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Comments: Hi Joe,

I attended the September 2 Open House and was impressed with the presentation. The SWCC had an initial discussion about the DEIS on Monday and your slides were very helpful. Also, thank you for posting the storyboard. It will help us look at the details as we continue our discussions. At our meeting, we developed some questions (see attached) and we hoped the team might address some of these at your September 23 meeting. We'll have additional questions during the meeting. Although not in our list of questions, the IGOR may also be worth reviewing at that open house. Thank you for providing these opportunities for a conversation around the project.

Questions for the Mid-Swan Team for Their September 23, 2020 Open House

September 18, 2020

The Southwestern Crown Collaborative (SWCC) was pleased to see the release of a DEIS from the Flathead National Forest on the Mid-Swan project, an attempt at large-scale restoration on National Forest lands that emerged from discussions during the 10-year term of the Southwest Crown CFLR project. The SWCC continues to function as an independent, volunteer organization to promote sustainable forest management, and we wish to continue our engagement with the Mid Swan Project. In the ongoing spirit of collaboration that has always guided the SWCC, we offer the following general questions regarding the Mid Swan Project so that the intentions and outcomes of the project can be more fully realized. We will offer additional more specific questions during the open house.

General Questions for further discussion at the September 23 Open House:

1. Why is biodiversity defined as it is? Why wasn't the definition included in the Forest Planning Rule used? The included definition is not one that is generally recognized and is too narrow to a fine filter approach.
2. New roads have been a continuing discussion item for the SWCC with the Mid-Swan project. Alternative B and C differ significantly in the amount of proposed new roads. What were the justifications for the proposed 38 miles of new permanent and 10 miles of temporary roads in Alternative B? Can these proposed roads be better described, justified and prioritized? What opportunities are there for providing for some but not all of the new roads included in Alternative B?
3. Some of the new roads are pretty close to bull trout spawning streams, particularly in Goat, Elk, and Jim Creek drainages. Can you address the potential harmful sediment increase and negative effects on bull trout?
4. The new roads into high elevation up against Wilderness or Proposed Wilderness are not a threat to the WUI and instead of building roads, have you considered prescribed fire in these locations instead?
5. There are a few new roads in the Dog Creek area where there is a handicap-accessible hunter gated road system in the fall. Several of these new roads would connect into other gated road systems and substantially increase the amount of motorized use in those systems. Has the USFS considered this?
6. Since there has been a well-recognized interest to focus attention for forest treatments in the WUI, why is this not highlighted more plainly in the DEIS?
7. Alternative B and C differ in proposed management in proposed wilderness areas. Concerns can be raised about changing rules for wilderness, such as allowing helicopter access associated with some management actions. Can some management be proposed for wilderness without needing changes to rules?
8. Large tree restoration and protection from loss is identified as a primary need in the DEIS, yet Alternative C precludes management in old forest structures and old growth as well as in ORMZ's where many large

trees occur. How can the DEIS be viewed as addressing its stated objectives in Alternative C given these blanket exclusions? Have large tree stands been mapped, and if so, how do their locations overlap with ORMZ's or old growth maps?

9. Alternative C will forgo management in lynx habitat. Is this a viable means to protect biodiversity, one of the overarching goals of the project?

10. The SWCC has repeatedly suggested that more specifics be included in descriptions of desired conditions. The DEIS has provided some additional descriptions and specifics. However, more specifics seem to be possible and advantageous. Can more and better descriptions of desired conditions be included in the DEIS, or specified as a requirement for inclusion as part of the implementation guide?

11. How will the Record of Decision from the Final EIS address the challenge to Condition-based Management based on the recent judgment of 9th Circuit Court in the case on Prince of Wales Island in Alaska?