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Organization:
Title:
Comments: Hello, please see the attached document for Mid-Swan Project public comments from myself and my wife

Dear Mr. Krueger

Here are our concerns, suggestions, and comments for the Draft Environmental Impact Statement for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project. Please note that these comments are our own personal opinions and not that of the organization we work for or any collaborative group that we are a part of.

We do not support Alternatives A, B, or C as they are currently proposed and believe that a combination of all three Alternatives would create a more beneficial landscape scale project that meets the stated purpose and needs.

Treatments in Canada lynx habitat: We understand and support the need for some small-scale treatments in lynx habitat that will promote a variety of age class stands that will be good for lynx in the long-term. Having tracked many lynx within and surrounding the project area for the past eight years as part of the SWCC meso-carnivore monitoring effort, we have observed first-hand how much time lynx are spending foraging in young stands of dense regeneration and along edges where such stands adjoin mature, multi-storied habitat, which the current scientific data supports that habitat component as the most productive foraging habitat, especially in winter when lynx mortality due to starvation is highest. Thus, we support small-scale treatments in occupied and unoccupied lynx habitat that will promote future productive lynx foraging habitat and will hopefully allow for large blocks of lynx habitat to not all burn up in one large wildfire. We would encourage treatments that promote a diversity of tree species and age class stands. We would also recommend looking at recent data from GPS-collared lynx collected by the Rocky Mountain Research Station to avoid currently used habitat.

Treatments in riparian management zones (RMZ): We are tentatively supportive of some minor treatments within the RMZ[rsquo]s. The number of acres (13,472 acres) proposed in Alternative B seems like way too much given the lack of scientific knowledge on how these treatments will affect fisheries, water quality, and sediment delivery to streams. If RMZ treatments are implemented as part of this project, ideally they would be low intensity prescribed fire and not mechanized treatments that would scarify the soil and potentially lead to erosion and unnatural sediment delivery into streams as well as potential weed infestations. If RMZ treatments are implemented, they should not be adjacent to known bull trout spawning streams or westslope cutthroat conservation population streams. We would also encourage water quality monitoring that will inform adaptive management over the 15-year implementation window if these RMZ treatments do occur.

Treatments in Designated Wilderness, Recommended Wilderness, and Inventoried Roadless: We are vehemently against the Forest Plan Amendment to land helicopters in designated or recommended Wilderness areas, as that directly contradicts the Wilderness Act and Forest Plan. We are also strongly opposed to any motorized or mechanized treatments (masticators/excavators) in Inventoried Roadless Areas, as these activities would directly conflict with the values that led to these designations. The only activities that we support in designated or recommended Wilderness in this proposal are prescribed fire and whitebark pine restoration, as long as they are carried out with non-motorized or mechanized tools. We are ok with aerial ignitions of prescribed fire in Wilderness if other minimum tools cannot be utilized.

Whitebark Pine Restoration: We are supportive of whitebark pine restoration via prescribed fire, direct seeding, or

seedling planting as long as they are done in a way that does not allow motorized or mechanized use within designated or recommended Wilderness. We are against any hand treatment other than prescribed fire to restore whitebark pine in designated or recommended wilderness.

Prescribed Fire: We were surprised to see that there is no prescribed fire in Alternative C given the purpose and need. We are highly supportive of prescribed fire as a tool to reduce unnatural fuel accumulation due to fire suppression in designated and recommended Wilderness areas, as well as a tool to promote whitebark pine regeneration. For this reason, we are supportive of the prescribed fire proposed in Alternative B.

We[rsquo]ve observed areas within the Swan watershed (Crazy Horse, Condon Mountain, Holland Fires) where natural wildfire occurred and whitebark pine are being naturally re-planted and restored from Clark[rsquo]s nutcrackers. We feel this is our greatest tool to restore whitebark pine on the landscape, through letting natural wildfires burn where and when possible, and with high elevation prescribed fire. We feel that the minimal acreage proposed to be seeded in Alternative B will have minimal effects on whitebark pine restoration on a landscape scale, but prescribed fire does.

