Data Submitted (UTC 11): 10/12/2020 6:00:00 AM
First name: michele
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Organization:
Title:
Comments: Comments on Mid Swan DEIS

Thanks for considering my comments attached and titled Dieterich Mid Swan DEIS also please include the 8 attachments

Dear Project Manager

Thank you for considering my comments. I am a resident of the Bitterroot Valley and spend time in the Flathead. I am concerned about this project for many reasons.

My greatest concern is the lack of specificity in the project. With plans to treat 174,000 acres (273 square miles) over a period of 15 years, it seems counterintuitive to withhold specific plans from the public until after the public has no recourse to stop parts or all of the project. This means the Flathead Forest can blatantly or inadvertently break the law and the public has no proper channels to bring the project into legal compliance. These laws are in place, many in the forest plan, some as a part of the Endangered Species Act (ESA) as a contract between the public and the Forest Service. The "conditions based" method of analysis disregards the input and concerns of the public and allows the Forest Service to ignore this contract. This "conditions based" style of analysis was shut down in court in Alaska (attachment 1) and should not be used in the Flathead or anywhere in Montana.

The lack of specificity in the DEIS makes it impossible for members of the public to make meaningful substantive comments concerning the project. Substantive commentary is required to allow for challenges to the project. Without specificity, it is difficult to challenge violations of the law. How does one know? Detailed treatments for specific areas are not stated in the DEIS. How does the public discern if critical habitat, riparian areas and old growth stands are protected? The project might build from 7 to 49 miles of "potentially" permanent roads. 7 to 49 is a huge range and not knowing if they will be permanent does not allow adequate analysis of core grizzly and lynx habitat. There is no way of knowing if a treatment would affect old growth status, areas near homes, or areas that are special to the public in a variety of ways including sacred sites and anthropologically significant areas.

The DEIS claims that 85% of the project area needs restoration (DEIS page 29). I wonder that the Forest Service has been "restoring" these areas for the past 100 years. Seems their interpretation of "restoration" should come into question if they have been unsuccessful thus far. More and more studies show that the forest does better on its own than with human manipulation, yet the forest service continues its pursuit of heavy manipulation. With a span of 15 years, this project could go against new science that we have yet to see.

Designated Wilderness is included in the project area. Designated Wilderness is protected by law. Natural processes are to be respected and allowed to happen without human interference. For this reason, Bradley et al 2016 (attachment 2), found that highly protected areas like Wilderness burn less frequently and with less severity and intensity than areas that have been "restored" by agencies. Are you venturing more into Wilderness so that analysis of these areas can no longer disprove current management practices? Scientists have found that protected areas are the only hope for wildlife (See attachment 3)

The Forest Service is mandated to create a sustainable, minimum road system. Yet this 15 year project does not reduce the nearly 600 miles of Forest Service system roads (DEIS 190) already in place, fragmenting habitat, dumping sediment into streams, and allowing human access to endangered wildlife. With over a 50 billion backlog of road maintenance, t seems ill-advised for the forest service to continue to build more roads that it

cannot maintain. Without identifying the minimum road system makes the plans to build more roads even more egregious.

Alternative B claims decommissioning roads will maintain 550 miles of roads even with the new road construction, but are these roads in need of decommissioning or are they already physically decommissioned? And will they remove culverts and truly decommission these roads or will they be left on the landscape to be decommissioned again or reconstructed without adding or subtracting from the system. Seems this is a slight of hand method to play with numbers not honestly look at road conditions on the ground and truly analyze and maintain a minimum road system. True restoration would include a reduction in roads, not maintaining an already overblown, environmentally unsound road system.

Alternative C claims to construct fewer roads, but would still keep 523 miles of system roads on the landscape (DEIS pages xii-xvi and 66). Roads harm wildlife by promoting recreation (see attachment 4), fragmenting habitat (see attachment 5), and dumping sediment into streams harming fish habitat.

