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Comments: Trusting that others will contribute critique relevant to other, equally important topics including wildlife and recreation, I will limit comment to the future of trees. I will be brief and will be uploading some of the key documentation of evidence that guides my remarks here.

The DEIS is negligent in it's inattention to increasingly well-documented evidence that forest cover cannot persist as it has in the past. Because the Washington Office knows about this risk, the Regional Office knows it exists, and the Flathead National Forest - hereafter the Forest - has been told that it exists, the omission of this evidence may go beyond negligence to suppression of evidence, or, at a minimum, the appearance of suppression of evidence.

For example, the Washington Office's August 2020 "U.S. Forest Service R&D Newsletter" included this important record of evidence;

Wildfire-driven forest conversion in western North American landscapes

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Description

Changing disturbance regimes and climate can overcome forest ecosystem resilience. Following high-severity fire, forest recovery may be compromised by lack of tree seed sources, warmer and drier postfire climate, or short-interval reburning. A potential outcome of the loss of resilience is the conversion of the prefire forest to a different forest type or nonforest vegetation. Conversion implies major, extensive, and enduring changes in dominant species, life forms, or functions, with impacts on ecosystem services. In the present article, we synthesize a growing body of evidence of fire-driven conversion and our understanding of its causes across western North America. We assess our capacity to predict conversion and highlight important uncertainties. Increasing forest vulnerability to changing fire activity and climate compels shifts in management approaches, and we propose key themes for applied research coproduced by scientists and managers to support decision-making in an era when the prefire forest may not return.

Publication Notes

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Citation

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This is a matter of some considerable material interest, and on economic as well as ecological grounds. So it is of considerable interest that 1- the Washington Office made it widely available for upload, and that 2 - the Forest has somehow elected to exclude mention of it in its DEIS. It would be difficult for the Forest to feign ignorance of it, so the questions of negligence and suppression of evidence do gain substance.

Furthermore, and in that context, the Forest's DEIS refers to regeneration 259 times, but so far as I could determine, it makes no reference to regeneration failure. Similarly, and equivalently, the DEIS makes many references to seedlings, but I could find no reference to seedling mortality.

More to the point, while the DEIS makes repeated reference to evidence that hot and dry conditions are favorable to fire, it fails to disclose evidence that hot and dry conditions are unfavorable to seedlings and saplings after fire has come and gone.

From an economic perspective, it is ironic that, while the Forest Service is frequently criticized as a handmaid to commercial timber interests, the Forest's exclusion of these risks to next-generation forest is a disservice to those interests, city-county planners, and to labor leaders relying on realist projections of future forest availability. This consideration seems particularly pertinent in the case of economically important Ponderosa pine and Doug Fir, with Davis et al (2019) citing evidence that these species have already crossed an early, initial "critical climate threshold" for survival. The DEIS does not cite Davis, and thus adds to concern about neglect and/or suppression of evidence.

Evidence is crucial in science and law, economics and environment alike. The Forest's Mid-Swan DEIS fails on all 4 counts. Indeed, the Forest has seemed to cherry-pick evidence favoring an unrealistically optimist message to stakeholders, policy makers, and the public at large

References: pdfs attached below

Coop et al (2020). Wildfire-Driven Forest Conversion in Western North American Landscapes. Bioscience August 2020, first published online July 1, 2020

Davis et al (2020). Wildfires and climate change push low-elevation forests across a critical climate threshold for tree regeneration. PNAS Mar 11, 2019

It's too easy to blame the corporations for the climate crisis, when we subsidize them every time we buy what they're selling.

Corporate policy does matter. At the same time, corporations are totally dependent on their customers.

This buck stops everywhere.

<<https://www.counterpunch.org/2018/06/25/caught-in-a-trap-of-our-own-making-climate-change-blame-and-denial/>>