

Data Submitted (UTC 11): 10/7/2020 6:00:00 AM

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Organization:

Title:

Comments: Mid Swan Project comments

To whom it may concern,

Here are my comments for the Mid Swan Project. Thank you for the opportunity to comment and for considering.

* These comments are my personal comments as a born and raised Montanan and a resident of Condon and the Swan Valley in regards to the Mid Swan project and do not reflect opinions of any organization I may work for or am associated with.

* This project is way too big and will be tied up in court for a long, long, time. That is disappointing.

* Why not use CE[rsquo]s, such a better option, small projects that are specific and well thought out, this is too big and all just a GIS model exercise with little on the ground info to support it.

* It would be better to do CE[rsquo]s of all the restoration projects completely separate, prescribed fire, whitebark pine restoration, beavers, logging all separate. Now as one big project they will all get shut down or tied up for years in one lawsuit

* What is the incentive to do all of the restoration work? I have no doubt that most of the volume producing logging would be done if it gets through NEPA, but there will be no money for the restoration work so I doubt that much of that would actually be accomplished, I am hopeful but doubtful.

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Timber management

* I support the effort to actively manage the forests in the Swan Valley.

* Focus logging and fuels reduction in the WUI, around the private land first, around the values at risk, not just the big volume producing timber units

* Fire suppression and past timber harvesting practices has the fire regimes out of historical norms in valley bottom forest types

* I support the intent to increase the presence of large, fire resilient trees on the landscape, by harvesting the smaller shade tolerant species that are encroaching due to fire suppression

* Focus on restoring the low intensity, high frequency ponderosa and larch areas in the valley bottom, in the WUI first

* Utilize stewardship contracts to bring money back to the district for infrastructure improvement activities and restoration

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Primary lines of defense (PLOD[rsquo]s)

* Focus logging and fuels reduction in areas, such as along roads and create tactical shaded fuel breaks, along the Primary lines of Defense already identified in the Seeley Swan Fire Plan for example for fire protection of the Swan Valley communities. Do all of this before the large wildfire happens, before it is an emergency. Otherwise, you can do all the logging and burning proposed and there will still be too much last minute to create shaded fuel breaks that the fire suppression folks will actually use. It happens on every large fire, last minute emergency and inefficient logging. Let[rsquo]s be proactive and plan ahead and implement those shaded fuel breaks now and do the logging and thinning right, when it isn[rsquo]t an emergency.

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Roads

* The Swan Valley has a considerable amount of roads already, use the current road system and minimize new roads

* I support decommissioning roads that are problematic, are in riparian areas, cross streams, or have minimal use for management

* Please remove the 1 mile new road proposed in the Meadow Smith unit, near Smith Creek, sec 28. Adding a new road section that goes higher up a mountain side into an un-roaded hill side does not contribute to as you stated, [ldquo]the most efficient road system for management possible[rdquo]. This is clearly just a road to access the un-cut stand of Douglas fir timber up there. Focus your efforts in places closer to structures that actually need treatment and fuels reduction. The area above this burned in the Condon Mtn fire 2012 and is not a high fire risk to any structures.

* Please remove roads segments 87 and 88 in Goat creek unit, Scout lake area, aren[rsquo]t there enough roads on the Squeezer face area already, steep hillside, one of few un roaded areas nearby, no structures nearby, focus on the WUI and around private property for fuels reduction

* Please remove new road segment 112 in Cold Jim section 5 and 6. You have put all of this emphasis on removing crossings of streams and this is a new proposed crossing of Jim Creek an important bull trout/cutthroat stream, clearly the road just accesses an uncut stand of timber that is surrounded by a creek on the other side, this is not critical for fire protection of the Salmon prairie area, please remove makes no sense

* If you are going to claim all of these numbers of gated and stored roads the FS better make sure that they are actually following through, I see abundant violations and open gates with missing locks regularly, with all of the \$ and might of the FS if you can[rsquo]t figure out how to keep illegal access from happening on roads you claim to be gated or closed than that is a problem.

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Prescribed fire

* Prescribed fire is an important forest management tool that is underutilized

* I support the implementation of a lot of prescribed fire in the Swan Valley

* Using bulk crown density to determine prescribed fire polygons is ridiculous, analysis paralysis. I hope that you design better prescribed fire polygons than this that could actually be implemented.

* Please explain how you will accomplish for example burn polygons in the bottom of the N. and S. Forks of Elk Creek and keep within your boundaries. This is a dark hole of ABLA/MEFE habitat type and very wet, the only time you could get this to burn would be on a red flag warning day in the middle of August during a drought, good luck getting support from the public on that one.

* Design burn polygons primarily on south and west facing slopes, up and down the Swans and Missions, giving you the widest range of burn windows, and aspect changes that will help you to burn with minimal line construction. Replicate work that John Ingebristzen started such as the Mission uplands burn in Piper Creek (south and west facing slope!). John had it figured out.

* There are even places south west facing slopes that you could burn in late March and April, that would still be completely surrounded by snow, no line construction, look for those opportunities.

* I doubt that you would ever be able to implement a fraction of the burning that is proposed, how many acres have been burned on the Swan RD / year in the last 5 years, how many acres / year on the Flathead NF? There are prescribed burns that have been on the books for years that still haven[rsquo]t been completed like Lindy Ridge (which is on a south facing slope, and not a deep dark wet jungle like Elk Creek), so I am concerned that you will promise all this burning and not complete it.

* Coordinate with private landowners adjacent to prescribed fire units, see if they want their land burned too while you are there, cross boundary treatments

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Wildlife

* Please utilize lynx collar data from Dr. John Squires of the Rocky Mountain Research station projects to determine some of the important wildlife corridors and important areas for lynx in the mid swan.

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Whitebark pine

* I support the efforts and activities to restore whitebark pine such as planting, seed caching, prescribed fire, and thinning outside wilderness. Inside wilderness the best option is prescribed fire and managing wildfires.

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Western white pine

* I support the efforts to restore some aspect of the western white pine in the Swan Valley through the thinning of other species and planting the rust resistant western white pine.

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Beavers

* I support the use of beaver dam analogs to restore beaver and their ecological function to the swan valley.

* For this to actually be successful the FS needs to coordinate with MT Fish Wildlife and Parks to manage beaver trapping in a sustainable way in the proposed areas. Have you talked with Bob Inman, fur bearer coordinator for MT FW&P? Otherwise, it will be a bunch of wasted effort, time and money.

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Old growth

* I support the understory thinning of small trees and shade tolerant species that have become more prevalent in the old growth ponderosa pine and larch forests to restore and maintain those old growth forests.