be made comparing the initial cost of road construction per mile, the cost of implementing Road Best Management Practices per mile and the cost of Storm Proofing Roads per mile. The effect of not including this economic analysis may contribute to financial irresponsibility.

1. Cost Benefit Analysis; The implementation or application of Storm Proofing roads, Road Best Management Practices, improving fish passages, beaver dam analog structures, riparian management zone treatments, pre[shy] commercial thinning with variable density, commercial thinning with variable density, regeneration with variable retention, controlled burns only, planting of western white pine and seed caching for whitebark pine are potential projects that would contribute importantly to promoting a healthy and resilient forest environment now and in the future. The implementation or application of each of these potential activities also represent a potential investment cost. Reasonable financial accountability, whether private, corporate or public, should include a cost benefit analysis for each activity considered.

1. litigation Risk; The beginning of the scoping process in the development of an environmental impact statement for the Mid-Swan Landscape Restoration &Wildland Urban Interface Project is an action that may have substantial beneficial environmental effects. A substantial investment of time and salaries may also contribute to a substantial financial and environmental loss if the proposal does not survive litigation. It has been a rare exception for any U.S Forest Service project in the Swan Valley that involves vegetation manipulation to survive litigation. Therefore, however, do you expect a project of the scale of the Mid-Swan Landscape Restoration & Urban Interface to survive in litigation? What different steps or actions are being incorporated into the process to avoid this adverse environmental effect?

Thank you for the opportunity to be involved and provide comments in this very early stage of planning for the Mid-Swan Landscape Restoration & Wildland Urban Interface Project.