Data Submitted (UTC 11): 10/13/2020 6:00:00 AM
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Organization:
Title:
Comments: Mid-Swan Project Comments on Draft Environmental Impact Statement (DEIS)

Hello USFS Mid-Swan Project Staff,

Thank-you for all your hard work getting this project to the DEIS stage. With more work by all of us, we may eventually see Sustainable Forestry practiced in Montana! My comments are attached.

Sincerely,

Comments on Flathead National Forest Mid-Swan DEIS - Mark Benedict 10/12/2020

General Comments

1. Trust - In the website executive summary statement and particularly the implementation guide (IGOR) for the DEIS, it is stated:

"Public feedback periods associated with individual treatment proposals will be considered informal in that there are no regulations requiring comment during Mid-Swan project implementation (36 CFR 218). It needs to be clearly understood that public engagement is not intended to "re-scope" or reanalyze potential environmental effects. Rather, the Swan Lake Ranger District is committed to an open and transparent process."

Comment: This public input implementation stage condition means that the risk of adverse environmental impacts today from generic, loosely-defined treatments applied later to specific unit sites is unknown and may be higher than assessed in the DEIS. The USFS is asking citizens to trust that they will listen to feedback during the implementation (IGOR) phase when specific treatment prescriptions will be selected after on-site assessments of discreet management units of the forest. You are asking for pre-approval to apply 'treatments' to our National Forest based on general principles and promises of achieving high goals. This makes it difficult to approve any plan alternative and may be contrary to NEPA. It might be helpful if between DEIS and EIS you could plan some field trips for citizens to see some before and after examples of what treated units look like. I found the USFS/SVC site visits I attended during the scoping phase to be informative but they were all untreated units.

2. Accountability - Assuming an action alternative is selected, a lot of the treatment work will be conducted by private contractors working under USFS contracts. Every contractor working on projects in the WUI will be operating alongside private property boundaries. Unfortunately, I recently had to resort to filing a claim against the USFS for damage caused during contractor work along our joint boundary in the Flathead National Forest. The outcome of my claim is described in the letter (appended below) received from Jennifer Newbold, Attorney for the USDA Office of the General Counsel (Missoula). Since apparently there isn't any accountability by the USFS for damage caused by contractors, I recommend that setbacks need to be established for any work conducted along private property boundaries in order to prevent damage from occurring.

Specific Comments

A. Cold Jim (T21N R17W Section 4) Alt. B: Commercial mechanized harvest/broadcast burn - Currently, the Cold-Jim Fuels Reduction Project is started (road system reconstructed). What is the relationship between that project and the Mid-Swan Cold Jim unit with implementation scheduled to start in 2029? I am opposed to the Alternative B treatments proposed for units south and southwest of our property in section 4. There are large tree

stands (probable old growth) in these units including very large ponderosa pines, particularly in the SW unit. Implementation of Alt. B would also damage the watershed immediately south of our property resulting in a significant change in the hydrology including reduced stream flow into our property, negatively impacting our efforts to restore our own wetland and likely affecting our pending conservation easement. These areas are also important winter habitat for ungulates and other wildlife as you acknowledge in your discussion about canopy snow breaks.

B. Mechanized harvest - After observing the reconstruction of the logging roads in the Cold Jim Fuels Reduction Project area this year, I am wondering if the heavy equipment used on the roads is the same machinery that will be used for harvesting the trees. If so, mortality of non-target trees and shrubs will be extreme. Basing the harvest technique only on conventional economics ignores the value of the other elements of the forest ecosystem including the non-target trees and other vegetation that should be left intact.

C. Wetland Buffers - The road reconstruction in the Cold Jim area for the Cold Jim Fuels project is adjacent to several wetlands (Mid-Swan Cold Jim Sections 9 & 10) along the old Salmon Prairie Road that don't appear to have buffers around them and the road reconstruction has included drains into the margins of the wetlands. I'm concerned these forest wetlands will be negatively impacted as the projects progress.

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