Data Submitted (UTC 11): 9/17/2025 6:00:00 AM
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Comments: Please accept the following comments on the West Reservoir Project on behalf of Friends of the Wild Swan.

Friends of the Wild Swan PO Box 103

Bigfork, MT 59911

September 17, 2025

Gary Blazejewski, Environmental Coordinator Flathead National Forest

Attn: West Reservoir Project 650 Wolf Pack Way Kalispell MT 59901

Via: https://cara.fs2c.usda.gov/Public/CommentInput?Project=67436

Mr. Blazejewski,

Please accept the following comments on the West Reservoir Project on behalf of Friends of the Wild Swan and Council on Wildlife and Fish. We incorporate by reference the comments submitted by Swan View Coalition.

* We object to the use of the emergency action determination under the Infrastructure Investment and Jobs Act, Section 40807 for fuels and forest health. The public deserves to see how our comments on the EA were addressed and to object to the project (if necessary) as allowed under 36 CFR Part 218. This area is not a Wildland Urban Interface, aside from 19 cabins on Forest Service lands at the Heinrude residential permits that have strict regulations on development, there are no residential areas that would be impacted by not implementing this project. And there is no emergency to protect homes and infrastructure since there aren't any in the project area.
* We believe it is premature to release the Environmental Assessment (EA) for this project prior to complying with the June 28, 2024 District Court Order. In that Order the Court granted:

1. Plaintiffs are entitled to summary judgment on their ESA [Endangered Species Act] claims regarding grizzly bears insofar as FWS failed to address the exclusion of unauthorized motorized use from road density calculations and, to the extent the agency did address this issue, failed to articulate a satisfactory explanation regarding its decision;

2. Plaintiffs are entitled to summary judgment on their ESA claims regarding grizzly bears insofar as FWS offered an explanation for its decision to exclude impassable roads from TMRD [Total Motorized Route Density] that runs counter to the evidence before the agency;
3. Plaintiffs are entitled to summary judgment on their ESA claims regarding bull trout and bull trout critical habitat insofar as FWS failed to address its decision to abandon the culvert removal requirement with respect to impassable roads;
4. Plaintiffs are entitled to summary judgment on their ESA claims insofar as the Forest Service relied on the flawed provisions of the Revised BiOp.

The Flathead does not have a valid Biological Opinion on its Forest Plan for roads, grizzly bears and bull trout so it is baffling that this project is being pushed forward without the essential

elements in place to protect threatened species given that it adds 3.1 miles of roads to the forest system road network and constructs 1.6 miles of temporary roads that will be made "impassable" after use but not decommissioned or reclaimed. Immediately excluding impassable roads from TMRD when they have not been reclaimed or culverts removed is increasing road densities above the 2011 baseline.

*
* The EA discloses an assumption (without a citation) that 15 bull trout redds is a "conservation threshold level at which inbreeding and associated reduction in fitness become a concern. Populations with average annual redd counts greater than 15 are less vulnerable to extinction triggered by severe random events, such as fire or flooding, than populations with fewer redds." Yet the EA is dismissive of the fact that Wounded Buck and Wheeler Creeks have been below 15 redd counts since 2020 and it blames reservoir operations and angling rather than road densities and sediment.
* The proposed action will impact old-growth forest habitat by thinning in old-growth stands, burning in and adjacent to old-growth, placing regeneration units directly adjacent to four old- growth stands (increasing risk of blowdown and edge effects to old-growth) and constructing 1,500 feet of new roads within three old growth stands.

The Environmental Assessment fails to analyze the impacts of these treatments in and adjacent to old-growth forest habitat on:

Old-growth associated wildlife Weed spread

Connectivity between old-growth stands Soil trampling

Mychorrizal fungi and other fungi necessary for a healthy forest

Old growth patch sizes are not even disclosed or analyzed to see whether they are sufficient to provide habitat for old-growth associated wildlife. Logging will further diminish their function as habitat for wildlife.

By subjecting old growth forest to edge effects, that are not analyzed, you are degrading old growth habitat which directly impacts birds, wildlife, native plants, mychorizal fungi and other attributes that are necessary to these species survival and old growth attributes. Again, no analysis.

The EA is totally devoid of any analysis of the impacts to wildlife that are dependent on old growth habitat. How large should old growth patch sizes be to maintain viability? How much edge is too much?