We are also supportive of prescribed fire understory burns following mechanical thinning, as these treatments have been shown to be the most effective at altering subsequent wildfire behavior. We are also supportive of prescribed fire in mature ponderosa pine/Douglas fir forest types that historically experienced frequent, low intensity wildfire.

Eligible Wild and Scenic River Corridors: The proposed activities inside eligible wild and scenic river corridors also directly conflict with the values that led to these designations. Please eliminate these activities (road building, mechanized treatments) from the proposal.

New road construction: We are against nearly all new, permanent roads as part of this project, both in Alternative B and C. We cannot support Alternative B in any form based on the amount of new roads and the detrimental effects they would have to biodiversity. We are fine with the building of temporary roads for project implementation as long as they are properly reclaimed. We have a dense network of existing roads in the Swan, we don[rsquo]t need 31.1 miles of new, additional permanent roads that will negatively impact the very aquatic and terrestrial biodiversity that this project aims to restore. Furthermore, new roads in drainages that are bull trout spawning or rearing streams and weststope cutthroat conservation population streams will have potential negative impacts to those streams and populations. Swan Lake and the Swan River watershed are listed by the EPA/DEQ as a threatened waterbody due to exceeding Total Maximum Daily Loads of sediment, primarily caused by the legacy road network in the Swan Valley. It doesn[rsquo]t make any sense to spend the time and money to decommission some roads to decrease sediment delivery into waterbodies or promote habitat quality, and then create new roads that will increase sediment delivery into the same waterbodies or degrade habitat quality.

There has been a big effort to reduce road sediment delivery via road decommissioning and BMP work across the broader Swan Valley landscape, and specifically in the Jim Creek watershed and has led to that stream being taken off the EPA/DEQ[rsquo]s list of impaired waterbodies. So now you are proposing to build new roads in the Jim Creek drainage, which makes no sense. Please take those out of the proposed action in Alternative B.

We are against the building of any new roads into previous unroaded areas, especially near the Mission Mountains Wilderness boundary, or high on the Swan Front near the recommended Wilderness boundary. These roads would decrease secure habitat for grizzly bears as well as big-game, provide a vector for weeds to colonize pristine areas, and provide access points for illegal snowmobile and other motorized use into these areas. Creating a road to reach the last patches of big timber in the valley doesn[rsquo]t sound like sustainable forestry is occurring on the rest of the landscape. If these high elevation patches pose such a significant threat due to fuel accumulations, then please just reduce those fuel loads using prescribed fire.

The USFS cannot maintain the current transportation system (spraying weeds and fixing illegal motorized access issues), so why would you want to create up to 31.1 miles of new road issues that would exacerbate these problems?

Detailed Road Location Comments:

Road #94 Alt B: We are vehemently opposed to this 1 mile of new, permanent road that would create a new road high onto the Swan Front into previously unroaded country and near the recommended Wilderness boundary. The current stored road system that this addition would lengthen is full of knapweed and a chronic road system that receives much illegal OHV use that the USFS is currently unable to fix. This new road would extend the weed infestation and illegal motorized trespass higher on the mountainside. We have personally interacted with two separate illegal OHV users in the past two years on this stored road system and have reported it to the USFS and have yet been able to get the USFS to fix the illegal access issues. With this level of maintenance of the current road system, it makes no sense to extend the problems. This road would not promote terrestrial biodiversity or create a more efficient transportation system. The fuel loading is very high, but since it is high on the mountainside and is adjacent to the Condon Mountain Fire perimeter, why not just use prescribed fire there to promote biodiversity and reduce fire danger?

Road #156 Alt B&C: We do not understand the need to create [lsquo]loops[rsquo] with the current transportation system. This road doesn[rsquo]t make sense since you are decommissioning a road to the south where this new road would end up. The vegetation management activities in the area can be accomplished without a new road via the open Falls Creek Road or gated road system to the south.

Road #152 Alt B&C: This road already basically exists if you were to go cut down about six trees. Again, we don[rsquo]t understand the rationale for [lsquo]loop[rsquo] roads, as timber can be reached from both sides of the current road systems. This is one of the few roads that we don[rsquo]t have any great heartburn over, basically because if you go visit the site on the ground you will find that it[rsquo]s already there.

