Data Submitted (UTC 11): 10/4/2020 6:00:00 AM
First name: Peter
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Organization:
Title:
Comments: Mid Swan Restoration Project

Dear Sirs, attached are our comments.

Dear Sirs,

Given that an Alternative must be chosen here, we would prefer alternative A, or no action at this time.

We responded with comments to the Mid Swan Scoping process and are pleased to see that scenic resources will be addressed to limit the [ldquo]unnatural[rdquo] effects of human activities although an objective to remove the imprint of the old Plum Creek Checkerboard was not given. The promotion of enhancing the White Pine and Whitebark Pine forests is good as well as the removal of 619 old road crossings. The Swan Front and other potential wilderness areas were respected as well. Consideration for more Beaver habitat is very good as well but present Beaver trapping in the Swan presents a glaring contradiction here as well as no consideration to stop the removal of log jams in the Swan River. A major objection is the imposition of so much new roading onto the landscape. Yes, there was much talk of [ldquo]decommissioning[rdquo] and road storage and temporary followed by removal but often this does not happen to really reduce the access by poaching and persistent weed penetration and the lack of verification in the entire process is problematic. Indeed the real road density violates Grizzly Bear security which is well established in the earlier Forest Plan. We did not really see any attempt to follow up on my last recommendation to utilize winter machinery to circumvent the need for new roading to accomplish the needed thinning. Much more [ldquo]hand[rdquo] treatment can be planned for vegetation treatment and prescribed burning as well.

The greatest objection to the action Alternatives being acceptable is their [ldquo]Condition Based[rdquo] approach to each phase of activity during the 15 year period as proposed in this project. Approval of this now would leave the public but little input as the scale and impact of each phase once this [ldquo]cast in stone[rdquo] approach is taken. While lofty goals toward forest diversity, RMZ protections and others are promoted the actual implementation will likely be conducted under the canopy of the GNC (Good Neighbor Authority) as each phase will be handed out to the Montana DNRC where there will be no accountability for what happens. Indeed the results of at least one of these arrangements (Taylor Hellroaring) has shown this to have happened.

Another Objection here follows basically from the last; for instance there is no clear definition where the Old Growth Forest to be protected is actually located except in the arbitrary process which will be used for each phase implementation. In addition there are too much new roading imposed and while there is much discussion given to road decommissioning, there is no real confirmation provided these roads will definitely disappear from the landscape. Appendix A and B should be where the concepts as outlined in the lengthy DEIS should be stored and documented. While it is only logically consistent that a landscape restoration would mean in this case the elimination of the 576 miles of preexisting roads, the entire logic and science as presented in the DEIS otherwise does seem to have merit and should provide a blueprint. Therefore the entire project should be broken back piecemeal whereby each phase will be subject to the same NEPA process. In this way verification and validation will be best accomplished, public trust maintained and refinements consistently applied as the science is validated. I would hope that if this approach is adopted there will be ways found to avoid the imposition of more roading onto the landscape as well.

Thank you for serious consideration of our comments; we appreciate your dedication presented here to work towards a balanced and science based approach to Forest Management. We have not objected to previous fuel

reduction/logging projects in the Swan and did not object to the recent proposal in the North Fork Flathead.