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Comments: I am submitting public comment on the Mid-Swan Landscape Restoration & Wildland Urban Interface Project. I have lived and worked in the Swan Valley for 40 years, am familiar with the lands under consideration, working as a wilderness ranger in the Mission Mountains Wilderness for 35 seasons, and have a PhD in wildland recreation management.

My first concern is whether the Forest Service has taken into consideration the Swan Forest Initiative proposed by the Lake County Conservation District to transfer forest management of 60,000 acres of the Flathead National Forest in the Swan Valley for large-scale timber operations? Much of the same land in the Swan Forest Initiative is the same national forest land as that is included in the FS Mid-Swan Landscape Restoration & Wildland Urban Interface Project. While the Swan Forest Initiative project is currently discontinued, it is not dead. See: <http://www.valleyjournal.net/Article/20799/Valley-forest-project-discontinued>

How do you reconcile these two proposals?

My second concern is the 60 miles of new road construction above Goat Creek, Lion Creek to Napa Creek, upper McKay Creek and into the steep terrain above Smith Creek, and areas adjacent to the Mission Mountains Wilderness (in the Cold Creek drainages - South Fork, Middle-Cold and North Fork Cold Creek); Jim Creek; Fatty Creek; and South and North Woodward Creek drainages). We already have too many roads scattered throughout lands managed by the Forest Service in the Swan Valley. I oppose new road construction for the following reasons:

- 1) Steep terrain with a high chance of road failure and ineffective drainage.
- 2) Insufficient timber base to warrant road construction
- 3) Roads will provide easier access and increased snowmobile trespass into designated wilderness and there is insufficient funding for adequate and effective law enforcement patrols
- 4) Roads will provide easier access and increased snowmobile trespass into designated wilderness and there is insufficient funding for adequate and effective law enforcement patrols. I can provide ranger journals from 1984-2014 that document illegal snowmobile trespass in the Mission Mountains Wilderness (MMW).
- 5) Negative impacts of roads in wolverine habitat. See attached "Wolverine - Winter Recreation Research Project, Final Report, 2017, p. v, 39-42. "Indirect habitat loss from winter recreation reduced the quality of 2 - 28% of available habitat within home ranges. Female wolverines exhibited strong avoidance of off-road motorized recreation and were more vulnerable to higher levels of indirect habitat loss than males who appeared to be less sensitive to disturbance. While non-motorized recreation covered a relatively small proportion of home ranges, these areas were also avoided by male and female wolverines. The avoidance of areas of linear access used by winter recreationists was not as strong as estimated for dispersed recreation and wolverines may be less sensitive to predictable patterns of human use" (Heinemeyer, Squires, Hebblewhite, Smith, Holbrook, & Copeland, 2017). See attached report, "Wolverine - Winter Recreation Research Project.
- 6) Roads would decrease secure habitat for grizzly bears as well as big-game
- 7) Increased roads provide a vector for weeds to colonize pristine areas

My third concern is the proposed manual caching of white bark pine (WBP) seeds developed from hybridized blister rust/pine beetle resistant WBP into the MMW. Howard Zahniser, author of The Wilderness Act said, "In regard to areas of wilderness we should be guardians not gardeners." I oppose the caching of hybridized WBP seeds for the following reasons:

- 1) Hybridized WBP is NOT native to the Mission Mountains Wilderness and negatively affects the genetics of WBP found in this wilderness
- 2) This proposed action violates the mandates of The Wilderness Act where the forces of nature should prevail.

See Section 1(c) '...undeveloped federal land ... without permanent improvements ...' "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man,.. "An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions..." See attached copy of The Wilderness Act (PL 88-577).

Wilderness areas are not places to experiment with hybridized WBP seed caches. Look for opportunities outside of wilderness first (Belote, Dietz, David-Chavez, & Aplet, 2018-see attachment).

The rust resistant hybridization of WBP in British Columbia and Alberta to date have either failed or produced inconclusive results.

http://www.whitebarkpine.ca/uploads/4/4/1/8/4418310/promoting_recovery_in_bc.pdf

https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_Whitebark%20Pine_0810_e.pdf

Hybridized WBP seedlings grown in greenhouses in Idaho have been found to live only 35 years. So does that mean the FS goes into the MMW every 35 years to plant more hybridized WBP seeds and further trammel the wilderness?

3)Planting rust-resistant WBP seeds would not help preserve the biodiversity of the MMW. It is critical to conduct an inventory of the restoration treatments conducted outside wilderness and based on the effectiveness of those interventions determine whether a balance can be achieved between an ecosystem that is unique and self-willed or one that is manipulated and controlled.

4)Preserving Wilderness Character is required by Law. The Wilderness Act states in Section 2(a): "a National Wilderness Preservation System ... shall be administered ... so as to provide for the protection of these areas, the preservation of their wilderness character." Use of Wilderness Areas, Section 4(b): "each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area." Simulating WBP seed caches using hybridized, nonnative WBP seeds negatively affects the "natural" and "untrammelled" qualities of Wilderness Character. What is the expected impact of the treatment to other qualities of wilderness character? See attached copy of The Wilderness Act (PL 88-577).

5)This proposed action should be assessed through the Supplement to Minimum Requirements Analysis/Decision Guide (MRA/MRDG): Evaluating Proposals for Ecological Intervention in Wilderness authored by Beth Hahn and Peter Landres, Aldo Leopold Wilderness Research Institute, November 2017.
<https://www.wilderness.net/toolboxes/documents/restoration/Supplement%20to%20MRA-MRDG.pdf>

My fourth concern is that during the November 2018 field trip in Lion Creek FS managers told us that the project is based on modeling. Models are just models and might not adequately reflect what is actually happening on the ground. All proposed actions based on modeling should be ground-truthed before any treatments are approved or conducted.

Thank you for your consideration.

Kari Gunderson, PhD.