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Last name: Wolfe

Organization:

Title:

Comments: "Mid-Swan Project" Comments

Please accept our attached comments on the "Mid-Swan Restoration and Wildland Urban Interface Project" DEIS.

Thank you.

Dear Mr. Steele,

We are part-time residents of the Swan Valley, and our home and property (located in Section 4, T20N, R17W) borders the Flathead National Forest within the Hemlock-Elk Implementation Unit of the proposed Mid-Swan Landscape Restoration and Wildland Urban Interface Project area. Additionally, we recreate year-round on the public lands within the proposed project area and have a keen interest in the sound management of these national forest lands.

General Comments on the Draft Environmental Impact Statement (DEIS).

[bull] Single Record of Decision - We congratulate the Flathead National Forest on taking a long-term, landscape scale approach to restoration activities on these lands. However, given the scope and duration of the proposed actions, we do not support the concept of using a single record of decision to authorize such a broad scale, complex project to be implemented over many years. The sheer magnitude and time frame of this proposed project should preclude using a single record of decision to cover all of the issues and prescriptions mentioned. From our perspective, it is unreasonable to expect the public to review and comment on one DEIS affecting such a large area, and then provide no additional opportunity for formal public comment over the ensuing 15 years of the project's implementation. We believe the EIS should serve as a "strategic plan" for the restoration work, with incremental opportunities for formal public reviews, comments and agency approvals as the project progresses through the various Implementation Units over time.

[bull] Project Purpose - The DEIS specifically states that the purpose of the Mid-Swan project is to:

- o restore and maintain terrestrial and aquatic biodiversity;

- o improve the resilience of forest ecosystems; and o reduce the fire behavior in the wildland-urban interface and in areas that have influence on fire behavior within the wildland-urban interface.

We believe that all timber harvest approved within the Mid-Swan project area should be specific to achieving these stated goals, and encourage the use of stewardship contracts to perform the work whenever possible. Commercial timber production should not be the driving reason to approve any timber harvest operation within the Mid-Swan project area.

[bull] Roads

- o There should be no new permanent roads constructed within the mid-Swan project area. The Swan Valley is still recovering from the excessive road building of the 1970s-80s. Temporary roads that can be properly reclaimed to reduce erosion and prevent illegal access should be sufficient for the proposed restoration and fire mitigation activities.

- o There should be no net increase in public motorized access within the project area.

o We support the project's plan of storm-proofing many miles of existing roads that are currently closed to public motorized access. However, we encourage the Forest Service to not make these roads impassable for foot or horseback travel. Many of these old roads are used by the public for hiking, berry picking and hunting access.

[bull] Noxious Weeds are a major problem within the Swan Valley, especially along the old Plum Creek logging roads. We encourage the Forest Service to put more emphasis on controlling noxious weeds as part of the Mid-Swan Landscape Restoration Project.

[bull] Prescribed Fire

o The best available science increasingly shows that logging alone will not reduce the extent and severity of wildfires on the landscape; and mechanical fuels reduction does not provide the same ecological benefits as fire. Therefore, we strongly encourage the Forest Service to use prescribed burning as a vegetation management tool wherever it is appropriate to do so.

[bull] We generally support Alternative C for the majority of the Mid-Swan Landscape Restoration Project area, although we support the more extensive prescribed fire and associated direct seeding treatments that are proposed in Alternative B.

Hemlock-Elk Implementation Unit and Cold Jim Implementation Unit

The following comments are specifically focused on the Hemlock-Elk Implementation Unit and the Cold Jim Implementation Unit, as we are most familiar with those areas, and our home is located within the Hemlock-Elk Creek Implementation Unit.

[bull] In regards to these two Implementation Units, we support Alternative C as presented in the DEIS, with the following caveat regarding Vegetation Management in Sections 3, 4, 5, and 9 in Township 20N, Range 17W in the Hemlock-Elk Implementation Unit.

o During the Flathead National Forest Plan revision process, we objected to reclassifying Sections 3, 4, 5, and 9 in Township 20N, Range 17W from Management Area 6b (General Forest Moderate-Intensity Veg. Mgmt.) in the draft forest plan to Management Area 6c (General Forest High-Intensity Veg. Mgmt) in the revised proposed Alternative B Modified. This is along the Elk Creek drainage, which is one of the Swan's most productive bull trout spawning streams. Furthermore, this area has long been identified as a conservation priority (Elk Creek Conservation Area, and many private land conservation easements), and parts of Elk Creek are classified as proposed Wild and Scenic in the Forest Plan.

o In response to our objections, the Regional Forester ruled in our favor (see pages 15-17 in FLATHEAD NATIONAL FOREST LAND MANAGEMENT PLAN REVISION AND THE NORTHERN CONTINENTAL DIVIDE ECOSYSTEM PLAN AMENDMENTS, dated August 15, 2018). We expect the Forest Service to adhere to the new Forest Plan and apply only "Moderate-Intensity Vegetation Management" in sections 3, 4, 5 and 9 in Township 20N, Range 17W.

[bull] Prescribed Fire - Although we strongly support Alternative C for the Hemlock-Elk and Cold Jim Implementation Units, we do support the more extensive prescribed fire and associated direct seeding treatments that are proposed in Alternative B.

Thank you for considering our comments. Please keep us apprised as this proposal progresses.