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Organization:

Title:

Comments: Mid-Swan Project

Dear Sirs:

This is a government make-work project, not a landscape restoration project.

It denigrates native ecosystems by claiming they are out of whack and can't restore themselves, arrogantly claiming that 85% of the 273 square mile project area needs human manipulation - including in designated Wilderness where natural processes are by law supposed to unfold on their own. (DEIS page 29).

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).

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.

Alternative B keeps over a 550 mile FS logging road system on the landscape, proposing to build as many miles of new road as it proposes to decommission. This makes no real progress towards true landscape restoration. (DEIS pages xii, xiii and 66).

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.

The DEIS refused to develop an alternative that would reduce the road system to still referenced "research benchmark levels" indicating thresholds where the road system no longer causes significant harm to grizzly bears. Just because the revised Forest Plan removed Amendment 19, the DEIS cannot ignore the benchmark thresholds established by research and still used to assess environmental impacts and "take" by FWS. (DEIS page 87).

Alternative B logs, burns or otherwise "fixes" vegetation on 185 square miles; Alternative C on 87 square miles. Both are heavy-handed and based on flawed assumptions that these ecosystems cannot fix themselves. (DEIS at xiii-xv). Alternative B finds that lynx habitat is too abundant and too well connected, "increasing forest management in lynx habitat outside the wildland-urban interface" - under the ruse of making it less susceptible to fire even though this violates the Flathead Forest Plan and Northern Rockies Lynx Management Direction. (DEIS at xiv and 71).

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!

The Project is an 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.

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

Sincerely,

Margaret Davies