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Title:

Comments: Objection to the Mid-Swan Landscape Restoration and Wildland Interface Project

Introduction

The Flathead-Lolo-Bitterroot Citizen Task Force Objects to the Draft Record of Decision and Final Environmental Impact Statement, Mid-Swan Landscape Restoration and Wildland Interface Project. The responsible official is Kurt Steele, Supervisor, Flathead National Forest. We filed timely comments on the project. This Objection is submitted pursuant to 36 CFR 218. We hereby incorporate by reference the full Objection comments filed by the Swan View Coalition.

We represent residents of western Montana and throughout the nation who have used and enjoyed the Flathead National Forest and the Northern Continental Divide region for decades. We have worked there, conducted scientific research, hiked, backpacked, fished, hunted, picked berries, taken photographs, enjoyed the forests, scenery and the watersheds and taken comfort that the Flathead National Forest contains habitat for a host of threatened and endangered species and is a great national resource of rapidly vanishing wildlands, roadless areas and designated Wilderness.

Thus, we have a vested interest in protecting the natural features and conditions of the area, its native fish and wildlife and their habitat, and maintenance of its natural and primitive attributes

for our continued use and enjoyment. Damage or loss of these features would cause direct harm to us.

The Project Area is Essential Habitat for Grizzly Bears and Bull Trout

This project is completely out of place in that virtually all of the Project Area has been identified as crucial linkage habitat for grizzly bears moving between the Swan and Mission Ranges (Servheen and Sandstrom 1993) and Core Habitat Areas for bull trout (Montana Bull Trout Scientific Group (1996) shown on the following maps.

From: Servheen and Sandstrom (1993).

From: Friends of the Wild Swan, Bader (2002).

From: Friends of the Wild Swan, Bader (2002).

Within the Project Area numerous sections were purchased through the Land and Water Conservation Fund and transferred to federal management based on the outstanding values as habitat for grizzly bear, bull trout and lynx. Now the Forest Service will reverse recovery and log it again. It is an outrageous decision. The level of roading with dozens of miles of new roads and

removal of security cover through commercial logging is completely in violation of the recent court ruling on the Flathead National Forest Plan. These lands are recovering from decades of abuse from excessive logging that has fragmented habitats which has resulted in a Degraded Baseline condition. Further degradation is a violation of Sections 7 and 9 of the Endangered Species Act. The Forest Service has a legal obligation to remediate Degraded Baselines. Further degradation is a direct violation of the Section 9 prohibitions on taking. In fact, the Forest was ordered by the Federal District Court to prepare a new Biological Assessment to apply Forest- wide, which would calculate a new baseline and presumably result in a Biological Opinion and a new Incidental Take Statement and Authorized Take Level for the Forest that includes the impact of illegal road use and other factors such as the exploding recreational use across the Forest.

Moreover, the Court made it clear that the Flathead National Forest, through formal consultation with the U.S. Fish and Wildlife Service must document the effect that its Plan will have on the "national population of grizzly bears" and the role the Flathead National Forest has in providing connectivity to other Grizzly Bear Recovery Areas. The Swan Valley is the connectivity area to the Mission Mountains, from which grizzly bears move to the Ninemile Demographic Connectivity Area and to the Cabinet-Yaak and Bitterroot Recovery Areas.

It is clear the Forest Service does not have a handle on the roads it already has. There can be no justification for constructing new roads.

Forest Service is Hiding Behind Fire Excuse So It Can Implement Commerical Logging

The misapplication of WUI to cover tens of thousands of acres is an abuse of the concept and a smokescreen for logging. A three-mile wide strip across Highway 83 on public lands where there are no homes or structures is without scientific merit. This tactic was recently criticized by renowned Forest Service fire scientist Dr. Jack

Cohen and Missoula County Commissioner David Strohmaier (article attached). The disingenuous Mid-Swan Project is illegal because it does not identify its true underlying purpose of commercial timber production, which may actually increase wildfire risk.

Request for Relief

Withdraw the Draft Record of Decision and FEIS because they are based on a legally deficient Flathead Forest Plan, its BiOp and its ITS, based on the Order and Ruling on the Flathead National Forest Plan (Case 9:19-cv-00056-DWM, 6/24/21).

Replace the "Condition-Based Management" approach with one that provides the public the opportunity to review and formally Object to each management project after site-specific data has been gathered to demonstrate what the conditions are and how they will be impacted, before management actions are approved or taken.

The new BiOp must comply with the court ruling and order and account for impacts/taking of grizzly bears from illegal use of closed roads and trails;

The new BiOp must be consistent with the court ruling and assess impacts on the national population of grizzly bears in the 48 states and particularly the role the Flathead National Forest plays in providing connectivity habitat between the isolated Grizzly Bear Recovery Areas;

The new BiOp must assess impacts of all road and trail use on grizzly bears and their habitat, both motorized and mechanized and must include all roads within the Forest boundary (federal, state, private, county).

The new BiOp must develop a new baseline of roads (degraded baseline) that incorporates all recently discovered roads and take into account user-created roads, road closure failures, and road removal failures not currently accounted for in the Flathead National Forest road data.

Sincerely,

/s/

Patty Ames, President

Flathead-Lolo-Bitterroot Citizen Task Force

Attachments: Objection from Swan View Coalition; news article from the Missoula Current.