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Organization:

Title:

Comments: Final WBP Comments

Dear Supervisor Steele,

Thank you for the opportunity to comment on the Mid-Swan Landscape Restoration and Wildland Urban Interface Project, hereafter referred to as mid-Swan Project. Our comments will focus exclusively on the proposed actions in the Mission Mountains Wilderness (MMW). We will start with general statements then provide specific comments.

#### General Comments

[mdash]We are opposed to your proposed actions in the MMW, both the prescribed fire and Whitebark Pine (WBP) restoration. The purpose of the mid-Swan Project as stated in your EIS is to "restore and maintain terrestrial and aquatic biodiversity in light of changing climate." Though this is certainly a laudable purpose, it is in conflict with the purpose of Wilderness which is, "In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of Wilderness." (1964 Wilderness Act, P.L. 88-577). Given the purpose of Wilderness, how exactly do the actions proposed for the MMW contribute to your overall purpose? We would argue that they do not. Though we only scanned the rest of your document, it does seem like your other proposals fit your purpose. It leads one to wonder why these proposed actions in the MMW were even included in this project. It almost seems like they were an after-thought[mdash]someone's pet project, perhaps? An opportunity to "sneak" a Wilderness project into a huge 174,000- acre proposal? Just looking at the makeup of your team, it's quite obvious that Wilderness was not considered a key component to this project. Your team did not even include a Wilderness Specialist.

[mdash]Typically, a proposal as manipulative and significant as prescribed fire and WBP restoration in Wilderness would warrant an extensive analysis specific to this project, rather than it being tacked onto a large Landscape Restoration Project. For instance, the scoping notice would be about this project. We couldn't find any mention of work proposed in the MMW in your original scoping document dated October, 2018. Again, your notice on how to comment, from August 27, 2020, does not even include the word Wilderness. To deliberately exclude something from the scoping notice that would undoubtedly be controversial is possibly illegal, but definitely unethical. There are any number of people and organizations, who would be quite interested in a Wilderness project, who might not even take notice of a vegetation and restoration project. This, once again, begs the question about if this project was deliberately, quietly, included as an add-on, so as not to call attention to a very controversial precedent-setting proposal.

[mdash]It appears that your reference to FSM 2320 was cherry-picked to include only objectives for managing Wilderness and doesn't include policy on Reforestation (FSM 2323.52 and 2323.54). In fact, if you were to consult your own policy, FSM 2323.04b, you would see that the Chief has the authority to approve reforestation activities, not the Forest Supervisor. The Regional Forester has the authority to approve prescribed fire in Wilderness, not the Forest Supervisor. This is one example of FS Wilderness policy being ignored. We will be pointing out other examples in the specific comment section. We are shocked and dismayed with the woefully inadequate analysis of effects to Wilderness character.

[mdash]On page 290, the DEIS states: The proposed project activity in the Mission Mountains Wilderness was evaluated regarding:

[mdash]The effects of the proposal to the wilderness character

[mdash]The ability to preserve and protect the quality of wilderness character, as required by the Wilderness Act.

Yet, your analysis of effects to Wilderness character from your action alternative, B, is confusing and inadequate. In fact, it appears to be written by someone who didn't even understand what the qualities of wilderness character are about. In the affects to "Untrammeled" you state how many acres would be affected. That is a moot point. You either have affects to untrammeled or you don't. The Wilderness is managed as a whole not acre by acre. And, yes, your proposal would have a significant effect on the Untrammeled quality of Wilderness.

Again, it appears to be a complete thrown together after thought. A significant, controversial, precedent-setting manipulative project proposal should have had a team of topnotch wilderness specialists addressing how this proposal would affect Wilderness.

#### Specific Comments

[mdash]The WBP restoration proposal has never been done in Wilderness in the Northern Region, which means that, if approved, this decision would set a precedent. This is another reason why this proposal should be treated separately and not as an add-on to a large 174,000-acre project.

[mdash]We are concerned with the lack of knowledge about the success of "direct seeding".

