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Comments: Dear Mr. Gassmann and colleagues,

I could not more strongly object to the No Significant Impact (FONSI) designation for the so-called Swamped Project in the Kootenai National Forest southeast of Libby, Montana. This would occur in the Swamp Creek watershed, which connects to the extensive Kootenay River running north of Libby. This is a thinly disguised proposal to harvest for the profit of a few likely non-American interests a 10 square mile area of lush, biodiverse Rocky Mountain conifer swamp forest. The proposed project would dangerously release an enormous amount of carbon into the atmosphere.

While many are working to decrease their energy use to rein in the effects of climate change, proposals like this would rapidly accelerate greenhouse-gas release which drives climate destabilization and extreme temperatures, altered ocean and air currents, high-intensity storms on the east coast, and a decades-long drought in the southwestern United States. I see and feel the climate change effects first-hand in the wildland-urban interface where I live, which are making it an unsafe place to live. The extensive road-building also proposed to carry out this unsound harvesting project would further fragment, disturb and dry an extensive swamp forest region, increasing the encroachment of highly flammable invasive species such as non-native grasses, which promote uncontrollable wild fires.

Using U.S.F.S. calculations:

?Average Stock: Conifer forests in the Rocky Mountain region hold roughly 25 metric tons of carbon per acre in live above-ground biomass.

?Release Rate: Following a standard commercial harvest, approximately 32.5% of the harvested carbon is released into the atmosphere via decay and slash burning within 5 years. This is without considering the processing and use of the timber itself.

?Calculation: $7,870 \times 25 \times 0.325 = 63,943.75$ metric tons of carbon would be released into the atmosphere. This is equivalent to burning 26 million gallons of gasoline!

The total ecosystem impact (including soil & deadwood disturbance) is calculated as follows:

?Average Stock: Wet conifer swamps can store upwards of 100 metric tons of carbon per acre when factoring in the forest floor, deadwood, and organic topsoils.

?Release Rate: Heavy harvesting machinery disrupts the saturated soils, accelerating the decomposition of organic muck and releasing roughly 40% of the total ecosystem carbon over time.

?Calculation: $7,870 \times 100 \times 0.40 = 314,800$ metric tons of carbon would be released, 6 times as much as described by the above-ground-only calculation above: equivalent to burning 130 million gallons of gasoline!

This indicates how much more deleterious it is to disturb wetlands and riparian zones than upland forest, even.

From the perspective of keeping native ecologies intact in our National Forests, the Swamp Creek watershed within the Kootenai National Forest in Northwest Montana features a rich, modified Pacific maritime ecosystem. This climate fosters highly diverse, lush wetland complexes, ranging from montane forested conifer swamps to emergent freshwater marshes. The vegetation around the Swamp Creek drainage is characterized by dense overstory canopies and moisture-loving undergrowth typical of Rocky Mountain Conifer Swamps and riparian zones:

Canopy Trees: Dominant species include Western Redcedar (*Thuja plicata*), Western Hemlock (*Tsuga heterophylla*), Engelmann Spruce (*Picea engelmannii*), and Subalpine Fir. Broadleaf species like Black Cottonwood (*Populus balsamifera*) thrive closer to the moving water.

Shrubs: Dense thickets of Devil's Club (*Oplopanax horridum*) dominate the wet toeslopes, alongside Thinleaf Alder (*Alnus incana*), Redosier Dogwood (*Cornus sericea*), and various native Willows (*Salix* spp.).

Understory Herbs & Ferns: The ground cover features American Skunk Cabbage (*Lysichiton americanus*), American Ladyfern (*Athyrium filix-femina*), Field Horsetail (*Equisetum arvense*), and Bluejoint Reedgrass (*Calamagrostis canadensis*).

I have hiked (in knee-high rubber boots) in similar areas just to the north in Montana, and am familiar with similar rich cedar swamp forests in northern Michigan, the kinds of places where orchids grow on hummocks and wildlife thrives. They are incredibly sensitive and biodiverse but at the same time sequester carbon, purify air and provide fresh water essential to us. Timber harvest would instantly remove or permanently degrade all these functions.

The intersection of dense forest and open wetland also creates critical travel corridors and breeding habitats for a vast range of Northwest Montana wildlife, several of which are already highly threatened by habitat loss and fragmentation:

Mammals: Large species like Moose, Elk, and White-tailed Deer heavily utilize the marshes for foraging. Key semi-aquatic fur-bearers include Beavers and Muskrats. The dense surrounding forest is also prime habitat for Grizzly Bears and Black Bears.

Birds: Wetlands draw migratory and resident waterfowl such as Wood Ducks, Mallards, and Cinnamon Teals. Raptors like the Bald Eagle and Osprey hunt along the creek corridors, while the dead snags support Pileated Woodpeckers.

Aquatic Life: Swamp Creek and its connected tributaries support cold-water fisheries, most notably the native Westslope Cutthroat Trout (*Oncorhynchus clarkii lewisi*) and bull trout.

The value of the Kootenai National Forest and its Swamp Creek watershed are far more important to the American people in their current biologically intact state, performing vital ecosystem services including oxygen production from carbon dioxide by natural photosynthesis carried out by their living, healthy vegetation. They are an important reservoir for holding and purifying water, and important for maintaining the nature of our Wild West in its fully functioning and balanced mix of wildlife and plant life. To massively disturb a complex of conifer swamp forest and release 315,000 metric tons of carbon (equivalent to burning 130 million gallons of gasoline) is a deeply unsound and self-destructive proposal that would make the region more fire-prone due to ecological destabilization, drying of the swamp reservoir, and invasion of highly flammable invasive species in cleared areas. It takes centuries for regrowth to make up for the carbon lost when these trees are cut.

Thank you for your consideration.