Data Submitted (UTC 11): 10/25/2021 11:00:00 AM
First name: Chris
Last name: Ryan
Organization:
Title:
Comments: Objection Reviewing Officer:

This is our formal objection to the Flathead National Forest Supervisor's decision on the mid-Swan Landscape Restoration and Wildland Urban Interface Project. I, Chris Ryan, will serve as your contact for this objection. Our objections deal solely with the pro- posals to complete work within the Mission Mountains Wilderness.

Objections:

We object to the Mission Mountains Wilderness (MMW) work being included in a large landscape restoration project rather than being considered as a stand alone proposal. Prescribed fire in Wilderness is a significant intrusion that deserves a thorough analysis. White bark pine (WBP) restoration in not only a significant intrusion but it has never been approved in this region and possibly in the nation. Both of these actions deserve a dedicated team, that includes wilderness specialists, to analyze the effects and to consider alternatives. We encourage you to drop this part of the project. If, in the fu- ture, you want to consider prescribed fire and WBP restoration, do it in a thoughtful, thorough manner instead of as an add-on to a much larger scale proposal.

Specific Objections:

[mdash] Public Scoping was inadequate and must be repeated- Failure to notify the public of wilderness actions- Scoping documents did not include any mention of work pro- posed in the MMW. There is no mention of work proposed in the MMW in your original scoping document dated October, 2018. Again, your notice on how to comment, from August 27, 2020, does not even include the word Wilderness. Additionally, all articles, which were published to invited interested persons to participate in scoping, did not even mention wilderness, thereby failing to adequately notify those who are interested in activities within wilderness that this action would be of concern to them and they should investigate further.

A new project purpose was recently added to PALS in response to a request from an or- ganization: "Projects that affect Wilderness. Units using govDelivery are highly encour- aged to create a topic for their project if they have chosen "Projects that affect Wilder- ness" as one of their purposes. Doing so ensures that organizations who are tracking these projects are able to subscribe to project email updates." Though there was agency acknowledgment that wilderness projects should be identified in scoping, the Flathead NF chose to not go back out a scope this MMW project.

[mdash]Though there have been a number of prescribed fire proposals in Wilderness in this region, all have been treated as separate, distinct proposals, not included as a small add-on to a bigger project. Therefore, the team makeup and analysis were focused on Wilderness. WBP restoration has never been done in Wilderness in the Northern Re- gion, which means that, if approved, this decision would set a precedent. This is an- other reason why this proposal should be treated separately and not as an add-on to a large 174,000-acre project.

[mdash]The purpose of the mid-Swan Project as stated in your EIS is to "restore and maintain terrestrial and aquatic biodiversity in light of changing climate." This is in direct conflict with the purpose of Wilderness which is, "In order to assure that an increasing popula- tion, accompanied by expanding settlement and growing mechanization, does not oc- cupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition (em- phasis added), it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of Wilderness." (1964 Wilderness Act, P.L. 88-577). Nowhere in your analysis do you explain how your project will preserve and protect the Wilderness.

[mdash]It appears that your reference to FSM 2320 was cherry-picked to include only objec- tives for managing Wilderness and doesn't include policy on Reforestation (FSM 2323.52 and 2323.54). In fact, if you were to consult your own policy, FSM 2323.04b, you would see that the Chief has the authority to approve reforestation activities, not the Forest Supervisor. The Regional Forester has the authority to approve prescribed fire in Wilderness, not the Forest Supervisor.

[mdash]Your analysis of the of effects to Wilderness character is woefully inadequate and confusing. In the affects to "Untrammeled" you state how many acres would be af- fected. That is a moot point. You either have affects to untrammeled or you don't. The Wilderness is managed as a whole, not acre by acre. The fact is, your proposal will have a significant effect on the untrammeled quality of wilderness character. You state that because the reforestation is dispersed, it is unlikely that it would be noticeable to the average visitor. Nowhere in the Wilderness Act does it state that wilderness charac- ter needs to be preserved if the effect will be noticeable to the average visitor.

The 1964 Wilderness Act defines Wilderness as:

A wilderness, in contrast with those areas where man and his own works dominate the land- scape, is hereby recognized as an area where the earth and its community of life are untram- meled by man, where man himself is a visitor who does not remain. An area of wilderness is fur- ther defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is pro- tected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practi- cable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other

features of scientific, educational, scenic, or historical value.

Please read this definition carefully and think about how this project fits with this definition. Un- trammeled means unrestricted, unhampered, allowed to exercise free will. In other words, na- ture is in charge.

Solitude also will likely be affected by your proposal. Projects of this significance and scale will require multiple entries of people on the ground and motorized equipment and mechanical

transport. This will have an effect on solitude for the visitors who have the misfortune of being there when the project is implemented.