First of all, nowhere in the 400+ page document is there a good description of what this project would entail; where it is, what would be the specific action on the ground, how often would there need to be re-entry, and most importantly, why can't this be accomplished outside of the MMW? These are all questions that absolutely MUST be answered before you can even consider these actions. Your document does state that, "direct seeding is a relatively new practice for regenerating WBP with a success rate of 8%-45%". Wilderness is not a place to "experiment" with WBP direct seeding. There may be more suitable locations outside of designated wilderness.

[mdash]Given the fact that "direct seeding" is essentially experimental, we would like to point out your FS Policy on Research in Wilderness:

#### 2324.4 - Research in Wilderness

##### 2324.41 - Objective

To provide appropriate opportunity for scientific studies that are dependent on a wilderness environment.

##### 2324.42 - Policy

1. Encourage research in wilderness that preserves the wilderness character of the area (FSM 2320.3).
3. Review proposals to conduct research in wilderness to ensure that research areas outside wilderness could not provide similar research opportunities. Direct projects that would jeopardize wilderness values to areas outside wilderness.

Clearly, your proposal for WBP Restoration conflicts with policy.

[mdash]The following was taken from a paper published by the Rocky Mountain Research Station (Keane, et al., 2012). It refers to any proposed project to restore Whitebark Pine.

Prior to any of these activities being implemented, the following steps must be taken:

- [bull] Determine that the loss of whitebark pine is due, in fact, to human intervention.

- [bull] Determine that restoration objectives cannot be accomplished entirely outside of wilderness.

- [bull] Determine if there is a reasonable expectation that human intervention will result in a significant improvement in whitebark pine survival.

- [bull] Determine if the analysis has proven that whitebark pine restoration actions are the minimum requirement or minimum tool necessary to meet the objectives.

- [bull] Determine the adverse effects of restoration actions on the other qualities of wilderness character (untrammelled, undeveloped, and outstanding opportunities).

- [bull] Determine if the timing, frequency, location, or intensity of the restoration actions can be altered to mitigate these adverse effects.

- [bull] Determine if the activity can be accomplished without the support of motorized equipment or mechanical transport. (p. 30)

[mdash]It is commendable that you state that prescribed fire is necessary to reduce the risk of wildfire escaping the Wilderness. However, given the long, narrow shape of the MMW and the prevailing winds causing any fire to head down slope and into the valley, what are the chances that natural fire will be allowed even if fuel reduction is completed?

What about the Mission Mountains Tribal Wilderness? Nothing is said about the Tribes' policy on wildfire.

Your document states that, "Due to past fire suppression and high fuel loads, it is reasonable to think that fire in the Mission Mountains Wilderness would likely continue to be suppressed, which is also considered trammeling and therefore, the strategy of reducing fuels with this alternative would reduce the amount of fire suppression in the future, thus reducing the trammeling." What does this mean? We take it to mean that, regardless of the manipulation you propose, fires will still likely be suppressed. So how can you justify the manipulation?

[mdash]The use of helicopters for your prescribed fire proposal is a prohibited act in the 1964 Wilderness Act. FSM 2326.1 describes conditions under which helicopters can be approved:

#### 2326.1 - Conditions Under Which Use May Be Approved

Allow the use of motorized equipment or mechanical transport only for:

1. Emergencies where the situation involves an inescapable urgency and temporary need for speed beyond that available by primitive means. Categories include fire suppression, health and safety, law enforcement involving serious crime or fugitive pursuit, removal of deceased persons, and aircraft accident investigations.

2. Aircraft or motorboat use established before the area was designated as wilderness by the Act of 1964 or subsequent wilderness legislation.

3. Exploration and development of valid existing mineral rights (FSM 2323.7).
4. Access to surrounded State and private lands and valid occupancies (FSM 2326.13).
5. To meet minimum needs for protection and administration of the area as wilderness, only as follows:
  - a. A delivery or application problem necessary to meet wilderness objectives cannot be resolved within reason through the use of nonmotorized methods.
  - b. An essential activity is impossible to accomplish by nonmotorized means because of such factors as time or season limitations, safety, or other material restrictions.
  - c. A necessary and continuing program was established around the use of motorized equipment before the unit became a part of the National Wilderness Preservation System, and the continued use of motorized equipment is essential to continuation of the program.
  - d. Removal of aircraft wreckage when nonmotorized methods are unsuitable.