The new Flathead Forest plan abolishes amendment 19 but requires roads to be in compliance with "research benchmark levels" of 2011. I see nowhere in this DEIS an analysis of the current system or the system during and after project completion as it complies with research benchmark levels as required in the revised Flathead Forest Plan. These benchmarks are used by the FWS they must be followed in any forest project. Where is the alternative that at the very least reduces roads to these benchmark levels or better yet eliminates as many roads as possible to protect wildlife? What about an alternative that includes more true restoration, less commercial logging and more considerations for wildlife?

Both Alternative B and C include heavy handed logging and burns. But nowhere in the analysis can we find research on the effects of these manipulations on weed and soil compaction and how that might destroy rather than restore the forest. These ecosystems will improve and restore more quickly with intact, non-compacted soils and without the weeds that facilitate fire catch and spread and destroy ecosystems.(Weeds exacerbated by logging and prescribed burning in ponderosa pine forests in Montana: https://www.jstor.org/stable/3838469?seq=1&cid=pdf-reference#page_scan_tab_contents).

Alternative B violates the Northern Rockies Lynx Management Direction and the Forest Plan. No habitat is overly connected. Forest ecologists are crying out for less fragmentation expressly with climate change. (see attachment 6). Why would an alternative push for more fragmentation? I am shocked by this figure from the DEIS:

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Certainly, it would behoove the Forest Service to maintain current levels rather than reducing levels of fragmentation. Once you build the roads and fragment the habitat, there is no turning back. This is in direct violation of ESA and biological ethics. Not only that, the project will increase forest management in Lynx habitat outside the WUI. (DEIS at xiv and 71).

Timber sales are heavily subsidized by the American taxpayer (see attachment 7). Why continue to imply that the restoration work cannot happen without commercial timber sales that destroy the ecosystem. Taxpayers are paying timber companies to cut trees rather than paying for true restoration. The true restoration only happens if money is left over. There is never moneys left over in subsidized projects.

Alternative B would harvest between 197-235 MMBF of timber, while alternative C

would harvest between 101-115 MMBF. Where is the alternative that does not include commercial logging that still performs true restoration? And where is the analysis on the effect of haul routes on streams using all

available rating systems?

I am disappointed that seeding whitebark pine is not included in both alternatives. Is this a restoration project? Or is this a giveaway to the timber industry. The DEIS admits that true restoration will be dependent on other funding and is not guaranteed in the project. (DEIS at 47 and A-58). How can this be called a restoration project when none of the restoration discussed has any chance of coming to fruition? Logging projects are a losing proposition. This is a logging project as logging is the only thing that is funded by this plan. Please be clear to the public.

One of the goals of the project is to improve habitat for bull trout, west slop cutthroat and grizzly bears. There should be NO NEW ROADS in any of the alternatives if this is truly a goal.

I am always concerned that there is no funding for road maintenance after the project is completed. In fact, the idea that all of the new roads and improved existing roads will improve road effects on habitat is ridiculous. Roads don't magically stay improved after a project. I have seen areas of roads fail within one year of project completion. Roads do not remain improved into the future, so the idea that much needed road maintenance from logging that uses those roads extensively (in this project between 50,000 to 60,000 haul trips) will improve landscape conditions into the future is nothing more than myth. Any short-term benefit does not make up for the sediment dump and destruction from the construction of the roads.

Please protect old growth. Or better yet, adopt Oregon's 21dbh rule. Don't cut down big trees. They are vital habitat and carbon stores. They cannot be replaced. Though some forest service rhetoric claims regenerative logging can increase carbon. They fail to reveal that this increase will take 80 years to come to fruition. The earth does not have 80 years to wait.

Leave all riparian zones alone. There is no evidence that logging in riparian zones will decrease fire. Riparian zones do not burn probably because they have not been logged in the past. Now riparian zones are proposed for logging. Why? I have seen extreme fires in my area that do not destroy riparian areas. Please leave riparian areas as they are and have been protected in the past. Logging affects so many aspects of healthy riparian areas (see attachment 8). They might be our only hope to reduce fire intensity. Certainly, the forest service is not.

Thanks again for considering my comments.

ATTACHMENTS:

attachment 1.pdf

attachment 2.pdf

attachment 3.pdf

attachment 4.pdf

attachment 5.pdf

attachment 6.pdf

attachment 7.pdf

attachment 8.pdf