[mdash]There is a serious lack of knowledge about the success of "direct seeding". First of all, nowhere in the 400+ page document is there a good description of what this project would entail; where it is, what would be the specific action on the ground, how often would there need to be re-entry, and most importantly, why can't this be accomplished outside of the MMW? These are all questions that absolutely MUST be answered be- fore you can even consider these actions. Again, this screams for the need for a sepa- rate analysis that delves thoroughly into this proposal. Your document does state that, "direct seeding is a relatively new practice for regenerating WBP with a success rate of 8%-45%". Wilderness is not a place to "experiment" with WBP direct seeding. There may be more suitable locations outside of designated wilderness.

Given the fact that "direct seeding" is essentially experimental, we would like to point out your FS Policy on Research in Wilderness:

2324.4 - Research in Wilderness

2324.41 - Objective

To provide appropriate opportunity for scientific studies that are dependent on a wilderness environment.

2324.42 - Policy

1. Encourage research in wilderness that preserves the wilderness character of the area (FSM 2320.3).

3. Review proposals to conduct research in wilderness to ensure that research areas out- side wilderness could not provide similar research opportunities. Direct projects that would jeopardize wilderness values to areas

outside wilderness.

Clearly, your proposal for WBP Restoration conflicts with policy.

[mdash]The following was taken from a paper published by the Rocky Mountain Research Station (Keane, et al., 2012). It refers to any proposed project to restore Whitebark Pine.

Prior to any of these activities being implemented, the following steps must be taken:

[bull] Determine that the loss of whitebark pine is due, in fact, to human intervention.

[bull] Determine that restoration objectives cannot be accomplished entirely outside of wil- derness.

[bull] Determine if there is a reasonable expectation that human intervention will result in a significant improvement in whitebark pine survival.

[bull] Determine if the analysis has proven that whitebark pine restoration actions are the minimum requirement or minimum tool necessary to meet the objectives.

[bull] Determine the adverse effects of restoration actions on the other qualities of wilder- ness character (untrammeled, undeveloped, and outstanding opportunities).

[bull] Determine if the timing, frequency, location, or intensity of the restoration actions can be altered to mitigate these adverse effects.

[bull] Determine if the activity can be accomplished without the support of motorized equip- ment or mechanical transport. (p. 30)

[mdash]It is commendable that you state that prescribed fire is necessary to reduce the risk of wildfire escaping the Wilderness. However, given the long, narrow shape of the MMW and the prevailing winds causing any fire to head down slope and into the valley, the chances that natural fire will be allowed even if fuel reduction is completed, is slim to not at all.

Your document states that, "Due to past fire suppression and high fuel loads, it is rea- sonable to think that fire in the Mission Mountains Wilderness would likely continue to be suppressed, which is also considered trammeling and therefore, the strategy of re- ducing fuels with this alternative would reduce the amount of fire suppression in the fu- ture, thus reducing the trammeling." What this tells us is that, regardless of the manipu- lation you propose, fires will still likely be suppressed. So there really is no justification or analysis in your document, for prescribed fire.

[mdash]The use of helicopters for your prescribed fire proposal is a prohibited act in the 1964 Wilderness Act. FSM 2326.1 describes conditions under which helicopters can be ap- proved:

2326.1 - Conditions Under Which Use May Be Approved

Allow the use of motorized equipment or mechanical transport only for:

1. Emergencies where the situation involves an inescapable urgency and temporary need for speed beyond that available by primitive means. Categories include fire suppression, health and safety, law enforcement involving serious crime or fugitive pursuit, removal of deceased persons, and aircraft accident investigations.

2. Aircraft or motorboat use established before the area was designated as wilderness by the Act of 1964 or subsequent wilderness legislation.

3. Exploration and development of valid existing mineral rights (FSM 2323.7).

4. Access to surrounded State and private lands and valid occupancies (FSM 2326.13).

5. To meet minimum needs for protection and administration of the area as wilderness, only as follows:

a. A delivery or application problem necessary to meet wilderness objectives cannot be re- solved within reason through the use of nonmotorized methods.

b. An essential activity is impossible to accomplish by nonmotorized means because of such factors as time or season limitations, safety, or other material restrictions.

c. A necessary and continuing program was established around the use of motorized equip- ment before the unit became a part of the National Wilderness Preservation System, and the continued use of motorized equipment is essential to continuation of the program.

d. Removal of aircraft wreckage when nonmotorized methods are unsuitable.

Specify, for each wilderness, the places and circumstances in which motorized equipment, mechanical transport, or aircraft are necessary for protection and administration of the wil- derness and its resources in the forest plan.

