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Comments: Dear Sirs

As you know I have been engaged with the aforementioned MidSwan Project from inception and I wish to submit my observations to the latest developments.

Main Objective, Mission Statement; return the Swan Forest to past Forest conditions which are best described as an "Open Forest Landscape"

This description of the forest in the Swan was given in 1900 prior to this Forest landscape being largely altered and fragmented much to the undesirable condition that it is now. That the Swan Forest is now whole under one management there is an opportunity for efforts here to return the Forest to a long term productive, Scenic, Fire and Pestilent resistive Resource.

I remember 32 years ago when I could easily walk through the same "Open Forest Landscape" from Smith Creek Trailhead to our cabin in Section 32 to the south. The Forest was studded mostly by 2-3 foot diameter Ponderosa with a solid understory of more modest sized trees of all species.

While this forest should never have been logged (Plum Creek) of all its big trees it could be remaining to this day as a continuous resource with harvesting albeit smaller trees but easily accessible (not requiring roads) as well as fire and disease resistant. But now the area is packed with young trees and dense brush. Big Ponderosas shade below and shed their needles which inhibits underbrush to take hold in the proximity while through their roots in tandem with the Mycorrhizal fungi network supply carbon and nutrients to the young trees and indeed other tree and brush species adjacent (deciduous included). However now the area is impassable packed with younger thick stands and underbrush and as a result much less fire resistant.

That so much of the Swan Forest is now in this condition does provide the opportunity to commercially thin with the goal of fostering a return to original conditions. I recommend that most large trees wherever they are found to not be taken, and that any large tree be considered as old growth. As you acknowledged you cannot properly inventory these locations or patches, you must be prepared to lower your expectations for harvest volume. In fact for each specific project your expectation for harvest should remain a variable to be realized after you have done the right thing consistent with our goals to the forest. Only low impact skid trails and tractors (best in Winter season) should be needed to collect logs and they should be obliterated afterword. Why wouldn't the Forest become more passable in the future after your treatment?

Paradigm shifts in Forest Management

Modern Research into how a Forest works reveal symbiotic relationships between trees and even among other tree species together (Suzanne Simard, Searching for the Mother Tree, 2021) through the Mycorrhizal Fungal and tree root networks. That the big trees with the understory function work much in tandem together presents a paradigm shift from seeing trees just competing for light and ground against each other. Leaving the Forest in its diversity (including the Deciduous) as much as possible does not result in slower forest growth as previously thought. Mono Sylvan plantations are ecological dead zones, even hunting guides avoid them. The idea of ever favoring a single species over others is proving counterproductive. Deciduous trees cover the ground with their leaves enrich the soil for the Pine and Conifers and can protect the roots systems from disease. Consider the beetle infestation of German Forests by the warming temperatures. Centuries of manicuring their forests by favoring Conifers over Deciduous could likely have contributed to their current devastation. A Forest cannot be

considered or molded to function as a farm does, it does not work as such. I am concerned that the mid Swan Project will try the old paradigm as revealed in the text (encourage the growth of the smaller diameter "desirable tree species", page 9). The stated goal of leaving even aged trees strongly suggests that a Mono Sylvan Forest is what is really intended. A return of the

White Pine as well as the Whitebark Pine are worthy goals but the implementation should always retain the diversity of the Forest. Again the Goal is to leave and foster a network of large trees in tandem with a diverse understory which should be able to endure a degree harvest for the long term.

Endangered Species, Wildlife

The text does not consider or even mention Amendment 19 from the Flathead 1995 Forest Plan which has been upheld recently in court. Amendment 19 requires that prior to any new road construction excess roads with culverts must be removed to mitigate any new roads. The Amendment is meant to protect the Grizzly Bear and Bull Trout from excess sediment in streams. Also any proposed project must undergo site specific ESA reviews for approval.

The text seems to go out of its way to acknowledge that impacts to bears during project implementation occur but insists that closed roads do not whereas studies have shown Grizzlies avoid any road. Roads also invite noxious weeds and poachers. Again it must be incumbent on any project to obliterate any roads and solutions to the quest to access timber for the Forest Restoration must be sought other than more roads in our Forest.

Accountability

It is stressed by the Regional Forester that before each phase implementation public hearings will be held for the more site specific aspects of the Plan. There must not be a "heavy hand" to guide a project to a predestined outcome. The document should not give the impression that everything be cast in stone, conditions change and new facts about the forest will be discovered.

What I find very disturbing is the statement that Good Neighbor Authority Agreements can be pursued which transfer implementation of the project to under the authority of a county or other governmental authority. I would never trust any local county Board of Commissioners to do the right thing with our Forests. The Document must strike out any possibility this would happen and leave the accountability with the US Forest Service.

Scenery

The Document covers the many measures that can be taken to remove the often ugly reminders of the Forests mismanagement in the past. That many of the artificial boundaries (Jeffersonian land grid) can now be smeared out by the plans activities because the forest can now be treated as a whole is not lost in the Plans formulation .

I only object to the statement that linear features can remain where private land is involved. Certainly the size of the areas to be treated under the plan can accommodate obfuscation of these boundaries.

Thank you for your consideration of these objections. Peter C Gynn