

Data Submitted (UTC 11): 10/13/2020 6:00:00 AM

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Comments: Attached are my comments on the Mid Swan draft EIS.

Mid Swan Draft EIS Team:

I am responding to the draft focusing on the Mission Wilderness and Proposed Wilderness components. This document, over 400 pages, assessing over 174,000 acres; 39% of which is Wilderness and proposed Wilderness, 13% recreation designation, 5 % special/sensitive designation and 43% identified in some type of forest management. I do commend you on the analysis for the Forest management portion of which you devoted (it appears) more than 90% of supporting documentation for some very positive projects. It is very clear the Wilderness and proposed Wilderness elements of this proposal need to be addressed separately. The recreation component needs to be analyzed in more depth in any final document, where is any reference to mitigation for actions that would conceivably impact existing recreation footprint- trails, trailheads, structures? Reinstate the recreation alternative eliminated on Page 88. The Forest is not addressing deferred trail maintenance at all. Recognition of that needs to be in any final statement.

My rationale starts with questions on apparent neglect to provide critical reports, policy, Wilderness Plan, and national and regional direction that would have been used for the draft assessment (were they utilized?). They are absolutely necessary for any final decision. Specifically:

- * The Mission Mountain Wilderness Plan 1978
- * The Minimum Requirement Decision Analysis
- * The Wilderness Stewardship Performance plan for the Mission Mountain Wilderness
- * The completed Wilderness Character narrative for the Mission Mountain Wilderness.
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The Wilderness Character Baseline assessment reports.

I am finding no reference of engagement with a major partner the Confederated Salish Kootenai Tribe, were they? There is reference to the Crown of the Continent partners, Seeley Lk., Lincoln and Rocky Mountain Districts who will be impacted little to none by any decision, but nothing with the Tribe whose Wilderness values and policy could be impacted. Any fire action could have significant impacts on Tribal Wilderness and lands.

It is unclear, specifically for Alternative B, how much mechanized intrusion will occur in Wilderness: will it be confined to only helicopter use, what kind and how much; what kind of mechanized tools, how much? The same questions are for proposed Wilderness. What is a thorough description of [ldquo]direct seeding[rdquo]?

Referenced in the draft for Wilderness character is the component [ldquo]Untrammeled Quality[rdquo] Page 291:

[ldquo]In the context of the Wilderness Act, an untrammeled area is where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem. Wilderness is essentially free from the intentional actions of modern human control or manipulation. Actions that intentionally manipulate or control ecological systems inside wilderness degrade the untrammeled quality of wilderness character, even though they may be taken to restore natural conditions. Any management action that intentionally manipulates or controls, hinders, or constricts any aspect of the ecosystem is considered trammeling. The concept of trammeling applies to all manipulation since the time of wilderness designation. It does not apply to manipulations that occurred prior to wilderness designation, because the mandates of the Wilderness Act don[rsquo]t apply prior to designation. Unlike the management of any other public lands,

designated wilderness legislation directs the managing agency to scrutinize its actions and minimize control or interference with plants, animals, soils, waterbodies, and natural processes.[rdquo]

The rationale provided on pages 294 [ndash] 295 completely contradicts any Wilderness character premise. With such rationale there would be no Wilderness at all. Did these interpretations derive from a required Minimum Requirement Decision Analysis? Was there any evaluation relative to Wilderness Character and with Forest Service objectives for managing wilderness (section 2320.2) page 292?

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.

It does not seem so.

In response to white bark pine management and seeding in Wilderness. Was there any review of literature evaluating the need for Wilderness restoration of white bark pine?

Specifically research compiled by Robert Keane and published by the Rocky Mountain Research Station (Keane, et al. 2012) that identified these thresholds:

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.

Before any effort reestablishing white bark pine populations in the Mission Wilderness occurs. All options and improvement strategy should occur in those viable areas outside the Wilderness that could include proposed Wilderness and on the Swan Front proposed Wilderness.

Fire: where is the treatment strategy including resources, time and place? The rationale for fire management in the Mission Wilderness does not stand up to real scrutiny or fire planning. I wish to have these specifics addressed before any action in Wilderness:

- * Planning initiated and evaluated with the Confederated Salish Kootenai Tribe.

- * Further review and assessment of Ayres and Barrett's reporting (pages 15-16. Why not confine burn plans to outside Wilderness in the lower elevations that will be more successful to the ecological restoration identified.

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Lessen the aggressive suppression strategy in the foothills that stops all natural fire from occurring. Any natural fire occurring in the Missions will not be allowed until there is real fire management outside Wilderness on the periphery.

In summary: Unless the decision removes the Wilderness components I can only support Alternative C with modification to the proposed Wilderness and Recreation sections. Great opportunity for environmental and ecological improvement will be lost if your broad path of area is maintained. Make the Wilderness component a separate analysis.