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First name: Ryan
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Organization: Vital Ground Foundation
Title:
Comments: November 8, 2018

Sandy Mack

24 Fort Missoula Road Missoula, MT 59804

Re: Mid-Swan Project Dear Ms. Mack,

Thank you for the opportunity to comment on the Mid-Swan Landscape Restoration and Wildland Urban Interface project scoping document. This is an ambitious project with commendable goals of restoring aquatic and terrestrial biodiversity and reducing wildfire risk in the wildland urban interface on a landscape scale in an area with high ecological diversity. While we support the goals and intent of the project, we have concerns with certain aspects of its implementation.

The Vital Ground Foundation is a land trust focusing on North America's grizzly bear populations through the protection of wildlife habitat. Vital Ground holds conservation easements and owns land throughout northern Idaho and western Montana. Our organization has strong ties to the Swan Valley, where we have protected over 1,000 acres of important grizzly bear habitat on private land through the placement of 12 conservation easements (including Vital Grounds' first conservation easement) and the purchase of a 40-acre parcel on Elk Flats Road. Vital Ground is dedicated to land conservation in the Swan Valley for a number of reasons: rich wetland and riparian habitat, proximity to the Northern Continental Divide Grizzly Bear Recovery Area, importance for habitat connectivity, and high levels of seasonal usage by grizzly bears.

While our work in the Swan Valley has focused on protecting key habitat for grizzly bears, it has also supported working forests and active management. We recognize that active forest management is important for restoring and maintaining forest health and therefore habitat quality, and we also recognize this can be done with minimal impacts to grizzly bear habitat. For this reason, we are concerned with the proposal to construct approximately 60 miles of roads. We feel the impacts of new roads would be a detriment to the overall project goals of restoring aquatic and terrestrial habitat, including habitat for listed threatened and endangered species such as bull trout, grizzly bear, and lynx. As the project is further developed, we strongly encourage you to examine opportunities to achieve the project goals without constructing new roads. This seems especially important considering many of the detrimental impacts to bull trout streams in the Swan Valley are due to the legacy of forest roads, road density has been shown to strongly correlate to decreased habitat quality for grizzly bears, and new roads increase the spread of noxious weeds.

Another area of the project we think could be improved is the scale of whitebark pine restoration, which is a key

food source for grizzly bears that is being greatly impacted by climate change. We strongly support the inclusion of this goal in the project and support the strategy proposed to do so, but we would like to see the scale expanded. The scoping document states that up to 2,400 acres of whitebark

pine stands will be restored using controlled burns and seed caching, but only 900 acres are proposed for seed caching. In the treatment areas that are not slated for seed caching, there is a risk that the treatment will increase recruitment for other species such as lodgepole pine and therefore may not increase whitebark pine recruitment and only increase growth of existing whitebark pine trees. In addition, 900 acres of seed caching seems minimal compared to the scale of the entire project (246,000 acres).

The Vital Ground Foundation is committed to conserving and restoring grizzly bear habitat, and the Flathead National Forest is a vital partner in this effort. We appreciate and value the work of the Flathead National Forest, and we look forward to continuing to work together on this important goal. Thank you for considering our comments and suggestions.

Sincerely,

Ryan Lutey

Executive Director, The Vital Ground Foundation