Road #153 Alt B&C: We are vehemently opposed to this as it makes no sense to punch a new road through what is a really fantastic block of big-game winter range and previously unroaded habitat. Also, it is drawn on maps as a straight line, but since there is topography in that country, would end up being longer than .6 miles. We suggest two alternatives to this proposed road: 1) connect roads 9815 and 90392 to the west of the proposed road, where they come within 200-300 yards to touching, or 2) don[rsquo]t decommission the segment of road on 90392 over Falls Creek to maintain access into the north part of Section 19. Falls Creek contains brook trout, so the fisheries habitat values aren[rsquo]t that high. This would also maintain a valuable road just east of private property that may come in handy during a wildfire. In our opinion, we think the proposed new road #153 would have more detrimental effects to biodiversity and fire-fighting capabilities than if you were to just leave road 90392 over Falls Creek.

Road #151 Alt B&C: We are strongly opposed to this road. This is another new road that we don[rsquo]t understand the need to connect the two separate road segments to create a [lsquo]loop[rsquo]. We feel that the terrestrial biodiversity habitat degradation that this new road would create would outweigh any possible reason for creating this road. This road would cut through some really fantastic big-game winter range.

Road #150 Alt B&C: We are opposed to this road, again for the unknown positive benefits of creating a [lsquo]loop.[rsquo] Both current road systems that this would connect are so grown in with vegetation that you wouldn[rsquo]t even realize there is a road there, so why the need to create a loop?

Road #149 Alt B&C: We are strongly opposed to this new road, as timber management can occur via both road systems and we don[rsquo]t understand the reason to connect them. It again punches a road through a nice

wildlife corridor where there aren[rsquo]t roads and is high quality big-game winter range. Also, Road 9835 is open to seasonal access by ambulatory hunters, so would this proposal increase the number of roads that would now receive that seasonal access too? It seems like that might create problems with grizzly bear core habitat calculations. Also, there is a loop road that does already connect into this road system (not shown on the USFS interactive map) in the SE corner of Section 1.

Road #155 Alt B&C: Again, this new road would connect into the current road system that is open to season access by ambulatory hunters and is high quality big-game winter range. Would this seasonal motorized access be allowed into the road system that this would connect?

Road #154 Alt B&C: Same comments as #155. Also, what is the reason for this new road since both road segments can easily be reached just to the east via road 899?

Roads #165 & 167 Alt B&C: Same concerns regarding increased seasonal motorized access via ambulatory hunters.

Road #144 Alt B&C: We are highly opposed to this new road. This proposed segment would create a new road across Alder Creek, which seems contradictory to the stated desire to restore aquatic biodiversity. This makes no sense. Please eliminate this road from the proposal.

Road #145 Alt B&C: This would create a [lsquo]loop[rsquo] for unknown purposes and reasons.

Road #146 Alt B&C: This new segment connects into 10648, which is currently so grown in you don[rsquo]t even know there is a road there, so what need does this [lsquo]loop[rsquo] fulfill?

Road #147 Alt B&C: Again, we[rsquo]re unclear why this new road is needed when timber management can be accomplished from surrounding road systems and would be created through some of the best big-game winter range in the valley?

Temp Road #143 Alt B: We are highly opposed to this temporary road since there is a road directly above it on the slope. It is a very steep slope that is a huge weed infestation, and the SW aspect provides some of best winter range and snowmelt conditions found in the valley. Punching a road down along Lion Creek, which is one of the Swan[rsquo]s most productive bull trout spawning streams doesn[rsquo]t seem like a wise choice either. Combined, the costs outweigh the benefits of this road, even if only temporary.

Road #135 Alt B: Creating this new road near Lion Creek seems like a potential risk to increase sediment into the bull trout spawning stream.

Road #134 Alt B: Combined with road #135, this would punch roads into areas that are currently unroaded, which generally in the Swan means it has high terrestrial wildlife habitat values. Is this road really necessary to accomplish vegetation management in the area?

