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Comments: Swan Mountain Project Objection

I strenuously object to the proposed Swan Mountain Project, its stated need and objectives, its proposed actions, the decision to proceed with the plan and the finding of no significant impact. The project proposal contradicts known science and common sense logic, would result in harm rather than benefit to nature and to area residents, and fails to evaluate financial, social, and climate impacts. This proposal is ill-conceived and should be reconsidered. Its objectives and impacts violate the spirit and letter of the National Forest Service mission and the National Environmental Policy Act; a full environmental impact analysis is certainly necessary. The modified alternative makes only a modest change to the original proposal, otherwise totally ignoring public comments made by me and others particularly to basic objections.

The proposal cites beetle kill and other natural processes impacting lodgepole pine forest, claims that those impacts increase fire hazard and therefore says large swaths of the forest need to be razed. The razed forest would then go through succession stages of grasses and weeds, dense so-called doghair lodgepole seedlings, relatively sterile monoculture young lodgepole, and then eventually back again to older beetle-impacted lodgepole such as now exists. All of the intervening stages would actually pose far greater fire hazard than currently exists. This greater fire hazard, particularly of the near-term grasses and weeds stage has all-too dramatically and tragically been demonstrated by recent fires the most catastrophic of which (Marshall, Maui, Texas Panhandle) have largely been wind-event grass fires.

The proposal adopts perpetuation of lodgepole pine (essentially a weed) as a central objective, as opposed to allowing the beetle-impacted lodgepole to morph into stable, biologically rich, climax spruce/fir forest, which also happens to be more desirable from a human recreational and beauty perspective. I challenge anyone to somehow find the insect-prone, disease-prone, crown-fire-prone, windblow-prone, sterile, monoculture, unnatural lodgepole the better choice.

The adoption of lodgepole perpetuation as a primary objective is couched in the ludicrous concept that clearcuts spread over time leading to monoculture lodgepole stands of different ages constitutes diversity. Saying that a three-year old patch of cheatgrass here, a ten-year old patch of identical-age doghair lodgepole there, and thirty- and fifty-year-old patches of uniform- age and species lodgepole over the next area make for a diverse forest is a mockery of the beauty, richness and stability of natural climax ecosystems. On the other hand, leaving beetle-impacted older lodgepole alone to follow their natural succession to spruce-fir forest would naturally lead to a rich mix of Engelmann spruce and subalpine fir of all ages interspersed with aspen, lodgepole pine and other species. Such, truly diverse stable forest supports a rich variety of flora and fauna, is much more desirable for human use and recreation, and is far less susceptible to insects, diseases, wind and fire than grassy clearcuts and monoculture stands of lodgepole.

Deforestation of more than 1700 acres by definition is a major ecological impact. This is especially so because the proposed project is in a high alpine environment where forest growth is particularly slow. It is also in the drought-stricken arid west which also means slow growth, but which in combination with climate change, also raises the specter that clear-cut forests could possibly not regenerate at all, instead becoming sage brush or high-altitude desert. Although the project clearly should be scrapped, certainly no action should be undertaken without conducting a full environmental impact analysis.

The environmental assessment of the proposal makes no effort to address climate impacts. Removal of large carbon-capturing trees and preclusion of larger spruce and fir trees growing; cutting, hauling and burning of

existing trees; increased exposure of the area to sun and wind will all adversely impact carbon balance. With the Earth facing an existential crisis of climate change, such oversight is absolutely irresponsible. Clearly adequate environmental assessment has not been done.

The proposed management of previously cut-down dead trees and subsequently blown-over live and dead trees along the Continental Divide (and other) trails acknowledges the horrible mistake that was made by previous district forest "management" projects. Rather than justifying new projects, past forest and recreation degradation should call for more critical assessment of any new "management" projects, generally. Specifically, removing more standing dead trees, thus exposing other dead- and live-standing trees to being blown over as well, would very seriously compound the past grievous mistake.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that both documents demonstrated a lack of understanding of natural ecological processes generally and for high-alpine spruce/fir ecosystems in particular. I pointed out that forest growth in the high alpine, arid West is particularly slow and that forest management practices appropriate to other regions may not be appropriate here. I recommended that the draft EA needed to be redone with understanding of ecology generally and the proposed project area in particular in mind. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that both documents adopted as a central objective the regeneration of lodgepole pine. No valid justification of such an objective was made. I recommended that fostering the achievement of climax spruce/fir forest instead was a far superior objective on a wide array of criteria, essentially all possible criteria. I recommended that the draft EA needed to be redone with that more appropriate objective in mind. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that both documents ignored the fact that our climate is changing and made no effort to assess the impact that the project proposal would have on greenhouse gas generation and carbon capture. I recommended that the draft EA needed to be redone to include a full assessment of both the proposed project's cumulative impacts on carbon balance and with consideration of climate change in mind. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that both documents failed to state what would be done with wood removed from the project and what would be the carbon-balance and other impacts of that removal. I recommended that the draft EA needed to be redone to assess those impacts. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that both documents failed to assess impacts on cross-country skiing and other recreational use. I recommended that the draft EA needed to be redone to assess that impact. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on both the scoping document and the draft environmental assessment, I pointed out that the plan proposal to improve scenic quality along the Continental Divide Trail, acknowledged by the documents to be needed because of disastrous results of previous management efforts, might make things worse. I recommended instead that no clearcutting be done along any recreational trails. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on the scoping document, I pointed out that no effort was made to assess snow sublimation in

clearcut areas and other impacts on water supply. I recommended that water supply impacts be assessed. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on the draft environmental assessment, I pointed out that the plan's core assumption that "fuels reduction" would reduce fire hazard is highly suspect. I recommended that the draft EA needed to be redone to thoroughly assess this assumption, especially in light of recent and subsequent disastrous grass fires. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

In my comments on the draft environmental assessment, I pointed out many specific factual, logical and ecological understanding mistakes in the text. I reiterate those specific comments now, as the revised plan made no effort whatsoever to respond to them.

In my comments on both the scoping document and the draft environmental assessment, I stated that the proposed project would have clear, obvious and major environmental impacts and recommended that a full environmental impact statement be done. I reiterate that recommendation now as the revised plan made no effort whatsoever to respond to it.

Howard Brown

with regard to:

Swan Mountain Project #60771;

Cary Green, Shelby Limberis, project coleads;

Adam Bianchi

District Ranger

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