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Title:

Comments: Mid-Swan Project

On behalf of the Conservation Congress and our members I am submitting the following comments on the proposed Mid-Swan Project. Please consider them prior to making a final decision and include them in the AR. This project violates the Flathead NF Forest Plan and federal environmental laws. It is also in clear violation of a recent 9th Circuit Court of Appeals decision the FS is aware of. If the Flathead NF does not want more litigation it should not develop unlawful projects, and it should not sign decisions are unlawful projects. Enough. The public is sick and tired of the mismanagement on the Flathead NF. New leadership is clearly needed.

1. Further fragmenting forest habitat in the already highly fragmented Swan Valley is not "landscape restoration" and doing so in threatened lynx habitat violates the revised Flathead Forest Plan, as admitted in the Draft Environmental Impact Statement (DEIS).

2. The Project would build over 40 miles of new roads even though the area is already highly fragmented with 567 miles of Forest Service logging roads and another 578 miles of state and private roads. Storing or decommissioning a handful of those roads still leaves the majority of those road templates on the landscape to harm grizzly bear, bull trout, other fish and wildlife.

3. Restoring this landscape to historic conditions would remove all of the logging roads, but the DEIS does not analyze such an alternative at all, not even as a point of comparison.

4. Nor does the DEIS look at reducing the road network to levels where research shows they no longer significantly harm threatened grizzly bears, as was required under former Forest Plan Amendment 19. Those thresholds still apply to effects analyses like the DEIS!

5. The "no new road" alternative in the DEIS still builds new roads and retains all but 40 miles of the existing road network. It does not provide the adequate range of alternatives required by the National Environmental Policy Act (NEPA).

6. The DEIS does not disclose the specific locations of the timber sales that will cut down trees to fill 60,000 log trucks over the next 15 years. Once those specifics become known, the public will have no NEPA process to review the estimated impacts of those timber sales. The courts have already ruled this violates NEPA!

7. The Project is an arrogant attempt to dominate the natural landscape with taxpayer subsidized make-work

projects. The DEIS claims that 85% of the area needs logging or other forms of human manipulation, including 36,000 acres of designated and recommended Wilderness where natural processes are by law supposed to unfold on their own without mechanical intrusions.

8. To restore this landscape, remove the logging roads, not the trees!

Denise Boggs, Director

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Beware the beast man, for he is the Devil's pawn. Alone among God's primates, he kills for sport or lust or greed. Yea, he will murder his brother to possess his brother's land. Let him not breed in great numbers, for he will make a desert of his home and yours.

~ Planet of the Apes (1968)