Corridors of interior forest habitat between old growth habitat with a minimum width of >100 meters have been recommended by scientists. All corridor habitat in the project area should be mapped and both current and long-term objectives defined for maintaining these corridors over time. This was not done so the EA is inadequate in analyzing the impacts to wildlife connectivity.

The Flathead has no plan for retaining old-growth forest habitat on the landscape and allowing stands to develop into old growth. Instead this project will fragment old growth, create abrupt edges from roads and cutting units adjacent to it, diminish habitat values from roads built through old-growth stands, and degrade the habitat quality for old growth associated birds and wildlife. The Flathead must develop an old growth network to ensure viability of old-growth associated wildlife rather than the current piecemeal encroachment on old growth from logging and roads.

Soil disturbance on 7,704 acres will spread weeds, especially since weeds are already well established in the project area. Weeds replace native plants that provide food/forage for wildlife. Weeds degrade old growth habitat. Yet there is no analysis of these impacts or no adequate mitigation other than using the same failed measures from the past. The way not to spread weeds is to not log or build roads.

*
* The EA does not analyze the impacts to Region 1 Sensitive Species such as bald eagle, black- backed woodpecker, common loon, harlequin duck, bighorn sheep, fisher, wolf, bats and toads. Since sensitive species are designated because population viability is a concern on National Forest lands it is imperative that impacts to them be analyzed to ensure that numbers and population distribution are adequate so they are not extirpated on Forest Service land.
* The EA is conflicting because it uses the term "multistory" which is not consistent with the NRLMD/Forest Plan's "multi story mature or late successional forest" in VEG-S6. The EA defines multistory structural stage as many age classes and vegetation layers with sufficient density to provide winter foraging habitat and may provide denning habitat. So, multistory in the context of the EA's analysis does not have to include mature or late successional forest only forest with different structural stages. This is an important distinction that allows younger stands to replace the mature or late successional forest that lynx require. The EA must use the NRLMD/Forest Plan's definition of multi-story mature or late successional forest to set the baseline and evaluate impacts to lynx.
* The project results in openings greater than 40 acres in size. Regional Forester policy (FSM 2471.1) directs the size of harvest openings created by even-aged silvicultural practices (e.g. seed tree, shelterwood, and clearcut harvest prescriptions) would be normally 40 acres or less. The National Forest Management Act at 219.27(d)(2)(ii): Size limits exceeding those established in paragraphs (d)(2) and (d)(2)(i) of this section are permitted on an individual timber sale basis after 60 days public notice and review by the Regional Forester.

Units 51 (50 ac), 52 (46 ac) [these are adjacent units that will result in a 96 acre clearcut], 55/56 (57 ac) and 62 (42) are seedtree units that exceed 40 acres. The EA does not analyze the impacts to wildlife of exceeding the opening size, it instead tiers to a generic Forest Plan standard that states that exceptions "may" occur (although these exceptions are now occurring in most timber sales on the Flathead). The impacts to wildlife must be analyzed on a site-specific level and not rely on a Forest Plan exemption.

There was also no 60 day public notice and review by the Regional Forester for this change.

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* The EA failed to analyze the economic impacts. How will the Flathead maintain the proposed new bloated road system in the project area? What is the road budget? How is enlarging the road system a wise use of taxpayer money? Why are culvert removals dependent on funding yet road construction is a blank check?
* The EA fails to consider a reasonable range of alternatives in violation of the National Environmental Policy Act. It's either all logging or none and all road construction or none. The EA did not analyze an alternative that removed but did not replace the culverts on Quintonkin and Clayton creeks but instead allowed those watersheds to heal from the impacts of roads. The EA did not analyze an alternative that did not log in riparian management zones or grizzly bear secure core.
* The EA does not analyze the impacts that climate change will have on tree growth and regeneration, impacts to soils and mychorrizal fungi essential for plant development, among other known impacts. How are your assumptions regarding tree regeneration consistent with a changing climate?
* EA failed to address the issues we raised in our scoping comments. They are attached.

Forests are more than just trees -- they are essential habitat for wildlife, they are the lungs of the planet and provide for aquatic ecosystem functions. Reducing them to stumps will degrade aquatic and terrestrial ecosystems which will cost more to attempt to restore -- if they even can be.

/s/Arlene Montgomery Program Director

Attachments:

FOWS West Reservoir EA 9-17-25.pdf