

Data Submitted (UTC 11): 11/21/2018 6:36:43 PM

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Comments: November 21, 2018

TO: Mid-Swan Project

Attention: Sandy Mack

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RE: Flathead National Forest; Montana; Mid-Swan Landscape Restoration & Wildland Urban Interface Fuels Project

The following are comments on the Forest Service's October 23, 2018 Federal Register Notice of Intent to Prepare an Environmental Impact Statement on the Mid-Swan Landscape Restoration & Wildland Urban Interface Fuels Project (83 FR 53443). It is helpful to know how the Forest Service addresses this issue and its terminology. Except for an admission that a past logging method known as "high-grading" was practiced in some areas of the Flathead National Forest that removed the best trees and their naturally selected seed sources, the word "logging" never appears in the FR notice. The Forest Service now prefers to use the terms:

"landscape restoration"

"restoring the resilience and function of the ecosystem within this landscape"

"treatments"

"removing vegetation"

"reducing fuel buildup"

The Forest Service also now interprets its mission as reducing "the risk from wildfire in the wildland urban interface where national forest systems lands are close or adjacent to private land." In an area such as the Mid-Swan with mixed NFS, private and state lands, of the 246,000 acre Mid-Swan area, the NFS proposes "treatment" on 70,000 acres. There is no indication of any specific threats to actual "urban" areas, just that private lands are adjacent to NFS lands. Instead, there is a vague statement that state, federal and private infrastructure, recreationists, and residents are at risk from fire.

The NFS proposes to storm proof approximately 167 miles of existing Forest Service roads, including about 20 miles of road within 20 miles of road within the riparian management zone. While this might be a good thing, the Forest Service now uses the term "storm proof" to refer to "decommission, store, or improve." It is not clear how many of these road miles will be decommissioned and how many "improved."

The NFS, while recognizing reduced beaver activity as an aquatic biodiversity problem, propose to install "beaver dam analog structures," and "artificial beaver dams." It would seem that real beaver introduction would be far more cost effective.

According to the NFS, "treatments" reduce ladder fuels, decrease bulk density, and reduce risk of crown fire. "Thinning" reduces competition from shade tolerant conifers, reduces encroaching subalpine fir and Engelmann spruce, converts overabundant competing multistory subalpine fuel patches to other cover types, and breaks up large homogeneous patches through mechanical treatments and prescribed fire.

The NFS proposal includes:

"removing vegetation"

"reducing ladder fuels"

"reduction of canopy fuels"

"Vegetation treatment" includes:

"non-commercial thinning on approximately 2,900 acres"

"thinning with variable retention on 12,000 acres"

"thinning with regeneration openings on 21,700 acres"

"regeneration harvest with variable retention on 7,400 acres"

"controlled burning on 24,600 acres"

"planting on 500 acres"

"seed caching on 900 acres"

Proposed "treatment" methods include "the use of tractor, skyline, helicopter, and land treatments."

Any EIS should replace the words "treatment," "harvest," and "thinning" with the more accurate term "logging."

In addition, any EIS should address impacts to fish and wildlife, as well as water quantity changes, including timing of runoff and retention of snowpack.

Finally, any EIS should provide a comprehensive analysis of past wildlife fires on the Flathead National Forest, including an analysis of forest recovery after such fires.

Please send me a copy of any draft EIS when it becomes available. Thank you.

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