Data Submitted (UTC 11): 4/3/2025 6:00:00 AM
First name: steve
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Organization:
Title:
Comments: Thank you for accepting and our considering our (attached) comments.

April 2, 2025

Chris Dowling, District Ranger

Swan Lake Ranger District

Re: Proposed East Valley Fuels Reduction Project

Dear Ranger Dowling:

Please accept the following comments relating to the proposed East Valley Fuels Reduction Project on behalf of the Council on Wildlife and Fish, Alliance for the Wild Rockies and Native Ecosystems Council.

The idea that there is an objectively existing world that we all share is a flawed assumption that creates the seemingly unsolvable paradoxes that lead to conflicts in the world today. People argue endlessly over the idea that their version of reality is the correct one, but in actuality there is no one, true reality.

For over 45 years I have seen language used in Projects and two Flathead National Forest Plans deteriorate to deliberately deceive and distract from what I see, not as "Multiple-Use" or "Sustained Yield" strategies, but as a top-down, single-minded

gathering intention to maximize commodity production in pursuit of a continuing - since 1910 as an historical benchmark - public-private partnership between the USFS-USDA and the heavily subsidized timber industry.

I cannot see this Project in any other light, due to my personal historical and work experience as a contract laborer (tree planter). In my lifetime I've personally replanted more clearcuts than I can count, totaling more than 500,000 trees, on roughly 2 square miles of public land that was clearcut, and burned ('site prep').

I realize what the Purpose and Need in the Scoping Notice purports. I do not, however, have any rational reason to believe a word of it, nor can I consent to any clearcut logging, and/or totally ineffective thinning strategies to "reduce fuels" in the following categories:

1) Inventoried Roadless Areas (IRAs)(109 acres). Stay out of IRAs. No, just no!

2) Logging extremely scarce old growth or old-growth habitat (12 acres) is a crime against Nature and biological diversity, in violation of NFMA. A truly 'multiple use, sustained yield' strategy would never log old growth stands. The Flathead NF's obsession with "fuels reduction" is mythic, magical thinking which has no correlation whatsoever with reducing wildfire risk. Without a baseline risk assessment (current condition), idle talk of 'reducing risk' is meaningless and nothing more than a coverup for more clearcuts and more roads, and more acres converted from native forest to managed tree plantation. Old growth cannot maintain its ecological significance managed as a plantation. No logging!

3) Streamside riparian zones are the most productive lands reflecting the fact that water is life. Killing 135 acres of life-giving land is analogous to bloodletting which was particularly popular in the Middle Ages, when doctors would use it not just to treat illness but also to prevent it. I hope someday we can all have a good laugh at the utter ridiculousness of logging riparian habitat to reduce wildfire risk.

As we all know by now, every road ever built in the forest was to remove logs from the logging site to the highway, and on to the sawmill. Roads are the arteries and capillaries that enable the flow of logs (commodities) to processing plants (industrial factories).

Reopening roads to haul logs from proposed thinning and logging units are closed to protect wildlife from the noise and gunners associated with motor vehicle use. And as we all know, road closures are ineffective and seldom enforced with citations and fines. Closures are routinely breached. Once breached, these failed barriers to access are even more rarely repaired. Thinning increases the opportunity to breach wildlife road closures.

Running log loads on closed roads would violates the common practice of honoring and protecting grizzly bears during the "winter denning season" (January 1 - February 15)), in violation of the Forest Plan and ESA.

In grizzly country the size of proposed logging units matters. When cover is lost it takes decades to come back. Six even age (call clearcuts clearcuts, why won't you?) openings exceed 40 acres maximum recommended by the National Forest

Management Act. Openings this large destroy hiding cover for wildlife, create soil erosion and stream sedimentation and present an unsightly scenic mess to all Flathead Valley residents and visitors. Multiple-Use? Not a chanc

The cumulative effects are staggering. The combination of ineffective road closures, inadequate Forest Plans, unscientific biological assessments and biological opinions BiOps, past logging and high road densities really do make one wonder how wildlife has survived for so long on the Flathead National Forest.

Failing to conform to the January 1 - February 15 denning dates defies reason.

Please conduct 'Big Picture" cumulative effects analysis ("zoom lens") of the ONE grizzly DPS, or the ONE ecosystem (range). Look ('hard look') beyond the micro to a thorough macro analysis. Forest Service actions must comply with the ESA. Congress enacted the ESA to protect and conserve endangered and threatened species and the ecosystems they depend upon. 16 U.S.C. [sect]1531(b). Emphasis added.

The terms "linkage," "corridor" and "linkage corridor" should appear and be defined in the BA and BO.

Please Note: There are no "grizzly bear subunits" in corridors.

Moreover, "decommissioned" is not defined in a way that guarantees bear security after the Project is completed.

I know that on the Flathead, Amendment 19 was dumped for the vague and unenforceable "impassable/passable" road access standard which did not remove culverts or "obliterate" roads. As my friend and colleague Sara Johnson always

points out: "There are no temporary roads (from wildlife's perspective)."

I visited the Project area in 2023 and saw mountain bikes and ATVs were literally everywhere, including roads that were supposed to be closed to motorized use.

It is totally inappropriate to use a Categorical Exclusion for this logging project. The significance of issues warrants the preparation of an Environmental Assessment. This cannot be the only public comment period for the Project. We need an opportunity to comment on the Draft EA, and to Object to elements of the project that violate the Forest Plan and/or federal environmental laws.

Please consult with USFWS on all listed ESA species.

Thank you for your consideration of our comments.

Sincerely yours,

Steve Kelly, President

Council on Wildlife and Fish

and for,

Mike Garrity, Exec. Dir.

Alliance for the Wild Rockies

and for,

Sara Johnson Native Ecosystems Council