Data Submitted (UTC 11): 10/11/2020 6:00:00 AM
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Comments: 1. Because the Mid-Swan project is using "conditions-based analysis", the DEIS does not give enough information to allow the public to submit significant and meaningful comments. The DEIS does not disclose site-specific details of where and when roads and logging will occur over the next 15 years, yet it makes clear that once those details are later disclosed, the public will have no formal process by which to analyze the environmental effects as required by the National Environmental Policy Act. This "condition based management" approach, with inadequate public review of the specifics, was struck down as a violation of NEPA by the U.S. District Court on Tongass National Forest in Alaska. Once the ROD is issued, the public has no choice but to trust the Forest Service in the management of the public's (our) lands. Based on my experiences with Bitterroot National Forest (BNF) projects, I am not willing to extend one bit of trust. Sorry, but even under the conventional analysis process on the Westside, Darby Lumber Lands 2, and Gold-Butterfly projects, BNF was able to disregard all public comment and proceed with no significant changes to these projects, even though many were requested by a majority of commenters. The now-completed Westside project went on to violate HFRA, break Montana Streamside Management Zone laws, disregard design criteria, violate the Forest Plan, and ignore sound science. Please release a new DEIS with specific treatments and treatment units.

2. You offer only two heavy-handed alternatives other than No Action. While Alternative C is much less ecologically damaging, it fails to include some of the real restoration work in Alternative B. For example, why did you not include the hand seeding of rust-resistant Whitebark Pine that is in Alternative B? And why not include non-commercial treatments such as hand thinning in Old Growth where it might help? Bitterroot National Forest used a similar all-or-nothing tactic to discourage support for a more ecologically sound alternative in their Gold-Butterfly EIS, and your omissions seem designed to do the same. A true conservation alternative that proposed less commercial timber harvest, no new road building, and all the true restoration activities of Alternative B should have been offered.

3. If one of the goals of the project is to improve bull trout, west slope cutthroat, and grizzly bear habitat, why build any new roads at all, let alone the 49 miles proposed by Alt B? That you are "decommissioning" 44 miles does not make up for this-in Bitterroot National Forest, most of the decommissioned roads had already been naturally decommissioned by vegetation, and are gone from the landscape already. Roads also disturb wildlife nesting and denning, and interrupt breeding and dispersal habitat connectivity. Hessburg et al (2015), in their recommendations for restoration of fire-prone forests, state "management activities should avoid the development of additional permanent roads." Remember that "historic conditions" included 0 miles of roads. Zero!

4. You provide no funding guarantee for road maintenance after project completion. It is imperative that you do. On BNF's Westside project, roads that were upgraded for the project became badly gullied and eroded within a year of project completion, and are still that way today. In fact, it appears that neither the Hayes Creek project (2009) nor the Westside project (2018) have had any post-project monitoring, reclamation, or maintenance. Post-project monitoring, reclamation, and maintenance should be budgeted in the project and included in the project's costs.

5. Old growth should be inventoried by thorough field surveys before treatment plans are made. No commercial treatments should occur in Old Growth. Commercial logging results in the degradation of Old Growth attributes such as snags, downed logs, and ground cover/shrub understory. Non-commercial treatments such as hand thinning and prescribed burning can be allowed if they contribute to restoration. On BNF's Westside project, a 20-acre stand of old growth Ponderosa-Doug Fir was logged and taken out of old growth status (even by weak FS standards) because field surveys were incomplete. Every single old Doug Fir was cut because they were

"encroaching on the crop trees". In addition, cutting/removing old growth stands is a violation of HFRA, under which the project was done.

6. Please provide scientific evidence that treatments are necessary in Riparian Zones. The literature I have seen consistently reports that infrequent, mixed- to high-severity fires historically characterized riparian areas.

7. One of the purpose and needs is to "protect, enhance, and restore large trees", yet you are proposing many square miles of regeneration harvest (essentially clearcuts) that will allow large trees to be cut. Larson and Churchill (2012) and Hessburg et al (2015) state that old, large trees provide the backbone to dry pine and dry to mesic mixed-conifer forests, and that all individual large or old trees should be retained. In reading these papers on restorative forestry, you will find no recommendations for clear cutting, so please remove all regeneration harvests from your proposal, including "regeneration openings". BNF's regeneration openings created by the Hayes Creek project (2009) now grow only knapweed, St John's wort, and cheatgrass (in order of abundance).

8. The Wilderness Act states that, in Wilderness, natural processes are allowed to unfold on their own. Instead of prescribing fire, allow natural fires to burn in Wilderness.

9. A purpose and need always omitted is: To get the cut out as mandated by Washington D.C. politicians and bureaucrats, thereby enriching the timber companies at taxpayer expense. Just once, I would like to see a restoration project that did not include commercial logging. Perhaps then, I could begin to trust the Forest Service.

References (attached):

Hessburg, P.F., et al., 2015, Restoring fire-prone Inland Pacific landscapes: seven core principles: Landscape Ecol (2015) 30:1805-1835, DOI 10.1007/s10980-015-0218-0

Larson, A.J., and D. Churchill, 2012, Tree spatial patterns in fire-frequent forests of western North America, including mechanisms of pattern formation and implications for designing fuel reduction and restoration treatments: Forest Ecology and Management 267, 74-92.