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Title:

Comments: Comment on Mid-Swan Landscape Restoration and WUI project

Hello Sandy Mac and or Rachel Feigley,

I am contacting you today in regards to the Mid-Swan Landscape Restoration and WUI project, with my immediate comments and concerns. I grew up about 15 miles south of Swan Lake, and currently live near Barber Creek full time. I have spent a lot of time exploring the Swan Valley on foot, skis, bicycle, and horseback, I am very familiar with the area this project covers! Right off the bat I want to say that it was stressed by Forest Service employee's at both the community meeting and the recent field trip, hosted by Swan Valley Connections, that this project is in the "conceptual stage" and as such creates challenges for the public and our comments.

Why don't I start off with my biggest concern, the 60 miles of new roads. I believe they are totally unnecessary and really an obsolete idea. Especially as commercial logging is not, and should not be a driving force on this project. The timber industry is in the tank and logging will not provide funds when coupled with big expenses, i.e. road building. It sounds like funding for this project is still totally unknown, and the cost of building these roads is substantial. I think that spending money to thin and burn in the valley and near private homes property is a justified expense. Not only would these roads be costly to build, the potential for sediment flowing into our creeks and eventually the swan river would be detrimental to riparian health. Much of the area for these proposed roads is quite steep and prone to avalanche, this will clog culverts and rip apart large areas of mountainside, adding even more cost, and more sediment. I would like to specifically mentioned Goat Cr./Napa, Woodward, Smith Cr., and Jim Cr, as well as the proposed roads near the Wilderness Boundary from the Fatty Creek to Piper Creek cut across. While I am commenting about these proposed roads adjacent to the Mission Mountain Wilderness boundary, it's important for me to stress that there is already a lot of illegal snowmobile trespass into the wilderness, and the Forest Service has inadequate funds to have law enforcement monitoring this illegal activity and issuing citations. I am certain it will become an even bigger issue if there is easier accesses from these opened travel corridors, and the fact that they are to be gated would not make a difference for illegal snowmobile use! The snow will easily cover the gates and getting over, and around them would be no problem. This illegal snowmobile traffic is also a huge disruption to denning wolverine.

I have read that the reason for this high elevation thinning is to create more diversity within the forest stands. And I believe that the models used are not capable of taking the uncertainty of fire and unique conditions that exist in the forest at any given moment. The proposed thinning and all its disruptions is not likely to make burns less severe because they happen during extreme drought conditions. Studies show again and again that logged areas burn just as heavily when conditions are ripe. This thinning will defiantly have negative impacts on the landscape, including but not limited to weeds, soil compacting, erosion, and disrupting critical species, such as wolverine, and lynx. The chance that it will mitigate large intense fires on the landscape, given the condition we face from climate change is highly unlikely, and the impacts are very negative. These areas are far from homes and private property where thinning coupled with burning would be a useful tool. The terrain around settled areas is generally not prone to as to erosion, or habit disruptions. Although weeds are still an issue.

Another concern is the model being used for WUI treatment. The way I understand it is, if a home is present the entire section will be treated as WUI. If only one home is present on a corner, but the entire section will be

treated for WUI, this is over kill, added expense without benefit. The same holds true for a home sitting on the edge of a section, if the adjoining section is free of homes, that area is not receiving treatment, and that home may not have adequate protection. This is also critical for species such as lynx, when protections don't apply to WUI areas, they will lose a travel corridor on treated areas that are not actually near homes. It seems to me cost efficient to overlay a radius around homes, rather than treating by section boundaries.

I think that our efforts should be focused in on the lower elevation areas, namely the valley floor and low foothills. Where a mix of thinning and burning could provide some fire security to residents, and minimal impact on threatened species and critical terrain and habitat. We have an over abundance of existing roads in the Swan Valley, make use of those rather than spending needlessly to create more roads in critical habitat, and with those roads a whole host of problems.

Thank you,
April Verboven
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