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MID-SWAN LANDSCAPE RESTORATION & WILDLAND URBAN INTERFACE PROJECT

Although we are asked for specific comments, my remarks at this time are mostly general, as the project is still in the conceptual stage. I'll be able to respond more specifically during the EIS process when I have had time to review maps that delineate township, range and sections, and after more field trips and community meetings are held.

PRESCRIBED FIRE

Prescribed fire is a useful tool for restoring forests to beneficial conditions and reducing the risk of extreme wildfires. In general, the proposed prescribed-fire activities seem appropriate and beneficial. But more site-specific detail will be needed before I can offer more specific comment.

The Flathead National Forest should embrace its relationships with Swan Valley Connections and other community organizations with the goal of helping people understand the advantages of prescribed fire versus the wildfires that occur during the heat of fire season.

Prescribed fire in the Mission Mountain Wilderness should only be conducted using the minimum tools and strategies that are deemed appropriate for designated wilderness areas.

I am not opposed to letting prescribed fires back down into riparian areas to mimic naturally occurring fires that historically burned more frequently and less intensively.

RIPARIAN MANAGEMENT ZONES

I'm supportive of constructing beaver analogs if native materials are used and collected nearby. The spread of noxious weeds into the riparian zones should be prevented by limiting mechanical treatments.

ROADS

Road Activities: The proposed BMP road improvements and storm-proofing activities will benefit the roads in the mid-Swan project area. Yet the goal should be to reduce the total number of roads on the landscape by storing or decommissioning as many as possible, after storm proofing, in order to reduce erosion and protect wildlife.

Permanent Roads: There should be no new permanent roads in the mid-Swan project area. The Swan Valley is still recovering from the excessive road building of the 1970s-80s. Temporary roads that can be properly reclaimed to reduce erosion and prevent illegal access should be sufficient for the proposed restoration activities designed to reduce the risk of wildfire in the wildland urban interface. If temporary roads cannot be effectively reclaimed in the mid-Swan area, the proposed activities should be abandoned.

Roads Near Wilderness: Roads of any kind near the Mission Mountains Wilderness boundary are not appropriate. New road openings will create additional illegal, over-the-snow access points. The Swan Lake Ranger District is already unable to prevent the illegal snowmobiling that occurs in the Wilderness every winter, and the proposed mid-Swan project does not call for increasing law enforcement on the District. Roads proposed near the Mission Mountains Wilderness Boundary, which should not be allowed, include all those in the Cold Creek drainages (South Fork, Middle-Cold and North Fork); Jim Creek; Fatty Creek; and South and North Woodward Creeks.

Smith Creek watershed, S22, T20N, R16W: The proposed new road leads across upper McKay Creek and into the steep terrain above Smith Creek. Any roads or logging activity here will risk pollution and instability, and should not be included in the plan. We need to maintain some wild, shady canyons on the Swan Range if we want biodiversity.

Lion Creek to Napa Creek watersheds: The slope of the Swan Range between the Lion Creek and Napa Creek watersheds is severely roaded. No new roads should be allowed in the Lion Creek, Scout Creek, Bethel Creek, Goat Creek and Napa Creek drainages. The terrain is steep and the area is already compromised by too many roads in this area along the slope of the Swan Range.

PLANTING AND CACHING

Wilderness Management experts, such as Kari Gunderson, Phd., Wildland Recreation Management, and

specialists with the Wilderness Society, Montana Wilderness Association, and Wilderness Watch should be consulted about the appropriateness of planting and caching in the Mission Mountains Wilderness before plans are finalized.