Roads #65,66, 138 Alt B: We are highly opposed to these new roads, as they literally come within a stone[rsquo]s throw of the confluence of Goat and Squeezer Creeks, two of the Swan[rsquo]s most productive bull trout spawning streams. Please take these out of the proposal, as well as any of the other temporary roads proposed in Section 17 that would create potential sediment delivery to these streams. Goat Creek is the Swan[rsquo]s only remaining impaired tributary according to the EPA/DEQ and there have been great efforts over time to improve the water quality and reduce sediment delivery over time. These actions seem contradictory to those previous efforts.

Roads #87 & 88 Alt B: We are highly opposed to these new roads, as they occur on incredibly steep slopes

high above Goat Creek. In fact, areas above these proposed roads regularly avalanche every year and seem like very poor places for roads that could potentially contribute sediment delivery to Goat Creek.

Road #53 & 54 Alt B: Both these roads appear to cross small creeks or riparian areas and #54 in particular appears to cross three separate seeps in addition to bordering on the edge of a very large wetland complex. This seems to directly contradict one of the stated purposes and needs of restoring aquatic biodiversity. Please remove these from the proposal.

Road #61 Alt B: This road appears to be proposed to be built over a creek, or in an RMZ, which again would be a negative impact to aquatic biodiversity. Please remove this from the proposal.

Roads #39, 40, 41, 43, 44, 46, 51, 172 Alt B: All of these new roads encroach into the upper North Woodward Creek drainage that is currently unroaded, providing secure habitat for big-game and grizzly bears. Woodward Creek is also one of the Swan Valley[rsquo]s most productive bull trout spawning streams, and the sedimentation caused by all these new roads at the head of the watershed would potentially have serious negative consequences for bull trout. Road #41 actually crosses a fork of North Woodward Creek. Please remove these from the proposal.

Roads #38 & 184 Alt B: These new roads encroach into the upper South Woodward Creek drainage and that is currently unroaded, providing secure habitat for big-game and grizzly bears. Woodward Creek is also one of the Swan Valley[rsquo]s most productive bull trout spawning streams, and the sedimentation caused by all these new roads at the head of the watershed would potentially have serious negative consequences for bull trout.

Roads #27, 28, 31, 171 Alt B: Section 34 is one of the few sections of the Swan Valley outside designated or recommended Wilderness or Inventoried Roadless, that doesn[rsquo]t have a single road going through it, which generally equates to high quality terrestrial wildlife habitat. Also, roads 28 and 171 appear to cross a small creek or riparian area, which would have negative consequences to aquatic biodiversity, which again contradicts one of the stated purposes and needs of this project.

Road #25 Alt B: There is no reason to punch this new road nearly to the Mission Mountain Wilderness boundary. The road leading to this location is so overgrown with vegetation you can[rsquo]t even walk down it, which creates a very nice, secure chunk of wildlife habitat for big-game and grizzly bears. Creating a new road will encourage even more illegal snowmobile access routes into this area, which is already problematic and the U.S. Forest Service does not have the funding or personnel to curtail. This would also potentially be a weed vector to inside the Wilderness, which is currently mostly weed-free. If the fuel loading in this location is undesirable, then use prescribed fire as the tool to reduce it.

Road #24 Alt B: This road segment crosses a small creek, again creating negative consequences to the aquatic biodiversity. There are already existing roads just above and below it, so why not utilize those?

Roads #2 & 3 Alt B&C: Again, Section 12 is one of the few sections in the valley bottom without a road and because of that, very high wildlife habitat values. Road #2 crosses two small creeks or riparian areas. Road #3 would extend existing road 90992, which currently has an illegal OHV trail cut out around the gate. There was a Mid-Swan team field trip at the beginning of road 90992 that approximately 20 U.S. Forest Service employees attended, and not one seemed concerned with the illegal use, or has done anything to fix the problem since that field trip. Why on earth would the general public want more roads that the U.S. Forest Service doesn[rsquo]t have the funding, capacity, or interest in maintaining? Please remove these roads from the proposal, or at the very least fix the illegal OHV trail before creating a new problem.

Roads #8,9, 10, 12, 170, 197 Alt B: Again, Section 30 is one of the few sections in the valley bottom without a

road and because of that, very high wildlife habitat values. Those habitat benefits outweigh the cost of new roads and associated habitat degradation that comes with them.