The Line Officer approving the use of motorized equipment, aircraft, or mechanical transport shall specify what uses of that equipment are suitable and will have the least lasting impact to the wilderness resource. Schedule use of this equipment to minimize impact on wilder- ness visitors .

There is absolutely no discussion of the use of helicopters in your document and no obvious analysis required by policy. An in-depth Minimum Requirement Decision Analysis should be included for review with this EIS.

[mdash]The cumulative effects section talks about fish stocking. What does this have to do with your proposal?

[mdash]Please go back and read from the FEIS on page 322:

The Forest Service objectives for managing wilderness (section 2320.2) are to:

1. Maintain and perpetuate the enduring resource of wilderness as one of the multiple uses of National Forest System land.

2. Maintain wilderness in such a manner that ecosystems are unaffected by human ma- nipulation and influences so that plants and animals develop and respond to natural forces.

3. Minimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation.

4. Protect and perpetuate wilderness character and public values including, but not lim- ited to, opportunities for scientific study, education, solitude, physical and mental chal- lenge and stimulation, inspiration, and primitive recreation experiences.

5. Gather information and carry out research in a manner compatible with preserving the wilderness environment to increase understanding of wilderness ecology,wilderness uses, management opportunities, and visitor behavior.

Then, ask yourself if the treatments proposed in the MMW adhere to those objectives. We think you will find it difficult to say they do. We strongly encourage you to drop any treatments from this proposal that are within the MMW.

[mdash]In 2014, Regional Forester Kent Connaughton, received the "Line Officer Wilderness Leadership" Award from Chief Tom Tidwell. The award states that, "Kent's passion and commitment to wilderness was reflected in his final decision to hold off on planting white bark pine in wilderness, while requiring program staff to continue working with research- ers on evaluating restoration projects in wilderness. Kent exemplifies line officer leader- ship in wilderness management by asking thoughtful questions and looking at the big picture of wilderness decisions. His approach has lasting impact on wilderness stew- ards and the wilderness resource." We are proud of Chief Tidwell for recognizing RF Connaughton for his leadership. We can only hope that there isn't a new generation of wilderness stewards and line officers who don't ask thoughtful questions and strive to make good

decisions to protect wilderness.

Wilderness is to be managed in contrast with those areas where man and his works dominate the landscape. This is the definition of Wilderness in the 1964 Act, (P.L.88- 577). The word untrammeled is used a lot in your document but do any of you even know the intent of that word? Howard Zahniser thought long and hard before deliber- ately using that word because he knew that it is human nature to want to "do" some- thing, to want to manage, to want to manipulate. We understand this first hand, after having spent, collectively, well over 100+ years working for the Forest Service.

In Wilderness, nature is in charge, even if that means a change in the vegetation over time. As managers of these precious areas, you MUST exercise humility. We strongly suggest you immediately drop the proposed projects in the MMW. Again, if you feel it necessary to propose this type of work in Wilderness in the future, we suggest you tackle it as a stand-alone project, stack your team with top-notch wilderness specialists and approach it honestly and thoughtfully, just like RF Connaughton.

Sincerely,

Chris Ryan, Wilderness Program Manager, Northern Region, Retired (lead contact)

Kathy McAllister, Deputy Regional Forester, Northern Region, Retired

Deb Gale, Recreation and Wilderness Program Leader, Bitterroot NF, Retired Kimberly Schlenker, Recreation and Wilderness Program Leader, Custer and Gallatin NF, Retired

Kari Gunderson, PhD, Wilderness Management Professor and Mission Mountains Wil- derness Ranger, Retired

Jennifer Zbyszewski, Recreation and Wilderness Specialist, Methow Valley RD, Okana- gon-Wenatchee NF, retired

List of References

Keane, Robert E.; Tomback, D.F.; Aubry, C.A.; Bower, A.D.; Campbell, E.M.; Cripps, C.L.; Jenkins, M.B.; Mahalovich, M.F.; Manning, M.; McKinney, S.T.; Murray, M.P.; Perkins, D.L.; Reinhart, D.P.; Ryan, C.; Schoettle, A.W.; Smith, C.M. 2012. A range- wide restoration strategy for whitebark pine (Pinus albicaulis). Gen. Tech. Rep.

RMRS-GTR-279. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 108 p.

USDA, Forest Service. 2007. Manual Section 2300 - Management of Recreation, p. 18-21. In Forest Service Manual, Title 2300 - Recreation, Wilderness, and Related Resource Management. Washington, D.C.

U.S. Public Law 88-577. The Wilderness Act of September 3, 1964. 78 Stat. 890.