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Comments: First, I would like to start this comment with strong praise for the continuous reminder from the USFS that this is just a first draft, and that the public's opinion will help shape the final result. I hope through this project's implementation the USFS will continue to listen to the public and keep the community's needs in mind with each step. With that, thank you for extending the public comment period on this proposal.

As the landscape continues to evolve over the 15 years of project implementation, I think it is critical to continue having public comment periods. What our community's priorities are in these early phases could shift drastically as the landscape deals with climate change and threats of mega-fires. The scale of the project needs to match the scale of the timing - creating opportunities to check-in with the public periodically as new pieces of the project progresses will surely lead to less litigation, a project that meets the needs of the community and can adapt to meet shifting conditions of aquatic and terrestrial ecosystems. Additionally, as science advances, it is important to create space for new science to shape the project as we work to restore this beautiful valley. While it is excellent to take a landscape-approach, it is important to stay connected to the community through this process to continue listening to what our needs are. During the field trip it was mentioned that "significant changes" to the landscape could lead to additional public comment. If the public is not able to continually voice opinions with each new project installation, the USFS certainly needs to put a definition to "significant change."

There is a glaring issue I have with the scale of the project. As mentioned, I think it is great to work at the landscape level, however ecosystems do not recognize USFS/DNRC boundaries, and this project certainly does. Through conversations at the public meeting and field trip, it has been made clear that the USFS has not partnered with the DNRC on creating a truly landscape-scale restoration project. Looking at maps, this project is horribly fragmented as around 1/3 of the landscape is ignored due to human-created boundaries. What good is it to reduce sedimentation downstream, when sediment loading will continue to happen upstream? While I understand there is endless bureaucracy associated with such a task, it seems worth the time and energy to partner with the DNRC and create a true landscape-scale project. A project of this scale will set precedents in the world of western Montana restoration. In a state that has some of the most impressive collaborations in natural resource management, I think it is an optimum time to demonstrate that spirit of collaboration and work with all stakeholders and land managers to create a plan that will improve the entire watershed.

I am writing this through the lens of a social scientist immersed in the world of natural science and natural resources. I firmly believe to create sustainable solutions, it is essential that these sciences must be bridged and am disappointed there was no social scientist on your team of experts. When looking at any restoration project, the organizing entity needs to ask first "How can the community participate?" This needs to extend beyond our two-cents on the project itself and dig into the actual implementation.

BDAs are an opportunity to demonstrate community-based, low-impact restoration. It would be a shame if the USFS missed an opportunity to showcase the power, beyond the hydrologic impacts, of using BDAs as restoration tools. Beaver dam analogs are an excellent way to engage community in restoration. By installing BDAs in appropriate sites, the USFS can reduce the impacts of restoration by using materials that are already present naturally. The site we visited on the field trip (Lion Creek) was a horrible location for BDAs as the water has too high of a flow, and a cedar forest is not conducive to building BDAs. For continued maintenance, the BDAs need to go in places that beavers would naturally exists. This means not only looking for the proper vegetation for humans to build with, but the proper vegetation for beavers to survive from and maintain with.

Another opportunity to engage community in this project is to encourage their help in ground-truthing - something seriously lacking from the current proposal. Your team of ecologists could partner with the community to organize a citizen science training where folks are trained on what ideal conditions look like for any number of treatments. Currently it seems the USFS is relying heavily on a few community members to provide insight. It doesn't have to be that way. Condon is an incredibly active community that is likely recreating in many of the spots with proposed treatments (come rain, shine, or snowstorm). By teaming up with the Condon residents you could create a project that has been ground-truthed to ensure the proper treatments, but also has empowered a community to

participate in this HUGE project.

I'm sure many of the public comments have addressed roads in some capacity, as will this one. The draft proposal praises the decommissioned 67 miles of road over the past decade, yet goes on to propose an additional 60 miles put in. Roads are also acknowledged as a huge problem for water quality and watershed processes in the project area. There are hundreds of miles of roads in this valley that could be used to access the timber projects. Before relying solely on modeling to decide where new roads should go, you need to connect with the community and learn where roads already exist, and where roads have already been decommissioned. There are proposed roads in the Jim Lakes area, an area that recently closed roads due to sensitive habitat, whose closing has led to an increase in native fish habitat. Don't undo that progress.

Adding roads near designated wilderness will certainly increase ease for folks to access these protected lands with motorized vehicles (ATVs, snowmobiles). In the Missions there are many proposed roads that lead directly to the wilderness boundary (Fatty creek, NW of Cedar Creek, just south of Cold Lake Rd, SF Cold Creek.) They absolutely cannot stay in the next draft.

In addition to creating increased access to the wilderness, each mile of road constructed will certainly lead to additional invasive plants in the valley. This furthers my argument for using roads that are already in existence rather than creating new ones. I have not seen or heard any discussion of invasive removal or management in this project. If we want to restore the landscape, and terrestrial ecosystems are a concern, then we must think about invasive removal as well. It is a major gap in the project and if the project will inherently lead to increased invasives, it needs to additionally take steps to 1) mitigate that damage and 2) reduce the amount of invasives present.

An additional qualm with the roads - there has been ambiguity surrounding the permanence of the roads. Once a timber project is done, these roads need to be decommissioned and closed. Earthen barriers/berms are a common way the USFS closes roads, using gates as an alternative. Both create ugly scars on the landscape (which is why we should avoid creating more roads and more places to close roads). Berms are not highly effective as many are done haphazardly, not digging a deep enough rut behind the bump, or creating too narrow of an obstruction creating an easy passage around the sides. Gates are surely more expensive to put in, are a bigger eye sore to a nature lover, and face their own challenges in preventing people from accessing the land - we've all seen fences that have been mangled by a disgruntled public land owner that wants to bring their motor vehicle to the protected land beyond. First, it needs to be established that the roads being constructed in this project will not be permanent, they will be temporary. Second, if the USFS is using berms to close the roads, there needs to be set standards to ensure effectiveness in closing the road, and these structures need to be checked. It is unfair for timber companies to come and profit off our public lands, then do a sub-par job at closing the road to future motorized use.

There are additional standards that need to be established in this project. When entering RMZs, there will be "feathering" to reduce the impact to the riparian zone. This is great in theory, however as it stands, the project has no set standard for what is allowed in these areas. If feathering theoretically meant a 25% reduction in take, that will look different in an area that is approved for a regen harvest, compared to a thin with variable opening harvest. The project needs to establish that no more than X trees per acre will be taken in an RMZ. As I am not a seasoned ecologist, I can't say what "X" should be, however I have faith that your team of ecologists (perhaps in partnership with community members) can determine what is an appropriate standard. I believe there are MT standards that would help inform this decision.

Finally, I have heard no discussion of a monitoring plan for this project. As mentioned above, this will certainly be used as a precedent for other large-scale restoration projects. There is a significant lack in monitoring many restoration projects in this country. If over the course of 15 years we are continually implementing projects, I sincerely hope the USFS will prioritize monitoring so they know whether to keep doing what they're doing, or adapt and evolve. After the 15-year period, the USFS needs to continue monitoring this landscape (another opportunity for community engagement) to continue learning how to best care of this land.