Roads #6, 103, 111, 112, 113, 179: Alt B: There has been a big effort to reduce road sediment delivery via road decommissioning and BMP work, specifically in the Jim Creek watershed and has led to that stream being taken off the EPA/DEQ[rsquo]s list of impaired waterbodies. So now you are proposing to build new roads in the Jim Creek drainage, which makes no sense. Jim Creek is also one of the Swan Valley[rsquo]s most productive bull trout spawning streams and these roads would increase sediment delivery and harmful associated effects. Roads #6, 103, 179 all cross small creeks or riparian areas, which would have negative effects on aquatic biodiversity. Please remove them from the proposal.

Road #162 Alt B&C: We are vehemently against creating this road. This location is a bottleneck between the Swan River and Cold Creek, and is a major wildlife migration route. Please don[rsquo]t sever this high quality habitat with a road. The 9767A Road is already grown-in and if you leave the area alone, nature will continue to store this road for you.

Roads #157 &169 Alt B&C: These roads would cross a riparian area and would sever a big-game migration corridor. Please remove from the proposal.

Road #164 Alt B&C: We don[rsquo]t understand the need to create this small loop road. It also would create a road through an area that is a premiere big-game migration corridor. Please remove it from the proposal.

Temp Road #95 Alt B: There was previously a big collaborative effort to come up with the thinning design in this area as part of the Windfall/Elk Project. The patch of timber that this temporary road would access was specifically left for its wildlife habitat values as part of that design. Please remove this road from the proposal.

Road #185 Alt B&C: Out of the hundreds of proposed new road segments, this is the only one that we support. We strongly support this new road, as long as the associated 90124 segment is fully removed and decommissioned. This is the one new road that makes sense as it would remove a problem road segment that washes away an incredible amount of sediment every year that is built over Condon Creek and through a wetland where a road should never have been built in the first place. This is a great example of promoting aquatic biodiversity and is one of the few examples that make sense in this proposal. Please make this your top priority of any new road that may be constructed as part of this project.

Road Management: We are very supportive of the amount of road decommissioning that is proposed in the project. However, on the ground unless those roads are fully recontoured, they still pose threats to habitat quality (weeds, illegal motorized access, etc), and the amount of miles proposed to be decommissioned should not warrant the building of new roads. We would also like to point out that from an ecological standpoint, stored roads prohibit certain management actions such as access for weed spraying, and some of the most egregious examples of weed outbreaks and infestations in the Swan Valley occur on stored roads. For this reason, we advocate for roads to be gated, not stored, and still allow access for weed spraying and immediate wildfire fighting equipment and personnel.

Monitoring: We encourage monitoring to be used to help inform adaptive management over the length of this project window, as well as other future projects. Monitoring will go a long way toward determining the success of this project, and we encourage partnering with organizations such as Swan Valley Connections or utilizing citizen science programs to carry this work out when possible.

Aquatic Restoration: We are very supportive of the beaver habitat restoration in this proposal and the removal of fish passage barriers. In particular, if you don[rsquo]t fix the fish passage culvert over Condon Creek soon, there is a headcut to the side of it that will probably wash away the entire road in the next couple of years and you

won[rsquo]t have a fish passage issue anymore.

Further public involvement: Since this project will be implemented over a 15-year period and is almost impossible to thoroughly digest all proposed actions across the entire project area, and that there aren[rsquo]t actual thinning prescriptions or detailed mechanical thinning treatments to review, we would encourage collaborative public participation in crafting treatments/prescriptions as implementation of the on-the-ground work approaches (i.e. collaborative participation after the scoping and decision process). We suggest hosting annual field trips with interested members of the public and collaboratives, public meetings and updates to the Condon Community Council or other appropriate entities, and an email chain for interested parties that outlines timelines and updates as parts of the project[rsquo]s implementation nears.

Vegetation Management: We are supportive of sustainable logging and the work it provides to local contractors as well as the wood products it provides to local mills and businesses. We request that the USFS utilizes Stewardship Contracting whenever possible.

We appreciate the opportunity to comment on the Mid-Swan project. Should you have any questions or comments, please contact us.