Specify, for each wilderness, the places and circumstances in which motorized equipment, mechanical transport, or aircraft are necessary for protection and administration of the wilderness and its resources in the forest plan.

The Line Officer approving the use of motorized equipment, aircraft, or mechanical transport shall specify what uses of that equipment are suitable and will have the least lasting impact to the wilderness resource. Schedule use of this equipment to minimize impact on wilderness visitors .

There is absolutely no discussion of the use of helicopters in your document and no obvious analysis required by policy. An in-depth Minimum Requirement Decision Analysis should be included for review with this DEIS. If you have this document but it is not included in the DEIS, it should be, and we would request a copy of it be sent to us, please.

[mdash]The cumulative effects section talks about fish stocking. What does this have to do with your proposal?

[mdash]Please go back and read from the DEIS on page 292:

The Forest Service objectives for managing wilderness (section 2320.2) are to:

1. Maintain and perpetuate the enduring resource of wilderness as one of the multiple uses of National Forest System land.
2. Maintain wilderness in such a manner that ecosystems are unaffected by human manipulation and influences so that plants and animals develop and respond to natural forces.
3. Minimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation.
4. Protect and perpetuate wilderness character and public values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences.
5. Gather information and carry out research in a manner compatible with preserving the wilderness environment to increase understanding of wilderness ecology, wilderness uses, management opportunities, and visitor

behavior.

Then, ask yourself if the treatments proposed in the MMW adhere to those objectives. We think you will find it difficult to say they do. We strongly encourage you to drop any treatments from this proposal that are within the MMW.

In 2014, Regional Forester Kent Connaughton, received the "Line Officer Wilderness Leadership Award from Chief Tom Tidwell. The award states that, "Kent's passion and commitment to wilderness was reflected in his final decision to hold off on planting white bark pine in wilderness, while requiring program staff to continue working with researchers on evaluating restoration projects in wilderness. Kent exemplifies line officer leadership in wilderness management by asking thoughtful questions and looking at the big picture of wilderness decisions. His approach has lasting impact on wilderness stewards and the wilderness resource." We are proud of Chief Tidwell for recognizing RF Connaughton for his leadership. We can only hope that there isn't a new generation of wilderness stewards and line officers who don't ask thoughtful questions and strive to make good decisions to protect wilderness.

Wilderness is to be managed in contrast with those areas where man and his works dominate the landscape. This is the definition of Wilderness in the 1964 Act, (P.L.88- 577). The word untrammelled is used a lot in your document but do any of you even know the intent of that word? Howard Zahniser thought long and hard before deliberately using that word because he knew that it is human nature to want to "do" something, to want to manage, to want to manipulate. We understand this first hand, after having spent, collectively, well over 100+ years working for the Forest Service.

In Wilderness, nature is in charge, even if that means a change in the vegetation over time. As managers of these precious areas, you MUST exercise humility. We strongly suggest you immediately drop the proposed projects in the MMW. If you feel it necessary to propose this type of work in Wilderness in the future, we suggest you tackle it as a stand-alone project, stack your team with top-notch wilderness specialists and approach it honestly and thoughtfully, just like RF Connaughton.

Sincerely,

#### List of References

Keane, Robert E.; Tomback, D.F.; Aubry, C.A.; Bower, A.D.; Campbell, E.M.; Cripps, C.L.; Jenkins, M.B.; Mahalovich, M.F.; Manning, M.; McKinney, S.T.; Murray, M.P.; Perkins, D.L.; Reinhart, D.P.; Ryan, C.; Schoettle, A.W.; Smith, C.M. 2012. A rangewide restoration strategy for whitebark pine (*Pinus albicaulis*). Gen. Tech. Rep.

RMRS-GTR-279. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 108 p. USDA, Forest Service. 2007. Manual Section 2300 - Management of Recreation, p. 18-21. In Forest Service Manual, Title 2300 - Recreation, Wilderness, and Related Resource Management. Washington, D.C.

U.S. Public Law 88-577. The Wilderness Act of September 3, 1964. 78 Stat. 890.